



Core Strategy Submission

Consultation Response Analysis by Topic

EMPLOYMENT



Prepared by Christchurch Borough Council and
East Dorset District Council

May 2013

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1 Introduction

1.1 This document sets out a consolidated summary and analysis of the Core Strategy responses received in relation to the issue of Employment 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 The issue of Employment includes an analysis of responses received to the Core Strategy Vision, Strategic Objective 4 and Chapter 16, Creating Prosperous Communities.

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

Employment

Chapter 3, Challenges, Vision and Strategic Objectives

Pre-Submission Core Strategy

The Core Strategy Vision

2.1 The economy of the area will grow, both by sustaining its traditional sectors such as tourism, health and education, but also by creating a mixed economy with emphasis on growth in new knowledge based sectors including engineering, creative and technical industries and the green knowledge economy. Economic growth will be sustained by the creation of major high quality employment sites in East Dorset and at Bournemouth Airport, and by the protection of other well located sites for key employment uses. These will have an important role in sustaining the economy of South East Dorset.....

Consultation Response (for Vision as a whole)

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

Table 2.1

2.2 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 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

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2706
510796	Mr Rollo Reid		CSPS2712
523531	Mr Tim Hoskinson	Savills	CSPS2109
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

2.4 Concerning Chapter 3 background text, the following issues were raised:

- The challenge of disruption to the economy, to food supplies and years of austerity are ignored.
- There is a general lack of strategy for rural areas, nor acknowledgement of the issues affecting these areas, including loss of facilities and services, poor transport links, and changes to housing and community caused by in-migration from urban dwellers.

2.5 The following issues were raised in response to the Vision:

2.6 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 area.

2.7 Navitus Bay Wind Farm

- The Vision for the natural environment and the economy will be affected by the Navitus Bay Wind Farm proposals.

Councils' Response

2.8 Issues such as austerity measures and food supply are acknowledged to have local impacts, however the policy solutions to these issues primarily rely on national Government, and are not directly addressed in the Core Strategy.

2.9 Additional text has been added to the 10th bullet point to recognise the need for diversification of the rural economy, including re-use of buildings and small new developments at the main villages.

2.10 The Vision will also be amended to include references to development of rural areas, with paragraph 4 referring to development of housing in both towns and villages, and references to diversification of the rural economy added to the 8th paragraph on the economy.

Proposed Changes to the Pre-Submission Core Strategy

2.11 Paragraph 3.1 - New text in response to representations to refer to the rural economy.

- Providing adequate land for employment growth, including major sites such as Bournemouth Airport and Ferndown Industrial Estate, **as well as enabling the rural economy to diversify and flourish through the reuse of buildings and small new employment developments at the major villages.**

The Core Strategy Vision

2.12 .The economy of the area will grow, both by sustaining its traditional sectors such as tourism, health and education, but also by creating a mixed economy with emphasis on growth in new knowledge based sectors including engineering, creative and technical industries and the green knowledge economy. Economic growth will be sustained by the creation of major high quality employment sites in East Dorset and at Bournemouth Airport, and by the protection of other well located sites for key employment uses. These will have an important role in sustaining the economy of South East Dorset. **Within the rural areas traditional employment will be supported and rural diversification encouraged to create jobs and prosperity.....**

Consultation Response (for Vision as a whole)

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

Table 2.2

2.13 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS309
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS245
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS440

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
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
719409	Jacquetta Morris		PCCS292
719411	Mrs Jane Low		PCCS293

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
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

2.14 Changes to supporting text in Paragraph 3.1

2.15 The references to the re-use of rural buildings will allow the loss of the farm in Burton to residential development which will impact upon agriculture in the village.

2.16 The Core Strategy should not limit its support for reuse of rural buildings and small employment development to "major villages".

2.17 Changes to the Core Strategy Vision

2.18 The reference in the vision to rural employment being supported is considered worthless given the proposed allocation of a farm in Burton for housing.

Councils' Position

2.19 The text at paragraph 3.1 refers generally to allowing the possibility of reuse of buildings and small employment developments at major villages to enable diversification of the rural economy. It is appropriate to focus this on villages which have a reasonable population whilst avoiding isolated employment development in open countryside.

2.20 The farm at Burton forms part of a proposed new housing site where any impact on the farm is outweighed by delivery of housing for the village.

Pre-Submission Core Strategy

Objective 4

To enable the mixed economy of Christchurch and East Dorset to grow, and to develop new employment sectors.

Significant **new zones of employment development** will be located at Bournemouth Airport (15-30ha) and on key sites in East Dorset to serve the local and sub-regional economy. **A range of employment sites** will be provided across the area meeting the needs of the local economy, and a hierarchy of sites will be developed so that certain sites can be reserved for higher order development in key employment sectors. Agriculture and horticulture will be supported and rural **farm diversification** will be encouraged in appropriate locations near key settlements such as Alderholt, Cranborne, Sixpenny Handley, Sturminster Marshall, Burton, Winkton and Hurn. The key environmental features which attract **tourism** will be protected, including Christchurch Harbour, rivers and beaches and the Dorset Heathlands. Opportunities will be taken to create new features and habitats where 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	
2	0	3	2	0	2	0	2	0	1	0	1	4

Table 2.3

2.21 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1309
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2411
359546	Mrs K. Bradbury	Vale of Allen Parish Council	CSPS388
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3708
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3225
498034	Mr Richard Cutler	Green Park Land Company Ltd	CSPS3176
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	CSPS2064

Summary of Responses

2.22 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:

2.23 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.

2.24 Land at Stourbank Nurseries.

- Proposed alternative employment site considered preferable to Uddens or Ferndown estates.

2.25 Impact on designated habitats and landscapes.

- The objective should refer to opportunities being taken to enhance landscapes and townscapes and to improving, extending and linking habitats. Reference to Tourism should include sentence that sustainable tourism will ensure low impact on the historic and natural environment while helping to generate employment for local people.

Councils' Position

2.26 The Objective already refers to the encouragement of rural farm diversification and a range of employment sites across the plan area. No specific changes to the Objective have been sought by those objecting to the strategy for the rural area.

2.27 A response to the proposed employment site is dealt with in the Omissions response paper. No change is proposed to the wording of Objective 4.

2.28 It is considered that Objective 1 already addresses impact on designated sites and landscapes, and reference to this issue does not need to be repeated in other Objectives.

2.29 **No changes are therefore proposed to Objective 4.**

Chapter 4, The Key Strategy

Pre-Submission Core Strategy

Policy KS5

Provision of Employment Land

Employment land supply located in Christchurch and East Dorset will contribute in part to meeting the wider strategic requirement across the Bournemouth and Poole Housing Market Area as identified in the 2012 Bournemouth, Dorset and Poole Workspace Study. 80 hectares of land will be identified to meet the requirements of existing and new businesses. An appropriate mix of premises will be encouraged on employment sites within the portfolio to meet these business needs. Live/work units will be supported for business activity that is acceptable in environmental terms (noise, discharges or emissions to land, air or water) and that will not affect the health, safety or amenities of nearby land.

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	
15	0	0	13	1	11	1	11	2	10	1	10	2

Table 2.4

2.30 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3527
359437	Ms Gill Smith	Dorset County Council	CSPS1954

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2472
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3243
474462	Mrs Sheila Bourton		CSPS172
490823	Mr Ian Jones	Ferndown Town Council	CSPS2969
498034	Mr Richard Cutler	Green Park Land Company Ltd	CSPS3175
499532		Bournemouth Borough Council	CSPS3251
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1089
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1473
662954	Mr Neil White	Quantum Group	CSPS3622

Summary of Responses

2.31 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:

2.32 General Comments

- **Dorset County Council** - The County Council supports this approach, where exceptional circumstances exist to allow changes to the green belt boundary to accommodate economic growth at Ferndown and at the Airport. The linkage to housing provision should be clarified to ensure that there is an appropriate balance with workforce projections - background evidence should be updated. The delivery of the proposed amount of employment land will place significant demands on local infrastructure - particularly transport. The County Council will wish to continue work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.
- **Ferndown Town Council** - considers that the broad locations for land suitable for employment are Bournemouth airport area and Ferndown Industrial Estate. Although use of sustainable forms of transport (bus, cycle) will be encouraged, there is likely to be a net detrimental effect on the local highway network and beyond by the use of private cars and commercial vehicles, including HGVs which can have a major impact on highway surfaces.

