



Core Strategy Submission

Consultation Response Analysis by Topic

KEY STRATEGY



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 Core Strategy 'Key Strategy' at Pre-Submission stage (Consultation period 2nd April to 25th June 2012) and at the Schedule of Proposed Changes stage (consultation period of 5th November - 21st December 2012.). The analysis in this document covers policies KS13, KS1 and KS2. Response analysis for the remaining Key Strategy policies is included within the Housing, Employment, Retail, Town Centre and Transport response papers.

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

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

2 Analysis of Responses

Policy KS13: Presumption in Favour of Sustainable Development:

Pre-Submission

2.1 No policy.

Proposed Changes to the Pre-Submission Core Strategy

Presumption in Favour of Sustainable Development:

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly, in particular through the pre-application process, to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

b) specific policies in that Framework indicate that development should be restricted.

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	4	1	0	0	0	1	1

Table 2.1

2.2 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	PCCS319
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS445
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS489
523531	Mr Tim Hoskinson	Savills	PCCS202
523531	Mr Tim Hoskinson	Savills	PCCS193
719394	Ms Jade Ellis	Assistant Planner Turley Associates	PCCS294

Summary of Responses

2.3 Consistency with NPPF

2.4 Jade Ellis, Turley Associates

- Inclusion of words '**unless material considerations indicate otherwise**' does not reflect the wording of Paragraph 14 of NPPF. This unacceptably dilutes the Presumption in Favour of Sustainable Development intended by NPPF, providing an opportunity to thwart its application. The Joint Authorities have not presented evidence of local circumstances that justify a departure from national policy in this regard. The sentence should be revised to better reflect Paragraph 14 of NPPF.

2.5 Sustainability

2.6 Dorset Wildlife Trust

- Dorset Wildlife Trust supports the inclusion of KS13. In particular, we support the need to find solutions that secure development which improves all three strands of sustainability, which includes the environment.

2.7 Hilary Chittenden, Chairman Environment TAG

- We support the policy but advise that it is essential that the Strategy defines unequivocally what is meant by sustainability - not just the standard definition but what sustainability means in practical terms for the implementation of policies. We have been advised by the Planners that a glossary will be included to define what the Strategy means by other frequently used terms such as significant, adequately and major.

2.8 Lisa Jackson, Jackson Planning representing Meyrick Estates

- Please note that with the new policy additions KS13 and ME8 the previous objections about these omissions have now been overcome.

Councils' Position

2.9 Comments are noted.

2.10 The Councils' wording for this policy reflects the model policy wording published by the Planning Inspectorate.

KS1 Settlement Hierarchy

Pre-Submission Core Strategy

KS1

2.11 The location, scale and distribution of development should conform with the settlement hierarchy, which will also help to inform service providers about the provision of infrastructure, services and facilities.

Settlement Type	Function
Main Settlements	The settlements which will provide the major focus for community, cultural, leisure, retail, utility, employment and residential development. This will include infill development as well as options for some greenfield development.
	Christchurch, Wimborne Minster, Ferndown and West Parley, Verwood, Corfe Mullen
District Centres	Settlements which will provide for smaller scale community, cultural, leisure, retail, employment and residential development within the existing urban areas.
	West Moors, Highcliffe
Suburban Centres	Settlements with no existing centres that will provide for some residential development along with community, leisure and retail facilities to meet day to day needs within the existing urban areas.
	Colehill, St Leonards and St Ives

Settlement Type	Function
Rural Service Centres	Main providers for the rural areas where residential development will be allowed of a scale that reinforces their role as providers of community, leisure and retail facilities to support the village and adjacent communities.
	Alderholt, Cranborne, Sixpenny Handley, Sturminster Marshall, Three Legged Cross
Villages	Settlements where only very limited development will be allowed that supports the role of the settlement as a provider of services to its home community.
	Burton, Hurn, Edmondsham, Furzehill, Gaunts Common, Gussage All Saints, Gussage St Michael, Hinton Martell, Holt, Horton, Longham, Shapwick, Wimborne St Giles, Witchampton, Woodlands/Whitmore
Hamlets	Settlements where development would not be allowed unless it was functionally required to be in the rural area.
	All other settlements

Table 2.2

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	
10	3	6	19	11	4	16	7	13	7	11	6	9

