

Core Strategy Submission

Consultation Response Analysis by Topic

TOWN CENTRES



Prepared by Christchurch Borough Council and East Dorset District Council

May 2013

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Core Strategy Consultation Response Analysis TOWN CENTRES - May 2013

1 Introduction

- 1.1 This Consultation Response Analysis deals with the development of Core Strategy policy for town centresthrough Pre-Submission and Schedule Of Proposed Changes consultations.
- **1.2** The Analysis covers a number of topics:
- Core Strategy Vision
- Strategic Objectives
- Key Strategy policies for town centres generally.
- Specific town centre policies in Christchurch, Highcliffe, Wimborne, Ferndown and Verwood.
- 1.3 This Analysis covers shopping frontage policies which are specific to a particular centre, but general retail policies are addressed in a separate Analysis.

2 Vision, Objectives and Key Strategy Analysis of Responses

Town Centres

1 - References to town centres in the Core Strategy Vision.

Pre-Submission

.....Historic towns such as Christchurch and Wimborne will be vibrant centres of commercial and cultural activity, with niche shopping, and varied attractions and facilities for residents and visitors alike. Other key local centres in Ferndown, Verwood, West Moors and Highcliffe will support shops and services for their local communities, with villages and smaller neighbourhood centres providing basic services. New ways of delivering services and facilities in rural areas will be developed.....

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

2.1 Consultation Response

2 Christchurch and East Dorset Core Strategy Consultation Response Analysis TOWN CENTRES - May 2013

2.2 The total number of responses relating to the Core Strategy Vision are set out in the table below:

Legally Compliant		So	und			Core Stra	tegy is uns	ound beca	use it is n	ot:		No
Comp	pilant			Positively Prepared Justified Effective C		Consistent with National Policy		Indication of legal compliance				
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
12	6	6	28	16	11	13	18	16	14	13	14	21

Table 2.1

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
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2706
510796	Mr Rollo Reid		CSPS2712
523531	Mr Tim Hoskinson	Savills	CSPS2109

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
524723	Mr John Worth	Wimborne Civic Society	CSPS1890
612430	Mr Nick Squirrell	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

2.4 Summary of Responses

4 Christchurch and East Dorset Core Strategy Consultation Response Analysis TOWN CENTRES - May 2013

- 2.5 There were a number of representations made on the text relating to Chapter 3. In many cases these related to the list of issues and challenges identified at the start of the Chapter. These representations were primarily statements regarding particular issues and did not request any change to be made to the text, or indeed to the Vision and Objectives. No response is therefore made to these comments, however they are summarised as follows:
- Junction improvements on the A35 will not be sufficient to improve traffic flow through Christchurch town centre.
- Loss of a community hall in Christchurch town centre runs counter to the strategy of helping communities to prosper. Support for local communities is affected by the decision to remove references to a new Druitt Hall community facility, and the decision to demolish the existing hall.
- 2.6 Councils' Response how we have taken into account the consultation responses?
- 2.7 No changes to the Core Strategy Vision were proposed in response to these representations. Since other Core Strategy policies could permit a community facility in the town centre, or elsewhere, the specific reference to a town centre community facility were proposed to be deleted.

Proposed Changes to the Pre-Submission Core Strategy

.....Historic towns such as Christchurch and Wimborne will be vibrant centres of commercial and cultural activity, with niche shopping, and varied attractions and facilities for residents and visitors alike. Other key local centres in Ferndown, Verwood, West Moors and Highcliffe will support shops and services for their local communities, with villages and smaller neighbourhood centres providing basic services. New ways of delivering services and facilities in rural areas will be developed.........

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

2.8 Consultation Response Table

2.9 The total responses received to the Core Strategy Vision at Schedule Of Proposed Changes consultation stage are set out in the table below:

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

Table 2.2

2.10 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
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

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Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
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
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

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
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

2.11 Summary of Responses

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

2.13 Councils' Position

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

Town Centres

2 - References to town centres in the Strategic Objectives.

Pre-Submission

Objective 2

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

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

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

2.15 Consultation Response

Legally Compliant		Sou	ınd			Core Stra	tegy is uns	sound beca	ause it is n	ot:		No
Comp	piiant			Positively	Prepared	Just	ified	Effective		Consistent with National Policy		Indication of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
1	0	1	1	1	0	1	0	2	0	2	0	4

Table 2.3

2.16 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2410
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3706
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3219
524723	Mr John Worth	Wimborne Civic Society	CSPS1945
524723	Mr John Worth	Wimborne Civic Society	CSPS1928
654506	Mr John Showell		CSPS807

2.17 Summary of Responses

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

2.19 Potential new town

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

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

- The strategy proposed is to locate new development close to existing settlements where facilities and services already exist or can be enhanced. This is considered more realistic and less intrusive than a major new settlement.
- No changes are proposed to this Objective in response to representations.

Proposed Changes to the Pre-Submission Core Strategy

Objective 2

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

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

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

2.21 Consultation Response Table

2.22 Since no changes were proposed to Objective 2 following Pre-Submission consultation, the Objective did not form part of the Schedule of Proposed Changes consultation.

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

Table 2.4

2.23 List of Consultee Reference Numbers

2.24 Not applicable.

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- 2.25 Summary of Responses
- 2.26 Not applicable.
- 2.27 Councils' position
- 2.28 No changes have been made to Objective 6 in response to representations.

Town Centres

- 3 Settlement Hierarchy (Policy KS1).
- 2.29 Although not dealing exclusively with town centres, responses on this Policy are included in this response analysis for contextual purposes.

Pre-Submission

Policy KS1

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.
	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

Settlement Type	Function
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
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 2.5

2.30 Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:							No	
				Positively Prepared		Justified		Effective		Consistent with National Policy		Indication of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
10	3	6	19	11	4	16	7	13	7	11	6	9

Table 2.6

2.31 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

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3633
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

2.32 Summary of Responses

2.33 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:

2.34 Settlement hierarchy

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- 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.

2.35 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.
- 2.36 Councils' Response how have we taken into account the consultation responses?
- 2.37 Settlement Hierarchy
- 2.38 There is a general degree of support for the settlement hierarchy set out in Policy KS1, with only minor amendments suggested by respondents.
- 2.39 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.
- 2.40 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.
- 2.41 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.

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2.42 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

2.43 No changes are proposed to Policy KS1.

Policy KS1

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.
	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
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

Settlement Type	Function
Hamlets	Settlements where development would not be allowed unless it was functionally required to be in the rural area.
	All other settlements

Table 2.7

2.44 Consultation Response Table

2.45 As no changes were proposed to Policy KS1 following Pre-Submission consultation, it did not form part of the Schedule of Proposed Changes consultation.

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

Table 2.8

2.46 List of Consultee Reference Numbers

- 2.47 Not applicable.
- 2.48 Summary of Responses
- 2.49 Not applicable.
- 2.50 Councils' Position

2.51 No amendments were proposed to Policy KS1 following Pre-Submission consultation.

Town Centres

4 - Town Centre Hierarchy (Policy KS6).

Pre-Submission

Policy KS6

Town Centre Hierarchy

The town centre hierarchy should be as follows:

Town Centres: Christchurch, Ferndown, Verwood and Wimborne Minster.

District Centres: West Moors, Highcliffe and Barrack Road.

Local Centres: Purewell, Corfe Mullen and West Parley.

Parades: All other clusters of shops.

2.52 Consultation Response

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

Table 2.9

2.53 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
490823	Mr lan Jones	Ferndown Town Council	CSPS2972
523627	David Lowin	WYG Planning & Design	CSPS1579
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3625
650761	Mr Anthony Ferguson	Peacock and Smith Limited	CSPS383
654310	Mr Bryan Taylor	Savills Commercial Ltd	CSPS661
656498	Mr Matthew Morris	GVA Planning Development	CSPS3997
662954	Mr Neil White	Quantum Group	CSPS3623
664634	Mr C Benham	Turley Associates	CSPS3831

2.54 Summary of Responses

2.55 The comments from key stakeholders and the general public in respect of this policy have been grouped together as follows:

2.56 General Comments

- Ferndown Town Council The key facts refer to a catchment population of 28,000 but there is a lack of evidence on this point. The Town Council is unable to comment at this time until work has been done and progressed on the Development Plan Document.
- Transition Town Christchurch With reference to the Mary Portas Report 'My Vision for the High Street', high streets won't just be about selling
 goods, they should become places where we go to engage with other people in our communities, where shopping is just one small part of a rich
 mix of activities.
- GVA Planning Development on behalf of The Co-operative Group The Co-op finds much to support in the Key Strategy section of the Pre-Submission document, including the retail hierarchy in Policy KS6 and the role of town and district centres in KS7.

2.57 Town Centre Hierarchy

2.58 Christchurch

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- Turley Associates on behalf of Dorset Development Partnership We support this approach given the strategic role of Christchurch town centre and as it is consistent with the town centre first policies advocated by national policy.
- Quantum Group support the identification of Barrack Road as a District Centre. This reflects the area's key role in supporting the population of West Christchurch with vital retail goods and services in a sustainable and locally accessible position plus its potential growth. We recommend the extent of the District Centre is defined as part of the Core Strategy to accord with the NPPF and provide decision making certainty in the interim. This should include the existing commercial frontages on Barrack Road, as well as the Christchurch Retail Park and the Former QuinetiQ Site. The former QuinetiQ Site should be included for the following reasons: (i) There is a long standing recognition that a District Centre consists of a group of shops which would include a Supermarket or Superstore and non retail services and community facilities. Such a range is necessary to adequately serve a local residential area; (ii) The Centre fronting Barrack Road does not contain either a Supermarket of Superstore and is deficient on this form of retailing. Whilst it contains a range of commercial services and smaller top-up food retail (Ones-Stop store), this aspect of its District Centre function is deficient and the Core Strategy should plan positively for the provision of a supermarket or Superstore to meet the needs of this area of Christchurch, to address the identified outflow of convenience goods expenditure identified in the Joint Retail Study. If this cannot be met on an identified existing site within the Centre boundary through improvements to existing facilities, following the principles of the sequential approach, the Core Strategy should identify a District Centre boundary that includes adequate provision to address the Centre's deficiency.
- Savills Commercial on behalf of Saxon Square Management Committee Barrack Road does not meet the definition of a District Centre. The PPS4
 definition includes a range of non-retail services, such as banking, restaurants, building societies, as well as public facilities such as a library.
 Barrack Road does not meet this definition of a District Centre and more closely matches the definition of a Local Centre.
- WYG Planning & Design on behalf of Sainsbury's Supermarkets Ltd The future role of Roeshot Hill in Christchurch in all likelihood will function as a District Centre, rather than a Local Centre. This is due to significant over trading, congestion and over crowding experienced at the existing Sainsbury's Roeshot Hill Store, and the consequential need for Sainsbury's to extend and update this store to address the deficiencies. The type, level and range of facilities proposed for the new centre (para 6.19), level of new housing development, and availability of land are, we would suggest, more in line with a what would be expected in a District Centre, as opposed to a Local Centre.

2.59 East Dorset

- Peacock and Smith on behalf of Morrisons The Morrisons store in Pennine Way, Verwood should be governed by a District Centre allocation in the emerging Core Strategy and Proposals Maps. The Morrisons store and surrounding facilities banking and pharmacy reflect the characteristics, scale, role and function of a District Centre.
- Ken Parke on behalf of ASN Capital It is evident from the document that Colehill has no facilities which would rank it in the Town Centre hierarchy, even as a Local Centre. Indeed Colehill would not even make the lowest rank as a 'cluster of shops'. The applicant submits Colehill is part of the wider area of Wimborne and not a separate settlement in terms of the settlement hierarchy. Land to the north of Leigh Road is being promoted as

Core Strategy Consultation Response Analysis TOWN CENTRES - May 2013

an alternative site for housing development by their clients to include a new suburban centre for Colehill. This would consist of an array of shops and other community uses in an identifiable centre which will act as a focus for the wider community.

- 2.60 Councils' response how have we taken into account the consultation responses?
- 2.61 General Comments
- 2.62 No comments.
- 2.63 Christchurch
- 2.64 The NPPF does not provide a definition of a 'district centre'. The most up to date definition is contained within Annex B of PPS4;
- 2.65 'District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local facilities such as a library'.
- 2.66 In the case of Barrack Road, on balance we do not feel that this road operates as a District Centre. It has a broad mix of shops but it is not a focus for shopping trips in the same way as Highcliffe, nor could we set out a meaningful vision for the road.
- 2.67 Retail frontages along Barrack Road as designated in the current adopted Local Plan (2001) will be retained which will protect its retail function to serve local needs.
- 2.68 Barrack Road is currently designated as a Local Centre and recent positive growth in trade and activity has been achieved in this context. On this basis, the future vitality and viability of Barrack Road will not be adversely affected through maintaining the current designation.

2.69 East Dorset

- 2.70 Whilst the NPPF does not offer detail on what a District Centre should contain, traditionally it would offer a range of shops, restaurants and facilities, such as a library as well as a supermarket. Pennine Way in Verwood does not contain a sufficient number of shops and facilities to warrant the change in hierarchy suggested at the Morrisons Store.
- **2.71** For planning purposes, Colehill is considered to be part of Wimborne Minster and does not have a centre due to its suburban growth and development over many years. This is accepted locally. The site offered as a development proposal by ASN Capital is not a preferred site by the local authority, nor is the provision of a district centre deemed necessary as a result.

Proposed Changes to the Pre-Submission Core Strategy

2.72 Paragraph 4.33

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- 2.73 Updated text to reflect the latest retail study that informs floorspace requirements in the plan area.
- 2.74 A Joint Retail Assessment (2008) has been prepared which identifies the future requirements for retail provision in Christchurch and East Dorset The Christchurch and East Dorset Retail Update (2012) identifies future requirements for retail floorspace provision in Christchurch and East Dorset. This study has informed the and establishes the broad level of retail development that needs to come forward in the main retail centres to maintain and enhance their vitality and viability as set out in Policy KS8. This study has informed the requirements for retail floorspace provision set out in Policy KS8 for the period to 2028.

2.75 **Paragraph 4.35**

- 2.76 Amended text to reflect a change in the proposed policy for Barrack Road as a 'local centre' as opposed to a 'district centre' which reflects its function.
- 2.77 The hierarchy set out in Policy KS6 changes the status of some of the centres in Christchurch and East Dorset. In some instances where a retail centre can sustainably accommodate a higher level of growth, its position may be elevated in the town centre hierarchy. Christchurch town centre is the main retail centre in Christchurch Borough and will be the focus for future retail development. Highcliffe functions as a district centre and will accommodate a smaller proportion of the Borough's future requirement for retail growth. Barrack Road is maintained as which was a local centre, as it does not function as a district centre. It has a broad mix of shops but it is not a focus for shopping trips in the same way as Highcliffe. is now defined as district centre as it contains a high proportion of commercial units and performs the role of a district centre. Purewell functions as a local centre and existing shopping parades will remain protected by Policy PC4 to serve local needs.

Policy KS6

Town Centre Hierarchy

The town centre hierarchy should be as follows:

Town Centres: Christchurch, Ferndown, Verwood and Wimborne Minster.

District Centres: West Moors, Highcliffe **and Barrack Road.**

Local Centres: <u>Barrack Road</u>, Purewell, Corfe Mullen and West Parley.

Parades: All other clusters of shops.

2.78 Consultation Response Table

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

Table 2.10

2.79 List of Consultee Reference Number

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
715197	Mr Neil White	Architectural Designer Quantum Group	PCCS144

2.80 Summary of Responses

2.81 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:

2.82 Barrack Road as a 'Local Centre'

2.83 Neil White, Quantum

- The amended text is contrary to the NPPF where it promotes sustainable development. The plan should be positively prepared and consistent with achieving sustainable development. Sustainable development is made up of three dimensions, economic, social and environmental as detailed with the NPPF. By redefining Barrack Road as a Local Centre the Core Strategy fails to acknowledge the objectively assessed potential for Barrack Road to be elevated up the retail policy hierarchy from its existing status. It therefore is not positively prepared especially when considering the Council's own commissioned evidence base.
- The Plan is un-justified in reverting back to the Local Centre status as the initial Core Strategy Pre-Submission acknowledged the findings within the Council commissioned Joint Retail Assessment 2008 that Barrack Road had potential to sustain a higher retail status (Table 8.3) and that it could be considered to perform the role of a District Centre (Para. 8.16). An updated Joint Assessment in September 2012 has been issued; this is to be read in conjunction with the original assessment (Para.1.5) and does not contradict the original findings contained within the currently

- adopted Local Plan it confirmed that Barrack Road (Para. 6.62) has the greatest concentration of shops in North Christchurch, this is emphasised by the large retail units located at Christchurch Retail Centre housing many national brands. These shops are not generally associated with Local Centres who generally include a range of small shops of a local nature serving a small catchment area (PPS4 Local Centre Definition).
- The amended text is not Effective as it has been assessed that Barrack Road has potential for a higher retail status. The October 2012 resolution to grant Planning Permission (LPA ref: 8/12/0044) for a 57,000ft2s supermarket highlights that Barrack Road can easily conform to the definition of a District Centre status making it highly deliverable over the plan period. Restricting Barrack Road to the existing status of Local Centre prevents the potential growth of Barrack Road over the period of the plan and how it is well positioned to improve locally accessible shopping for West Christchurch residents. This is recalcitrant with the NPPF as it goes against the core principles which are to provide sustainable development and encourage growth. The NPPF states "sustainable development is about positive growth making economic, environmental and social progress for this and future generations.". Paragraph 23 talks about growth and setting policies over the plan period. The current status of the amended text ignores the assessed findings and limits the potential for acknowledge growth of the Barrack Road Centre. The Plan should be consistent in line with National Policy defining a network and hierarchy of centres that is resilient to anticipated future economic changes.
- The amended text should read as detailed in the previous consultation.

2.84 Councils' Position

- 2.85 Following consultation on the Pre-Submission Core Strategy the status of Barrack Road centre has been reviewed and it is proposed to maintain its designation as a 'Local Centre'. The 2008 Retail Study forms part of the evidence that has informed the Core Strategy town centre hierarchy. The 2012 Retail Study Update focused specifically on updating retail floorspace projections.
- 2.86 The NPPF does not provide a definition of a 'district centre'. The most up to date definition is contained within Annex B of PPS4; 'District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non retail services, such as banks, building societies and restaurants, as well as local facilities such as a library'.
- 2.87 In the case of Barrack Road, on balance we do not feel that this road operates as a 'District Centre'. It has a broad mix of shops but it is not a focus for shopping trips in the same way as Highcliffe, nor could we set out a meaningful vision for the road.
- 2.88 Retail frontages along Barrack Road as designated in the current adopted Local Plan (2001) will be retained which will protect its retail function to serve local needs.
- 2.89 Barrack Road is currently designated as a Local Centre and recent positive growth in trade and activity has been achieved in this context. On this basis, the future vitality and viability of Barrack Road will not be adversely affected through maintaining the current designation and as such is not contrary to the NPPF in terms of achieving sustainable growth.

Town Centres

5 - The Role of Town Centres (Policy KS7).

Pre-Submission

Policy KS7

Role of Town and District Centres

The Town and District Centres are to be the focal point of commercial, leisure and community activity. Their vitality and viability will be strongly supported. Town and District centre boundaries are identified in the area chapters of the Core Strategy, and these will be the focus for town centre uses, including employment, retail, leisure and entertainment, arts, culture, religion, health, tourism, places of assembly, community facilities and higher density housing.

A sequential assessment will be required for planning applications for main town centre uses that are not in an existing centre to ensure that all in-centre options have been thoroughly assessed before less central sites are considered. Where it has been demonstrated that there are no town centre sites to accommodate the proposed development, preference is given to edge of centre locations which are well connected to a centre by means of easy pedestrian access. The sequential assessment will be required for extensions to retail and leisure schemes of more than 200 square metres of gross additional floorspace.

An impact assessment is required for planning applications for main town centre uses not in a centre to assess the impact on town centre vitality and viability, town centre investment plans, and impact on allocated sites outside town centres. Impact assessments are required for applications for retail and leisure developments over 2,500 square metres gross floorspace.

Primary Shopping Areas are identified where retail development is to be focused. Within these, Primary and Secondary Shopping Cores are defined.