- **Quantum Group** - We note the former QinetiQ site is identified as part of the provision of Employment Land in Christchurch. Whilst the site was formerly in employment use, it has been vacant for a prolonged period and will not be reoccupied for such purposes, as it has a Committee resolution to grant permission for a food store to replace the B class accommodation on site. Reference to the site in employment use should be removed throughout the Core Strategy.
- **ETAG** - The wording of the policy appears to seek environmental acceptability only for live/work units. This should be corrected to apply to all forms of development.

2.33 Alternative Locations for Employment Land

- **Bournemouth Borough Council** - Even though the provision of 80 hectares of employment land across the plan area is supported the most appropriate location in the sub-region for major B1 office development remains within the built up area of Bournemouth and Poole, in particular within the Lansdowne Employment Area of Bournemouth Town Centre. This area is identified as a location for B1 office development in the Bournemouth Core Strategy and Bournemouth Town Centre AAP. Such an approach to providing for the sustainable location of major office development is advocated in the NPPF paragraphs 23 to 27.
- **Goadsby Ltd on behalf of Site Developments** - It is our submission that industrial land demand will be higher than envisaged in the Workplace Strategy (BDP 2012). Delivery of land at the airport will be difficult due to major infrastructure delivery costs, including road improvements, funding for which has not been secured. In view of this, the Core Strategy should allocate additional land for employment development to the east of Ferndown Industrial Estate. This site is well related to the A31 highway network, without infrastructure constraints, could provide a landscape buffer to residential properties to the east and could be delivered early in the plan period. This would provide flexibility in delivering additional industrial land without major infrastructure costs associated with it.
- **Barton Willmore on behalf of Stour Valley Properties** - We question how well the identified sites relate to the proposed sites for new housing. We refer back to our comments in respect of Policy KS4 and whether sufficient housing requirement has been identified to meet future economic growth. We query whether there is an appropriate jobs : homes balance.
- **Green Park Land Company on behalf of Stourbank Nurseries** - The employment land should be dispersed across East Dorset to meet local needs and offer a range of locations, choice and competition on rent, cost and quality. Stourbank Park offers an alternative choice for employment purposes, with some residential uses included.

2.34 Workshops and Live/work Units

- Sixpenny Handley with Pentridge Parish Council -The need for rural workshops serving various business and support activities should be included
- Dorset Association of Parish and Town Councils (Eastern Area) - These comments relate only to East Dorset - Growth potential - whilst mention is made of diversification, there needs to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy. The need for rural workshops serving various needs should be included.
- Domestic living arrangements should not be within employment areas.

Councils' Response

2.35 General Comments

2.36 The support from Dorset County Council and Ferndown Town Council is welcomed for this policy. The sites have been selected as sustainable locations close to existing settlements with good access to the road network. We will continue to work with our partner authorities to ensure employment land supply located in Christchurch and East Dorset will contribute in part to meeting the wider strategic requirement across the Bournemouth and Poole Strategically Significant City and Town as identified in the 2012 Bournemouth, Dorset and Poole Workspace Study, with financial contributions from the Community Infrastructure Levy. Environmental considerations apply to all development, and site specific individual policies include specific environmental requirements, such as buffering.

2.37 Following Christchurch Borough Council's planning committee on the 23rd October consent was granted for the former Qinetiq site which would result in a change of use from employment land. This decision was not in accordance with the adopted development plan and it has been referred to the Secretary of State. The site will be removed from the employment land supply Map (4.3).

2.38 Alternative Locations for Employment Land

2.39 The Lansdowne Employment Area is one site among many within the 2012 Bournemouth, Dorset and Poole Workspace Study. The Christchurch and East Dorset employment sites also identify land supply to meet the wider strategic requirement across the Bournemouth and Poole Housing Market Area as identified in the 2012 Bournemouth, Dorset and Poole Workspace Study.

2.40 The preferred sites are deliverable, justified and appropriate for the Plan period and meet the requirements of the NPPF. Alternative site proposals suggested are discussed under 17.2 of this document.

2.41 Workspace and Live/work units

2.42 Policy PC3 (Chapter 16) supports the growth and potential of the rural economy, including the provision of live/work spaces in rural areas, the conversion of suitable buildings for businesses and rural diversification. These concerns are addressed in this policy. The need for live/work units will be assessed on a site by site basis to ensure the facilities for living and working are appropriate.

2.43 Evidence Study Updates

2.44 The Bournemouth, Dorset and Poole Workspace Study (2012) had not been finalised at the time of publication of the Pre-Submission Core Strategy. The final published study provides employment land projections for the Bournemouth and Poole Strategically Significant City and Town (SSCT) as opposed to the Bournemouth and Poole Housing Market Area. Employment land projections have been adjusted to apply to the SSCT, this does not affect the level of employment land that needs to come forward in Christchurch and East Dorset to enable the wider SSCT requirements to be addressed over the plan period. The policy does need to be amended to refer to the SSCT and the preceding chapter text will be updated to reflect the different area and projection figures.

Proposed Changes to the Pre Submission Core Strategy

2.45 Paragraph 4.26

2.46 The published Bournemouth, Dorset and Poole Workspace Study is based on the SSCT and the employment land figures are also amended to reflect this change in area.

2.47 The Bournemouth, Dorset and Poole Workspace Study (2012) forms the evidence base that informs the level of future employment land provision in the **Bournemouth and Poole Strategically Significant City and Town (SSCT) Bournemouth and Poole Strategic Housing Market Area**. The study identifies a requirement for **173 248ha** of employment land for B1, B2 and B8 use classes to be delivered across the Bournemouth and Poole **SSCT housing market area** between 2011 - 2031. **Within the Bournemouth and Poole SSCT housing market area** there is a supply of **150 235ha** of employment land that is capable of coming forward for development over this period.

2.48 Paragraph 4.27

2.49 The published Bournemouth, Dorset and Poole Workspace Study is based on the SSCT and the employment land figures are also amended to reflect this change in area.

2.50 The level of employment land provision identified in Policy KS5 is necessary to address projected requirements across the **Bournemouth and Poole SSCT housing market area** and reflects the availability of employment land across the area and shortages of supply in Bournemouth. Strategic sites of importance to the sub-regional economy are located in Christchurch and East Dorset such as Bournemouth Airport, **Northern** Business Park and Ferndown Industrial Estate. In this respect it is important for the economies of the districts and the wider sub region for sufficient employment land to come forward in Christchurch and East Dorset. On the basis of available supply across the housing market area it is necessary for in the region of 80ha to come forward in Christchurch and East Dorset over the plan period to address future requirements identified in the Workspace Study.