Table 2.3

2.12 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS903
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2092
359295	Mrs Maria Humby	Alderholt Parish Council	CSPS4006
359503	Mrs Lisa Goodwin	Knowlton Parish Council	CSPS2939
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2418
359585	Mr Robert Finn		CSPS3071
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1560
360692	Mrs Wendy Britton		CSPS677
361170	Mr Tim Harvey		CSPS3985
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3664
490823	Mr Ian Jones	Ferndown Town Council	CSPS2963
499596	Sir Roger Palin		CSPS2517
499596	Sir Roger Palin		CSPS2518
503554	Mr D Verguson		CSPS3990
512360	Mr Richard Acres		CSPS3986
521383	Mr Graham Paisley	Scottish and Southern Energy	CSPS38
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3642
523531	Mr Tim Hoskinson	Savills	CSPS2117
523531	Mr Tim Hoskinson	Savills	CSPS3185
523627	David Lowin	WYG Planning & Design	CSPS1576
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3633

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
524723	Mr John Worth	Wimborne Civic Society	CSPS3984
654392	Mr Geoffrey Chopping		CSPS671
654506	Mr John Showell		CSPS808
654660	Ms Anne Mason	Transition Town Christchurch	CSPS935
655009	Mr D Mure		CSPS3991
655876	Mr James Moran		CSPS3983
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1086
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1470
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3490
656692	Mr Robin Henderson	Ken Parke Planning Consultants	CSPS3626
657341	Mr & Mrs K Perry		CSPS3979
657372	Mr A.J Linehan	Brookside Manor Residents Association	CSPS3980
664634	Mr C Benham	Turley Associates	CSPS3830
669847	Mrs Christine McNulty	Ken Parke Planning Consultants	CSPS3972

Summary of Responses

- **Settlement hierarchy**

- Objection to the classification of Furzehill as a village due to concerns that its identification as such could lead to the pressure for more development. Suggests that the area be allocated as a hamlet instead as it does not function as a village.
- Gleeson Developments Ltd support the identification of main settlements across the area and agree that the settlements identified should deliver housing growth to support the communities, and support Wimborne as a main settlement with the capacity for further development.
- If growth is the objective of the Plan then hamlets should be included in the package. That or go for a New Town approach to meet external demand and use this provision of new supply as the reason why people have to compete for the existing hamlet properties.

- Barton Willmore, on behalf of clients, question whether the Plan proposes sufficient housing to meet the needs of the area. We consider that the policy is broadly sound but question the settlement hierarchy in respect of Wimborne Minster and Colehill. We contend that Colehill be included as a Main Settlement given its close functioning relationship to Wimborne.
- Eastern Area Dorset Association of Parish and Town Councils - Market Towns. The lack of any partnership working within East Dorset reduces the role of the market towns as a focus for their area. The location of market towns in the south of the district does not help. There is a confusion of terminology within the document between Rural Service Centres and Key Settlements. Despite previous comments, the Core Strategy remains urban centric, focusing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community is 72.21% of the East Dorset area and the rural population is 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be supported.
- Sixpenny Handley with Pentridge Parish Council - welcome the intention for Sixpenny Handley to be designated a Rural Service Centre. Such a designation reinforces the village's existing role in the provision of services, including to the surrounding area. However, there is nothing of significance in the rest of the document to say how this will be achieved reinforcing the impression that this is a token gesture. The concept of a settlement hierarchy is agreed, however, the policies require definition and for the rural communities should not be constrained if there is a need for limited diversification, development or expansion.
- Knowlton Parish Council - The needs of communities must be allowed to achieve a higher profile than is currently permitted by the constraints of conservation and the support of the concept of the rural idyll. The Core Strategy as currently written falls short of these objectives.
- Burton Parish Council - The Council notes and agrees with the place of Burton on the suggested Settlement Hierarchy, but notes however that the Strategy states in para 4.21 that limited development is proposed for the village to meet specific local needs. The Parish is concerned that the opportunity to define this housing by means of a local exceptions policy is not taken. In other words, this housing will not be specific to the needs of the village but will be available for general use on alleviating the waiting list, the validity of which the Council has some concerns.
- WYG Planning and Design, on behalf of Sainsbury's Supermarkets Ltd. Support Policy KS1, in particular the major focus for development within the identified main settlements of Christchurch, Wimborne Minster, Ferndown and West Parley, Verwood and Corfe Mullen.
- Savills - The inclusion of Ferndown and West Parley, and Corfe Mullen as main settlements in Policy KS1 is supported.
- Mr Robert Finn, local landowner - Alderholt, being a local centre and the largest village in East Dorset, has potential for being more than a Rural Service Centre. He is promoting an area of land on the edge of the village for residential development.
- Jackson Planning Ltd, on behalf of clients, suggests that the settlement hierarchy needs to include a new category - 'Principle Urban Area'. The settlement in this category should be the Bournemouth/Poole urban area. This reflects the evidence from a study by Roger Tym for the Regional Strategy and makes a more effective plan with regard to cross boundary working. The village of Burton should be re-classified as a Rural Service Centre and not a village. This would make the plan more consistent with settlements in East Dorset and is justified by our evidence.
- Pro Vision, on behalf of Wessex Water, request that the wording in respect of hamlets be amended to read as follows: Settlements where development would not be allowed unless it was functionally required to be in the rural area or comprises the sustainable redevelopment of Previously Developed land.
- Wimborne Civic Society and The Brookside Manor Residents Association - both raise concerns that the proportion of new housing proposed in Wimborne/Colehill is disproportionate to the size of the existing settlement and will be harmful to its existing character.