- 1. At ground floor level, support will be given within the Primary Shopping Cores for retail stores (Use Class A1), financial and professional services (Use Class A2), food and drink premises (Use Class A3), non-residential institutions (Use Class D1) and leisure uses (Use Class D2). Non retail uses (other than class A1) will not cumulatively amount to more than 30% of all ground floor units within the Primary Shopping Cores. Additionally, the proposal should not result in more than three continuous frontages being non-retail or leisure uses and shop frontage appearances should be retained.
- 2. In Secondary Shopping Cores the same uses will be supported as for Primary Shopping Cores along with drinking establishments (Use Class A4), hot food take-aways (Use Class (A5) and hotels (Use Class C1).

2.90 Consultation Response

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

Table 2.11

2.91 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
490823	Mr lan Jones	Ferndown Town Council	CSPS2974
654310	Mr Bryan Taylor	Savills Commercial Ltd	CSPS662
654989	Tanner & Tilley	Tanner & Tilley Planning Consultants	CSPS950
656498	Mr Matthew Morris	GVA Planning Development	CSPS2907
664634	Mr C Benham	Turley Associates	CSPS3832

2.92 Summary of Responses

2.93 The comments from key stakeholders and the general public in respect of this policy have been grouped together as follows:

2.94 General Comments

• Tanner and Tilley Planning Consultants - It is considered that some provision of an element of drinking establishments (Use Class A4) within Primary Shopping Cores can make a valuable contribution to the vitality and viability of those shopping cores and particularly contribute to keeping those

- areas active and attractive at night. The exclusion of an element of those uses from the Primary Shopping Core and their restriction to Secondary Core Areas only could create dead Primary Shopping Cores during the evening. The policy should be amended to account of this.
- GVA Planning Development on behalf of The Co-operative Group The Co-op urges both Councils to reconsider the minimum floorspace threshold for requiring impact assessments. A threshold of 2,500sq m gross is considered far too high and we consider that many retail developments under this floorspace level have the potential to cause significant adverse impacts on existing town centres across East Dorset and Christchurch. We recommend that a much lower threshold of 500sq m gross is set for Policy KS7. In addition to our suggested amendment to KS7 we also note the lack of a specific policy in the Pre-Submission document to deal with retail development proposals located outside of primary shopping areas. Whilst the general attitude of both Councils to maintaining and enhancing the health of town centres is not in doubt, we consider that the introduction of a single policy (or an extension to KS7) to deal with edge of centre and out of centre retail proposals is required. This should outline all of the impact criteria (including any 'local impact' criteria which the Councils will expect proposals to comply with, along with the flexibility which is required in connection with the sequential approach to site selection and also the retail impact assessment threshold (outline above).

2.95 Specific Comments relating to Christchurch

- Savills Commercial on behalf of Saxon Square Management Committee The land to the east of the River Avon at Bridge Street at present can only be described as 'Out of Centre' due to its distance from the existing retail core and the nature of the pedestrian journey. If this area to the east is now classified as Town Centre, the sequential test and impact assessment will no longer be required for any retail development in this area. Any retail development located in this eastern area will have negative impact upon the vitality and viability of the existing retail core. The area to the east of the River Avon is clearly not adjacent to the Primary Shopping Area as defined by PPS4. The southern end of the eastern Town Centre Boundary should be drawn along the line of the River Avon that runs under the bridge at Castle Street.
- Turley Associates on behalf of Dorset Development Partnership Policy KS7 sets out the sequential and impact tests as advocated by the National Planning Policy Framework (NPPF). Along with Policy CH1 the policy establishes a town centre boundary for Christchurch (for the first time) and provides strong support for the development of town centre uses to enhance the viability and vitality of the town centre. The policy is proactive and positively encourages development within Christchurch town centre.

2.96 Specific Comments relating to East Dorset

• Ferndown Town Council - The key facts refer to a catchment population of 28,000 but there is a lack of evidence on this point. The Town Council is unable to comment at this time until work has been done and progressed on the Development Plan Document.

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

2.98 Policy KS7 of the emerging Core Strategy indicates that within the primary shopping cores, non-A1 uses should not cumulatively amount to more than 30% of ground floor units. The Retail Update (2012) by NLP supports this stance. Based on the current proportions of non-A1 use within the designated centres and a comparison with Goad information for town centres across the Country, the proposed 30% threshold for primary shopping frontages should provide some flexibility for changes of use and is not considered to be overly restrictive. No change to the proposed threshold is recommended.

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- 2.99 The NPPF indicates that impact assessments should normally only be necessary for developments outside their town centres of over 2,500 sq m gross. Following the NLP Retail Update (2012), this threshold is considered inappropriate within Christchurch and East Dorset because this scale of development would represent a significant proportion of the overall retail floorspace projections in the authority area. Development smaller than 2,500 sq m gross could have a significant adverse impact particularly on the smaller town centres. Based on the retail floorspace projections and the network of centres, a threshold of 1,000 sq m gross is recommended for retail development within Christchurch, Ferndown or Wimborne and a 500 sq m gross threshold for other parts of the authority area. The NPPF no longer advocates a sequential assessment for extensions to out of centre retail or leisure uses over 200 sq m gross. The policy will be altered to reflect this.
- 2.100 The NPPF offers guidance on the impact of development outside the town centres and sequential test assessment criteria to determine the likely impact on the town centre. The policy will be updated to reflect this change in the policy.
- 2.101 The changes advocated in the NPPF recommend the extent of town centres and primary shopping areas are defined, based on a clear definition of primary and secondary frontages in designated centres, with associated policies setting out the clear uses permitted in these locations. The terms 'Primary and Secondary Shopping Cores' will therefore be removed from the policy, and replaced with 'Primary and Secondary Shopping Frontages' as appropriate.
- 2.102 The provision of markets, the support of new, and the retention of existing markets to ensure they remain attractive and competitive is advocated by the NPPF. Where town centres are in decline, we should plan positively for their future to encourage economic activity. This is reflected in the policy wording below.
- 2.103 The Core Strategy is clear that in Christchurch the sequential approach for retail proposals will be applied in relation to the primary shopping area. In this respect, proposals for retail development beyond 300m from the PSA will be 'out of centre'.

Proposed Changes to the Pre-Submission Core Strategy

Policy KS7

Role of Town and District Centres

The Town and District Centres are to be the focal point of commercial, leisure and community activity. Their vitality and viability will be strongly supported. Town and District centre boundaries are identified in the area chapters of the Core Strategy, and these will be the focus for town centre uses, including employment, retail, leisure and entertainment, arts, culture, religion, health, tourism, places of assembly, community facilities and higher density housing. **Existing markets will be retained and enhanced, where appropriate, and new ones created or re-introduced, to ensure they remain attractive and competitive. Town Centres in decline will be planned positively to encourage economic growth.**

A sequential assessment will be required for planning applications for main town centre uses that are not in an existing centre to ensure that all in-centre options have been thoroughly assessed before less central sites are considered. Where it has been demonstrated that there are no town centre sites to accommodate the proposed development, preference is given to edge of centre locations which are well connected to a centre by means of easy pedestrian access. The sequential assessment will be required for extensions to retail and leisure schemes of more than 200 square metres of gross additional floorspace.

An impact assessment is required for planning applications for main town centre uses not in a centre to assess the impact on town centre vitality and viability, town centre investment plans, and impact on allocated sites outside town centres. Impact assessments are required for applications for retail and leisure-developments over 2,5001,000 square metres gross floorspace within Christchurch, Ferndown or Wimborne and a 500 sq m gross threshold for other parts of the authority area. This should include assessment of:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal;
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it will be refused.

Primary Shopping Areas are identified where retail development is to be focused. Within these, Primary and Secondary Shopping <u>Gores-Frontages</u> are defined.

- 1. At ground floor level, support will be given within the Primary Shopping <u>Cores Frontages for retail stores</u> (Use Class A1), financial and professional services (Use Class A2), food and drink premises (Use Class A3), non-residential institutions (Use Class D1) and leisure uses (Use Class D2). Non retail uses (other than class A1) will not cumulatively amount to more than 30% of all ground floor units within the Primary Shopping <u>Cores Frontages</u>. Additionally, the proposal should not result in more than three continuous frontages being non-retail or leisure uses and shop frontage appearances should be retained.
- 2. In Secondary Shopping <u>Gores-Frontages</u> the same uses will be supported as for Primary Shopping <u>Gores-Frontages</u> along with drinking establishments (Use Class A4), hot food take-aways (Use Class (A5) and hotels (Use Class C1).

2.104 Consultation Response Table

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

Table 2.12

2.105 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
523627	David Lowin	WYG Planning & Design	PCCS503
642224	Mr T Atkinson	Director Christchurch Chamber of Trade & Commerce	PCCS73

2.106 Summary of Responses

2.107 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:

2.108 Retail Study Update

2.109 Christchurch Chamber of Trade

• We still do not consider the statements regarding the town centre to be based on up to date evidence or, in the case of the recent Retail Update, on reasonable predictions of future economic growth. This unrealistic approach to consultation will lead to poor planning decisions and will jeopardise the economic potential of the area.

2.110 Impact Assessment Threshold

2.111 Christchurch Chamber of Trade

We object to the change from 2500 square metres to 1000 square metres - this was based on the recent Retail Update recommendation that was
formed by opinion not evidence. This is a significant change from the universally accepted 2500 square metres threshold, based on a single
unchallenged opinion of one group of consultants. We cannot see how this will encourage economic progress.

2.112 David Lowin, White Young Green

Further clarification is needed regarding the proposed lower threshold set for retail developments outside defined centres. The National Planning Policy Framework requires Local Authorities to set their own 'proportionate' thresholds. However, given the default threshold in the NPPF is 2,500 sq m and it is proposed to set the threshold significantly below this, the Council have not justified how or why the threshold has been set at 1000 sq m. The Joint Retail Study Update (2012) does not provide any evidence or explanation as to how this threshold has been decided.

2.113 Non A1 Threshold

- Christchurch Chamber of Trade
 - In terms of the balance of class A1 and A3 retail uses, the report comes to an illogical conclusion by stating clearly that even though the ratio is already at nearly 32% in Christchurch that to adopt a figure of 30% would not be 'overly restrictive'. This cannot be considered as objective planning. Accordingly, we do not consider that the findings of the Retail Update 2012 form a sound or objective platform as the basis of updating the emerging Core Strategy.

2.114 Councils' Position

- 2.115 The Core Strategy has been informed by up to date and professionally produced retail studies that have applied nationally established methodology that have used up to date data for establishing projected growth. The Retail Study Update was published in 2012.
- 2.116 Paragraph 26 of the NPPF states that, 'When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up to date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is not a locally set threshold, the default threshold is 2,500sqm)..........'
- 2.117 Paragraphs 5.18 and 5.19 of the Retail Study Update (2012) examines the evidence and reasoning for the proposed local threshold. The 2012 Retail Study has advised on a proportionate local threshold for retail impact assessments that is appropriate for local circumstances, established in view of the vitality and viability of Christchurch town centre and based on clear evidence. The proposed Core Strategy impact assessment threshold is based on an assessment of the hierarchy of centres and the retail floorspace projections in the 2012 Retail Study which concludes that retail developments of

over 1,000sqm gross should generally be accommodated in Christchurch, Ferndown and Wimborne town centres. The Retail Study concludes that a threshold of 2,500sqm would be inappropriate because this would represent a significant proportion of the overall retail floorspace projections in the area. The Study concludes that development of less than 2,500sqm gross could have a significant adverse impact on the smaller town centres.

2.118 As stated in the 2012 Retail Study Report, the primary shopping frontages should have a lower proportion of non A1 use than within the secondary shopping frontages. As of December 2012 the percentage of non A1 units in the Christchurch town centre primary shopping frontage is 27% which provides some flexibility for change of use. The proportions of Non A1 units referred to in the 2012 Retail Study update refer to the town centre as a whole.

3 Christchurch Analysis of Responses

Town Centres

6 - Christchurch Town Centre Vision (Policy CH1).

Pre-Submission

Christchurch Town Centre Vision

Christchurch will continue to act as the key town centre in the Borough and will be the main focus for retail development. The Town Centre sits at the top of the Christchurch town centre hierarchy (Policy KS6), is well served by public transport and has the most development opportunities. The retail offer will be enhanced and the shopping environment improved to provide a more pleasant and pedestrian friendly townscape. Improvements in public transport services will be supported in conjunction with localised infrastructure improvements. Essential services and facilities will also be enhanced within the centre serving residents and local visitors to the town.

To achieve this vision:

- 1. Retail uses will be expanded and enhanced to promote the vitality and viability of the centre. The Town Centre will accommodate in the region of 8,000sqm of new comparison retail floorspace to meet future requirements to 2028. The strategy will seek to enhance the retail offer and improve the presence of national multiples to provide for better choice in comparison shopping. The regeneration of the Saxon Square Shopping Centre will attract national multiples whilst independent retail shops will continue to thrive on the High Street.
- 2. Residents of the Borough will continue to have access to a variety of community services and cultural facilities; important town centre uses (such as the Regent Centre, the Central Library) will be retained and where possible enhanced. There is a need to expand the health and fitness offer in the town centre.
- 3. Expansion of evening economy uses such as restaurants/cafés/pubs will be encouraged especially along Church Street. This will enhance the vitality of the centre, making it a more vibrant place in the afternoon and evening hours.

- 4. The following sites have been identified as strategic sites that will play a pivotal role in delivering the Town Centre Vision and Key Strategy.
- The Magistrates' Court Site.
- Saxon Square.
- The Lanes.
- Land between Bridge Street, Stony Lane South and the Civic Offices.
- Stony Lane.

Land between Bridge Street, Stony Lane South and the Civic Offices and Stony Lane is located 'out of centre' and within an area of high flood risk. Town centre uses including employment, retail, leisure and entertainment, offices, arts and culture and tourism may be appropriate in these locations subject to compliance with other policy. In particular, development in these locations should not adversely affect the vitality and viability of the town centre and should comply with flood risk policy.

The strategic sites set out above will be brought forward in accordance with site specific allocations and further detail will be set out in a Site Allocations Development Plan Document. The Site Allocations DPD will also set out how flood risk will be managed for these strategic sites.

- 5. Druitt Gardens will be enhanced to provide an attractive area of open space within the Town Centre. This will benefit tourism and contribute to the promotion of healthy lifestyles by providing high quality open space. Developer contributions will be obtained for the purpose of enhancing community facilities in the Town Centre.
- 6. High density residential development will take place alongside the projected requirement for retail to provide a balanced, mixed use environment in areas outside those affected by high flood risk.
- 7. The Town Centre will seek to accommodate new office development which complements the overall retail strategy and the vitality and viability of neighbouring centres.
- 8. Townscape quality will be enhanced by sensitive development and improvements incorporating Saxon Square will be refurbished so it relates more appropriately with the historic core of the High Street, and provides for a more attractive shopping environment and provision of units more attractive to retailers. The redevelopment of the Lanes, comprising the area between Sopers Lane and Wick Lane, will provide an opportunity for environmental enhancements by encouraging mixed used development, including residential, retail and community uses. Improvements to the linkage between the High Street and Bargates will be promoted in an effort to increase the flow of pedestrians between the shopping areas.

- 9. To minimise congestion and air pollution, the use of sustainable modes of transport will be encouraged. Christchurch Town Centre benefits from a comprehensive public transport network providing links both within the Borough and its surrounding areas via bus and rail services.
- 10. The Council will ensure that adequate parking levels are maintained within the Town Centre so as not to adversely affect vitality and viability.

More effective management of car parks will reduce pressure on 'core' car parks. A strategic signing strategy will also assist in making the best use of town centre car parks and in reducing congestion.

3.1 Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No
				Positively Prepared		Justified		Effective		Consistent with National Policy		Indication of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
10	4	5	29	5	3	9	19	7	18	4	19	21

Table 3.1

3.2 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359478	Mr Rohan Torkildsen	English Heritage	CSPS2734
360149	Mr John Urquhart		CSPS83
360509	Miss Rose Freeman	The Theatres Trust	CSPS359
360509	Miss Rose Freeman	The Theatres Trust	CSPS3477
510796	Mr Rollo Reid		CSPS2714
642224	Mr T Atkinson	Christchurch Chamber of Trade & Commerce	CSPS258
647876	Mr Christopher Whitcher		CSPS119

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
647898	Mr Derek Beasley		CSPS110
650644	Mrs C M Williams		CSPS336
653603	Mr Malcolm Edmund Parsons		CSPS575
653852	Mrs Susan Newman-Crane		CSPS589
654026	Ms Bev Miller		CSPS611
654456	Mr Elliot Marx		CSPS959
654660	Ms Anne Mason	Transition Town Christchurch	CSPS940
654704	Mrs J E John		CSPS1049
654775	Mr David Monks		CSPS1012
654775	Mr David Monks		CSPS3474
654989	Tanner & Tilley	Tanner & Tilley Planning Consultants	CSPS953
655432	Mr Andy Davies		CSPS1018
655526	Mr Paul Morrison		CSPS1033
656369	Mr Timothy Peter Cook	John Reid and Sons (Strucsteel) Ltd	CSPS2760
656498	Mr Matthew Morris	GVA Planning Development	CSPS2921
656542	Mrs Deidre Harding		CSPS2834
656567	Mr Michael D Chappell		CSPS2854
656664	Mr Glen Morrison		CSPS2454
662668	Mr & Mrs A Atkins		CSPS3396
663588	Mr Roger Street	Christchurch Conservation Trust	CSPS3743
664634	Mr C Benham	Turley Associates	CSPS3842

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID	
670146	Mr Peter Williams	Amicitia Partnership	CSPS3977	

Summary of Responses

3.3 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:

3.4 General Comments

- Christchurch Chamber of Trade and Commerce (CCTC) Incomplete. Not creative; not plan led; not based on joint working (NPPF para 23). Poor design (NPPF para 64). Not based on adequate, up-to-date and relevant evidence (NPPF para 158). Does not take full account of the market and economic signals (NPPF para 158). No reasonable prospect that the policy will be deliverable in a timely fashion (NPPF para 177). Planning authority has not worked with business community (NPPF para 160)
- CCTC Incomplete. New requirement of the NPPF there is no mention of improving the communications infrastructure in the town.
- The Theatres Trust Pleased that Regent Centre is acknowledged in Policy CH1.
- GVA Planning on behalf of The Co-op Support Vision and 10 strategies. Provides a strong and realistic vision for the Town Centre and contains a number of elements which will improve its health.
- Support the reference to the town centre being the 'main focus for retail development'.
- CCTC Paragraph 5.4 Key Facts: Environment Bullet 1 inaccurate. Confusion over use of term "town centre". It has a formal definition in terms
 of boundary yet is used as a general term as well. Question why Fairmile here as it is not in the town centre. Include Bargates rather than Barrack
 Road.
- Transition Town Christchurch Paragraph 5.4 Key Facts: Environment Bullet 4 should add the following words "but restoration of habitat bio-diversity is needed after the recent clearance of shrub understory and loss of insect-rich habitat."
- Paragraph 5.5 CCTC Suggest re wording to correct references to shop names.
- CCTC Paragraph 5.6 Inaccurate. The level of supermarket expenditure outflow to stores in Bournemouth is not 'reasonable'. Replace 'reasonable' with 'significant'.
- CCTC Paragraph 5.7 Disagree that retail offer is perceived as in need of enhancement. Christchurch does not need to be full of multi nationals. Suggest better to encourage more small independent businesses. In line 4 remove "Perceived as" before "in need of enhancement".
- CCTC Paragraph 5.8 Remove the statement "the Bargates area of the town is much weaker". This is not a factual statement. Bargates is just as viable as the rest of the town.
- CCTC Paragraph 5.8 Bullet 3 no evidence to support assertion that independent shops in the High Street may not be replaced. Vacant units in the High Street tend to get filled more quickly. There are some longer term vacant units in Saxon Square and Wick Lane, but there are good reasons for this.

- CCTC Paragraph 5.9 Incomplete. Add 'and to meet the needs of inbound tourism'.
- CCTC Paragraph 5.16 the Chamber of Trade should read "Christchurch Chamber of Trade and Commerce".