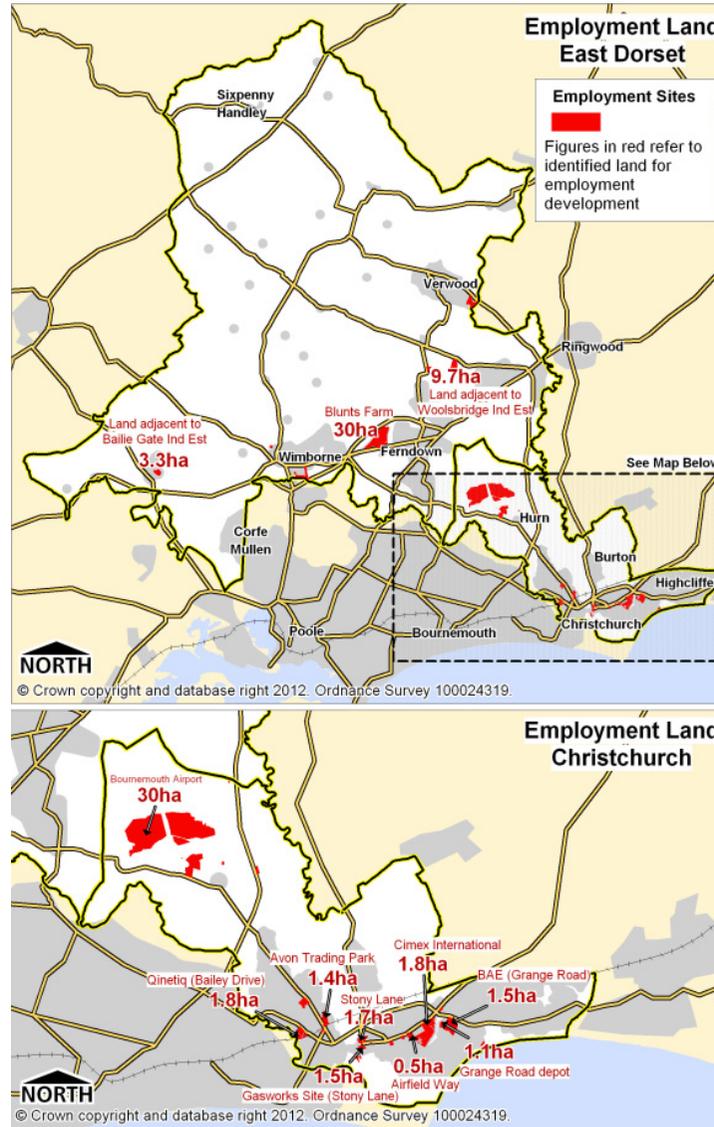
Policy KS5

Provision of Employment Land

Employment land supply located in Christchurch and East Dorset will contribute in part to meeting the wider strategic requirement across the Bournemouth and **Strategically Significant City and Town** as identified in the 2012 Bournemouth, Dorset and Poole Workspace Study. 80 hectares of land will be identified to meet the requirements of existing and new businesses. An appropriate mix of premises will be encouraged on employment sites within the portfolio to meet these business needs. Live/work units will be supported for business activity that is acceptable in environmental terms (noise, discharges or emissions to land, air or water) and that will not affect the health, safety or amenities of nearby land.

2.51 Map 4.3 Provision of Employment Land - Proposed Change

2.52 Removal of QuinetiQ, Bailey Drive Site, Christchurch, as site has consent for alternative uses.



Map 4.3 Provision of Employment Land (EXISTING)

Consultation Response

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

Table 2.5

2.53 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	PCCS390
499532		Planning Policy Bournemouth Borough Council	PCCS308

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 summarised as follows:

2.55 Household and Workforce Projections

2.56 Dorset County Council

- Dorset County Council notes the proposed changes to Paras 4.26- 4.27 and Policy KS5 in respect of the change to the area on which the employment land figures are based and has no objection to this change.

- However it is considered that these changes fail to address the County Council's concern that the linkages between workforce projections and housing provision should be clarified to ensure there is an appropriate balance. The delivery of the proposed amount of employment land alone will place significant demands on local infrastructure – particularly transport. The County Council will wish to continue to work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.
- The County Council re-iterates its concern that background evidence should be updated to explain the linkages between the latest household and workforce projections and policies derived from them, to clarify the relationship and ensure that there is an appropriate balance between them.

2.57 Bournemouth Borough Council:

- Bournemouth Borough Council Support the policy.

Councils' Position

2.58 The Councils have worked closely with Dorset County Council throughout the production of the Core Strategy and the Local Transport Plan and in the preparation of transport studies which have assessed the impact of planned development in the Core Strategy and the wider sub region. This has included the South East Dorset Multi Modal Study, A35 Route Management Study, the North and Northern East Dorset Transport Study, the Wimborne Town Centre Transport Study and the Local Sustainable Transport Fund Bid. A member of the Dorset County Council transport planning team has directly assisted with the preparation of the Core Strategy and the development of transport policy. In this respect the Councils have worked in an ongoing basis throughout the preparation of the Core Strategy to assess the transport impact of development proposed.

2.59 The employment land projections contained in Core Strategy Policy KS5 have been produced by Dorset County Council through the Bournemouth, Dorset and Poole Workspace Study in partnership with all the Dorset authorities for the purpose of informing employment policies in Core Strategies / Local Plans. The Workspace Study is based on an economic growth projection established through data provided by Experian.

2.60 The Strategic Housing Market Assessment and 2012 Household Projections were produced prior to the Workspace Study and also in partnership with DCC and are based on household projections not economic growth scenarios. In this respect the methodology of the SHMA / DCC Household projections and the Workspace Study are not compatible to determine the precise relationship between housing projections and workforce projections. The appropriate data set has not been available to the Dorset authorities to undertake this precise assessment during the preparation of the Core Strategy. The Councils will continue to work with Dorset County Council and the other Dorset authorities in establishing the precise relationship between household projections and workforce projections.

Chapter 16, Creating Prosperous Communities

Pre-Submission Core Strategy

Policy PC 1

Christchurch and East Dorset Employment Land Hierarchy

The following site hierarchy is proposed to influence the location of employment uses across sites in Christchurch and East Dorset. 'Higher order' uses that are economically productive offering highly skilled and well paid employment will be located on 'higher quality' sites which offer the necessary locational attributes. A more flexible approach toward employment uses will be adopted towards other employment sites in the Christchurch and East Dorset hierarchy.

The following sites are considered to be 'higher quality' and offer the necessary locational attributes to attract 'higher order' uses. These sites will be the focus for meeting projected requirements for B1 (Office and Light Industrial uses), B2 (General Industry) and B8 (Warehousing and Distribution) uses as set out in Key Strategy policy KS5. Strategic and higher quality sites set out below will be protected for employment uses within B1, B2 and B8. On these sites employment activity within non B use class (other employment generating uses) will only be considered where it makes a significant contribution to raising levels of productivity and offers skilled employment opportunities. Non employment uses ancillary to core employment functions will be considered on 'Strategic Higher Quality' Sites where such facilities are required to meet the needs of workers.

Strategic Higher Quality Sites

- Bournemouth Airport Northern Business Park (North West and North East Sectors), Christchurch.

Other Higher Quality Sites

- The former BAE site, Grange Road
- Sites located directly off Airfield Way, Airfield Road, and Wilverley Road including:
 - Silver Business Park
 - Airfield Industrial Estate
 - Ambassador Industrial Estate
 - Beaver Industrial Estate
 - Sea Vixen Industrial Estate
 - Somerford Business Park
 - Hughes Business Centre

A more flexible approach will be adopted for the following sites where B1, B2 and B8 uses will be accommodated in addition to a more diverse range of non B employment uses, as well as non employment uses ancillary to core employment functions:

- Avon Trading Park, Christchurch
- Stony Lane South including the Gasworks Site, Christchurch
- Groveley Road, Christchurch
- Somerford Road, Christchurch
- Brook Road Industrial Estate, Wimborne, East Dorset
- Gundrymoor Industrial Estate, West Moors, East Dorset
- Riverside Park Industrial Estate, Wimborne, East Dorset
- Uddens Industrial Estate, Ferndown, East Dorset
- Ferndown Industrial Estate, East Dorset
- Woolsbridge Industrial Estate, Three Legged Cross, East Dorset
- Ebblake Industrial Estate, Verwood, East Dorset
- Bailie Gate Industrial Estate, Sturminster Marshall, East Dorset

The following sites have been identified for upgrading:

- Bournemouth Airport Northern Business Park (North West and North East Sectors), Christchurch
 - In order to realise its potential for attracting business activity this site will require ‘upgrading’ to ensure it offers the necessary locational site attributes. This will include improvements in transport infrastructure, flood risk management infrastructure, on site environmental improvements and the delivery of new employment units to meet market requirements.
- Sites located directly off Airfield Way, Airfield Road, and Wilverley Road as set out above.