Environment

- Transition Town Christchurch - avoid greenfield development as this may be needed for food production. Brownfield should be used in older parts of the Town Centre as this will also reduce transport needs.
- Cranborne Chase and West Wiltshire Downs AONB - We note that Cranborne and Sixpenny Handley are two of the five rural service centres proposed and half of the villages where there will be limited development are also within the AONB. We welcome and support the view that the AONB is an absolute constraint when it comes to strategic scale housing development.

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

2.14 Settlement Hierarchy

- There is a general degree of support for the settlement hierarchy set out in Policy KS1, with only minor amendments suggested by respondents.
- The Councils consider that the request to include Colehill in the list of Main Settlements is unfounded as this settlement lacks the infrastructure, services and facilities of the towns listed in this category. The characteristics of Colehill meet the functions identified in the 'Suburban Centres' settlement type and therefore no change is proposed to this section.
- The concerns expressed by the Dorset Association of Parish and Town Councils, echoed by Sixpenny Handley and Knowlton Parish Councils, that the Plan is too urban-centric are noted. However the vast majority of the population living within the Plan area live within urban areas and the Councils have sought to meet the needs of these areas, but not at the expense of the rural areas. The rural economy is addressed in Policy PC3 (chapter 13) which seeks to promote sustainable economic growth in rural areas in and on the edge of the existing larger rural settlements. Policies LN3 and LN4 (chapter 15) set out the Councils' policy on the provision of affordable housing, which are applicable in the rural areas as well as urban areas, and Policy LN6 addresses the provision and protection of community facilities and services, which again applies to Rural Service Centres as well as the larger urban settlements.
- The Councils do not agree with the proposal to add an additional category to the hierarchy. The concept of 'Principle Urban Areas' arose out of work carried out to support the Regional Spatial Strategy. It is not considered necessary to carry this concept through into the Christchurch and East Dorset Core Strategy. Cross boundary issues are now dealt with via the 'Duty to Co-operate', as set out in paragraphs 156 and 178 of the NPPF.
- Burton does not function as a rural service centre due to its proximity and connectivity to facilities in Christchurch town centre and also because Burton village does not have the range of facilities that would be associated with a rural service centre. On this basis, the position of Burton within the settlement hierarchy remains unchanged.

Proposed Changes to the Pre-Submission Core Strategy

Settlement Hierarchy

The location, scale and distribution of development should conform with the settlement hierarchy, which will also help to inform service providers about the provision of infrastructure, services and facilities.

Settlement Type	Function
Main Settlements	The settlements which will provide the major focus for community, cultural, leisure, retail, utility, employment and residential development. This will include infill development as well as options for some greenfield development.
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Hamlets	Settlements where development would not be allowed unless it was functionally required to be in the rural area.
	All other settlements

Table 2.4

2.15 Summary of Responses

2.16 There were no responses.

Pre Submission Core Strategy

Policy KS 2

Green Belt

Development in East Dorset District and Christchurch Borough will be contained by the South East Dorset Green Belt. The most important purposes of the Green Belt in the area are to:

- Protect the separate physical identity of individual settlements in the area by maintaining wedges and corridors of open land between them.
- To maintain an area of open land around the conurbation.

Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs and also to include areas in the Green Belt that are no longer capable of providing for these needs.

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	
10	6	2	24	15	6	16	5	16	4	11	8	6

Table 2.5

2.17 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS904
359547	Mrs V Bright	Verwood Town Council	CSPS1756

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360082	Mr and Mrs K Healy		CSPS2409
360157	Mr Peter Fenning	The Open Spaces Society	CSPS3994
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3240
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2711
360962	Mrs V Hurst		CSPS2763
474462	Mrs Sheila Bourton		CSPS171
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS210
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3667
490823	Mr Ian Jones	Ferndown Town Council	CSPS2964
498034	Mr Richard Cutler	Green Park Land Company Ltd	CSPS3178
510796	Mr Rollo Reid		CSPS4015
523319	Mr Ryan Johnson	Turley Associates	CSPS3293
523319	Mr Ryan Johnson	Turley Associates	CSPS3774
523531	Mr Tim Hoskinson	Savills	CSPS2118
523531	Mr Tim Hoskinson	Savills	CSPS3192
523531	Mr Tim Hoskinson	Savills	CSPS3186
523893	Miss Lindsay Thompson	Terence O'Rourke Ltd	CSPS2050
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3637
524723	Mr John Worth	Wimborne Civic Society	CSPS1926
527744	Mr Alan Hannify	Alliance Planning	CSPS2308
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3676

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
649505	Miss Dawn Leader		CSPS437
652994	Mrs Kathleen Leader		CSPS541
653852	Mrs Susan Newman-Crane		CSPS646
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS879
654660	Ms Anne Mason	Transition Town Christchurch	CSPS936
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS772
654839	Miss Karen Mason		CSPS1007
654962	Mr Christopher Chope		CSPS913
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3491
656684	Mr Ed Denham	Dorset County Council	CSPS3618
656684	Mr Ed Denham	Dorset County Council	CSPS3621

Summary of Responses

2.18 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:

2.19 Green Belt Policy and Boundaries

2.20 • There should be no change to existing Green Belt boundaries. This is a view expressed by many local residents within the Plan area.

2.21 • Green Belt should be preserved all around the boundary of Verwood so that we do not encroach on anyone and they do not encroach on us.

2.22 • Keep Wimborne Green – concerned that releasing part of the Green Belt for housing as an ‘exceptional case’ as allowed in PPG2 could result in further releases of land and loss of more Green Belt at another time in the future. There should be a moratorium put on any further Green Belt development for at least 50 years.

- 2.23** • Tanner and Tilley for Pennyfarthing Homes – The opportunity should be taken to review the Green Belt boundary to accommodate for the needs of development, including housing development, not just for that which will arise during the Plan Period, but also beyond it, in accordance with the requirements of Para 83 of the NPPF.
- 2.24** • Paul Newman Property Consultancy – argues that the Local Planning Authority have not identified sufficient land to meet housing need and that additional land in the Green Belt should be allocated for development as a continued reliance on a policy of urban area regeneration will not deliver the affordable housing the district requires.
- 2.25** • Gleeson Developments Ltd – Due to the constrained nature of East Dorset Gleeson supports the Council’s intention to release Green Belt land to provide adequate land for future residential development, but wish to see the Policy reinforced by adding the wording ‘intention of the Council to release the land from the Green Belt in the locations allocated for development.’
- 2.26** • Mr Christopher Chope MP – Para 4.19 of Policy KS2 is unsound in asserting that a lack of capacity to meet needs identified in the Housing Market Assessment makes it ‘necessary’ to identify sites in the Green Belt. Para 4.21 is unsound in asserting that ‘the difficulty in meeting housing needs provides the exceptional circumstances required to amend Green Belt boundaries.’
- 2.27** • Savills, on behalf of clients, seek an amendment to Policy KS2 to remove the bullet points from the first part of the policy (not consistent with the guidance in the NPPF), and to extend the reference to local housing needs to include strategic housing needs where these can be sustainably accommodated.
- 2.28** • Barratt David Wilson Ltd echo the views submitted by Savills above, and request a further amendment to the policy to include areas in the Green Belt that are no longer capable of meeting strategic housing needs.
- 2.29** • Terence O’Rourke Ltd, on behalf of Bloor Homes Ltd, supports the alterations to the Green Belt to accommodate growth at North Wimborne, but suggests an alternative wording for policy KS2 to clarify the linkages between the proposed changes to the Green Belt boundary to show that the alterations are an important and justifiable component of the Core Strategy.
- 2.30** • Alliance Planning, on behalf of Eco Sustainable Solutions, argues that Policy KS2 should be amended to make express provision for developments which may represent ‘very special circumstances’ and that the policy should recognise that some renewable energy installations may be considered as ‘very special circumstances’ with reference to their wider environmental benefits and increased production of renewable energy. The policy should recognise that some renewable energy projects have large footprints which cannot be accommodated within built up areas.
- 2.31** • ETAG (and others) - The policy should include reference to the Green Belt function of protecting and preserving the setting and special character of historic towns.
- 2.32** • Savills – Colehill should be one of the Parishes where minor amendments to the Green Belt would be permissible to facilitate local needs, including local housing and the deliverability of local facilities.