3.5 Additional Floorspace

- CCTC Need for additional floorspace based on out of date evidence and national planning policy. Not taken account of post economic 2008 situation, impact of new shopping patterns or new thinking on town centres. It is therefore not a reliable prediction of the need for retail floorspace. Paragraph 5.10 Statement about no need for more supermarkets is not supported by current events in Christchurch. Suggest detailed rewording which includes statement that there is no clear requirement for additional comparative goods retail capacity in the Town Centre for the foreseeable future, but this is subject to variation with the state of the economy and the housing situation.
- Amicitia Partnership Challenge the need for additional comparison retail capacity in the town centre. Retail policies in town centre not coming to
 fruition. This proves that developers believe there isn't a demand for additional retail capacity in the town centre, particularly in secondary locations.
 Number of vacant units has increased. If the core strategy includes a requirement for additional capacity of comparison floorspace in the town
 centre, this will continue to inhibit development opportunities and adversely impact the town's vitality and sustainability.
- Disagree with need for 8,000 sq m of additional floorspace to 2028. Question why there is a need for yet more shops. This requirement needs explaining.
- CCTC Statement about regeneration of Saxon Square attracting national multiples is not supported by evidence or an agreed plan. The only way to attract national multiples to Saxon Square is to provide much larger units. There is little prospect of this happening.
- Retail development is priority to raise town centre's tired feel. Need to address key reasons why shops have had to close. Need to get to the core
 of today's problems before adding to them.
- Christchurch is swamped with coffee and tea outlets. Other business needs to be attracted We do not need any more food superstores.
- Empty units need to be utilised and more catering outlets provided for tourists and locals.

3.6 Community Facilities and Druitt Hall

- Too vague "a variety of community services and cultural facilities". Such as a town centre community hall?
- A town centre community hall has an important use and should be retained. Should be refurbishment of Druitt Hall or new modest sized community hall built on that site. Continuity of a community hall on this site will add to the vibrancy of the High Street.
- Transition Town Christchurch To "important town centre uses such as the Regent Centre, the Central library" add "Town centre community hall"

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- If there are to be more houses in the town centre, it is essential that there is also a community hall. Druitt Hall should be retained until there is sufficient money for a new hall.
- Christchurch Conservation Trust Re developer contributions to enhance community facilities in town centre request that these facilities be in
 place before Druitt Hall is demolished. The existing Druitt Hall should be retained as there are no funds to build a new community hall. Request
 that proposed demolition be lifted.
- Christchurch Conservation Trust Request a clear statement and commitment in the Town Centre Vision for a new community centre to replace Druitt Hall.

3.7 Evening Economy

- CCTC The vision of Church Street as an enclave of restaurants and cafes is undesirable. We would wish to see a mixed solution or retail and services to draw customers widely across the town centre. This document should reflect how we want it to be, not how it has happened to become.
- Tanner & Tilley Planning Consultants -The expansion of evening economy uses should not be restricted to the Secondary Shopping Core but can also play an important role in enhancing the vitality of the Primary Shopping Core such as Saxon Square, making it a more vibrant place in the evening hours. Suggest first sentence amended as follows:- "Expansion of evening economy uses such as restaurants/cafes/pubs will be encouraged especially along Church Street, the High Street and in Saxon Square".

3.8 Strategic Sites

- CCTC Stony Lane not well connected to the town centre. Stony Lane should be relegated to / kept as an out of centre area, as retail developments
 there will jeopardise the real town centre. There is no need to expand the town centre to include Stony Lane as any potential retail growth can be
 accommodated in the existing centre.
- CCTC Need to correct definitions. The land between Bridge Street, Stony Lane South and the Civic Offices is 'out of centre' for retail purposes (it is not well connected) but 'edge of centre' for other main town centre uses (leisure, entertainment, offices, arts, culture and tourism). The land bordering Stony Lane from the intersection with Bridge Street to the A35 roundabout is 'out of centre' (it has no main town centre uses).
- CCTC Paragraph 5.16 Incorrect terminology. Incomplete. As stated in Policy CH1, Stony Lane and land between Bridge Street, Stony Lane South and the Civic Offices are 'out of centre' and are not well connected to the town centre (NNPF para 24). Re-word para 5.16 to say "Delivery of Including the Magistrates Court site, Saxon Square, the Lanes and the out of centre sites at Stony Lane and land between....

- CCTC No mention of plans for a large supermarket to be built on the Magistrates Court site. Conflicts with para 5.14 which states that "the 2008 Retail Study suggests that the town centre does not have a requirement for new supermarkets". The 2003 Planning Brief states that the Council would not support proposals for a single food retail use on this site. A clear policy statement should be made with respect to any new supermarket on the Magistrates Court Site. Object to supermarket on this site. The Magistrates Court site must be confirmed, in accordance with the Planning Brief, as a site where a supermarket would not be permitted
- Turley Associates on behalf Dorset Development Partnership Ltd DDP -Support allocation of Magistrates Court Site as a strategic site. This site presents a unique opportunity to enhance the retail offer of the town centre and improve its vitality and viability. Its identification in Policy CH1 is therefore considered sound.
- Too vague. What role will these sites play and what uses?
- The Beagle site is an excellent site for affordable housing.

3.9 Office development

• CCTC - Replace with "There will be an emphasis on the promotion and provision of office space (other than Class A2) within the Town Centre and neighbouring Districts. There is a requirement for additional ground floor offices and light industrial premises (Class B1) in and around the Town Centre to provide greater opportunity for new small business units and employment, and footfall into and around the Town Centre".

3.10 Transport, Traffic and Parking

- CCTC Does not respond to local circumstances (NPPF para 10). Policy does not reduce greenhouse gas emissions (NPPF para 30). Does not incorporate charging facilities for low emission vehicles (NPPF para 35). Sites for future bypass not identified and protected (NPPF para 41). Suggests detailed re-wording of policy.
- CCTC Suggests that CBC conduct studies on the viability and options for a rural link road through traffic away from the town centre and the necessary consultation, public inquiries and potential funding options.
- Town centre often gridlocked for want of a real by pass. A new road must be built linking the A35 north of the railway and Roeshot Hill to Hurn village roundabout and on to the Airport.
- Unless the traffic situation is sorted out, no-one will want to attempt to or make it into the town centre.
- To be effective there will need to be adequate car parking. Bear in mind the planned additional housing and new economic vision.

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- The vision will depend on putting right or improving areas which are already difficult, congested or dangerous. Existing problems should be tackled first. Eg need pedestrian link between Druitt Gardens and Sopers Lane car park.
- CCTC -Does not seek to improve the quality of parking in the town centre (NPPF para 40). The statement on car parks needs to be more ambitious eg "Car Parks in and around the town centre are too widely dispersed for efficient traffic management –the Council will review the car parking offering to make it more attractive to customers and to realise the full potential of these assets".
- Paragraph 10 No need to refer to strategic signing strategy in last sentence as this has been implemented.

3.11 Townscape Quality

Too vague. How will improved links between High Street and Bargates be achieved?

3.12 Employment

• CCTC - Does not improve conditions for or create jobs (NPPF para 9). No policy for expansion of knowledge driven / creative industries (NPPF para 21). Does not promote competitive town centres (NPPF para 23). Does not take full account of the market and economic signals (NPPF para 158). Office accommodation should be stressed as an opportunity and key strategic aim. Not appropriate to say 'not a strong market for offices' as it has never been promoted. Suggest add words "There may be a requirement for additional ground floor offices and light industrial premises in and around the Town Centre, to provide greater opportunity for new small business units and employment (especially for knowledge based industries and crafts) and attract footfall into the Town Centre".

3.13 Floodrisk

- DCC Paragraph 5.4 Key Facts: Environment Bullet 6 Reference to zone 3a should be zone 3. Add to this "There are also areas of local flood risk (Dorset Surface Water Management Plan July 2011) to ensure that it reflects the County Council's responsibilities in respect of flood risk management.
- Christchurch Conservation Trust Paragraph 5.4 Key Facts: Environtment Bullet 6 Request that appropriate technical qualification attached to the
 statement that parts of the town centre are affected by high flood risk to avoid many houses in central Christchurch being blighted because of
 inability to obtain flood risk insurance, or mortgages to purchase property.

Councils' Response

3.14 General Comments

- 3.15 It is maintained that the Core Strategy conforms to the core planning principles set out in paragraph 17 of the NPPF which advises that there should be "succinct local plans setting out a positive vision for the future of the area". Policy CH1 sets out a vision for Christchurch town centre and identifies strategic sites for redevelopment which will play an important role in delivering the vision. It is consistent with paragraph 21 of the NPPF which refers to the need to identify strategic sites to meet anticipated needs over the plan period.
- 3.16 Christchurch BC and East Dorset DC are working in partnership to prepare and deliver a Core Strategy. This is being informed by evidence of which a significant amount has been prepared jointly with other Councils eg the Joint Retail Study 2008 and the Christchurch and East Dorset Retail Study Update 2012.
- 3.17 Under the Localism Act there is a Duty to Co-operate to ensure that local authorities and other bodies have proper regard to strategic and cross-boundary issues.
- **3.18** Paragraph 8 of CH1 addresses design issues, in particular townscape quality. There is also a generic design Policy HE2 which sets out criteria for the design of new development.
- 3.19 Retail policy has been informed by evidence in a Joint Retail Assessment (2008) prepared by NLP which identifies future requirements for retail development in Christchurch and East Dorset. NLP have been commissioned to undertake an update of the 2008 study taking into account recent national policy changes, changes in the economy and trends in retail planning. This 2012 update has informed the proposed changes to retail policies. Thus the evidence is up-to-date, relevant and has taken into account market and economic signals.
- 3.20 Paragraph 177 of the NPPF states that it is important that there is a reasonable prospect that planned infrastructure is delivered in a timely fashion and recommends that infrastructure and development policies should be planned at the same time in the Local Plan. The Infrastructure Delivery Plan sits alongside the Core Strategy and gives information on the range of infrastructure which is to be delivered to support the policies and growth set out in the Core Strategy. Delivery of the vision and retail strategy for the town centre will involve the Council working with landowners, stakeholders and other local organisations to bring forward key strategic sites. This is explained in paragraph 5.16 of the Core Strategy.
- 3.21 Throughout the development of the Core Strategy, the planning authority has consulted with the business community on the key issues to be addressed in relation to Christchurch and Highcliffe Town Centres. A Christchurch and Highcliffe Centres Focus Group was held on 6 December 2010 which was attended by members of the business community. This meeting provided an opportunity for the business community to hear about and discuss Christchurch and Highcliffe Town Centre issues set out in the Options for Consideration document. A Core Strategy Pre-Submission Consultation meeting was held with representatives of Christchurch businesses on 19 June 2012. This sought views on the soundness of the Pre-Submission Core Strategy's draft retail policies.
- 3.22 The vital role that the development of high speed broadband technology and other communications networks plays in enhancing the provision of local community facilities and services is highlighted in paragraph 42 of the NPPF. A new policy addressing issues concerning the electronic communications network is proposed in Chapter 16: Creating Prosperous Communities. This sets out criteria for considering applications from licensed telecommunications operators including the provision of high speed broadband networks.

3.23 Additional Floorspace

- 3.24 Paragraph 23 of the NPPF states that "LPA's should allocate a range of suitable sites to meet the scale and type of retail development needed in town centres. It is important that needs for retail are met in full and not compromised by limited site availability."
- 3.25 NLP have been commissioned to undertake an update of the 2008 Joint Retail study taking into account recent national policy changes, changes in the economy and trends in retail planning. The 2012 Joint Retail Study Update report reviews the capacity for Christchurch to accommodate growth. The assessment suggests that there is scope for new retail development in Christchurch. There is limited capacity for food store development in the short term (up to 2018). There could be scope for a large food store in Christchurch in the longer term up to 2,300sqm by 2028. The comparison goods floorspace projections indicate capacity for around 8,100 sq m of additional floorspace across the Borough by 2028. There is therefore a need to amend paragraph 1 of Policy CH1 to reflect updated retail floorspace requirements.
- 3.26 It is recognised that the economic downturn has had a significant impact on the retail sector. The 2012 Retail Study Update in projecting expenditure levels takes into account the economic down turn, particularly in the short term. Trends in population growth, home shopping / internet sales and growth in turnover efficiency have been carefully considered. The study takes long term view for the LDF period, recognising the cyclical nature of expenditure growth.
- 3.27 The 2012 Retail Study Update highlighted the trend for High Street national comparison multiples to seek large shop units (over 200sq m). It concluded that this trend will influence future requirements for Christchurch with smaller vacant units becoming less attractive for new occupiers. Demand from multiples within the town centre is likely to be weaker as many prefer to locate in larger centres. In view of this it would seem that paragraph 8 of Policy CH1 should be amended to delete reference to Saxon Square attracting national multiples.
- 3.28 In response to the comment about Christchurch being swamped with coffee and tea outlets, the 2012 study indicates that there has been a national increase in the proportion of A3 A5 uses, which may continue in the future, and will compete for shop premises with other uses. The study concludes that it may be reasonable to assume that there will be scope for a further 25% floorspace in all centres over and above the comparison floorspace projections that can be occupied by Class A2 A5 uses and Class A1 non-retail services. Looking more specifically at A3 A5 uses, the study concludes that the proportions of A3/A4/A5 uses within Christchurch and Highcliffe are within the range one would anticipate for centres of their size. It may be reasonable to assume that there will be scope for a further 15% floorspace that can be occupied by Class A3 to A5 uses.

3.29 Community Facilities, Druitt Hall and Gardens

3.30 It is not considered appropriate to refer to a town centre community hall in this paragraph in view of the uncertainty of a specific proposal in this location. Reference to the need for community facilities in the town centre should be retained.

3.31 Evening Economy

- 3.32 The vision of Church Street as an evening economy enclave is not undesirable. Designating Church Street as a secondary shopping core as proposed in Policy CH3 allows for more flexibility in an area which has become hub for the evening economy. This was also recommended in the 2008 Retail Study. This would have a positive impact on the town centre as a whole, ensuring that the centre remains vibrant in the afternoon and evening.
- 3.33 However it is not considered appropriate to amend the policy to refer to the encouragement of evening economy uses along High Street and Saxon Square. It is important to retain a sufficient proportion of A1 uses within the primary shopping frontage Saxon Square and the High Street as set out in Policy CH6. The 2012 Retail Study update still identifies a need to provide significant additional comparison floorspace within use class A1 during the plan period. It would be inappropriate to put forward a policy which encourages the further loss of A1 retail floorspace to evening economy uses.

3.34 Stony Lane and Land between Bridge Street /Stony Lane South /Civic Offices

- 3.35 The two strategic sites are referred to as "out of centre" but it could be clarified that they are "out of centre for retail purposes" taking into account definitions in Annex 2 of the NPPF.
- 3.36 Including Stony Lane as a strategic site within the town centre boundary could assist in the regeneration of this wider area. The policy wording will clarify that it is an out of centre site for retail purposes as defined in NPPF, so any proposals for retail development will be subject to town centre impact and other policy considerations.
- 3.37 The findings in the 2008 Retail Study have been superseded by the 2012 Retail Study Update which concluded that there could be scope for a large food store in Christchurch in the longer term up to 2,300sqm by 2028. The Magistrates Court site is a sequentially preferred site for convenience floorspace in view of its town centre location. The 2012 evidence strengthens the suitability of this site to have a convenience store as part of a mixed use scheme. The Council is working closely with landowners on developing options for this site.
- 3.38 In response to the comment on it being too vague, the strategic sites will be brought forward in accordance with site specific allocation and further detail will be set out in a Site Allocations Development Plan Document.

3.39 Office Development

3.40 The Christchurch and East Dorset Employment Land Review indicated that there is not a strong market for offices in Christchurch town centre. The main market for office development is located in Bournemouth and Poole, although the Airport North West Business Park is likely to accommodate a significant element of future office development. It is considered that the existing wording as set out in paragraph 7 is appropriate, as it conveys that limited office development in the town centre should continue, although there is a need to consider the impact on neighbouring centres.

3.41 Transport, Traffic and Parking

- 3.42 Improved links between High Street and Bargates is an important objective. Measures to produce a more pedestrian friendly environment around the Fountain roundabout will be an important element of the design of a highways improvement scheme to Fountain Roundabout (KS 10). Measures to improve pedestrian /vehicular conflict are identified in the Town Centre Strategy (2003), the Parking Access and Signage Strategy (2006) and Joint Retail Assessment (2008).
- 3.43 The Christchurch Bypass will not be included in the Core Strategy transport policies. The South East Dorset Multi Modal Transport Study has not recommended a Christchurch Bypass as part of the future transport strategy for South East Dorset, so it does not appear in the adopted Local Transport Plan (LTP3), and therefore not delivered before 2028. Alternative transport improvements are being pursued instead. There is a risk that by including undeliverable road schemes within Core Strategy policies, the plan could be found unsound against the tests of soundness (National Planning Policy Framework, para 182) at examination.
- 3.44 Paragraph 9 of Policy CH1 does refer to the encouragement of sustainable modes of transport. The suggested changes refer to detail that is not appropriate to include within this policy. Policy KS9 sets out proposals for sustainable transport which support development proposed in the Core Strategy.
- 3.45 The existing paragraphs set out the intention to ensure adequate levels of parking and more effective management of car parking so the intention to improve the quality of the parking is inferred. The reference to the signing strategy should be retained as it is an important element of car park management.

3.46 Employment

3.47 This issue has already been considered in developing an employment site hierarchy as set out in Policy PC1. Evidence from the Christchurch and East Dorset Employment Land Review indicated that there is not a strong market for offices in Christchurch town centre. There may be opportunities for office uses as part of mixed uses in the town centre strategic sites identified in Policy CH1.

3.48 Flood Risk

- 3.49 It is correct to refer to zone 3a as this refers to the category of flood risk identified in the Strategic Flood Risk Analysis 2009. The words suggested by DCC can be inserted at the end of this bullet point.
- 3.50 It is considered sufficient to refer to the source of evidence as being the SFRA Report 2009. Anyone seeking further information can examine the report itself.

Proposed Changes to the Pre-Submission Core Strategy

- **3.51 Paragraph 5.4 Key Facts Environment** Last Bullet Point.
- 3.52 Additional informative words at the end of the last bullet point in response to DCC's comment.

- 3.53 Part of the town centre including Stour Road, Wick Lane and Bridge Street is affected by high flood risk (zone 3a) (Christchurch Strategic Flood Risk Assessment 2009) There are also areas of local flood risk (Dorset Surface Water Management Plan July 2011)
- 3.54 Paragraph 5.4 Key Facts Strategic Requirements
- 3.55 Amend first bullet point to take into account the Retail Study Update (2012) which supercedes projections in the 2008 study.
- There is a need for in the region of <u>7,5008,000</u> sqm net of additional comparison retail floorspace to <u>203128</u> in Christchurch town centre <u>(Christchurch</u> and East Dorset Retail Update (2012).(Joint Retail Study, 2008)
- **3.56** Amend second bullet point to correct text.
- 3.57 The Christchurch Strategic Housing Land Availability Assessment (2011) identifies potential for 251 new dwellings in the town centre by 2028.
- 3.58 Paragraph 5.5
- 3.59 Amend references to shop names in response to CCTC's comment
- 3.60 In second sentence Marks and Spencer Simply Food Marks and Spencer (Food) and The Co-operative Food Co-Op
- 3.61 Paragraph 5.10
- 3.62 Amend text to take account of the Retail Study Update (2012) which supersedes projections contained in the 2008 study:-
- The 201208 Retail Study update suggests that there is a projected requirement for Christchurch town centre to accommodate in the region of 2,300sqm net additional convenience floorspace to 2031. does not have a requirement for new supermarkets, but requires new non food retail outlets to meet the needs of a growing population and to enhance its position as a shopping destination within South East Dorset. In Christchurch there is also a requirement for around 8,000sqm net additional 9,000sqm of comparison retail floorspace over this period.over the next 15 years. There is a need for in the region of 8,000sqm of additional non food retail floorspace in Christchurch town centre specifically. The centre has a limited but adequate selection of commercial, leisure, entertainment and cultural facilities, but there is good access to other facilities outside of the Borough in Bournemouth and Poole. There is scope to improve provision of health and fitness facilities and appropriately located restaurants and bars which can enhance the economic vitality of the centre, in addition to the requirement for new retail floorspace.
- 3.64 Paragraph 5.16
- **3.65** Correct reference to CCTC in response to CCTC's comment.
- 3.66 In second sentence Christchurch Chamber of Trade and Commerce Chamber of Trade.
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3.67 Policy CH1 to be amended as set out below:-

Christchurch Town Centre Vision

Christchurch will continue to act as the key town centre in the Borough and will be the main focus for retail development. Future growth and development will be based around promoting the town centre as a place to shop, participate in leisure activities, enjoy culture, access key services, and enjoy good food and drink. The attractive and historic environment of Christchurch town centre will contribute to its future vitality and viability whilst creating a vibrant multi-functional centre serving the needs of the local community and visitors alike.