The upgrading of these sites will involve the provision of an enhanced range of higher quality employment premises to meet market requirements and to attract a more diverse range of business activity to the Borough. This may also include business park environmental enhancements and improvements to broadband infrastructure. Transport infrastructure improvements will be delivered on Stony Lane as identified in the Key Strategy.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
8	0	3	11	3	9	3	9	3	8	3	9	3

Table 2.6

2.61 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3537
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2495
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3426

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
507546	Mr Nigel Pugsley	BNP Paribas Real Estate	CSPS403
557299	Mr Peter Weatherhead	DTZ Planning	CSPS3173
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1489
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3493

Summary of Responses

2.62 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:

2.63 General Comments

- Dorset Wildlife Trust (DWT) - The recognition given to the value of the natural environment in creating prosperous communities is supported.
- The Cranborne Chase and West Wiltshire Downs AONB Team - The AONB are concerned that Section 16 does not appear to focus on renewable energy which is both an important and sensitive issue. There should be policy guidance on this matter.
- Transition Town Christchurch - Support - this is essential for sustainability.
- ETAG - The recognition given to the value of the natural environment in creating prosperous communities is supported.
- BNP Paribas Real Estate on behalf of Royal Mail - It is vital that any new uses be designed and managed so that they are both cognisant and sensitive to Royal Mail's operations at Christchurch Delivery Office and other strategic sites in Christchurch and East Dorset.
- DTZ Planning on behalf of The Malmesbury Estate - Object. The Employment Land Hierarchy should be amended to include the strategic allocation of employment land at Bournemouth Airport.
- Dorset Association of Town and Parish Councils (DAPTC) & Sixpenny Handley with Pentridge Parish Council - No mention is made of District owned rural sites such as Town Farm Workshops, Sixpenny Handley.

2.64 Coverage of Policy

- Goadsbys on behalf of Site Developments - As a consequence of the consideration of our separate representations in respect of Policy KS5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment hierarchy.

- DTZ Planning on behalf of The Malmesbury Estate - Object. The policy should be reworded to refer to a higher quality strategic allocation of the Airport business parks and 'appropriate land in the immediate vicinity of the Airport business parks and 'appropriate land in the immediate vicinity of the Airport.'
- Pro Vision Planning and Design on behalf of Wessex Water - Policy PC1 Christchurch and East Dorset employment land hierarchy should be revised to include Little Canford Depot as a site where: 'A more flexible approach will be adopted for the following sites where B1, B2 and B8 uses will be accommodated in addition to a more diverse range of non B employment uses, as well as non-employment uses ancillary to core employment functions'.

Councils' Response

2.65 In relation to comments by the AONB and in accordance with the NPPF the Core Strategy will include a criteria based policy in the Managing the Natural Environment chapter which will apply to proposals for renewable energy development.

2.66 The Airports northern business parks are included as strategic higher quality sites within the employment land hierarchy in Policy PC1. Christchurch and East Dorset are already identifying a significant amount of employment land required to meet the needs of the Strategically Significant City and Towns (SSCT) area of SE Dorset across the plan period and beyond. This is an example of how the SE Dorset authorities are working together under the 'Duty to Co-operate'. The level of employment land identified in the Borough and District is far in excess of the level of provision that is required for each individual authority. The Bournemouth, Dorset and Poole Workspace Study 2012 identifies a shortfall in employment land provision across the SSCT as a whole between 2011 - 2031 when providing 10% or 20% additional supply above baseline projections for flexibility. Any shortfall in site provision should be addressed applying a sequential approach across the Bournemouth and Poole SSCT before Green Belt sites are considered.

2.67 Malmesbury Estates refer to the inclusion of land within their ownership between Hurn village and the east of the Airport southern sector currently located in the Green Belt. The policy approach in the Core Strategy is to keep this land free from development in order to maintain the openness of the Green Belt and avoid adverse impacts upon the character of Hurn and the conservation area. Additionally, Manchester Airports Group have not supported Malmesbury Estates proposal relating to this land as it is not required to support requirements of the operational airport.

2.68 Sites such as Town Farm Workshops , Sixpenny Handley are not referred to within the hierarchy as the policy applies to larger, more strategic sites.

2.69 East Dorset Sites

2.70 Land east of Ferndown Industrial estate -The Council considers that a more than sufficient allocation of employment land has been made. Furthermore, the proposed site is close to European designated wet heathlands and the Council is concerned that the suggested development would impact on the hydrology of the area with implications for Slop Bog. Development in this location would lead to coalescence of the Industrial Estate with the main built up area of Ferndown and therefore harm the Green Belt. No change.

2.71 Little Canford Depot - The Council does not consider that this site falls is located in a sustainable location, as it is separated from Wimborne, the closest settlement, by the A31. Development greater than currently exists would harm the Green Belt. No change.

2.72 The second sentence of the policy has been amended to include those sites listed in the hierarchy as 'Strategic Higher Quality Sites' and 'Higher Quality' for the location of higher order employment uses due to the locational attributes of these sites and existing uses.

2.73 Sites included within the list where a more flexible approach will be applied will also be key in contributing to the employment land requirement set out in Policy KS5 of the Core Strategy. Therefore, additional text has been added to reflect this and to provide protection for employment uses within B1, B2 and B8 use classes on these sites consistent with the requirements of Policy PC2.

2.74 Specific reference has been made to Policy KS10 as this sets out the strategic transport improvements that will help to support new employment development over the plan period.

Proposed Changes to the Pre-Submission Core Strategy

Policy PC 1

Christchurch and East Dorset employment land hierarchy

The following site hierarchy is proposed to influence the location of employment uses across sites in Christchurch and East Dorset. 'Higher order' uses that are economically productive offering highly skilled and well paid employment will be located on **'Strategic Higher Quality' and 'Higher Quality'** sites which offer the necessary locational attributes. A more flexible approach toward employment uses will be adopted towards other employment sites in the Christchurch and East Dorset hierarchy.

The following sites are considered to be 'higher quality' and offer the necessary locational attributes to attract 'higher order' uses. These sites will be the focus for meeting projected requirements for B1 (Office and Light Industrial uses), B2 (General Industry) and B8 (Warehousing and Distribution) uses as set out in Key Strategy policy KS5. Strategic and higher quality sites set out below will be protected for employment uses within B1, B2 and B8. On these sites employment activity within non B use class (other employment generating uses) will only be considered where it makes a significant contribution to raising levels of productivity and offers skilled employment opportunities. Non employment uses ancillary to core employment functions will be considered on 'Strategic Higher Quality' Sites where such facilities are required to meet the needs of workers.

Strategic Higher Quality Sites:

- Bournemouth Airport Northern Business Park (North West and North East Sectors), Christchurch.

Other Higher Quality Sites:

- The former BAE site, Grange Road
- Sites located directly off Airfield Way, Airfield Road, and Wilverley Road including:
 - Silver Business Park
 - Airfield Industrial Estate
 - Ambassador Industrial Estate
 - Beaver Industrial Estate
 - Sea Vixen Industrial Estate
 - Somerford Business Park
 - Hughes Business Centre

The following sites will also be a focus for meeting projected requirements for B1 (Office and Light Industrial uses), B2 (General Industry) and B8 (Warehousing and Distribution) uses as set out in Key Strategy policy KS5. Employment uses within B1, B2 and B8 use classes will be protected in accordance with Policy PC2. A more flexible approach will be adopted for these **following** sites where B1, B2 and B8 uses will be accommodated in addition to a more diverse range of non B employment uses, as well as non employment uses ancillary to core employment functions:

- Avon Trading Park, Christchurch
- Stony Lane South including the Gasworks Site, Christchurch
- Groveley Road, Christchurch
- Somerford Road, Christchurch

- Brook Road Industrial Estate, Wimborne, East Dorset
- Gundrymoor Industrial Estate, West Moors, East Dorset
- Riverside Park Industrial Estate, Wimborne, East Dorset
- Uddens Industrial Estate, Ferndown, East Dorset
- Ferndown Industrial Estate, East Dorset
- Woolsbridge Industrial Estate, Three Legged Cross, East Dorset
- Ebblake Industrial Estate, Verwood, East Dorset
- Bailie Gate Industrial Estate, Sturminster Marshall, East Dorset

The following sites have been identified for upgrading:

- Bournemouth Airport Northern Business Park (North West and North East Sectors), Christchurch

In order to realise its potential for attracting business activity this site will require 'upgrading' to ensure it offers the necessary locational site attributes. This will include improvements in transport infrastructure, flood risk management infrastructure, on site environmental improvements and the delivery of new employment units to meet market requirements.