2.33 • The policy should be amended to allow for minor development in the Green Belt in highly accessible locations, subject to criteria, on sites which adjoin existing boundaries which would allow for a limited number of well planned houses on larger plots, suitable for families and those wishing to engage in more sustainable living.

2.34 • Turley Associates – Concern over the use of words ‘meet local needs’, which does not reflect the NPPF requirement to objectively assess and meet local housing needs or provide compelling evidence why only ‘local needs’ can be met. Suggest that ‘local’ is replaced with ‘objectively assessed’ in policy KS2.

2.35 • Pro Vision Planning and Design, on behalf of clients, propose that the final paragraph of Policy KS2 be amended to read ‘ Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs, to release large brownfield sites for development and also to include areas in the Green Belt that are no longer capable of providing for these needs.’

2.36 • Burton Parish Council – strongly support Policy KS2. The Council in particular notes and stresses the need to protect the separate physical identity of Burton by maintaining the green wedge between the village and Somerford.

2.37 • Ken Parke Planning Consultants, on behalf of ASN Capital, support the policy in principle, but suggest that some of the specific boundary changes in East Dorset to allow for housing development are in the wrong place and that his client’s site would be more appropriate and comply with national planning policy.

2.38 • Home Builders Federation – The policy is unsound as currently drafted as it is uncertain when the question of when the release of Green Belt land will occur, despite the release of areas of Green Belt being necessary to accommodate an element of the development needs of the two councils.

2.39 • Turley Associates, on behalf of Burry and Knight Ltd., are concerned over the use of words ‘ meet local needs’, which does not reflect the objective assessment of needs advocated by the NPPF, nor the duty to co-operate in addressing unmet requirements from neighbouring authorities.

2.40 Environment

2.41 • Urban land should be used (for development) and the Green Belt preserved for its intended use as farmland.

2.42 • Green Belt land serves a function as wildlife corridors and locations for wildlife and should be protected.

2.43 • Transition Town Christchurch – add to the policy ‘to protect key bio-services (key species, pollinators) and biological systems which produce good air quality, water resources and carbon sinks.’

2.44 Need for the Green Belt

2.45 • Surely sooner or later everyone will find a ‘good reason’ to build on Green Belt. Just because the local council have to meet government targets to build new houses doesn’t mean that is a good reason to change Green Belt.

- 2.46** • There should be no change to Green Belt policy.

Councils' Response

2.47 Green Belt Policy

2.48 A significant number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Statement, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, for example when planning for larger scale developments such as major urban extensions. The Secretary of State for Communities and Local Government issued a statement on 6th September 2012 about Green Belt policy, which is as follows: "The Coalition Agreement commits the Government to safeguard Green Belt and other environmental designations. As has always been the case, Councils can review local designations to promote growth. We encourage Councils to use the flexibility set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered on reviewing or drawing up Local Plans, we will support councils to move quickly through the process by prioritising Local Plan examinations." The Christchurch and East Dorset Councils are complying with the above statement.

2.49 The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. There is also a need to provide additional land for employment uses within the areas which cannot be met elsewhere. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development. The exact revised Green Belt boundary required for each strategic allocation will follow the edge of the new urban area, excluding areas of significant open space and SANGs, and will be shown on the Proposals Maps.