The Town Centre sits at the top of the Christchurch town centre hierarchy (Policy KS6), is well served by public transport and has the most development opportunities. The retail offer will be enhanced and the shopping environment improved to provide a more pleasant and pedestrian friendly townscape. Improvements in public transport services will be supported in conjunction with localised infrastructure improvements. Essential services and facilities will also be enhanced within the centre serving residents and local visitors to the town.

To achieve this vision:

- 1. Retail uses will be expanded and enhanced to promote the vitality and viability of the centre. The Town Centre will accommodate in the region of 8,000sqm of new comparison retail floorspace to meet future requirements to 2028. The Town Centre will accommodate in the region of 7,500 sq m (net) of new comparison retail floorspace and 2,300 sq m (net) of convenience floorspace to meet future requirements to 2028. The strategy will seek to enhance the retail offer and improve the presence of national multiples to provide for better choice in comparison shopping. The regeneration of the Saxon Square Shopping Centre will attract national multiples whilst independent retail shops will continue to thrive on the High Street.
- 2. Residents of the Borough will continue to have access to a variety of community services and cultural facilities; important town centre uses (such as the Regent Centre, the Central Library) will be retained and where possible enhanced. There is a need to expand the health and fitness offer in the town centre.
- 3. Expansion of evening economy uses such as restaurants/cafés/pubs will be encouraged especially along Church Street. This will enhance the vitality of the centre, making it a more vibrant place in the afternoon and evening hours.
- 4. The following sites have been identified as strategic sites that will play a pivotal role in delivering the Town Centre Vision and Key Strategy.
- The Magistrates' Court Site.
- Saxon Square.
- The Lanes.

- Land between Bridge Street, Stony Lane South and the Civic Offices.
- Stony Lane.

Land between Bridge Street, Stony Lane South and the Civic Offices and Stony Lane is located 'out of centre' **for retail purposes** and within an area of high flood risk. Town centre uses including employment, retail, leisure and entertainment, offices, arts and culture and tourism may be appropriate in these locations subject to compliance with other policy. In particular, development in these locations should not adversely affect the vitality and viability of the town centre and should comply with flood risk policy.

The strategic sites set out above will be brought forward in accordance with site specific allocations and further detail will be set out in a Site Allocations Development Plan Document. The Site Allocations DPD will also set out how flood risk will be managed for these strategic sites.

- 5. Druitt Gardens will be enhanced to provide an attractive area of open space within the Town Centre. This will benefit tourism and contribute to the promotion of healthy lifestyles by providing high quality open space. Developer contributions will be obtained for the purpose of enhancing community facilities in the Town Centre.
- 6. High density residential development will take place alongside the projected requirement for retail to provide a balanced, mixed use environment in areas outside those affected by high flood risk.
- 7. The Town Centre will seek to accommodate new office development which complements the overall retail strategy and the vitality and viability of neighbouring centres.
- 8. Townscape quality will be enhanced by sensitive development and improvements incorporating Saxon Square will be refurbished so it relates more appropriately with the historic core of the High Street, and provides for a more attractive shopping environment and provision of units more attractive to retailers. The redevelopment of the Lanes, comprising the area between Sopers Lane and Wick Lane, will provide an opportunity for environmental enhancements by encouraging mixed used development, including residential, retail and community uses. Improvements to the linkage between the High Street and Bargates will be promoted in an effort to increase the flow of pedestrians between the shopping areas.
- 9. To minimise congestion and air pollution, the use of sustainable modes of transport will be encouraged. Christchurch Town Centre benefits from a comprehensive public transport network providing links both within the Borough and its surrounding areas via bus and rail services.
- 10. The Council will ensure that adequate parking levels are maintained within the Town Centre so as not to adversely affect vitality and viability.

More effective management of car parks will reduce pressure on 'core' car parks. A strategic signing strategy will also assist in making the best use of town centre car parks and in reducing congestion.

Consultation Response

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

Table 3.2

3.68 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
642224	Mr T Atkinson	Director Christchurch Chamber of Trade & Commerce	PCCS77
670146	Mr Peter Williams	Partner Amicitia Partnership	PCCS115
715197	Mr Neil White	Architectural Designer Quantum Group	PCCS145

Summary of Responses

3.69 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:

3.70 Retail Floorspace Projections

3.71 Christchurch Chamber of Trade & Commerce

• The section (para 5.4) is headed 'facts' - the changes proposed are not based on fact. The change to the floorspace figures are conjecture based on the unjustified growth presumptions.

3.72 Quantum Group

• The amended text of Policy CH1 should refer to the future requirements to 2031 not 2028.

54 Christchurch and East Dorset Core Strategy Consultation Response Analysis TOWN CENTRES - May 2013

Councils' Position

- 3.73 The Core Strategy has been informed by up to date and professionally produced retail studies that have applied nationally established methodology that have used up to date data for establishing projected growth. The 2012 Retail Study Update has taken account recent national policy changes, changes in the economy and trends in retail planning. The changes to the floorspace projections are based on sound evidence, not conjecture.
- 3.74 The Retail Study Update provides floorspace projections up to 2031. The Core Strategy plan period is up to 2028, hence the reference to that date in Policy CH1. The projections are a broad requirement rather than a prescriptive figure. As the period up to 2028 covers the majority of the period up to 2031 it is not considered practical to work out a proportionate figure for the shorter period.

Town Centres

7 - Christchurch Town Centre Boundary (Policy CH2).

Pre-Submission

Christchurch Town Centre Boundary

The Town Centre as defined by the Town Centre boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts, culture and tourism development subject to compliance with other national and local policy.

Consultation Response

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

Table 3.3

3.75 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
653852	Mrs Susan Newman-Crane		CSPS649
654026	Ms Bev Miller		CSPS613
656498	Mr Matthew Morris	GVA Planning Development	CSPS2919
663588	Mr Roger Street	Christchurch Conservation Trust	CSPS3741
664634	Mr C Benham	Turley Associates	CSPS3843

Summary of Responses

3.76 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:

3.77 Boundary

- CCTC Stony Lane and Land between Bridge Street, Stony Lane South and the Civic Offices are not well connected to the town centre.
- CCTC Not based on adequate, up-to-date and relevant evidence (NPPF para158)
- CCTC Strongly object to widening the definition of the town centre to include Stony Lane. Retail development there is a threat to the viability of
 the town centre and it is not necessary to be able to cater for possible retail growth. There is no evidence that shoppers will regularly walk between
 the two areas. Town Bridge offers a natural geographic end to the town centre. Stony Lane should be for out-of-centre services and the retail of
 bulky items.
- Boundary drawn too tightly. This definition of the town centre is arbitrary and policies applying to the town centre will therefore exclude areas which should be within it. The boundary should include at least all the buildings up to Sopers Lane on its eastern side, including the school and playing field and ideally the recreation ground, New Zealand Gardens and all areas up to Stour Road. Part of the northern, station end of the railway is included, but the part near the junction with Barrack Road is excluded and should be included along with the triangle from the railway bridge to Stour Road, presently excluded. These areas are closer to the High Street than the Stony Lane industrial units, which are included.
- GVA Planning Development on behalf of the Co-op Object to extent of area as far too wide and includes land which has no relationship with the
 town centre. Boundary should exclude area to the east of the River Avon, including Bridge Street and Stony Lane as they contain very few town
 centre uses. With this revised boundary, both Stony Lane sites would fall outside of the town centre and main town centre uses should not be
 promoted on these sites.

- Turley Associates on behalf of Dorset Development Partnership Ltd DDP -National policy encourages town centre boundaries to be drawn tightly to the town centre areas. In its current form the town centre boundary does not conform to national policy. Boundary should not include residential areas to the north and south west. Should be drawn more closely to reflect central commercial areas of town centre. The Magistrates Court site should continue to be included within the boundary. Town Centre Area should not go beyond the west side of the bridge at Castle Street and should reflect the Primary Shopping Area. However support redevelopment of these sites but suggest that site specific policies prepared for these sites.
- Savills Commercial Ltd -Due to both distance and the quality of the pedestrian journey the areas to the east of the River Avon could only be classified
 as "Out of Centre" To classify these areas as "Town Centre" would allow for retail development to be bought forward without the need for either a
 Sequential Test or Impact assessment. Allowing retail development in these areas will lead to a split centre and adverse impact on the vitality and
 viability of the existing retail core. Suggest redefine the southern edge of the eastern Town Centre Boundary to run along the River Avon that runs
 under the bridge at Castle Street
- Extremities do not belong to the town centre. End the town centre boundary at the Civic Offices on Bridge Street and do not include Stony Lane South.
- Already an over-provision of food and drink premises in town centre to serve evening economy so cannot support CH2 on this point.

Councils' Response

- 3.78 The majority of the comments consider the boundary is drawn to wide and object to the inclusion of the Bridge Street and Stony Lane areas. Several comment that Town Bridge offers a natural end to the town centre although one considers it should end at the Civic Offices.
- 3.79 NPPF requires the LPA's define the extent of town centres and primary shopping areas. Annex 2 states that the town centre is an "area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area."
- 3.80 The centre for retail developments is defined by the primary shopping area, and this has been drawn tightly around the existing shopping area (see Map 5.3). The town centre boundary can be drawn more widely as it defines where all other town centre uses including office and leisure development can be located, subject to other policy considerations. Including strategic sites such as Stony Lane and the former Gasworks sites within the town centre boundary could assist in regeneration of this wider area. Stony Lane and the former gasworks sites are identified as strategic sites in Option CH1 and detail on appropriate future uses will be set out in a Site Specific Development Plan Document.
- 3.81 In response to Savills' comments, the sequential approach to retail development is applied to the Primary Shopping Area boundary, not the wider town centre boundary.

3.82 There is one comment that the boundary is drawn too tightly and suggests that the boundary should include the area extending from Sopers Lane to Stour Road, including Twynham School and the recreation ground. It is considered that including this predominantly residential area would not result in significant benefits to the purposes of the town centre boundary.

Proposed Changes to the Pre-Submission Core Strategy

3.83 No changes proposed to Policy CH2 or Map 5.2.

Christchurch Town Centre Boundary

The Town Centre as defined by the Town Centre boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts, culture and tourism development subject to compliance with other national and local policy.

Consultation Response

3.84 Since no changes were made to this policy following Pre-Submission consultation, it did not form part of the Schedule Of Proposed Changes consultation.

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

Table 3.4

3.85 List of Consultee Reference Numbers

3.86 Not applicable.

Summary of Responses

3.87 Not applicable.

Councils' Position

3.88 No amendments to Policy CH2 were considered necessary following Pre-Submission consultation.

Town Centres

8 - Christchurch Primary Shopping Area and Retail Frontages (Policy CH3).

Pre-Submission

Christchurch Town Centre Primary Shopping Area and Retail Cores

The policy defines the Christchurch town centre Primary Shopping Area, where retail development will be concentrated, and the primary and secondary shopping cores.

Consultation Response

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

Table 3.5

3.89 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
656498	Mr Matthew Morris	GVA Planning Development	CSPS2917
663588	Mr Roger Street	Christchurch Conservation Trust	CSPS3742
664634	Mr C Benham	Turley Associates	CSPS3844

Summary of Responses

3.90 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:

3.91 General Comments

- CCTC Incorrect terminology. Replace 'shopping cores' with 'frontages'
- CCTC The adoption of a single figure (eg 30%) for non retail uses across the whole area is not conducive to achieving desired planning outcome. Recommend having different figures for defined frontages to clearly set out what will be allowed (NPPF)
- Transition Town Christchurch Welcome relaxation of the limit to non-retail uses. A mix of uses will encourage vitality and community resilience see Mary Portas Review
- CCTC Paragraph 5.21- Not relevant delete this paragraph.

3.92 Boundary of Primary Shopping Core

- GVA Planning Development on behalf of Co-op Boundaries of the primary and secondary shopping frontages and the primary shopping are drawn too widely, particularly around the edges of the centre around Castle Street and the northern part of Bargates.
- Turley Associates on behalf of Dorset Development Partnership DDP Primary Shopping Area given the clear intention to allocate the site for a comprehensive mixed use redevelopment, the boundary should be redrawn to include the whole site to allow proper planning of the area.

3.93 Removal of Church Street and Wick Lane from Primary Shopping Frontage

CCTC - Object strongly to proposed change of definition at Church Street and Wick Lane. The business community wish to see these areas remain
as primary frontages to encourage the same level of mixed use as in the rest of the town. Any policy aimed at improving the evening economy must
be based around the whole of the centre.

- CCTC Oppose removal of Church Street and Wick Lane from primary core designation to secondary core. Would result in over-saturation of restaurants. This together with increase in non-retail uses in primary core from 20% to 30% could result in a possible 40% food and drink outlets in the town centre. Town centre already well serviced with restaurants and cafes.
- CCTC Inconsistency with statement in para 5.9. Continued increase in food and drink outlets can only be at the expense of shops which are 'capable of meeting the day to day needs of residents'
- Questions whether it is now Council planning policy to allow any A3 use to serve takeaway food.

Councils' Response

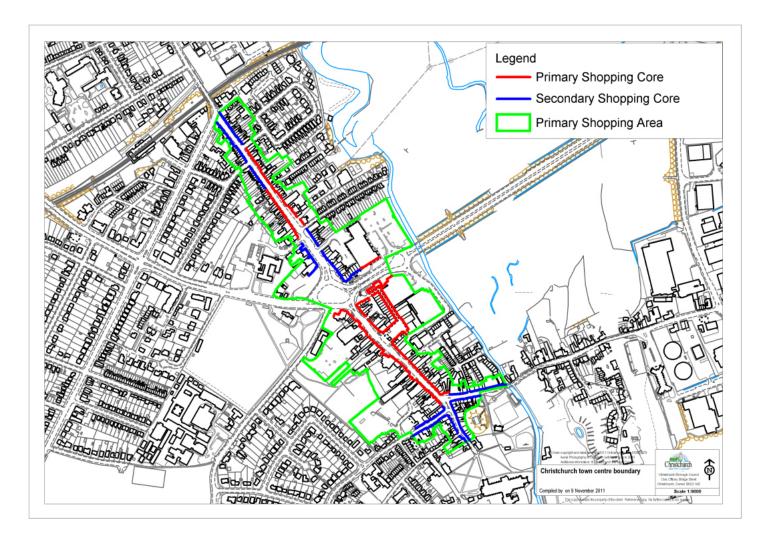
- 3.94 The Pre-Submission Consultation was drafted before the publication of the NPPF. The relevant policies and paragraphs will be amended to refer to shopping frontages rather than cores for consistency with national policy guidance.
- 3.95 Comments on 30% threshold are addressed in comments on Policy CH 6.
- 3.96 Paragraph 5.21 clarifies the role of the primary shopping frontage in the retail strategy for the town centre. It is relevant and needs to be read with Policy CH3.
- 3.97 It is not considered that the Primary Shopping Frontage boundary is drawn too widely. It is drawn closely around the main shopping areas.
- 3.98 The 2012 Retail Study identifies town centre retail requirements. The Magistrates Court site has the potential to deliver a significant proportion of this. The Council is working closely with landowners on developing options for this. In view of this, all of the Magistrates Court site should be brought within the Primary Shopping Area.
- 3.99 The re-designation of Church Street and Wick Lane as secondary shopping frontages is supported by evidence in the Joint Retail Study 2008. This will allow for more flexibility in an area that has become an evening economy hub and will have a positive impact on the centre as a whole. However it is not considered appropriate to amend the policy to aim at improving the evening economy in the whole of the centre. It is important to retain a sufficient proportion of A1 uses within the primary shopping core Saxon Square and the High Street as set out in Policy CH6. The 2012 Retail Study Update still identifies a need to provide significant additional comparison floorspace within use class A1 during the plan period.
- 3.100 The 2012 Retail Study Update indicates that there has been a national increase in the proportion of A3 A5 uses, which may continue in the future, and will compete for shop premises with other uses. The study concludes that it may be reasonable to assume that there will be scope for a further 25% floorspace in all centres over and above the comparison floorspace projections that can be occupied by Class A2 A5 uses and Class A1 non-retail services. Looking more specifically at A3 A5 uses, the study concludes that the proportions of A3/A4/A5 uses within Christchurch and Highcliffe are within the range one would anticipate for centres of their size. It may be reasonable to assume that there will be scope for a further 15% floorspace that can be occupied by Class A3 to A5 uses.

Proposed Changes to the Pre-Submission Core Strategy

Christchurch Town Centre Primary Shopping Area and Retail <u>Cores</u>**Frontages**

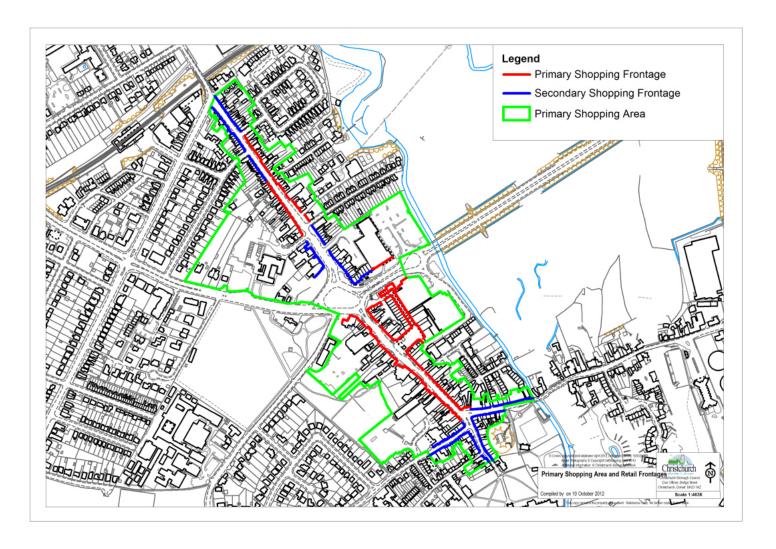
The policy defines the Christchurch town centre Primary Shopping Area, where retail development will be concentrated, and the primary and secondary shopping **coresfrontages**.

- 3.101 Map 5.3
- **3.102** Amend Map 5.3 boundary of Primary Shopping Frontage to fully incorporate the Magistrates Court site which will be a key strategic site in delivering the town centre vision.
- 3.103 Amend title and legend to refer to Shopping Frontages not Cores, in accordance with the NPPF.
- **3.104** Map **5.3** Existing



Map 5.3 Primary Shopping Area & Shopping Cores (EXISTING)

3.105 Map 5.3 Proposed Change



Map 5.3 Primary Shopping Area & Shopping Frontages (PROPOSED CHANGE)

Consultation Response

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

Table 3.6

3.106 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
642224	Mr T Atkinson	Director Christchurch Chamber of Trade & Commerce	PCCS78
715197	Mr Neil White	Architectural Designer Quantum Group	PCCS146
717253	Mr Graeme Warriner	Director Turley Associates	PCCS52

Summary of Responses

- 3.107 The comments from the stakeholders in respect of this Proposed Change are as follows:-
- 3.108 Support for inclusion of whole of Magistrates Court Site
- **3.109** Dorset Development Partnership
- Support the extension of the PSA to include the whole of the Magistrates Court site. Given the clear intention to redevelop this site for a comprehensive
 retail led mixed use scheme, the inclusion of the whole site will encourage a holistic development solution and allow for the proper planning of the
 area.

3.110 Goadsby & Harding on behalf of the Hospital of St Mary Magdalen Trust

• Whilst the Hospital of St. Mary Magdalen Trust does not object to the Proposed Change to Map 5.3, it wishes to maintain the flexibility for the Trust land and properties to be developed for an alternative range of uses as set out in policy CH 2; i.e. residential, employment, retail, leisure and entertainment, offices, arts, culture and tourism development.

3.111 Objections to inclusion of whole of Magistrates Court Site

3.112 Quantum Group

• The NPPF Annex 2 Glossary states that a PSA is an area where retail development is concentrated. This generally comprises the primary and those secondary frontages which are adjoining or closely related to the primary shopping frontage. This definition and that of Primary and Secondary Frontages does not include car parks, residential dwellings and nor is retail development concentrated in this particular area. Whilst the Joint Retail Study seeks to provide justification for this change and recommends the boundary, any justification and the recommendation in this document are not sound as it does not accord with the NPPF definition. The PSA should only be extended once the scale and type of development on this site is known.