- Sites located directly off Airfield Way, Airfield Road, and Wilverley Road as set out above.

The upgrading of these sites will involve the provision of an enhanced range of higher quality employment premises to meet market requirements and to attract a more diverse range of business activity to the Borough. This may also include business park environmental enhancements and improvements to broadband infrastructure. Transport infrastructure improvements will be delivered on Stony Lane, **Christchurch** as identified in **the** Key Strategy **Policy KS10**.

2.75 There were no responses received in relation to this proposed change.

Pre-Submission Core Strategy

Policy PC 2

Alternative uses for employment land where justified by market evidence

Where there is strong evidence of the lack of market demand over the plan period (2013 – 2028) employment land may be considered for non B use classes. High quality mixed use schemes may also be considered to ensure a site can be brought forward for development.

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	0	0	0	0	0	0	0	0	0	1

Table 2.7

2.76 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
507546	Mr Nigel Pugsley	BNP Paribas Real Estate	CSPS719
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3494

Summary of Responses

2.77 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:

2.78 General Comments

- BNP Paribas Real Estate on behalf of Royal Mail - My client is supportive of policy which permits alternative uses for existing employment land where a lack of market demand can be demonstrated. It is considered that this option protects employment sites required by the market which assists the economy and provides flexibility to address other land use requirements.

2.79 Coverage of Policies

- Pro Vision Planning and Design on behalf of Wessex Water -Alternative uses for employment land where justified by market evidence should be revised to read the following: 'Where there is strong evidence of the lack of market demand over the plan period (2013 – 2028) employment land may be considered for non B use classes. High quality mixed-use schemes may also be considered to ensure a site can be brought forward for development or to achieve the Core Strategy Vision and Objectives'.
- Goadsbys on behalf of Site Developments - As a consequence of the consideration of our separate representations in respect of Policy KS5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment hierarchy.

Councils' Position

2.80 The Core Strategy Policy PC2 refers to the potential consideration for high quality mixed use schemes to enable a site to come forward for development where there may be issues of viability. The suggested additional wording provided by Pro Vision Planning creates ambiguity in the policy for where alternative uses for employment land will be permitted.

Proposed Changes to Background Text

2.81 Paragraph 16.15 Change:

2.82 The Council will work closely with landowners and neighbouring authorities to ensure that sufficient employment land is brought forward across the Bournemouth and Poole Strategically Significant City and Town Housing Market Area to meet projected requirements set out in the Bournemouth, Dorset and Poole Workspace Study (2012). This will require a cross border approach to the use of contributions through the Community Infrastructure Levy for key infrastructure required to enable strategic sites of sub regional importance to come forward. The Employment Land Review and Workspace Study will be monitored and reviewed to ensure the policy is performing.

2.83 Reason

2.84 The published Bournemouth, Dorset and Poole Workspace Study (2012) refers to SSCTs and not Housing market Areas.

2.85 No change to the Pre Submission Policy.

Pre-Submission Core Strategy

Policy PC 3

The Rural Economy

Although economic development will be strictly controlled in open countryside away from existing settlements, in order to promote sustainable economic growth in the rural area, applications for economic development will be encouraged where development is located in or on the edge of existing settlements where employment, housing, services and other facilities can be provided close together. Such proposals should be small scale to reflect the rural character. This includes the settlements of Alderholt, Cranborne, Sixpenny Handley, and Sturminster Marshall.

Proposals for the conversion and re-use of appropriately located and suitably constructed existing buildings in the countryside (particularly those adjacent to the villages set out above) for economic development must ensure:

- The proposal supports the vitality and viability of market towns and other rural service centres.
- Proposals must not adversely impact the supply of employment sites and premises and the economic, social and environmental sustainability of the area, when considering proposals which involve the loss of economic activity.
- Proposals do not have a materially greater impact on the openness of the Green Belt and the purpose of including land within it.
- The benefits outweigh the harm in terms of:
 1. The potential impact on countryside, landscapes and wildlife.
 2. Local economic and social needs and opportunities not met elsewhere.
 3. Settlement patterns and the level of accessibility to service centres, markets and housing.
 4. The building is suitable for the proposed use without major re-building and would not require any significant alteration which would damage its fabric and character, or detract from the local characteristics and landscape quality of the area. Any necessary car parking provision should also not have an adverse impact on the setting of the building in the open countryside.
 5. The preservation of buildings of historic or architectural importance/interest, or which otherwise contributes to local character.

Proposals for rural diversification will be supported which meet the criteria set out in the National Planning Policy Framework and also that:

- Are consistent in scale and environmental impact with their rural location avoiding adverse impacts on the Cranborne Chase and West Wiltshire Downs AONB, sensitive habitats, Areas of Great Landscape Value and landscapes identified through landscape character assessments and the openness of the Green Belt.
- Do not harm amenity and enjoyment of the countryside through the impact of noise and traffic generation.
- That minimise additional trips on the highway network and are accessible by sustainable modes other than the car.

Subject to compliance with criteria set out above acceptable uses for rural diversification include:

- Tourism
- Leisure and related activities
- Equestrian
- Small offices
- Light Manufacturing
- Renewable energy
- Retail (farm shops and pick your own)

Support will be given to new forms of working practises, which include the creation of live/work spaces in rural areas. The assessment of these proposals will be made in accordance with rural housing need and potential affordable housing exception sites as well as access to services.

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	1	5	4	1	4	1	4	1	4	2	2

Table 2.8

2.86 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359284	Miss Lynne Evans	Southern Planning Practice	CSPS2237
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2417
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1572
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3430
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3428
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3650
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1492

Summary of Responses

2.87 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:

2.88 General Comments

- Dorset Association of Parish and Town Councils (DAPTC) - Improved mobile phone reception and broadband are required in the rural area.
- DAPTC - Policies must encourage small business units and home working and must recognise their existence. Improved communications will help and cost of travelling encourage this.
- DAPTC - No mention of the role of rural estates in the economy of the rural area.
- DAPTC - Lack of partnership working reduces the role of market towns as a focus.
- DAPTC - Confusion of terminology between Rural Service Centres and Key Settlements.
- DAPTC - Rural roads must be maintained. They are not recognised in the strategy or policies.
- Sixpenny Handley with Pentridge Parish Council - Surface water flooding is more common than 25 years ago - DCC co-operation is required to mitigate the effects.
- Sixpenny Handley with Pentridge Parish Council - Increased elderly population due to the retired moving in. Not contributing economically, but offer volunteering skills. The elderly should be able to remain in the rural community with the necessary care package.

- Sixpenny Handley with Pentridge Parish Council - Major land owners should be encouraged to build new housing in villages and hamlets suitable for people on lower incomes, such as craft workers and the technically skilled.
- Sixpenny Handley with Pentridge Parish Council - New affordable housing is essential.