2.50 A number of the responses, on behalf of specific landowners and prospective developers, propose that alternative areas of land to those being considered in the Core Strategy be removed from the Green Belt and allocated for development. The Council do not intend to make any further changes to the Green Belt boundary, other than three small changes including the allocation of employment land at Woolsbridge Industrial Estate (Pre-Submission Policy VTSW6), to accommodate additional development as the evidence underpinning the broad location and scale of housing and employment land set out elsewhere in this chapter demonstrates that the land allocated for residential and employment uses meets the needs of the Plan area. The other two changes remove land from the Green Belt in order to enable the expansion of schools. Master Plan work has also been carried out to inform the location of this necessary development, and some of the sites put forward for consideration have already been assessed as part of that process, and dismissed as being inappropriate for development. Therefore there is no requirement to release additional land from the Green Belt for development.

2.51 The response on behalf of Eco Sustainable Solutions requests that reference is made within Policy KS2 to make express provision for developments which may represent 'very special circumstances' in the field of renewable energy projects. The Councils do not agree that this amendment is needed, as paragraph 91 of the NPPF makes it very clear that it is up to the developer to demonstrate very special circumstances if any such renewable energy project is to proceed. 'Very special circumstances' are, by definition, specific to the particular circumstances of each individual proposal. To attempt to

define what would constitute a very special circumstance would be contrary to well-established case law that each application has to be considered on the individual merits of the case. However, in light of the guidance set out in the NPPF regarding renewable energy proposals, a policy has been introduced in Chapter 13, Managing the Natural Environment, which addresses this issue.

2.52 A number of comments have been received regarding the requirement to make reference to the need to protect the environmental quality of the Green Belt. The Councils do not intend to make any amendments to the policy to address this concern because paragraph 80 of the NPPF clearly sets out the five purposes of including land in the Green Belt. Its environmental quality is not included within this list. However, paragraph 81 of the NPPF states that local planning authorities should plan positively to enhance the beneficial use of Green Belt, and this includes visual amenity and biodiversity. Other policies elsewhere in the Core Strategy, for example policies ME1 and ME2 which address safeguarding biodiversity and the creation of Suitable Alternative Natural Greenspaces (SANGs), consider the environmental quality of the Plan area. The majority of the rural area of Christchurch and about 45% of East Dorset are within the Green Belt and all of the development proposals set out within the Core Strategy are also contained within land that abuts the Green Belt. Therefore there is no requirement to amend Policy KS2 to include reference to biodiversity as it is adequately dealt with under other policies within the Plan.

2.53 Changes required in response to the National Planning Policy Framework

2.54 Previous national guidance on development within the Green Belt was set out in Planning Policy Guidance Note 2: Green Belt. This guidance was replaced by the National Planning Policy Framework issued by the current government in March 2012 and has removed the reference to Major Developed Sites in the Green Belt. Within East Dorset there is one site which previously met the criteria of a Major Developed Site, which is St Leonards Hospital. Policy VTSW7 addresses the pre-requisites for any re-development of this site. No other sites within either Christchurch or East Dorset have previously been considered of sufficient size or scale to meet the requirements of Annex C to PPG2 and therefore no other policy exists to consider what are now referred to as previously developed sites in the Green Belt (NPPF paragraph 89). It is considered necessary, in light of the change in national policy, to amend Policy KS2 to include criteria against which any application on a previously developed site will be considered.

Proposed Changes to the Pre-Submission Core Strategy

2.55 The policy will be amended to make reference to the fact that the revised Green Belt boundaries will be defined on the Proposals Maps for each development and Policy KS2 shall be amended to include criteria against which any application for development on land considered as a 'previously developed site' will be assessed.

Policy KS 2

Green Belt

Development in East Dorset District and Christchurch Borough will be contained by the South East Dorset Green Belt. The most important purposes of the Green Belt in the area are to:

- Protect the separate physical identity of individual settlements in the area by maintaining wedges and corridors of open land between them.
- To maintain an area of open land around the conurbation.

Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs and also to include areas in the Green Belt that are no longer capable of providing for these needs. **The revised Green Belt boundaries will follow the edge of the new urban area, significant open space and SANGs will be within the Green Belt, and will be shown on the Proposals Maps for each individual development proposal.**

In accordance with the guidance contained within the National Planning Policy Framework, development proposals on sites considered as previously developed sites within the Green Belt shall be considered against sustainable development criteria, and prerequisites for development which include:

- **Approval of a development brief by the Council,**
- **Agreement of a comprehensive travel plan, and**
- **A wildlife strategy to be agreed with the Council that ensures no harm to features of acknowledged biodiversity importance, as well as enhancing the biodiversity where possible through improving the condition of existing habitats or creation of new ones.**

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					
7	2	4	10	4	4	8	9	0

Table 2.6

2.56 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359291	Mr Jeremy Woolf	Woolf Bond Planning	PCCS364
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS318
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS232
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS446
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS447
476036	Mr Colin Jamieson		PCCS162
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS496
523531	Mr Tim Hoskinson	Savills	PCCS221
523531	Mr Tim Hoskinson	Savills	PCCS190
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	PCCS474
654871	Mr Martin Miller	Technical Director Terence O'Rourke Ltd	PCCS148

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
717053	Mrs Janet Healy		PCCS82
718911	Mr Joshua Lambert	Planning Assistant Pro Vision Planning and Design	PCCS467
719394	Ms Jade Ellis	Assistant Planner Turley Associates	PCCS295

Summary of Responses

2.57 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:

2.58 Comments from Nature Conservation Bodies

2.59 RSPB

2.60 We welcome the confirmation that SANGs and open space will be created in the Green Belt. We also welcome the addition of a 'wildlife strategy' as a prerequisite to these sites being brought forward.

2.61 Nicola Brunt for DWT

2.62 Dorset Wildlife Trust supports the inclusion of significant open space and SANGs within the Green Belt. We also support the need for development proposals on sites considered as previously developed sites within the Green Belt to require a development brief, travel plan and wildlife strategy as detailed in the proposed amended text.

2.63 Hillary Chittenden, Chairman Environment TAG, East Dorset

2.64 We support the inclusion of significant open space and SANGs within the Green Belt. We welcome the requirement for previously developed sites to be considered against sustainable development criteria and including agreement of a wildlife strategy. The wording has not addressed our concern regarding the selection of just two of the Green Belt criteria. For Christchurch and Wimborne, the setting of historic towns (NPPF 80) is equally important.

2.65 Janet Healy, Dorset CPRE

2.66 We support keeping all the SANGs within the Green Belt. We reluctantly support some revision of the Green Belt in order to increase the supply of much needed affordable homes. We cannot support all the potential revision of the Green Belt using the criteria proposed in the Core Strategy by officers, and some of the most valuable purposes of the Green Belt as set out in the NPPF have been omitted.

2.67 General Comments

2.68 Tim Hoskinson, Savills

2.69 In order to provide for locally led and small scale development initiatives that will emerge through the Site Specific Allocation Document, Neighbourhood Plans and other parts of the development plan process, the policy needs to be amended to enable minor amendments to the Green Belt boundaries to be made at these later stages in the planning process. The policy as currently proposed is too rigid to allow for this degree of flexibility

2.70 The need to amend the policy to clarify that Green Belt boundaries will follow the edge of the the new urban area is recognised and supported, but the revisions would provide greater clarity if it were reworded to explain that the revised Green Belt boundaries follow the extent of the proposed development sites as indicated by the red line on the illustrative plans in the document, excluding SANGs and strategic open space.

2.71 The additional criteria added to the policy to clarify the approach to the development of previously developed sites is welcomed.

2.72 Turley Associates

2.73 The wording of the new paragraph and criterion regarding previously developed sites in the Green Belt is not consistent with paragraphs 88 and 89 of the NPPF. Reference to 'sustainable development criteria' is insufficiently precise and would require further definition if retained. The current wording is more positive towards development in such sites than is necessarily reflected in NPPF. The objective should be to secure development in the most appropriate and sustainable locations, not maximise the use of previously developed land at all costs.

2.74 Martin Miller, Terence O'Rourke Ltd.

2.75 Whilst we welcome the council's intention to modify the policy to take account of paragraph 89 of the NPPF, objection is raised to the requirement for an adopted development brief, travel plan and wildlife strategy to be agree with the council as pre-requisites to any planning applications for development being determined. Whilst we accept that they can be useful in developing development parameters at sites, it is argued there is no national requirement for them, they would add to costs and delays for developers, and there may be problems with the delivery of sites if the council does not agree any element of the development brief etc.