3.113 Christchurch Chamber of Trade & Commerce

• To be designated as a primary shopping area, is to conclude that either the area already consists of essential primary and all secondary shopping frontages or that it will in future become an area of contiguous retail frontages. The plans for the Magistrates Court site do not entail such an extent of retail development, and the Council's Planning Committee meeting of the 23rd of October, 2012 concluded that the site was not suitable for extensive retail development. There can therefore be no evidence based reason to extend the primary shopping area to include this site.

Councils' Position

- **3.114** From the definitions in the NPPF it is clear that the Primary Shopping Area is not the same as Primary Shopping Frontage. A PSA will "generally comprise primary and secondary frontages..." This allows some flexibility and does not appear to prohibit the inclusion of a site which has the potential to deliver a significant proportion of future town centre retail requirements. In view of its central location and future retail potential it would seem logical to draw the PSA boundary around the whole of the Magistrates Court Site rather than run through part of it.
- 3.115 The Magistrates Court site has been identified as a strategic development site within Policy CH1. At the Special Planning Control committee 23.10.12 at which 2 supermarket applications were considered, Turley Associates submitted a feasibility study which showed a possible development of a foodstore on the Magistrates Court site, a sequentially preferable site. Evidence in the 2012 Retail Study Update which concluded that there would be scope for a large food store in Christchurch in the long term, strengthens the suitability of this site to have a convenience store as part of a mixed use scheme. Information has been provided by Dorset Development Partnerships confirming their intention to develop a planning strategy for the site. They have also supported the inclusion of the Magistrates Court in the PSA (see their comments above). The Council is working with landowners on developing options for this site. Therefore there is justification to extend the primary shopping area to include this site.

Town Centres

9 - Highcliffe District Centre Vision (Policy CH4).

Pre-Submission

Highcliffe District Centre Vision

Highcliffe District Centre will continue to act as a thriving and busy centre for the local population and visitors. The centre will accommodate further comparison retail floorspace, with Christchurch Town Centre remaining the principal centre for retail development in the Borough. The shopping environment will be improved to provide a more pleasant townscape, public transport services will be enhanced, and facilities and services will continue to be located in this central location.

To achieve this vision:

- 1. Retail uses will be expanded and enhanced to promote the vitality and viability of the centre consistent with the Borough retail strategy. The strategy for Highcliffe will seek to enhance the niche retail offer to attract more visitors with unique, specialist shops.
- 2. Expansion of evening economy uses will be encouraged, especially in the designated secondary shopping cores. This will enhance the vitality of the centre, making it a more vibrant place in the afternoon and evening hours.
- 3. Community services in Highcliffe will be retained, supported and where possible enhanced to support the vitality and viability of the centre.

 The enhancement of facilities for older people such as community meeting places, medical and social care will be sought. Opportunities will also be pursued to provide further sports and recreation facilities to meet the needs of children and young people.
- 4. Better marked/signposted linkages between the Highcliffe beach front and the town centre will draw in more visitors to the centre that will benefit local trade.
- 5. The townscape quality of the centre will be improved: the objective is to secure a high quality environment that will give the centre a distinct character and enhance its sense of identity. This will be achieved by providing new street furniture and planting in an effort to create an attractive, welcoming and pedestrian friendly environment. The pedestrian-vehicular conflict, apparent on the A337 Lymington Road will be minimised by the introduction of appropriate traffic calming measures and provision of more frequent pedestrian crossings.
- 6. To minimise congestion and air pollution, sustainable transport infrastructure and services will be encouraged.
- 7. The Council will ensure that adequate parking levels are maintained within the centre to ensure its vitality and viability.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:						No		
				Positively Prepared		Justified		Effective		Consistent with National Policy		Indication of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
2	1	1	6	2	0	2	4	2	4	2	4	10

Table 3.7

3.116 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360149	Mr John Urquhart		CSPS84
510796	Mr Rollo Reid		CSPS2715
642224	Mr T Atkinson	Christchurch Chamber of Trade & Commerce	CSPS267
647876	Mr Christopher Whitcher		CSPS120
647898	Mr Derek Beasley		CSPS109
653576	Mrs Sue Ellis		CSPS1117
654704	Mrs J E John		CSPS1050
655432	Mr Andy Davies		CSPS1019
655526	Mr Paul Morrison		CSPS1034
656426	Mrs Pauline Pritchard		CSPS2722
656498	Mr Matthew Morris	GVA Planning Development	CSPS2914
656664	Mr Glen Morrison		CSPS2455

Summary of Responses

3.117 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:

3.118 *General*

- CCTC Object to Highcliffe being relegated to a district centre rather than a town centre as it has more shops and town centre uses than many of the other towns in East Dorset. It is different from the district centre at Barrack Road. Para 5.22 refers to Highcliffe as a coastal town.
- CCTC Paragraph 5.24 Duplicates previous paragraph.
- CCTC Key Facts incorrect terminology and not based on adequate up-to-date and relevant evidence (NPPF para 158).
- Before addressing Highcliffe's retail needs, key focus needs to be directed to Christchurch town centre to achieve the status as 'retail centre'
- CCTC Vision 2nd bullet point Remove statement "especially in the designated secondary shopping cores".
- Question whether another Doctors practice needed.

3.119 Retail Hierarchy

- CCTC Highcliffe should not be a district centre. It should be a town centre.
- Co-op Supports vision for district centre and improvements outlined in Policy CH4.

3.120 Shopping Environment

- CCTC Key Facts 1st bullet point. The 2008 NLP Joint Retail Assessment only covered the period up to 2016. There is no evidence base to show
 figures given in that report can be extrapolated to 2028.
- There is no evidence that increasing the number of unique, specialist shops will attract more visitors to Highcliffe. Visitors come to Highcliffe for the beaches and countryside rather than the shops. More national stores would attract more of the local population to shop in Highcliffe.
- More new essential retail outlets (not over large) could be supported.
- As there is more flexibility for uses within secondary shopping cores, it is relevant to retain the reference to encouraging evening economy uses
 especially in these areas.

3.121 Strategic Requirements

- 2nd bullet point The need for new supermarket floorspace was on a quantitative rather than qualitative bass and did not extend to 2028.
- 4th bullet point Potential for 291 new dwellings for Highcliffe/North Highcliffe/ Walkford by 2028 if fully implemented would represent the second largest population increase in population after the North Christchurch urban extension. This would impact on prime traffic corridors and social and demographic balance if redevelopment to flats and loss of family houses. Statement should be given more prominence and impacts analysed. (includes Labour Party Christchurch Branch).

3.122 Transport, Traffic and Parking

- Paragraph 5.27 Incomplete. All major roads are 'physical barriers to pedestrians' Highcliffe has more controlled pedestrian crossings than the High Street. The main problem is an environmental one with a large proportion of HGV's that use the route.
- Need reference to better bus links to Hinton Admiral station.
- Too vague. Highcliffe already ruined by Tesco site causing major traffic congestion and loss of market square which should have been a pleasant garden area, not built on.
- Highcliffe lacks more variety of shops for the locals. Traffic going through is chaotic and big lorries cause problems.
- CCTC Additional traffic calming measures are not necessary as the average speeds through the centre are already low. Adding further pedestrian crossings will increase the congestion and pollution from heavy vehicles.
- Main improvement should be to relieve the main road of the present congestion.
- Provide more free parking to make it attractive to come and shop.

Councils' Response

3.123 Retail Hierarchy

- 3.124 Policies in this chapter have to conform to Policy KS6 which sets out the town centre hierarchy. This defines Christchurch as a Town Centre and Highcliffe as a District Centre. Highcliffe functions as a District Centre and will accommodate a smaller proportion of the Borough's future requirement for retail growth. It is considered that this is a correct definition. However the point about the differences between Highcliffe and Barrack Road District Centres is relevant. The status of Barrack Road centre has been reviewed and it is proposed to maintain its designation as a Local Centre under a revised Policy KS6. The role and relationship between retail centres in Christchurch is established through the definition of a Town Centre hierarchy in Policy KS6.
- 3.125 The NPPF does not provide a definition of a 'district centre'. The most up to date definition is contained within Annex B of PPS4; 'District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non retail services, such as banks, building societies and restaurants, as well as local facilities such as a library'.
- 3.126 In the case of Barrack Road, on balance we do not feel that this road operates as a District Centre. It has a broad mix of shops but it is not a focus for shopping trips in the same way as Highcliffe, nor could we set out a meaningful vision for the road.

- 3.127 Retail frontages along Barrack Road as designated in the current adopted Local Plan (2001) will be retained which will protect its retail function to serve local needs.
- 3.128 Barrack Road is currently designated as a Local Centre and recent positive growth in trade and activity has been achieved in this context. On this basis, the future vitality and viability of Barrack Road will not be adversely affected through maintaining the current designation. This identifies Highcliffe as a District Centre, which will accommodate a smaller proportion of the Borough's future requirement for retail growth.

3.129 Shopping Requirements

3.130 The terminology is correct and based on the most up to date and relevant evidence of the time. The previous Joint Retail Assessment 2008 provided projections up to 2026. The 2012 update has updated the figures and covers the plan period up until 2028. The 2012 Retail update includes quantitative assessments of the potential capacity for new retail floorspace but there is still no need for further supermarkets in Highcliffe. Evidence from the 2012 Retail Study Update indicates that the trend is for national stores to seek large shop units (over 200 sq m). There is unlikely to be demand for multiple retailers for units in Highcliffe district centre as the shopping units are of a smaller size. However there is a need to amend Policy CH4 to refer to new evidence from the Retail Study Update 2012 which identifies a projected requirement for Highcliffe District Centre for 500 sq m comparison retail floorspace up to 2028.

3.131 Strategic Requirements

- 3.132 This figure is taken from the Strategic Housing Land Availability Assessment 2011. This identifies potential for housing development for a 15 year period and the area referred to is quite extensive as it covers three wards to the east of the Borough. It is a technical document which provides an estimate of housing potential, but each site will be subject to detailed planning consideration which will take account the concerns referred to by the consultees.
- 3.133 The Health authorities have been consulted throughout the preparation of this document. Any requirements are set out in the Infrastructure Delivery Plan which forms part of the Core Strategy. As development takes place throughout the plan period, the health authorities will monitor the capacity of surgeries and determine any requirements at that stage.

3.134 Transport, Traffic and Parking

- 3.135 The Joint Retail study (2008) identifies the pedestrian-vehicular conflict in Highcliffe as an issue which raises concerns. The shopping area is very linear along the A337 and the traffic creates a physical barrier to pedestrians, separating the shops on either side of the road. It is appropriate that the Highcliffe centre vision includes measures to address this issue and this may include traffic calming measures. Car parking charges cannot be set in the Core Strategy.
- **3.136** Paragraph 5.24 This paragraph is necessary and does not duplicate the previous paragraph.

Proposed Changes to the Pre-Submission Core Strategy

- **3.137** Paragraph 5.22
- 3.138 Additional text to refer to the preparation of policy and design guidance to protect the character of Highcliffe.
- 3.139 Highcliffe-on-Sea is a coastal town located to the east of Christchurch. It is one of a number of towns that merge to form a conurbation along the south coast of Dorset. Highcliffe has seen considerable development over the past 30 years, which has included some larger blocks of flats and high density infill development which has detracted from the character of the area. Consideration will be given to developing policies and design guidance in future Development Plan Documents which protect the character of Highcliffe.
- 3.140 Paragraph 5.22 Key Facts: Strategic Requirements
- 3.141 Amend first 2 bullet points to take account of the Retail Study Update (2012) which supersedes projections for Highcliffe district centre contained in the 2008 study.
- Highcliffe district centre can accommodate in the region of <u>500</u> 800 8qm additional non food comparison retail floorspace to 2031 <u>28</u>. (Christchurch and East Dorset Retail Update (2012) Joint Retail Assessment, 2008)
- There is no need for further supermarket floorspace in Highcliffe to 203128.(Christchurch and East Dorset Retail Update (2012)Joint Retail

 Assessment 2008), (NLP Revised Retail Floorspace Projections 2011)
- **3.142** Paragraph **5.24**
- 3.143 Amend text to take account of the Retail Study Update (2012) which supersedes projections for Highcliffe district centre contained in the 2008 study.
- 3.144 Highcliffe does not require additional supermarket floorspace during the period to 203128. In the Borough as a whole there is a requirement for additional comparison retail floorspace. There is a need for Highcliffe has capacity to provide in the region of 500 800 sqm additional comparison retail floorspace in contributing to the overall borough requirement. This is significantly less than Christchurch town centre which has far more capacity for retail development.
- 3.145 Policy CH4
- 3.146 Amend policy to take account of the Retail Study Update (2012) which supersedes projections for Highcliffe district centre contained in the 2008 study.

Policy CH4

Highcliffe District Centre Vision

Highcliffe District Centre will continue to act as a thriving and busy centre for the local population and visitors. The centre will accommodate further comparison retail floorspace, in the region of 500sqm (net) to 2028 with Christchurch Town Centre remaining the principal centre for retail development in the Borough. The shopping environment will be improved to provide a more pleasant townscape, public transport services will be enhanced, and facilities and services will continue to be located in this central location.

To achieve this vision:

- 1. Retail uses will be expanded and enhanced to promote the vitality and viability of the centre consistent with the Borough retail strategy. The strategy for Highcliffe will seek to enhance the niche retail offer to attract more visitors with unique, specialist shops.
- 2. Expansion of evening economy uses will be encouraged, especially in the designated secondary shopping cores. This will enhance the vitality of the centre, making it a more vibrant place in the afternoon and evening hours.
- 3. Community services in Highcliffe will be retained, supported and where possible enhanced to support the vitality and viability of the centre.

 The enhancement of facilities for older people such as community meeting places, medical and social care will be sought. Opportunities will also be pursued to provide further sports and recreation facilities to meet the needs of children and young people.
- 4. Better marked/signposted linkages between the Highcliffe beach front and the town centre will draw in more visitors to the centre that will benefit local trade.
- 5. The townscape quality of the centre will be improved: the objective is to secure a high quality environment that will give the centre a distinct character and enhance its sense of identity. This will be achieved by providing new street furniture and planting in an effort to create an attractive, welcoming and pedestrian friendly environment. The pedestrian-vehicular conflict, apparent on the A337 Lymington Road will be minimised by the introduction of appropriate traffic calming measures and provision of more frequent pedestrian crossings.
- 6. To minimise congestion and air pollution, sustainable transport infrastructure and services will be encouraged.
- 7. The Council will ensure that adequate parking levels are maintained within the centre to ensure its vitality and viability.

Consultation Response

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

Table 3.8

3.147 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
654046	Mr David Pardy		PCCS142
714782	MR MALCOLM MAWBEY		PCCS14

Summary of Responses

- 3.148 The comments from the general public in respect of this Proposed Change are as follows:-
- Strongly support the statement in para 5.22 (Character of Highcliffe) & wish to reinforce the view that a social/demographic balance must be maintained to prevent the area from becoming a geriatric ghetto. In order to achieve this I believe that the plans for redevelopment of existing family houses should be resisted.
- Object to reference to non food comparison retail floorspace in paragraph 5.22. Paras 5.24 and Policy CH4 do not specify "non food". Suggest leave out "non food" or insert it in the other two paragraphs as appropriate.

3.149 Councils' Position

3.150 The proposed change expands on issues relating to the character of Highcliffe rather than an intention to influence the social / demographic balance. Of relevance is Policy LN1 which expects new housing to be of an appropriate size and type to reflect the needs of the Strategic Housing Market Assessment, subject to site specific circumstances and the character of the local area.

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3.151 The addition of the words "non food" before "comparison retail floorspace" in paragraph 5.22 is to clarify what "comparison retail" means. It does not alter the definition. For consistency with paras 5.24 and Policy CH4 the words "non food" could be deleted as this would be minor textual correction.

Town Centres

10 - Highcliffe Shopping Frontages (Policy CH5).

Pre-Submission

Highcliffe Shopping Cores

Policy CH5 defines the Highcliffe District Centre Primary and Secondary Shopping Cores.

Consultation Response

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

Table 3.9

3.152 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
642224	Mr T Atkinson	Christchurch Chamber of Trade & Commerce	CSPS268

Summary of Responses

3.153 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:

3.154 General Comments

CCTC - The 2008 NLP report concluded that there was no justification for dividing Highcliffe into primary and secondary cores. No benefit by
continuing with this policy. Suggest re-word to say "The Secondary Shopping Core in Highcliffe will be combined with the Primary Shopping Core
into a single designated Primary Frontage Zone, ensuring all in the Highcliffe Primary Shopping Area is managed as a whole".

Councils' Response

3.155 Retaining an area for the secondary shopping frontage allows for more flexibility of ground floor uses, particularly as the proportion of non-retail uses is already at 30% in the Highcliffe primary shopping frontage. It is not considered appropriate to change the boundary as suggested.

Proposed Changes to the Pre-Submission Core Strategy

- **3.156** Paragraph 5.30
- 3.157 Replace the word "cores" to "frontages" in accordance with the NPPF
- 3.158 The Primary Shopping <u>Frontage Gore</u> is defined in Policy CH5 along Lymington Road where there will be a high proportion of retail uses in accordance with Policy CH6. Within the Secondary Shopping <u>FrontageGore</u> to the east of Waterford Road a greater diversity of uses will be permitted in accordance with Policy CH7.
- **3.159** Policy CH5
- **3.160** Replace the word 'Cores' to 'Frontages' in line with the NPPF.

Highcliffe Shopping Cores Frontages

Policy CH5 defines the Highcliffe District Centre Primary and Secondary Shopping **CoresFrontages**.

3.161 Map 5.4

3.162 Amend title and legend to refer to Shopping Frontages not Cores, in line with the NPPF.



Map 5.4 Highcliffe Shopping Frontages (PROPOSED CHANGE)

Consultation Response

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

Table 3.10

3.163 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
714782	MR MALCOLM MAWBEY		PCCS15

Summary of Responses

- 3.164 The comments from the public in respect of this Proposed Change are as follows:-
- The revised map does not show "frontages". It outlines and shades in the primary and secondary shopping cores. Suggest redraw and show the shopping frontages.

Councils' Position

3.165 The boundaries of the shopping frontages shown on Map 5.4 - 5.6 are drawn around the curtilages of the properties in the absence of any other logical boundary line to use. There are no changes to the actual boundaries of the Highcliffe shopping frontages shown in Map 5.4, but the Legend has changed to refer to shopping frontages rather than cores, and there is shading, hence the inclusion in the Schedule of Proposed Changes. Policies CH6 and CH7 are relevant as they deal with changes of use within each primary and secondary shopping frontage in Christchurch. The actual policy relates to the ground floor units within each shopping frontage.

Town Centres

11 - Development in the Primary Shopping Frontages (Policy CH6).

Pre-Submission

Development in the Primary Shopping Cores.

Within the Saxon Square and High Street Primary Core, and the primary cores at Bargates and Highcliffe, planning permission for the change of use of existing ground floor retail premises (Class A1) to non – retail uses will be permitted provided that:

- 1. The proposed use is for a financial or professional service use (Class A2), or for a food and drinks uses (Class A3) or for non residential institutions falling within Class D1 and leisure and entertainment uses falling within Class D2.
- 2. Non-retail uses (other than Class A1) will not cumulatively amount to more than 30% of all ground floor units in each of the identified areas,
- 3. The proposal will not result in more than three continuous frontages in non retail use (other than Class A1).
- 4. A shop front appearance will be retained.

Consultation Response

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

Table 3.11

3.166 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
642224	Mr T Atkinson	Christchurch Chamber of Trade & Commerce	CSPS270

Summary of Responses

3.167 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:

3.168 Boundaries

- Co-op Primary and secondary shopping cores are reasonable.
- CCTC Object to Highcliffe shopping cores boundary. Suggest re-word to say "The Secondary Shopping Core in Highcliffe will be combined with the Primary Shopping Core into a single designated Primary Frontage Zone, ensuring all in the Highcliffe Primary Shopping Area is managed as a whole".
- CCTC No flexibility in this policy as Non-retail use in the primary shopping frontage already exceeds 30% in Highcliffe.
- CCTC Suggests a more flexible statement which defines what will be permitted in what area. This accepts that non-A1 use in general will occur
 as a changing customer demand but ensures that Saxon Square remains predominantly a retail mall by having a 15% limit for non-A1. Increase
 the non-retail figure in Highcliffe to 35%.