2.89 Coverage of Policy

- Sixpenny Handley with Pentridge Parish Council - Ensure a wide variety of opportunities for employment is encouraged and supported wherever possible.
- Sixpenny Handley with Pentridge Parish Council - The Core Strategy barely acknowledges agriculture which has to be the largest and most economically significant activity in the district.
- Sixpenny Handley with Pentridge Parish Council - Mention of the business opportunities offered by farm diversification are welcomed, although the peripheral locations identified are too restrictive.
- Sixpenny Handley with Pentridge Parish Council - The paper is entirely lacking a strategy for the development of the rural area and thus ignores the present and future needs of almost 15% of the district's population and their potential contribution to the whole. Without a proper strategy, C & EDDC risk losing substantial benefits from tourism and other income.
- DAPTC - Delete reference to market towns.
- ETAG - We welcome the criteria but note the omission of light pollution, which for completeness we recommend including to comply with the NPPF.
- Southern Planning on behalf of Hall and Woodhouse - It is unclear how much of the district is covered by this policy; the open countryside or, in addition, the smaller settlements.
- Southern Planning on behalf of Hall and Woodhouse - The policy is silent on residential development and it is not clear whether this should be interpreted as an indication that residential would not be supported or that it is dealt with elsewhere. The NPPF list examples where residential use of individual properties in the countryside may be appropriate but this does not appear to be addressed by this policy or elsewhere in the plan.
- Jackson Planning on behalf of the Meyrick Estate - As drafted, this policy appears to suggest that the rural area only applies to East Dorset District and there is no acknowledgement of the rural area within Christchurch Borough supporting development in this category.

2.90 Re-use of buildings

- The Councils approach to the potential re-use of non-residential properties for residential purposes is unclear. Para 55 of the NPPF lists examples where where this is appropriate and the Core Strategy needs to be amended to take this into consideration.

2.91 AONB

- The Cranborne Chase and West Wiltshire Downs AONB Team - Policy includes the Area of Great Landscape Value with the AONB and does not give the AONB the clarity of support required as in para 14 of the NPPF.

Councils' Response

2.92 A number of the comments received in respect of this Policy make general statements about how the commentators would like to see the rural area thrive, but make no specific recommendation as to how the Core Strategy should address these concerns. It is also considered that a number of the comments are unfounded as the document as whole does make reference to the significant role of the rural economy in the sustainable economic growth of the plan area and East Dorset in particular. However, this desire for economic development has to be weighed against the Council's obligations to protect the landscape quality and scenic beauty of the Area of Outstanding Natural Beauty, which covers over 45% of the District, and which constitutes the majority of the rural area. A further 47% of the District (some of which is also designated as AONB as well) is covered by the Green Belt designation where national policy seeks to maintain the openness of the area by preventing inappropriate development within it. New buildings, unless for a small group of appropriate uses, are by their very nature inappropriate development in the Green Belt and not permitted unless very special circumstances can be demonstrated to outweigh national policy. The re-use of existing buildings for alternative uses, or the re-construction of buildings, again for alternative uses, either within the Green Belt or the AONB may be acceptable, subject to the requirements of national guidance on ensuring that any such development does not harm the integrity of the feature of acknowledged importance and are sustainable. The Council therefore has to balance the needs of the rural communities against the limitations on development imposed by the presence of nationally important land use designations on all but a very small proportion of East Dorset.

2.93 All of the area of Christchurch Borough outside the main built up area is subject to national Green Belt policy set out in the NPPF. Therefore there is no need for policies to apply specifically to Christchurch Borough as it is covered by national guidance and Policy KS2 of the Core Strategy.

2.94 Sixpenny Handley Parish Council make reference to the need for affordable homes within the rural area. This matter is addressed under Policy LN3 (provision of affordable housing) and LN4 (affordable housing exception sites). Any scheme for residential development within the village envelopes of villages in the rural area will be subject to the provisions of policy LN3, and Policy LN4 will guide proposals for affordable housing for local people on sites outside the settlement boundaries where there is a recognised specific need. These policies comply with the guidance set out in the NPPF. Residential development in the rural areas of the plan area other than in accordance with the above policies will be limited to agricultural dwellings where there is a proven need. Residential development within the Green Belt is by its very nature inappropriate, and only in very special circumstances could such a use be justified in the Green Belt, even for the re-use of existing buildings. The NPPF contains guidance on the limited circumstances in which new isolated dwellings in the countryside are appropriate. In this instance national policy is clear about how proposals for new dwellings in the open countryside are to be considered and a separate policy is not necessary within the Core Strategy.

2.95 Concerns expressed about the need to improve mobile phone and broadband coverage are noted, but are beyond the scope of the Core Strategy. However, a new policy on communications infrastructure has been introduced elsewhere in this Chapter.

2.96 The Council consider that the role of the economy and landscape quality are central to maintaining the character of the rural areas and wish to assist in promoting developments which will achieve this aim. A new policy is proposed to address the needs of electronic communications networks, and is set out below. Policy PC3 is clarified to ensure that it is clear to which settlements and types of settlements it applies, and more emphasis is placed on the role of agriculture and farm diversification and tourism in supporting the rural economy. The importance of the AONB to the character of the area is also reinforced.

Proposed Changes to the Pre-Submission Core Strategy

2.97 Paragraph 16.16

2.98 The Councils' recognise the important role played by major country landowners and large rural estates in shaping, maintaining and promoting rural housing, enterprise, tourism and landscape quality.

Policy PC 3

The Rural Economy

Although economic development will be strictly controlled in open countryside away from existing settlements, in order to promote sustainable economic growth in the rural area, applications for economic development will be encouraged where development is located in or on the edge of existing settlements where employment, housing, services and other facilities can be provided close together. Such proposals should be small scale to reflect the rural character. This includes the settlements of Alderholt, Cranborne, Sixpenny Handley, and Sturminster Marshall, **and other locations where the development will aid the sustainability of the village.**

Proposals for the conversion and re-use of appropriately located and suitably constructed existing buildings in the countryside (particularly those adjacent to the villages set out above) for economic development, **including tourist related uses,** must ensure:

- The proposal supports the vitality and viability of ~~market towns and other~~ rural service centres **and villages with existing facilities.**
- Proposals must not adversely impact the supply of employment sites and premises and the economic, social and environmental sustainability of the area, when considering proposals which involve the loss of economic activity.
- Proposals do not have a materially greater impact on the openness of the Green Belt and the purpose of including land within it.
- The benefits outweigh the harm in terms of:
 1. The potential impact on countryside, landscapes and wildlife.
 2. **Development is compatible with the pursuit of the Cranborne Chase and West Wiltshire Downs AONB purposes, which are set out in the AONB Management Plan.**
 3. Local economic and social needs and opportunities not met elsewhere.
 4. Settlement patterns and the level of accessibility to service centres, markets and housing.
 5. The building is suitable for the proposed use without major re-building and would not require any significant alteration which would damage its fabric and character, or detract from the local characteristics and landscape quality of the area. Any necessary car parking provision should also not have an adverse impact on the setting of the building in the open countryside.
 6. The preservation of buildings of historic or architectural importance/interest, or which otherwise contributes to local character.

Proposals for rural diversification ~~the development and diversification of agricultural and other land-based rural businesses~~ will be supported which meet the criteria set out in the National Planning Policy Framework and also that:

- Are consistent in scale and environmental impact with their rural location avoiding adverse impacts on ~~the Cranborne Chase and West Wiltshire Downs AONB~~, sensitive habitats, Areas of Great Landscape Value and landscapes identified through landscape character assessments and the openness of the Green Belt.
- **Conserve the landscape quality and the scenic beauty of the Cranborne Chase and West Wiltshire Downs AONB, and comply with the provisions of the AONB Management Plan.**
- Do not harm amenity and enjoyment of the countryside through the impact of noise and traffic generation.
- That minimise additional trips on the highway network and are accessible by sustainable modes other than the car.

Subject to compliance with criteria set out above acceptable uses for rural diversification include:

- Tourism
- Leisure and related activities
- Equestrian
- Small offices
- Light Manufacturing
- Renewable energy
- Retail (farm shops and pick your own)

Support will be given to new forms of working practises, which include the creation of live/work spaces in rural areas. The assessment of these proposals will be made in accordance with rural housing need and potential affordable housing exception sites as well as access to services.