2.76 Woolf Bond Planning

2.77 Our clients object to the wording of this policy as the boundary of the proposed SANG at the Christchurch urban extension is yet to be determined and therefore revised Green Belt boundaries cannot as yet be shown.

2.78 Pro Vision Planning and Design representing Wessex Water

2.79 They argue that the Green Belt boundary should be further amended to exclude land at Little Canford Depot as the site is suitable for re-development within the Plan period.

2.80 The client supports the further criteria set out within the proposed changes to the policy as the criteria are consistent with paragraph 89 of the NPPF, which states that redevelopment of Previously Developed Land, whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt, and the purposes of including land within it than the existing development, is appropriate within the Green Belt.

2.81 Jackson Planning Ltd representing Meyrick Estates

2.82 The plan as revised is not consistent with National Policy as it does not include a proposals map showing the extent of the Green Belt as required by the NPPF paragraph 83.

2.83 Tanner and Tilley Planning Consultants

2.84 The proposed change to the policy has failed to take the opportunity to review the Green Belt boundaries to accommodate for the needs of development, including housing development, not just for that which will arise during the Plan period but also beyond it. We suggest that the opportunity of reviewing the Green Belt boundary should be taken now to allow for the accommodation of possible future development that may be needed beyond the Plan period.

2.85 Cllr Colin Jamieson (Burton)

2.86 The Green Belt, particularly related to Burton protects the character of the village and supports the Burton Conservation Area Management Plan in that it significantly protects the local village centred farm and supports the strategic gap between Burton and the wider conurbation of Christchurch.

Councils' Position**2.87 Comments from Nature Conservation Bodies**

2.88 The general support for the inclusion of SANGs in the Green Belt and the need for development on previously developed sites to be considered against sustainable development criteria is welcomed. With respect to the omission of listing all the purposes of the Green Belt set out in paragraph 80 of the NPPF, the Councils have only listed those considered of particular significance within the Plan Areas, but all 5 purposes continue to be of importance.

2.89 General Comments

2.90 The Councils believe that they have allocated sufficient land to meet the development needs of the area for the next 15 years, and that no land currently needs to be 'safeguarded' for future development between the existing urban area and the Green Belt. The Local Authorities consider that the future needs of the area beyond the plan period are currently unknown, and that in particular the local housing market area is wider than the Plan area. There will be the need for a strategic, cross-boundary, review of the South East Dorset Green Belt to meet the future housing needs of the local housing market area, which may involve land within an adjoining Local Authority being released from the Green Belt for development rather than additional land within the Plan area.

2.91 If any Neighbourhood Plans were produced within the Plan area, then existing legislation would allow for limited alterations to the Green Belt boundary to accommodate development supported and promoted via this route. Paragraph 83 of the NPPF requires local planning authorities to establish their Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. This is what the Core Strategy sets out and therefore the Councils do not consider it necessary to introduce further flexibility into Policy KS2 to allow for future changes to the Green Belt.

2.92 The Councils do not consider that it is possible to exactly define the revised Green Belt boundary around the new neighbourhoods/urban extensions proposed in the Plan as the final layouts of these developments have yet to be agreed. The final Green Belt boundaries will be drawn in accordance with Paragraph 85 of the NPPF, which includes the requirements to not include land which it is unnecessary to keep permanently open and to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The illustrative plans which accompany the development policies in the Core Strategy are just that, they are illustrative. They should not be used to define something as important and enduring as the Green Belt boundary which can only be done once the final development boundaries are agreed.

2.93 A policies map will form part of the Core Strategy for Christchurch and East Dorset.

2.94 The Councils welcome the support for the changes to the policy to include criteria to guide development on previously developed sites, and suggest to those respondents who object to this change that the revised policy complies with the provisions of paragraph 89 of the NPPF in that it seeks to ensure that any re-development of previously developed sites would not have a greater impact on the openness of the Green Belt, nor the purpose of including land within it than the existing development. These criteria also accord with the guidance on sustainable development set out in paragraph 9 of the NPPF, which, as the Minister for Planning stated, the purpose of planning is to help achieve sustainable development.