Councils' Response

- 3.169 Retaining an area for the secondary shopping frontage allows for more flexibility of ground floor uses, particularly as the proportion of non-retail uses is already at 30% in the Highcliffe primary shopping core. It is not considered appropriate to change the boundary as suggested.
- 3.170 The 2012 Retail Study Update considered the proposed 30% threshold for primary shopping frontages. It concluded that this should provide some flexibility for changes of use and is not considered to be overly restrictive. It did not recommend any change to the proposed threshold.

Proposed Changes to the Pre-Submission Core Strategy

3.171 Paragraph 5.31

3.172 Replace the word 'core' with 'frontages' in line with the NPPF. Amend text to reflect advice in the 2012 retail study update which supports the approach of a 30% threshold for non A1.

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3.173 The main function of the <u>Primary Shopping FrontagesGores</u> of Christchurch town centre, Bargates and Highcliffe is to provide an appropriate mix of retail units alongside other uses which contribute to the vitality and viability of the centres. Policy CH6 restricts the number of ground floor non retail units within the Primary Shopping Core to no more than 30% in order to maintain a strong retail presence. <u>This approach has been appraised</u> and is supported by the Christchurch and East Dorset Retail Update (2012).represents a more flexible approach than recommended in the 2008 Retail Study, but reflects the fact that the previous limit of 20% has now been exceeded.

3.174 Policy CH6

3.175 Replace the word 'Cores' to 'Frontages' in line with the NPPF.

Development in the Primary Shopping Cores Frontages

Within the Saxon Square and High Street Primary <u>GoreFrontage</u>, and the Primary <u>GoreFrontages</u> at Bargates and Highcliffe, planning permission for the change of use of existing ground floor retail premises (Class A1) to non – retail uses will be permitted provided that:

- 1. The proposed use is for a financial or professional service use (Class A2), or for a food and drinks uses (Class A3) or for non residential institutions falling within Class D1 and leisure and entertainment uses falling within Class D2.
- 2. Non-retail uses (other than Class A1) will not cumulatively amount to more than 30% of all ground floor units in each of the identified areas,
- 3. The proposal will not result in more than three continuous frontages in non retail use (other than Class A1).
- 4. A shop front appearance will be retained.

Consultation Response

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

Table 3.12

3.176 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
642224	Mr T Atkinson	Director Christchurch Chamber of Trade & Commerce	PCCS79

Summary of Responses

- 3.177 The comments from a stakeholder in respect of this Proposed Change are as follows:-
- (Re Paragraph 5.31) The Retail Update does not form an objective opinion.

Councils' Position

3.178 The Core Strategy has been informed by up to date and professionally produced retail studies that have applied nationally established methodology that have used up to date data for establishing projected growth. The 2012 Retail Study Update has taken account recent national policy changes, changes in the economy and trends in retail planning. The changes to the floorspace projections are based on sound evidence, not an objective opinion.

Town Centres

12 - Development in the Secondary Shopping Frontages (Policy CH7).

Pre-Submission

Development in the Secondary Shopping Cores

Proposals for the change of use of existing non residential premises locates within the secondary cores at Bargates, Wick Lane, Church Street, Castle Street, Barrack Road, Purewell and Highcliffe as identified on the proposals map will be permitted provided that the following criteria are satisfied:

- 1. The proposed use is for a financial or professional service use (Class A2) or a food and drink use (Class A3), drinking establishments (Class A4), hot food take-aways (Class A5), hotels (Class C1), or non-residential institutions falling within Class D1 and leisure and entertainment uses falling within Class D2, and
- 2. The amenities of the local residents are not adversely affected by noise or disturbance, or by loss of light and privacy.

Consultation Response

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

Table 3.13

3.179 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
642224	Mr T Atkinson	Christchurch Chamber of Trade & Commerce	CSPS272
654822	Mrs Marion Crumpler		CSPS838

Summary of Responses

3.180 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:

3.181 *General*

- CCTC Incorrectly refers to Barrack Road and Purewell.
- CCTC Policy should give flexibility to accept development in Bargates and future development on the Magistrates Court / Police Station sites that
 will improve street scene in these areas but with less onerous protection than would be afforded to the Primary Frontage zones.
- CCTC Suggest re-wording to refer to Bargates secondary shopping core only and insert new criteria "Uses outside Class A will not exceed 10% of the ground floor frontages".

Councils' Response

- 3.182 Proposed changes in the retail hierarchy as set out in KS 6 change the proposed status of Barrack Road from a District Centre to a Local Centre. However Barrack Road and Purewell both have secondary shopping frontages so it is relevant to retain references to these in the policy.
- 3.183 Bargates has a secondary shopping frontage which allows for more flexibility of uses. The proposed changes of the boundary of the Policy CH3 Primary Shopping Area will incorporate the whole of the Magistrates Court site into the area.
- 3.184 The policy incorrectly refers to "as identified on the proposals map". Instead it should refer to Map 5.3 which shows the Christchurch Town Centre Secondary Shopping Frontage and Map 5.4 which shows Highcliffe Secondary Shopping Frontage. There is also a need to include maps which show the Barrack Road and Purewell secondary shopping frontages.

Proposed Changes to the Pre-Submission Core Strategy

3.185 Change reference from shopping cores to chopping frontages in accordance with the NPPF.

3.186 Delete reference to 'proposals map' and replace with reference to Maps 5.3 - 5.6 which show the boundaries of the secondary shopping frontages referred to in the policy.

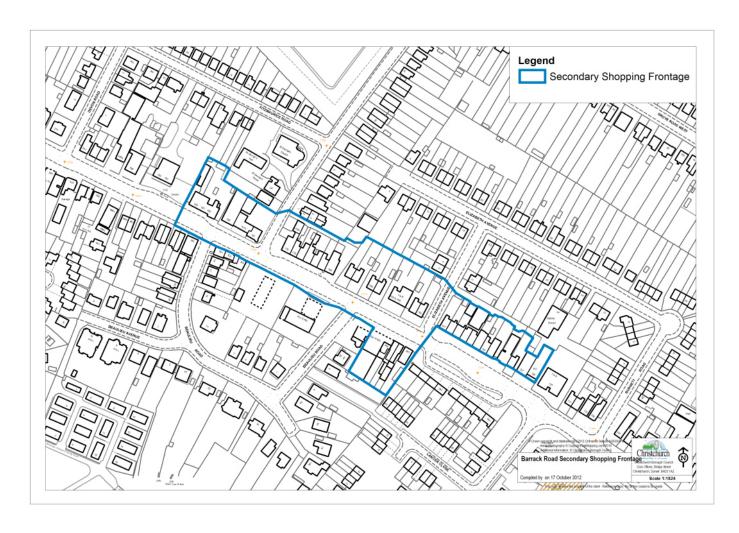
Development in the Secondary Shopping Cores-Frontages

Proposals for the change of use of existing non residential premises located within the Secondary eores Frontages at Bargates, Wick Lane, Church Street, Castle Street, Barrack Road, Purewell and Highcliffe as identified on the proposals mapMaps 5.3, 5.4,5.5 and 5.6 will be permitted provided that the following criteria are satisfied:

- 1. The proposed use is for a financial or professional service use (Class A2) or a food and drink use (Class A3), drinking establishments (Class A4), hot food take-aways (Class A5), hotels (Class C1), or non-residential institutions falling within Class D1 and leisure and entertainment uses falling within Class D2, and
- 2. The amenities of the local residents are not adversely affected by noise or disturbance, or by loss of light and privacy.

Omission of Maps following Policy CH7

- 3.187 Insert a new Map 5.5 showing the boundary of Barrack Road secondary shopping frontage to provide clarity in the Core Strategy document.
- 3.188 Insert a new Map 5.6 showing the boundary of Purewell secondary shopping frontage to provide clarity in the Core Strategy document.



Picture 3.1 Map 5.5 Barrack Road Secondary Shopping Frontage



Picture 3.2 Map 5.6 Purewell Secondary Shopping Frontage

Consultation Response

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

Table 3.14

3.189 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
715197	Mr Neil White	Architectural Designer Quantum Group	PCCS147

Summary of Responses

3.190 The comments from a stakeholder in respect of this Proposed Change are as follows:-

3.191 Barrack Road Centre should include the Bailey Bridge Retail Park and former QinetiQ site (Quantum Group)

- The proposed map 5.5 does not show or provide an appropriate boundary for Barrack Road Centre. The Proposal Map seems to ignore the main shopping centre along Barrack Road. It also does not consider the Former QinetiQ Site which recently (23rd October 2012) gained a resolution to grant a planning permission for 57,000ft2 of retail for a new supermarket. Allocating both the existing Retail Park and Former QinetiQ site within the District Centre is sound for the following reasons:
 - (i) There is a longstanding recognition that a District Centre consists of a group of shops which would include a Supermarket or Superstore and non-retail services and community facilities. Such a range of services is necessary in order to adequately serve a local residential area. This reflects the approach taken in the Joint Retail Study evidence base (based on then PPS6) and PPS4. Whilst the NPPF is silent on a definition for a District Centre, the principles remain unchanged in terms of the reasons for identifying a 'Centre'.

- (ii) The Centre fronting Barrack Road does not contain either a Supermarket or Superstore and is deficient in this form of retailing. Whilst it contains a range of commercial services and smaller scale top-up food retail (such as the One-Stop store), this aspect of its District Centre function is deficient when compared with the established definitions of a District Centre. The March 2012 Planning Permission for a mixed use scheme including a 371 sg.m retail store at 170-174 Barrack Road does not alter this position.
- (iii) To perform a District Centre role and ensure the needs of local residents in the Barrack Road / West Christchurch area are met, the Core Strategy should plan positively for the provision of a Supermarket or Superstore in the Barrack Road area. This will then provide a sustainable solution to address the identified outflow of convenience goods expenditure in our Retail Assessment. Such an outflow was identified in the Core Strategy evidence base (see the household survey of the Joint Retail Study) upon which our Assessment was based. If this cannot be met on an identified existing site within the existing Centre boundary through improvements to existing facilities, following the principles of the sequential approach, the Core Strategy should identify a District Centre boundary that includes adequate provision to address the Centre's deficiency.
- (iv) From our assessment, the most suitable location to accommodate such growth is the Former QinetiQ Site. This was effectively acknowledged in the June & October 2012 Committee resolutions to approve a planning application on this site for a Food Store (LPA Ref: 8/12/0044). This offers the only suitably sized site to accommodate a Food Store of sufficient scale to serve the District Centre / West Christchurch area and already benefits from pedestrian linkage with the Centre. Such linkage can be strengthened via physical improvements which will be delivered as part of the eventual scheme. The provision of a Food Store will then ensure the Centre fulfils its potential for growth reflecting one of the reasons for its identification (see PCSC paragraph 4.35).
- (v) The identification of the site within the District Centre boundary would still complement Christchurch's Town Centre status in the hierarchy as this Centre would still contain additional and wider comparison, convenience and service retail choices to serve the wider CBC area. It is however appropriate to plan for enhanced local convenience provision in a District Centre location in preference to a Town Centre as this will ensure the District Centre fulfils its particular policy role and function. This then allows the Town Centre to increase its role in other forms of retailing (e.g. comparison goods) to ensure it performs effectively in that particular form of retailing. This is particularly appropriate for Christchurch as it seeks to improve its competitiveness and attraction for local residents compared with Bournemouth, Castlepoint and other sub-regional alternatives.
- Suggest that the proposal should read in line that Barrack Road has been acknowledged to be a District Centre and the proposal map should represent this.

Councils' Position

- 3.192 Following consultation on the Pre Submission Core Strategy the status of Barrack Road centre has been reviewed and it is proposed to maintain its designation as a 'Local Centre'. The 2008 Retail Study forms part of the evidence that has informed the Core Strategy town centre hierarchy. The 2012 Retail Study Update focused specifically on updating retail floorspace projections.
- 3.193 The NPPF does not provide a definition of a 'district centre'. The most up to date definition is contained within Annex B of PPS4; 'District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non retail services, such as banks, building societies and restaurants, as well as local facilities such as a library'.
- 3.194 In the case of Barrack Road, on balance we do not feel that this road operates as a 'District Centre'. It has a broad mix of shops but it is not a focus for shopping trips in the same way as Highcliffe, nor could we set out a meaningful vision for the road. Retail frontages along Barrack Road as designated in the current adopted Local Plan (2001) will be retained which will protect its retail function to serve local needs.
- 3.195 Despite the June and October resolutions to approve a planning application on the former QinetiQ site this does not make a case for including the retail part and QinetiQ site within a boundary and reclassifying it as a District centre as the Barrack Road shopping area does not include a range of non-retail services such as banks, building societies and restaurants as well as local facilities such as a library. The Bailey Bridge retail park contains retail warehouses and does not include a range of non-retail services.

4 East Dorset Analysis of Responses

Town Centres

13 - Wimborne Minster Town Centre (Policy WMC1).

Pre-Submission

Wimborne Minster Town Centre

Wimborne Minster will continue to act as a key town centre in the District and together with Ferndown will be the main focus for retail development. This is because it is well served by public transport and there are more development opportunities within the centre. The shopping environment will be improved to provide a more pleasant pedestrian townscape, public transport routes will be supported, and facilities and services will continue to be located in this central location for residents and visitors to the town.

To achieve this vision:

- 1. The range of retail uses will be supported and improved, to continue to provide a niche range of quality comparison goods shops to appeal to the residents and large number of visitors to the town.
- 2. Residents will continue to have access to a variety of community services and cultural facilities in the town centre, such as the Tivoli Theatre, Walford Mill, the Allendale Centre and the Library. These will be retained, supported and where possible enhanced to support the vitality of the town centre. The Allenview area will be re-developed to provide a new civic hub and riverside park.
- 3. The evening economy uses such as restaurants, cafés and pubs will be supported in the secondary shopping locations to enhance the vibrancy of the afternoon and evening economy of the town.

- 4. The townscape quality of the town centre will be enhanced; only high quality development proposals that respect and enhance the local character of the centre, and improve ease of movement and legibility will be permitted.
- 5. Higher density residential and commercial development will take place alongside the projected requirement for retail to provide for a balanced, mixed use environment.
- 6. In order to improve pedestrian safety, traffic movement and improve the ambience of the public realm, enhancements to the High Street will be introduced in a phased programme, subject to funding.
- 7. The townscape quality in and around Crown Mead will be improved, and the opportunity for redevelopment to improve links through the town will be promoted.
- 8. In order to improve the vitality of the town centre and improve pedestrian safety around the town, traffic management and calming measures will be considered to reduce pedestrian/vehicular conflict.
- 9. New development, shop fronts and advertisements in the town centre will be of the highest standard of design and in good quality materials, to reflect the architectural and historic significance of the town centre.
- 10. To minimise congestion and air pollution, the use of sustainable modes of transport will be supported with a transport hub created in the Town Centre to support this and pedestrian safety.

The town centre as defined by the town centre boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

Consultation Response

Legally Compliant		Sound			Core Strategy is unsound because it is not:							
				Positively Prepared		Justified		Effective		Consistent with National Policy		Indication of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
7	0	5	8	1	2	4	2	4	2	1	2	13

Table 4.1

4.1 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1322
359478	Mr Rohan Torkildsen	English Heritage	CSPS2738
359555	Mr L Hewitt	Wimborne Minster Town Council	CSPS2074
360235	Mr Christopher Undery	Christopher D Undery	CSPS734
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3259
474462	Mrs Sheila Bourton		CSPS175
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS212
475541	Mr and Mrs P Spencer		CSPS1270
499596	Sir Roger Palin		CSPS2372
507546	Mr Nigel Pugsley	BNP Paribas Real Estate	CSPS698
524723	Mr John Worth	Wimborne Civic Society	CSPS1918
589293	Mr Penri Jones		CSPS1291
643167	Mr Ian Foster		CSPS13
647352	Mrs Audrey Bowler		CSPS75
654989	Tanner & Tilley	Tanner & Tilley Planning Consultants	CSPS978
656498	Mr Matthew Morris	GVA Planning Development	CSPS2905

Summary of Responses

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

4.3 Settlements

 Wimborne as a settlement has expanded into the surrounding parishes and this should be acknowledged. There should be no coalescence of Wimborne and Colehill.

4.4 Town centre

- The function of town centres is changing and is out of the hands of local authorities.
- The District Council should not relocate to this area (Allendale Area) as the use of public money for this cannot be justified.
- A commitment should be included in the Core Strategy to provide the bridge from Waitrose to Crown Mead and Point 7 revised to include this
 requirement.
- Point 3 the policy should be amended refer to the need for the Prime Shopping Core to contribute to the evening economy providing it does not detract from the primary shopping purpose of the core.

4.5 Environment

- Dorset Wildlife Trust recommends that the text supporting the Policy should be amended to recognise the habitat of the River Allen and the
 Groundwater Source Protection Area as well as flooding issues. The opportunity should be taken to consider ecological improvements including
 on the river within the town centre.
- Dorset County Council (DCC) References to flooding need updating to ensure the County Council's responsibilities are reflected.
- English Heritage Support.

4.6 Green Belt

Green Belt should not be built on.

4.7 Housing

• New housing areas should be deleted in view of the impacts on education, health facilities and on the town itself. A new settlement should be planned instead.

- High density development should not take place on Cuthbury allotments.
- Proposal to build additional properties close to Julian's Rd, at a high density will have a detrimental impact and affect the Conservation Area.

4.8 Facilities

• The relocation of the football and rugby clubs with additional housing does nothing for the town and will be used by people from outside the plan area.

4.9 Transport

- There is no plan to improve traffic flow from the north of Wimborne and therefore WMC5 should be deleted.
- Insufficient plans have been made for transport and car parking.
- Highways Agency Although the improvements to Canford Bottom are predicted to improve flows, we would highlight that any development
 proposals in the Wimborne and Colehill areas will still need to take account of and mitigate their traffic impacts. The improvement to Canford Bottom
 does not change the policy, as referenced in 4.57 and Policy KS11 of this Core Strategy, for developments to ensure that any traffic impacts are
 appropriately mitigated.
- The potential Green Link crossing of Julians Road is located in the flood plain.

4.10 Employment

 People living in development north of Wimborne will impact on the town when travelling to work. The Business Park at Stone Lane should be renovated.

Councils' Response

- 4.11 The majority of the responses relate specifically to other policies in the plan and therefore no changes are recommended to this policy. The issues which the responses detail will be dealt with under the relevant policy.
- 4.12 A change to paragraph 8.5 was requested by the Dorset Wildlife Trust to recognise the importance of the Rivers Allen and Stour. It is considered that this issue is covered in Chapter 13, Managing the Natural Environment and the background papers also recognise the importance of the variety of habitats to be found in the District and Borough but a change to the paragraph is recommended. DCC wished for additional wording on flood risk to be added. This is covered by Policy ME6. Further information on flood risk is available in the background papers including the Strategic Flood Risk Assessments.
- 4.13 The Wildlife Trust also suggested that the reference to a park should include the words "wildlife linear park". It is accepted that any proposal here will need to consider biodiversity.
- 4.14 The comments by the Highways Agency will be referred to under the relevant policy headings.

4.15 The changes advocated in the NPPF recommend the extent of town centres and primary shopping areas are defined, based on a clear definition of primary and secondary frontages in designated centres, with associated policies setting out the clear uses permitted in these locations. The terms 'Primary and Secondary Shopping Cores' will therefore be removed from the policy, and replaced with 'Primary and Secondary Shopping Frontages' as appropriate. Changes are also made to paragraph 8.25.

Proposed Changes to the Pre-Submission Core Strategy

- **4.16** Text changes No explicit mention of Primary Shopping Area and Primary and Secondary Shopping Frontages in the policy wording. Traffic movement has been merged into one paragraph to avoid repetition.
- **4.17** Paragraph 8.5
- 4.18 Text expanded
- 4.19 The Natural Environment
- **4.20** Expand text to give clarity on habitats.
- **4.21** Wimborne sits at the confluence of the Rivers Allen and Stour. These are not protected in themselves, but they do <u>provide habitat for protected species have ecological value in providing habitats for protected and priority species.</u> They also affect the location of development as they cause flooding. Additionally, the area to the north of Wimborne is protected as a Groundwater Source Protection Zone and is a major source of water for the area.
- **4.22** Paragraph 8.24
- 4.23 The Key Facts need to be expanded to support the policy. Additional text to be included regarding the Town Centre Boundary, the Primary Shopping Area, Primary Shopping Core and Secondary Shopping Core in the policy wording.
- 4.24 Key Facts (2012)
- Wimborne has about 160 commercial and retail units in the town centre.
- 43% of the units are used for commercial or miscellaneous uses.