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					
2	0	0	2	1	2	1	2	1

Table 2.9

2.99 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359284	Miss Lynne Evans	Consultant Southern Planning Practice	PCCS249
359529	Mrs Lisa Goodwin	Clerk to the Council Sixpenny Handley with Pentridge Parish Council	PCCS172
718911	Mr Joshua Lambert	Planning Assistant Pro Vision Planning and Design	PCCS178

Summary of Responses

2.100 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:

2.101 Restrictive approach to business development and diversification outside of the major villages

2.102 Sixpenny Handley with Pentridge Parish Council

- The Parish Councils have stated that they are concerned regarding a restrictive approach to business development and diversification where it is clearly implied that this will only be permitted at the major villages. The parish councils state that the Core Strategy should not incorporate a policy that effectively caps rural development. The parish councils recommend the following change:
- PC3 Recommend Amended Text be changed (in red) to read: The Rural Economy - ***'Although economic development Sixpenny Handley and Sturminster Marshall, and other locations where the development will aid rural sustainability.'***

2.103 Housing Development in the Countryside

2.104 The Charborough Estate

- Para 16.16 - The Charborough Estate supports this paragraph regarding the important role played by major country landowners and large rural estates in shaping, maintaining and promoting rural housing, enterprise, tourism and landscape quality.
- Comments were made relating to PC3 and paragraph 16.16 not being consistent. The emerging policy is inconsistent with the NPPF (paragraph 55) which identifies circumstances in which housing development in the countryside would be appropriate. PC3 does not provide for the residential re-use of redundant or disused buildings in the countryside where these would represent the optimal viable use of a heritage asset, would be appropriate enabling development to secure the future of a heritage asset or would lead to an enhancement of the immediate setting.
- Christchurch and East Dorset's approach to residential development in the countryside is inconsistent with Policy CO of the adopted Purbeck Local Plan part 1, which is permissive of the conversion or reuse of rural buildings for housing.
- The Charborough Estate propose the following amendment to Policy PC3:

2.105 *'conversion to housing may also be appropriate, provided it would represent the optimal viable use of a heritage asset, would be appropriate enabling development to secure the future of a heritage asset or would lead to an enhancement of the immediate setting.'*

2.106 Southern Planning Practice

- Objection is raised to this policy as the policy is silent on residential development and it is not clear whether this should be interpreted as an indication that residential would not be supported or that it is dealt with elsewhere? It is also not clear as to the extent of the district to be covered by this policy.
- The policy needs to be reviewed to clarify: a) The parts of the district it covers – the open countryside or in addition, the smaller settlements; b) Whether it should address in this policy residential use to comply with guidance in the NPPF or whether that will be addressed elsewhere.

Councils' Position

2.107 The proposed change recommends a more general focus to the location of economic development which is not consistent with sustainable development and the Core Strategy Settlement Hierarchy.

2.108 Policy PC3 deals with the rural economy and the location of 'economic development' and not residential development. Policy KS1 sets out the settlement hierarchy for Christchurch and East Dorset which directs the location, scale and distribution of development, including residential development. It is not necessary for the Core Strategy to repeat national policy in terms of paragraph 55 of the NPPF.

Pre-Submission Core Strategy

Policy PC 4

Shops and community facilities in local centres and villages

In local shopping areas and villages planning applications which propose improvements to the provision of shops which provide for people's day to day needs, leisure uses including public houses and facilities for local communities will be supported in principle.

The loss of existing retail premises, leisure and other local facilities 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 services for local people.

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	0	3	2	1	2	1	2	1	2	1	3

Table 2.10

2.109 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID	Number
359284	Miss Lynne Evans	Southern Planning Practice	CSPS2233	Policy PC4
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2497	Policy PC4
524723	Mr John Worth	Wimborne Civic Society	CSPS1956	Policy PC4
654660	Ms Anne Mason	Transition Town Christchurch	CSPS977	Policy PC4
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1495	Policy PC4

Summary of Responses

2.110 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:

2.111 General Comments

- Southern Planning Practice on behalf of Hall and Woodhouse - This seems to address similar issues set out under Policy LN6. Is there a need for both policies? There are much more onerous requirements relating to the potential loss of community facilities under PC4 in comparison with Policy LN6.
- DAPTC - Resisting the closure of a non profitable rural retail premises is not going to make it profitable. A policy is required that provides support for that community.
- Transition Town Christchurch - Support - this is essential to prevent isolation of satellite communities which is otherwise likely to occur as Peak Oil and rising fuel prices make transport increasingly unaffordable.
- Wimborne Civic Society - Shopping/tourism is a vital aspect of life in our area. We wholeheartedly support this policy.
- Sixpenny Handley with Pentridge Parish Council - Resisting the closure of a non profitable rural retail premises is not going to make it profitable. A policy is required that provides support for that community and encourages business investment.

2.112 Coverage of Policy

- Southern Planning Practice on behalf of Hall and Woodhouse - Objection to the policy requirement to demonstrate that the loss would not result in substantial decline in the range and quality of services for local people. The principal reason why local facilities and services close is because they

are not supported and used by local people and cannot therefore be continued as a viable business. These are almost exclusively private businesses that have no public subsidy or alternative funding mechanisms - as a result if the business folds through lack of support and is therefore no longer viable, there can be no economic or social justification for seeking to keep the facilities. The policy would likely result in the premises being left vacant, boarded up and derelict making no positive contribution to the local economy and community. This would conflict with the core principles set out under the NPPF.

- Southern Planning Practice on behalf of Hall and Woodhouse - The second part of the policy seeks to resist the loss of such facilities but the tests set are not clear or compliant with national policy. There is no requirement for the word 'clear' in the second line of the second paragraph - this suggests a more onerous test than needing to demonstrate compliance with policy and is unlikely to be the intention of the policy. There needs to be much greater clarity as to what will be required to meet the policy requirements - evidence of marketing the property for a period of time to demonstrate demand and feasibility. Suggest rewording in line with Policy CF in the Purbeck Core Strategy.

Councils' Position

2.113 The Government has recently recognised the value of local assets such as shops, post offices or community pubs to local communities and has introduced The Community Right to Bid provision as part of the Localism Act 2011. This new right gives voluntary and community organisations and parish councils the opportunity to nominate an asset to be included on a list of 'assets of community value', pausing the sale of successfully listed assets for six months, giving communities the time to prepare a bid and get a business plan together. The Councils suggest that Policy PC4 complements this new national provision in terms of seeking to prevent the loss of community facilities, as well as positively supporting the provision of new ones within the Plan area. This policy applies within the urban areas of the Plan area as well as the rural areas. No change is therefore recommended to this policy.

2.114 No change to Policy PC4.

Pre-Submission Core Strategy

Policy PC 5

Tourism

The Core Strategy will protect and enhance the unique features of Christchurch and East Dorset that attract visitors to the area whilst encouraging investment. This will be achieved through the following measures:

- Protection of the beaches, river front and Christchurch Harbour and supporting appropriate sustainable tourist related development.
- Tourist related development must avoid increasing visitor pressure on the Dorset Heaths. Appropriate mitigation measures will be identified through the Heathlands Supplementary Planning Document (2012 - 2014) and subsequently by the Joint Heathlands Development Plan Document.
- By protecting visitor attraction sites unless it can be proved the use is no longer economically viable, and promoting new visitor attractions and accommodation in sustainable locations.
- By encouraging sustainable transport to tourist and cultural sites.
- By supporting the aims and objectives of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty.

Tourism and culture in Christchurch and East Dorset will develop in the context of the wider sub- regional strategy (Towards 2015 – Shaping Tomorrow’s Tourism), by improving planning and use of resources through collaboration across Dorset, Bournemouth and Poole, which values local distinctiveness and diversity.