4.25 Trading

- The quality and proportion of special independent retailers within Wimborne Minster was rated as 'very good' due to the variety and quality of goods sold.
- The vacancy rate in the town is good (4.3%) as it is less than half the national average (10.7%). The few empty units are dispersed throughout the town centre, so there is not a large concentration of vacant units.
- The centre has a high number of service uses for its size, in particular banks and other financial services and estate agents (43.2%).
- The number of convenience retailers (5.6%) is far below the national average (9.4%).
- There are a high number of pubs, restaurants and takeaways/cafes, the majority of which are high quality units.
- The evening economy is very good with several pubs, and restaurants, as well as the Tivoli Theatre which doubles as a cinema, and as a venue for live shows.

4.26 **Environment**

- The location and convenience of car parks, of varying size is seen to be quite good, as is the frequency of bus stops.
- Accessibility and movement around Wimborne is seen as an issue due to the sprawling nature of the town centre along largely un-pedestrianised routes, and a relatively high volume of traffic, leading to some pedestrian vehicular conflict.
- The quality of buildings, of planting and attractiveness of open space are considered to be very good.
- The cleanliness of Wimborne is generally very good, with limited litter or fly posters.

4.27 Strategic Requirements

- There is a need for 2,500 2,550 sqm (net) of additional comparison floorspace and 400 500 sqm (net) of convenience floorspace to 2031 in Wimborne Town Centre (Retail Study Update 2012).
- 4.28 Insert before WMC1 Inclusion of Town Centre boundary and extent of Shopping Frontages.
- 4.29 Wimborne Minster Town Centre Boundary
- 4.30 The Town Centre Boundary defines the focus of where town centre uses may be appropriate subject to compliance with other national and local policy, including the sequential test approach and impact assessment for retail uses.
- 4.31 <u>Wimborne Minster Town Centre Primary Shopping Area and Shopping Frontages</u>
- 4.32 The Primary Shopping Area forms the area where retail development will be concentrated and comprises the Primary and Secondary Shopping Frontages. The defined Primary Shopping Area boundary has been informed by the Joint Retail Study and the annual pedestrian count surveys.

4.33 The Primary Shopping Frontages cover the busier streets and includes The Square, High Street, and Crown Mead where A1 retail uses will supported. The streets covered by the Secondary Shopping Frontages, where footfall is lower, will allow a more flexible approach to uses, including Class A1, A2 and A3 in order to contribute to the overall vitality of the centre.

Policy WMC1

Wimborne Minster Town Centre Vision

Wimborne Minster will continue to act as a key town centre in the District and together with Ferndown will be the main focus for retail development. This is because it is well served by public transport and there are more development opportunities within the centre. The shopping environment will be improved to provide a more pleasant pedestrian townscape, public transport routes will be supported, and facilities and services will continue to be located in this central location for residents and visitors to the town.

To achieve this vision:

- 1. <u>The Town Centre as defined by the Town Centre Boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts, culture and tourism development, subject to compliance with other national and local policy.</u>
- 2. <u>A Primary Shopping Area will be designated in Wimborne Minster which forms the area where retail development will be concentrated and comprises the Primary and Secondary Shopping Frontages.</u>
- 3. The range of retail uses will be supported and improved; <u>convenience units of 400 500 sqm and comparison units of 2,500 2,550 sqm</u> <u>during the plan period</u> to continue to provide a niche range of quality comparison goods shops to appeal to the residents and large number of visitors to the town.
- 4. Residents will continue to have access to a variety of community services and cultural facilities in the town centre, such as the Tivoli Theatre, Walford Mill, the Allendale Centre and the Library. These will be retained, supported and where possible enhanced to support the vitality of the town centre. The Allenview area will be re-developed to provide a new civic hub and riverside park.
- 5. The evening economy uses such as restaurants, cafés and pubs will be supported in the secondary shopping locations to enhance the vibrancy of the afternoon and evening economy of the town.
- 6. The townscape quality of the town centre will be enhanced; only high quality development proposals that respect and enhance the local character of the centre, and improve ease of movement and legibility will be permitted.
- 7. Higher density residential and commercial development will take place alongside the projected requirement for retail to provide for a balanced, mixed use environment.
- 8. In order to improve pedestrian safety, traffic movement and improve the ambiance of the public realm, traffic management and calming measures will be considered to reduce pedestrian/vehicular conflict and enhancements to the High Street will be introduced in a phased programme, subject to funding.

- 9. The townscape quality in and around Crown Mead will be improved, and the opportunity for redevelopment to improve links through the town will be promoted.
- 10. <u>In order to improve the vitality of the town centre and improve pedestrian safety around the town, traffic management and calming measures will be considered to reduce pedestrian/vehicular conflict.</u>
- 11. New development, shop fronts and advertisements in the town centre will be of the highest standard of design and in good quality materials, to reflect the architectural and historic significance of the town centre.
- 12. To minimise congestion and air pollution, the use of sustainable modes of transport will be supported with a transport hub created in the Town Centre to support this and pedestrian safety.

The town centre as defined by the town centre boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

4.34 Map 8.1 Wimborne Minster Town Centre

4.35 Amend Key to 'Primary Shopping Frontages' and 'Secondary Shopping Frontages' - change in terminology from PPS4.

Consultation Response

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

Table 4.2

4.36 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
360235	Mr Christopher Undery	Christopher D Undery	PCCS67

360235	Mr Christopher Undery	Christopher D Undery	PCCS90
718952	Chris Slocock	Chairman Wimborne BID Ltd	PCCS219

Summary of Responses

- 4.37 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:
- 4.38 Accessibility and Car Parking
- 4.39 Mr C Undery, Surveyor
- Strategy objectives seek to foster the commercial prosperity of Wimborne Town and pedestrian flow within the town centre. At the time of approval for the Waitrose development a bridge link was envisaged from Crown Mead to join the major space occupier in the town with the historic shopping centre. Waitrose earmarked funds to provide this bridge. The link connection with Crown Mead should be incorporated into the Strategy & Policies with compulsory powers exercised as necessary to ensure its provision, recognising that cost funding by Waitrose will underwrite the work.
- See previously submitted Response Form dated 15/06/2012. The imposition on the developer of cost burdens including high proportions of affordable
 housing, suitable alternative natural green spaces, heathland mitigation, community and transport infrastructure levies etc. will undermine viability,
 cause developers to reduce purchase offers to landowners to the extent that landowners will decide not to sell, or offers to purchase will fail to
 reach base price provisions in option agreements. In consequence development will not come forward, landowners will withhold allocated land and
 housing provision and other benefits will not be achieved.

4.40 Mr C Slocock, Chairman, Wimborne BID Ltd

- In relation to the policies listed where several options have been put forward to increase the number of homes in and around Wimborne, the 'Infrastructure' sections of each policy make no mention of the current or future availability of parking in Wimborne Town Centre. The residents and traders of Wimborne already feel that the parking arrangements are inadequate and yet there appears to be no consideration of increasing the number of number of spaces in line with the corresponding increase in residents that would enter the town. There can only be a boost to the local economy if the new residents are able to access the town.
 - The Local Authority has a responsibility to support the local economy (Government Directive) and the Mary Portas review also identified car parking as the 'number one' issue to a town economy.

Councils' Position

4.41 The bridge link between Crown Mead and Waitrose has detailed planning permission for its construction, and we are committed to its delivery.

4.42 In order to consider the future needs for businesses and residents, a public car parking assessment in Wimborne will take place, as stated in Policy WMC2.

Town Centres

14 - The Allendale Area of Potential Change, Wimborne (Policy WMC2).

Pre-Submission

Policy WMC2

The Allendale Area of Potential Change

The area shown on the Proposals Map is identified as an area for potential change to enable the delivery of a civic hub to include:

- 1. A new Allendale Community Centre.
- 2. District Council Offices.
- 3. Offices for other public bodies.
- 4. A riverside park
- 5. Public car parking.

This is to be planned in an Area Brief which will provide a comprehensive overview of how to deliver the potential changes. To enable any change to take place the following information must be provided:

- A Flood Risk Assessment.
- A conservation assessment of the impact of development on the historic setting of Allendale House.
- A public car parking assessment for Wimborne Town Centre.
- An assessment of need for community facilities.

Consultation Response

Legally Compliant		Sound			Core Strategy is unsound because it is not:							
				Positively Prepared		Justified		Effective		Consistent with National Policy		Indication of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
9	0	3	18	2	2	8	6	7	5	1	3	21

Table 4.3

4.43 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1324
359478	Mr Rohan Torkildsen	English Heritage	CSPS2740
359546	Mrs K. Bradbury	Vale of Allen Parish Council	CSPS384
359555	Mr L Hewitt	Wimborne Minster Town Council	CSPS2075
360082	Mr and Mrs K Healy		CSPS2469
360235	Mr Christopher Undery	Christopher D Undery	CSPS735
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3268
474462	Mrs Sheila Bourton		CSPS176
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS213
475541	Mr and Mrs P Spencer		CSPS1271
498554	Mr Paul Davenport	Stour Valley Properties Ltd	CSPS3035

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
499596	Sir Roger Palin		CSPS2373
501497	Mr Adrian Rafferty		CSPS1455
515938	Mr Frank Stevens		CSPS400
524723	Mr John Worth	Wimborne Civic Society	CSPS1920
643167	Mr Ian Foster		CSPS19
644986	Mr John Slow	Allendale Community Centre	CSPS39
648141	Mr David Plowman		CSPS133
650948	Mr Gary Court		CSPS402
654392	Mr Geoffrey Chopping		CSPS672
654506	Mr John Showell		CSPS984
654511	Mr Kevin Hodder	East Boro Housing Trust	CSPS687
656498	Mr Matthew Morris	GVA Planning Development	CSPS2904
703944	Cllr John Little	Christchurch & East Dorset Conservative Association	CSPS447

Summary of Responses

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

4.45 Environment

• Would prefer "a riverside park" to be described as "a riverside wildlife and linear park" and text changed accordingly. An ecological assessment and appraisal of biodiversity would be required.

- English Heritage support.
- Need to ensure that redevelopment secures an attractive entrance to the town.

4.46 Transport

- Insufficient plans have been made for transport and car parking.
- The public car parking assessment should take into consideration the needs of employees, entertainment, tourists and residential.
- A multi-storey car park should be built on the Allenview car park and the other car parks used for affordable and sheltered housing.
- A commitment should be included in the Core Strategy to provide the bridge from Waitrose to Crown Mead.
- The environmental impact of the increase in traffic and car parking should be assessed.
- Need to ensure that redevelopment does not damage accessibility into the town.

4.47 Facilities

- The District Council should not relocate to this area as the use of public money for this cannot be justified. Too much land would be needed for the offices and car parking. A multi-storey car park would be required to cater for the Council staff.
- Build replacement offices on Cuthbury.
- The relocation of the District Council should be to the Police Station/Magistrates Courts site.
- The Allendale Centre has a lease till 2022 therefore no action can take place till then.
- No evidence included to show the Allendale Centre is not capable of refurbishment.
- Existing facilities are sufficient, including parking

Councils' Response

- 4.48 The Wildlife Trust suggested that the reference to a park should include the words "wildlife linear park". It is accepted that any proposal here will need to consider biodiversity.
- 4.49 The Council monitors the use of its car parks and will continue to do so. The policy requires an assessment of car parking to be carried out as part of the proposals.
- 4.50 A number of people have stated that the transport issues which they believe will result from the proposed development are not covered by the proposals set out in the policy. Dorset County Council has carried out transport assessments in general and the assessments show that development can take place. Following the adoption of the Core Strategy, further detailed assessments which will show the specific issues relating to the site and the improvements which will be needed as part of the planning application process. The Highways Agency has stated that although the improvements to Canford Bottom are predicted to improve flows, any development proposals in the Wimborne and Colehill areas will still need to take account of and mitigate their traffic impacts. The improvement to Canford Bottom does not change the policy, as referenced in 4.57 and Policy KS11 of this Core Strategy, for developments to ensure that any traffic impacts are appropriately mitigated. This requirement applies to this proposal.

4.51 The Council notes the comments on the proposal to provide a new Community Centre and new District Council Offices. The Council will continue to investigate the opportunities to provide new public facilities, including the operation of its business and no change will be made in respect of this part of the policy.

Proposed Changes to the Pre-Submission Core Strategy

4.52 No changes were proposed to Policy WMC2 following Pre-Submission consultation.

Policy WMC2

The Allendale Area of Potential Change

The area shown on the Proposals Map is identified as an area for potential change to enable the delivery of a civic hub to include:

- 1. A new Allendale Community Centre.
- 2. District Council Offices.
- 3. Offices for other public bodies.
- 4. A riverside park
- 5. Public car parking.

This is to be planned in an Area Brief which will provide a comprehensive overview of how to deliver the potential changes. To enable any change to take place the following information must be provided:

- A Flood Risk Assessment.
- A conservation assessment of the impact of development on the historic setting of Allendale House.
- A public car parking assessment for Wimborne Town Centre.
- An assessment of need for community facilities.

Consultation Response

4.53 As no changes were proposed to this policy, it did not form part of the Schedule of Proposed Changes consultation.

Leg	ally	Sou	ınd	Core Strategy is unsound because it is not:						
Com	Compliant		Positively Prepar		Justified Effective		Consistent with National Policy	Indication of legal compliance		
Yes	No	Yes No						or soundness		
0	0	0	0	0	0	0	0	0		

Table 4.4

4.54 List of Consultee Reference Numbers

4.55 Not applicable.

Summary of Responses

4.56 Not applicable.

Councils' Position

4.57 No changes to Policy WMC2 were proposed following Pre-Submission consultation.

Town Centres

15 - Ferndown Town Centre (Policy FWP1).

Pre-Submission

Policy FWP1

Ferndown Town Centre

Our vision is that Ferndown will continue to act as a key Town Centre in the District and will remain a key focus for retail development. The comparison and convenience retail offer will be enhanced and the shopping environment improved to provide a more pleasant and pedestrian friendly townscape, public transport routes will be supported, and facilities and services will continue to be located in this central location for residents and visitors to the town.

To achieve this vision:

Retail uses will be expanded and enhanced to promote the vitality and viability of the centre; convenience units up to 2,064 sq m and comparison units up to 4,239 sq m. The strategy will seek to enhance the niche retail offer and with a mix of unit sizes improve the presence of national multiples, to provide for better choice in comparison shopping. An enhanced pedestrianised Penny's Walk will help to attract national multiple chains whilst niche retail shops will continue to thrive on Victoria Road.

Residents of the town will continue to have access to a variety of important community services and cultural facilities located in the town centre, such as the Barrington Theatre and the Library. These will be retained and where possible enhanced.

The evening economy uses such as restaurants, cafés and pubs will be supported in the secondary shopping locations to enhance the vibrancy of the afternoon and evening economy of the town.

The townscape quality of the centre will be improved to achieve a safe, high quality and attractive environment that will give the centre a distinct character and enhance its sense of identity. This will benefit residents, visitors and businesses, improving ease of movement around the town for pedestrians and cyclists and offer better legibility.

Higher density residential and commercial development will take place alongside the projected requirement for retail growth to provide for a balanced, mixed use environment.

In order to improve the vitality of the town centre and improve pedestrian safety around the town, traffic management and calming measures will be introduced to reduce pedestrian/vehicular conflict in Victoria and Ringwood Roads together with the diversion of Heavy Goods Vehicles. Public transport will be promoted as the primary means of travelling into the town centre.

To minimise congestion and air pollution, the use of sustainable modes of transport will be encouraged. Ferndown benefits from a comprehensive public transport network providing links both within the town and its surrounding areas via bus services. Public transport, cycling and walking will be promoted as the primary means of travelling into town.

The Council will ensure that appropriate public parking levels and accessibility are maintained within the town to maintain the vitality and viability of the centre, with an appropriate signage strategy.

The Town Centre as defined by the Town Centre Boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

Consultation Response

	ally	So	und	Core Strategy is unsound because it is not:								No Indication
Compliant				Positively Prepared		Justified		Effective		Consistent with National Policy		of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
9	0	6	18	11	4	15	2	17	2	5	1	8

Table 4.5

4.58 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360271	Cllr Paul Timberlake		CSPS525
360509	Miss Rose Freeman	The Theatres Trust	CSPS369
360509	Miss Rose Freeman	The Theatres Trust	CSPS3478
490823	Mr Ian Jones	Ferndown Town Council	CSPS2985
490823	Mr Ian Jones	Ferndown Town Council	CSPS2986
490823	Mr Ian Jones	Ferndown Town Council	CSPS2992
507546	Mr Nigel Pugsley	BNP Paribas Real Estate	CSPS700
538118	Mrs Christine Cullen		CSPS2785
645272	Mr Kenneth Frost		CSPS45
650107	Mr David Baxter		CSPS285
654783	Mrs Lesley Wilson		CSPS812
655064	Mr and Mrs K Cullen		CSPS2790
703944	Cllr John Little	Christchurch & East Dorset Conservative Association	CSPS448

4.59 Summary of Responses

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

4.61 General

- Ferndown Town Council Support Highway alterations and environmental enhancements will help to improve the pedestrians shopping experience.
- The Town Centre has shown a steady decline over the last decade and without some positive proposals the situation will continue.
- Proactive radical improvements are required, and this policy does nothing to support this requirement.

4.62 Shopping Environment

- Ferndown Town Council Support, but require a stronger commitment to improvements to Penny's Walk and Victoria Road, with details of a time frame.
- Ferndown is awash with charity shops. Are more shops and facilities really needed?
- A pedestrian friendly town centre is supported.

4.63 Town Centre Facilities

- Where will the 'additional shopping' go? There is a lack of vacant units and the car parks should not be used.
- The community centre is out dated and Ferndown Leisure Centre was built in the 1970's and despite changes is still not very nice.
- We need something for youngsters to do.

4.64 Transport

- Ferndown Town Council Is there an opportunity to create a Transport Hub as part of the Penny's Walk / Victoria Road Improvement Plan?
- It is inexcusable that HGVs continue to be allowed to travel through Ferndown Town Centre. They should use Ferndown by pass.
- Public car parking is lacking in Ferndown. Not everyone can use the bus network.
- Local traffic should be able to use the town centre, and non-local traffic should be discouraged by a congestion charge.

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

- 4.66 The NPPF continues to support the vitality and viability of town centres, emphasising the need to positively plan for those in decline, to stimulate markets, and to promote competitive town centres that provide customer choice and a diverse retail offer, reflecting the individuality of the town centre. The Ferndown Vision supports the continued vitality of the town centre, by advocating enhancements to Penny's Walk, by reducing vehicular conflict in Ringwood and Victoria Roads, and by designating Primary and Secondary Shopping Frontages in line with Policy KS7. Future retail growth is discussed in Policy KS8 which should also be read in conjunction with this policy.
- **4.67** The supporting text of the Policy will be enhanced to present a robust commitment to the support and growth of Ferndown Town Centre. To drive the Vision, the Council will work with key stakeholders, including the Chamber of Trade and Commerce, the Town Council, community planning groups and landowners in the centre to support the local economy and community.

Proposed Changes to the Pre-Submission Core Strategy

- 4.68 Paragraph 10.7
- 4.69 Amend text. <u>1980's</u> to <u>1980s</u>....

- 4.70 Paragraph 10.20 insert Key Facts and an explanation of Shopping Frontages
- 4.71 Key Facts
- 4.72 Trading
- The shopping area of Ferndown is concentrated along Ringwood Road and Victoria Road, with some shops located within the purpose built shopping area of Penny's Walk and the Ferndown Centre.
- Ferndown has 113 commercial and retail units in the town centre.
- There is a high proportion of service use units (53.1%) compared to the national average of 31.6%.
- <u>In contrast, Ferndown has a relatively low proportion of comparison retail units (36.3%), compared with the national average (48.3%).</u>

 The offer is limited however, with a lack of clothing, footwear, arts, crafts and stationers.
- The quality and proportion of national multiples is low and are under represented in the town centre.
- The vacancy rate is very low at 2.7%, and these units are dispersed across the town, rather than concentrated in one location, the national average is 10.7%.
- The evening economy consists of the Barrington Theatre, the two pubs, two restaurants and take-aways.