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	3	1	0	0	0	0	1	0	0	0	5

Table 2.11

2.115 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID	Number
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3768	Policy PC5
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1574	Policy PC5
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3431	Policy PC5
523319	Mr Ryan Johnson	Turley Associates	CSPS3787	Policy PC5
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	CSPS2078	Policy PC5
663588	Mr Roger Street	Christchurch Conservation Trust	CSPS3744	Policy PC5

Summary of Responses

2.116 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:

2.117 General Comments

- Natural England - support.
- Royal Society for the Protection Birds (RSPB) - We support the statement made in para 16.22 which states that the Core Strategy adopts a 'sustainable approach to tourism in avoiding harmful impacts on important natural features which make an area attractive to visitors and in reducing recreational pressure on sensitive habitats, the Dorset heathlands and the New Forest.'
- The Cranborne Chase and West Wiltshire Downs AONB Team - Whilst we welcome the support for the aims and objectives of the AONB in Policy PC5, Tourism, we would also wish to see similar support for AONB Management Plan proposals as set out in Management Policy K4 in connection with Community Infrastructure Levy / developer contributions within this Core Strategy.
- ETAG - welcomes recognition of the role of our natural and historic built environment in tourism and the local economy, the need to avoid visitor pressure on the Heaths, and the use of sustainable transport.

2.118 Coverage of Policy

- RSPB - We note the intention in this policy to protect and enhance the area's environment whilst delivering investment in tourism. This is challenging, but we welcome the ambition of the Councils to protect and enhance the assets tourists wish to visit. Unconstrained growth in tourism would threaten the environmental assets of the area, and must be resisted.
- Christchurch Conservation Trust - This policy is stated to include existing Town Plan policies ET1 (loss of tourism accommodation), L17 (development of undeveloped rivers and harboursides) and L19 (development of indoor/outdoor recreation facilities). However, it fails to embody the detailed local conditions described in L17 where the development of currently undeveloped riversides and harboursides is conditioned.
- Turley Associates on behalf of Burry and Knight Ltd - The use of the word 'Protecting' is insufficiently flexible to endure the plan period. There may well be instances where site rationalisation offers greater net gains to the area, providing similar or even reduced provision, but alongside new social or economic uses that act as enabling development to fund better tourism facilities on the same or other attraction sites in the area. The tourism policies of the plan need to be flexible enough to respond to changes in the market over the plan period. Site provision and extent should therefore be tailored to the market and not just viability, allowing the Council to promote a flexible supply of land to support the tourism market and encourage investment.

Councils' Response

2.119 This Policy has generally been supported by respondents to the consultation on the Pre-Submission document, in particular the references to a sustainable approach to tourism and protecting the features people come to visit. The comments of the Christchurch Conservation Trust are considered to be too detailed for the Core Strategy, and it is suggested that Policy PC5, together with the guidance contained in the NPPF, will give adequate protection to their areas of concern.

2.120 The comments on behalf of Burry and Knight Ltd are noted, but the Councils consider that the policy, along with national guidance, does contain suitable flexibility to consider proposals which would allow the re-development of a tourist site to an alternative use if appropriate.

Proposed Changes to the Pre-Submission Core Strategy

Policy PC 5

Tourism

The Core Strategy will protect and enhance the unique features of Christchurch and East Dorset that attract visitors to the area whilst encouraging investment. This will be achieved through the following measures:

- Protection of the beaches, river front and Christchurch Harbour and supporting appropriate sustainable tourist related development.
- Tourist related development must avoid increasing visitor pressure on the Dorset Heaths. Appropriate mitigation measures will be identified through the Heathlands Supplementary Planning Document (2012 - 2014) and subsequently by the Joint Heathlands Development Plan Document.
- By protecting visitor attraction sites unless it can be proved the use is no longer economically viable, and promoting new visitor attractions and accommodation in sustainable locations.
- By encouraging sustainable transport to tourist and cultural sites.
- By supporting the aims and objectives of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty.

Tourism and culture in Christchurch and East Dorset will develop in the context of the wider sub- regional strategy (Towards 2015 – Shaping Tomorrow’s Tourism), by improving planning and use of resources through collaboration across Dorset, Bournemouth and Poole, which values local distinctiveness and diversity.

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	0	0	0	0	0	0	0	0	0	0

Table 2.12

2.121 No responses were received.

Councils' Position

2.122 The Councils position is as set out above following consultation on the Pre Submission Core Strategy.

Proposed Changes to the Pre-Submission Core Strategy

2.123 The following new policy shall also be added to the Creating Prosperous Communities chapter of the Core Strategy in accordance with paragraph 43 of the National Planning Policy Framework.

2.124 New Paragraph 16.15

2.125 High quality communications infrastructure is vital for sustainable economic growth, and high speed broadband and other communications networks also play an important role in enhancing the provision of local community facilities and services. Many types of communications equipment do not require express planning permission but may be installed under permitted development rights.

2.126 New Paragraph 16.16

2.127 It is national policy, set out in the NPPF, that the planning system should encourage and not hinder the expansion of electronic communications networks, including telecommunications and high speed broadband. However, this does not mean the appearance of buildings, towns and the countryside can be allowed to suffer serious damage, or that the ecology of identified sites of nature conservation importance should be degraded. The Councils will consider the prevailing government advice which stresses the importance of modern communications as an essential part of the local community and national economy in determining planning applications. It is recognised that other developments may, in turn, have an impact on electronic communications. In particular, bulky buildings or large structures may mask or reflect signals or block micro-wave links. This may be a material consideration in determining planning applications.

Policy PC 6

Electronic Communications Networks

In determining whether approval of siting and appearance is required or considering applications for planning permission from licensed telecommunication operators, including the provision of high speed broadband networks, the planning authority will need to be satisfied that:

1. The siting and external appearance of apparatus, including any location or landscaping requirements, have been designed to minimise the impact of such apparatus on amenity, while respecting operational efficiency;
2. Antennae have, so far as is practicable, been sites so as to minimise their effect on the external appearance of the building on which they are installed;
3. Applicants for large masts have shown evidence that they have explored the possibility of erecting antennae on an existing building, mast or other structure;
4. Applicants have considered the need to include additional structural capacity to take account of the growing demands for network development, including that of other operators.

The potential impacts of proposals for bulky buildings or other structures upon known telecommunications links will be taken into account in determining planning applications. Measures to mitigate significant impacts will be required as a condition of planning permission.

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					
2	0	0	2	2	0	2	0	1

Table 2.13

2.128 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
474462	Mrs Sheila Bourton		PCCS25
474490	Mrs Sheila Bourton	Chairman Keep Wimborne Green	PCCS36
710840	Ms Jacquelyn Fee	Planner Mono Consultants Limited	PCCS8

Summary of Responses

2.129 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:

2.130 Locational Criteria

2.131 Sheila Bourton, Keep Wimborne Green

- Any electronic equipment should be sited as far away as possible from residential development and schools. It should be stated just exactly what is meant by '*measures to mitigate significant impacts*' on proposed housing developments and how those mitigation measures will be assessed and by whom.

2.132 Structural Capacity

2.133 Mono Consultants Limited

- While we support the inclusion of a telecommunications policy within the emerging Core Strategy, we have the following concerns about the draft wording of Policy PC6. Criteria 4 of Policy PC6 states that the Planning Authority will need to be satisfied that: **'applicants have considered the need to include additional structural capacity to take account of the growing demands of network development, including that of other operators'**. Unfortunately, it is not possible for any operator to give a clear indication of what their infrastructure requirements are likely to be in 5, 10, 15 or 20 years time. The technology is continually evolving and ways of improving quality of coverage and / or network capacity may change in the future. We therefore request that the above wording be removed from Policy PC6.

2.134 New policy wording suggested:

2.135 We would consider it appropriate to introduce the policy and we would suggest the following:

2.136 *'Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.'*

2.137 *'Proposals for telecommunications development will be permitted provided that the following criteria are met;-*

2.138 *(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;*

2.139 *(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;*

2.140 *(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.*

2.141 *(iii) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.*

2.142 *When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.'*

Councils' Position

2.143 Criterion 1 of Policy PC6 deals with locational considerations and impact on amenity. 'Measures to mitigate significant impacts...' is related to the preceding sentence and will be assessed by the local planning authority.

2.144 It is reasonable to assume that operators undertake some form of future planning for additional structural capacity. The amended criteria suggested by Mono Consultants Limited is broadly addressed in the existing draft Policy.