4.73 Environment

- The topography of the town is relatively flat, with many converted buildings and some purpose built units, particularly in Penny's Walk.

 Overall, the units are quite large in size.
- Penny's Walk and the Ferndown Centre is pedestrianised.
- Movement in and around the centre of Ferndown is considered to be difficult due to the volume of traffic passing along Victoria Road and particularly Ringwood Road (A348).
- The main car park at Tesco is well located and free with 800 spaces. The position of bus stops and quality of them around the centre could be improved.
- The streets are clean and tidy with limited litter and are generally well maintained.
- The quality of the streetscape and shopping environment is considered to be low, requiring greater vibrancy and liveliness.

4.74 Strategic Requirements

- To improve the pedestrian vehicular conflict which exists in Ringwood Road and Victoria Road.
- To enhance the shopping streets to create a more attractive shopping environment.
- There is a need for 1,500 1,600 sgm of comparison floorspace, and 1,400 1,500 sgm of convenience floorspace in Ferndown.

4.75 Ferndown Town Centre Primary Shopping Area and Shopping Frontages

- 4.76 The Primary Shopping Area forms the area where retail development will be concentrated and comprises the Primary and Secondary Shopping Cores. The defined Primary Shopping Area boundary has been informed by the Joint Retail Study (2008), the Retail Update (2012) and the annual pedestrian count surveys.
- 4.77 The Primary Shopping Frontages cover the busier streets and includes Penny's Walk and the Ferndown Centre where A1 retail uses will be supported. The streets covered by the Secondary Shopping Frontages, where footfall is lower, will allow a more flexible approach to uses, including Class A1, A2 and A3 in order to contribute to the overall vitality of the centre.
- 4.78 Proposed Pre-Submission Change

Policy FWP1

Ferndown Town Centre Vision

Our vision is that Ferndown will continue to act as a key Town Centre in the District and will remain a key focus for retail development. The comparison and convenience retail offer will be enhanced and the shopping environment improved to provide a more pleasant and pedestrian friendly townscape, public transport routes will be supported, and facilities and services will continue to be located in this central location for residents and visitors to the town.

To achieve this vision:

- 1. The Town Centre as defined by the Town Centre Boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts, culture and tourism development, subject to compliance with other national and local policy.
- 2. A Primary Shopping Area will be designated in Ferndown which forms the area where retail development will be concentrated and comprises the Primary and Secondary Shopping Frontages.
- 3. Retail uses will be expanded and enhanced to promote the vitality and viability of the centre; convenience units up to 2.064-1.400 1500 sq m and comparison units up to 4.239-1.500 1.600 sq m. The strategy will seek to enhance the niche retail offer and with a mix of unit sizes improve the presence of national multiples, to provide for better choice in comparison shopping. An enhanced pedestrianised Penny's Walk will help to attract national multiple chains whilst niche retail shops will continue to thrive on Victoria Road.
- 4. Residents of the town will continue to have access to a variety of important community services and cultural facilities located in the town centre, such as the Barrington Theatre and the Library. These will be retained and where possible enhanced.
- 5. The evening economy uses such as restaurants, cafés and pubs will be supported in the secondary shopping locations to enhance the vibrancy of the afternoon and evening economy of the town.
- 6. The townscape quality of the centre will be improved to achieve a safe, high quality and attractive environment that will give the centre a distinct character and enhance its sense of identity. This will benefit residents, visitors and businesses, improving ease of movement around the town for pedestrians and cyclists and offer better legibility.
- 7. Higher density residential and commercial development will take place alongside the projected requirement for retail growth to provide for a balanced, mixed use environment.
- 8. In order to improve the vitality of the town centre and improve pedestrian safety around the town, traffic management and calming measures will be introduced to reduce pedestrian/vehicular conflict in Victoria and Ringwood Roads together with the diversion of Heavy Goods Vehicles. Public transport will be promoted as the primary means of travelling into the town centre. To minimise congestion and air pollution, the use of sustainable modes of transport will be encouraged.

9. <u>To minimise congestion and air pollution, the use of sustainable modes of transport will be encouraged. Ferndown benefits from a comprehensive public transport network providing links both within the town and its surrounding areas via bus services. Public transport, cycling and walking will be promoted as the primary means of travelling into town....</u>

The Town Centre as defined by the Town Centre Boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

4.79 Map 11.1 Ferndown Town Centre - Proposed Changes

4.80 Remove reference to Primary and Secondary Shopping Cores and replace with Primary and Secondary Shopping Frontages.

Consultation Response

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

Table 4.6

4.81 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
490823	Mr Ian Jones	Clerk Ferndown Town Council	PCCS168

Summary of responses

4.82 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:

4.83 General comments

4.84 Ferndown Town Council

- The proposed changes are not backed up with specific details as to why the amended text is required.
- The issue of HGVs using through routes through the town has not been addressed.
- The issue regarding the increase in the number of dementia homes within the town has not been addressed by the policy. For the size of town, there are an excess.

4.85 Councils' Position

4.86 The amendments have taken into account changes to retail floorspace required after the Retail Study Update (2012), and the Primary Shopping Area as required by the NPPF (2012). Bullet point 8 covers the issue of HGV traffic using the town, and this was not altered from the Pre-Submission document. The issue of dementia care homes in not covered in this particular policy which considers the health and vitality of the town centre, and future needs in the vision. New Policy LN7 discusses the provision of housing and accommodation for vulnerable people, including sheltered housing and dementia care homes and how they should be delivered. This policy was written in conjunction with Dorset County Council as social care provider for the area.

Town Centres

16 - Verwood Town Centre (Policy VTSW1).

Pre-Submission

Policy VTSW1

Verwood Town Centre

Our vision is that Verwood Town Centre will be a key town centre in East Dorset, providing a thriving busy centre to the local population and visitors. The town centre will continue to provide an attractive townscape, public transport routes will be supported, and facilities and services will continue to be located in this central location.

To achieve this vision:

- 1. The range of retail uses will be supported and improved to provide more comparison and convenience goods shops in small to medium size units to appeal to small independent shops.
- 2. Residents will continue to have access to a variety of community services and cultural facilities in the town centre, such as the Hub, the Memorial Hall and the Library. These will be retained, supported and, where possible, enhanced.
- 3. Evening economy uses such as restaurants, cafés and pubs will be supported in the town centre to enhance the vibrancy of the afternoon and evening economy of the town.
- 4. The townscape quality of the town centre will continue to be enhanced; only high quality development proposals that respect and enhance the local character of the centre, and improve ease of movement and legibility will be permitted.
- 5. Residential and commercial development will take place alongside the projected requirement for retail to provide for a balanced, mixed use environment.
- 6. In order to improve the vitality of the town centre and improve pedestrian safety around the town, traffic management and calming measures will be provided to reduce pedestrian/vehicular conflict.
- 7. To minimise congestion and air pollution, the use of sustainable modes of transport will be supported.

The Town Centre as defined by the Town Centre Boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

Consultation Response

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

Table 4.7

4.87 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359547	Mrs V Bright	Verwood Town Council	CSPS1728
507546	Mr Nigel Pugsley	BNP Paribas Real Estate	CSPS705
522117	Mrs Hilary Chittenden		CSPS1536
588532	Mr and Mrs Nick Hunt		CSPS47
649505	Miss Dawn Leader		CSPS302
654030	Mr Jim Lumley		CSPS659
654512	Ms Jane Russell		CSPS787

Summary of Responses

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

4.89 Housing

New housing in Verwood should not be permitted unless it is required to meet local needs.

- Reference to residential development should be deleted as the majority of the Town Centre is within 400m of protected heathland where additional residential development is precluded.
- Verwood Town Council request that if any residential units are re-developed, the residential use is maintained above the new shop units.

4.90 Car Parking and Transport

- More car parking spaces should be provided for any additional units.
- There is insufficient parking now, in particular there is a shortage of disabled spaces.
- The county-wide Local Transport Plan recommends that low noise road surfacing should be used for re-surfacing works in certain conditions this would add to the attractiveness of the town centre.
- Details of traffic management and calming should be provided.
- Concerns that the existing bus service in the town is insufficient and is unlikely to improve.
- It is argued that the level of congestion is bad in Verwood, especially in the town centre, which is created by vehicles delivering to the shops.

4.91 Town Centre Uses

- More office space to provide additional job opportunities is required, rather than more units for services such as hairdressers, banks and estate agents.
- There needs to be reference to the fact that Verwood has two centres one at Ferrett Green and one around Morrisons (which is to be expanded). There is an existing footpath link between the two which needs to be promoted by good signage.
- Any vision for the Town Centre will need to be totally radical and move away from a traditional 'high street' approach.
- Consideration should be given to ensure the most effective use of existing community buildings within the town, for example the Day Care Centre which is currently under-used
- The town cannot expand any further with such a poor town centre. The shops are inadequate, parking is too limited for shoppers and there is no bus service to speak of which can be used by Verwood residents without cars.
- 4.92 The comments from key stakeholders and the general public set out below refer the the introductory paragraphs to Chapter 11 and are as follows:
- Paragraph 11.5 should refer to the Bugdens Meadows element of the SSSI as well as the woodland element
- Paragraph 11.7 should include reference to the fact that the River Crane is part of the Moors River SSSI system
- Long-time local resident has never witnessed the River Crane to flood.
- DCC, as Lead Local Flood Authority, wish to see reference made to the fact that the River Crane is subject to main river and local flooding.
- A number of respondents comment that the doctors and dentists in Verwood are currently full and that new medical facilities should be built in advance of any new housing development
- Sufficient space should be provided at any new school to accommodate drop off and picking up points to avoid the congestion that exists around the existing schools.

Councils' Response

4.93 A number of the responses recorded in this section refer to information/statements contained within the opening introductory paragraphs to Chapter 11. Some of the factual changes suggested have been accepted and will be dealt with as minor changes to the Submission document, and some are dealt with in more detail in respect of the specific policy proposals for the issue raised, such as the upper school provision. They are therefore not addressed in any detail here.

4.94 Town Centre Uses

- 4.95 The NPPF contains guidance on ensuring the vitality of town centres, and Policies KS7 and KS8 in the Key Strategy Chapter of the Core Strategy set out in more detail the Councils' response to issues on the role of Town Centres and Future Retail Provision, and update these policies in light of the revised national guidance and local information contained in the Retail Update 2012.
- 4.96 Reference to residential development being appropriate within the town centre has been removed as the majority of the area lies within 400m of European protected heathland where residential development is precluded.

4.97 Transport

4.98 A significant number of people have stated that the transport issues which they believe will result from the proposed development are not covered by the proposals set out in the policy. Dorset County Council has carried out transport assessments in general and the assessments show that development can take place. Following the adoption of the Core Strategy a developer will be required to carry out further assessments which will show the specific issues relating to the site and the improvements which will be required as part of the planning application process.

Proposed Changes to the Pre-Submission Core Strategy

- 4.99 Policy VTSW1
- **4.100** Include the word 'Vision' in the title.
- 4.101 There is no explicit mention of Primary Shopping Area and Shopping Frontages in the policy wording, as required in the NPPF. The policy is therefore amended to comply with national guidance and to be consistent with policies KS7 and KS8 elsewhere in the Core Strategy.
- **4.102** Floorspace projections have been included in the policy wording.
- **4.103** References to residential development in the town centre removed. Most of the town centre is within 400m of heathland, which would preclude residential development.
- **4.104** Traffic movement has been merged into one paragraph to avoid repetition.
- **4.105** Delete the wording at the bottom of the Policy VTSW1 text box relating to the Town Centre Boundary.
- 4.106 Paragraph 11.7
- **4.107** Text change 'The River Crane that <u>runs flows</u> along the....
- 4.108 Paragraph 11.21 Verwood Town Centre
- 4.109 Insert a Key Facts Text box to support policy
- 4.110 Key Facts (2012)
- 4.111 Trading
- Verwood has 37 ground floor commercial use units in the centre.

- There is a high proportion of service uses (hairdressers, estate agents and beauty salons) at 67.6%, compared to the national average of 31.6%.
- <u>Conversely, Verwood has a low proportion of comparison shop units at 24.3% compared to the national average of 48.8%. The vacancy rate is very low in the town.</u> In particular there is under provision in furniture, clothing, books, textiles and hardware.
- There are a high proportion of independent traders.
- There are no restaurants or pubs in the centre.

4.112 **Environment**

- The topography is flat and most buildings are conversions of a modern design.
- The centre is accessible by road and bus, but there can be pedestrian and vehicular conflict in Ringwood Road.
- The centre is attractive and newly laid out with a green.
- The public car parks are free, well located and well used.

4.113 Strategic Requirements

- There is a need for 700 800 sqm of comparison floorspace, and 600 650 sqm of convenience floorspace in Verwood.
- 4.114 <u>Verwood Town Centre Primary Shopping Area</u>
- 4.115 The Primary Shopping Area forms the area where retail development will be concentrated which has been informed by the Joint Retail Study (2008), the Retail Update (2012) and the annual pedestrian count surveys.

Policy VTSW1

Verwood Town Centre Vision

Our vision is that Verwood Town Centre will be a key town centre in East Dorset, providing a thriving busy centre to the local population and visitors. The town centre will continue to provide an attractive townscape, public transport routes will be supported, and facilities and services will continue to be located in this central location.

To achieve this vision:

- 1. The Town Centre as defined by the Town Centre Boundary will be the focus for town centre uses including employment, retail, leisure and entertainment, arts, culture and tourism development, subject to compliance with other national and local policy.
- 2. <u>A Primary Shopping Area will be designated in Verwood which forms the area where retail development will be concentrated and contains the Primary Shopping Frontages.</u>
- 3. The range of retail uses will be supported and improved to provide more comparison and convenience goods shops in small to medium size units to appeal to small independent shops. This includes up to 600 650 sqm of convenience floorspace and 700 -800 sqm of comparison floorspace in Verwood in the plan period.
- 4. Residents will continue to have access to a variety of community services and cultural facilities in the town centre, such as the Hub, the Memorial Hall and the Library. These will be retained, supported and, where possible, enhanced.
- 5. Evening economy uses such as restaurants, cafés and pubs will be supported in the town centre to enhance the vibrancy of the afternoon and evening economy of the town.
- 6. The townscape quality of the town centre will continue to be enhanced; only high quality development proposals that respect and enhance the local character of the centre, and improve ease of movement and legibility will be permitted.
- 7. Residential and Commercial development will take place alongside the projected requirement for retail to provide for a balanced, mixed use environment.
- 8. In order to improve the vitality of the town centre and improve pedestrian safety around the town, traffic management and calming measures will be provided to reduce pedestrian/vehicular conflict, and sustainable modes of transport will be supported.
- 9. To minimise congestion and air pollution, the use of sustainable modes of transport will be supported.

The Town Centre as defined by the Town Centre Boundary will be the focus for town centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

Consultation Response

	ally	Sou	ınd	Core Strategy is unsound because it is not:						
Com	pliant			Positively Prepared	Positively Prepared Justified		Effective Consistent with National Policy			
Yes	No	Yes No						or soundness		
0	0	0 0		0	0	0	0	0		

Table 4.8

4.116 List of Consultee Reference Numbers

4.117 None were received.

Summary of Responses

4.118 No responses were received on the Proposed Changes to this policy.

Councils' Position

4.119 The Councils' propose Policy VSTW1 as amended by the proposed changes. No representations have been received on the changes proposed.

Town Centres.

17 - West Moors District Centre (Policy VTSW9).

Pre-Submission

Policy VTSW9

West Moors District Centre

Our vision for West Moors District Centre is that it will continue to act as a key District Centre in East Dorset, providing a central focus to the local population. The District Centre will be supported to provide an attractive townscape, public transport routes sustained, and facilities and services will continue to be located in this central location.

To achieve this vision:

- 1. The range of retail uses will be supported and improved to provide more comparison goods shops, in small to medium sizes to appeal to small independent shops.
- 2. Residents will continue to have access to a variety of community services and cultural facilities in the district centre, such as the doctors' surgeries and the Library. These will be retained, supported and, where, possible enhanced.

- 3. The promotion of evening economy uses such as restaurants, cafés and pubs will be supported in the district centre to enhance the vibrancy of the afternoon and evening economy of the town.
- 4. The townscape quality of the district centre will continue to be enhanced; only high quality development proposals that respect and enhance the local character of the centre, and improve ease of movement and legibility will be permitted.
- 5. In order to improve the vitality of the district centre and improve pedestrian safety around the town, traffic management and calming measures will be considered in Station Road to reduce pedestrian/vehicular conflict.
- 6. Residential and commercial development will take place alongside the projected requirement for retail to provide for a balanced, mixed-use environment.
- 7. To minimise congestion and air pollution, the use of sustainable modes of transport will be supported.

The District Centre as defined by the District Centre Boundary will be the focus for district centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

Consultation Response

	gally	Soi	und	Core Strategy is unsound because it is not:								
Con	npliant			Positively	Positively Prepared Justified		ified	Effective		Consistent with National Policy		Indication of legal compliance
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	or soundness
1	1	1	1	0	0	0	1	0	0	0	0	1

Table 4.9

4.120 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
498956	Major & Mrs B Andrews		CSPS1876

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
643623	Mrs Nita Mulford		CSPS18
657362	Mr J Bestley and Mrs J Light		CSPS2859

Summary of Responses

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

4.122 *Vision*

The vision opens the gate for much more building on surrounding areas in the future.

Councils' Response

- **4.123** There was very little response to this policy.
- 4.124 The comment above has mis-interpreted the purpose of the policy, and failed to appreciate that a very similar policy and town centre boundary currently exist in the current East Dorset Local Plan. There is only limited scope for additional development within this policy area.
- 4.125 The NPPF contains guidance on ensuring the vitality of town centres, and Policies KS7 and KS8 in the Key Strategy Chapter of the Core Strategy set out in more detail the Councils' response to issues on the role of Town Centres and Future Retail Provision and update these policies in light of the revised national guidance and local information contained in the Retail Update 2012.

Proposed Changes to the Pre-Submission Core Strategy

4.126 Policy VTSW9

- 4.127 There is no explicit mention of Primary Shopping Area and Shopping Frontages in the policy wording, as required in the NPPF. The policy is therefore amended to comply with national guidance and to be consistent with policies KS7 and KS8 elsewhere in the Core Strategy.
- **4.128** Floorspace projections have been included in the policy wording.
- **4.129** Traffic movement has been merged into one paragraph to avoid repetition.

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- **4.130** Delete the wording at the bottom of the Policy VTSW9 text box relating to the Town Centre Boundary.
- **4.131** Paragraph 11.46
- **4.132** Additional Key Facts text to bring in line with the other settlements.
- 4.133 Key Facts
- 4.134 Trading
- a relatively small centre located just north of Ferndown
- 44 ground floor non-residential units
- high number of service and miscellaneous uses within the town centre (52%), compared to 31.6%
- low vacancy rate at 6.8%
- 4.135 **Environment**
- relatively flat, non-pedestrianised and largely linear in structure.
- Low crime rate and good safety in the town centre
- Pleasant shopping environment
- 4.136 Strategic Requirements
- 40 50sqm of convenience floorspace
- 150 200sqm comparison floorspace
- 4.137 <u>West Moors District Centre Primary Shopping Area</u>
- 4.138 The Primary Shopping Area forms the area where retail development will be concentrated which has been informed by the Joint Retail Study (2008), the Retail Update (2012) and the annual pedestrian count surveys.

Policy VTSW9

West Moors District Centre Vision

Our vision for West Moors District Centre is that it will continue to act as a key District Centre in East Dorset, providing a central focus to the local population. The District Centre will be supported to provide an attractive townscape, public transport routes sustained, and facilities and services will continue to be located in this central location.

To achieve this vision:

- 1. The District Centre as defined by the District Centre Boundary will be the focus for district centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.
- 2. A Primary Shopping Area will be designated in West Moors which forms the area where retail development will be concentrated.
- 3. The range of retail uses will be supported and improved to provide more comparison goods shops, in small to medium sizes to appeal to small independent shops. This includes up to 40 50 sqm of convenience floorspace and 150 -200 sqm of comparison floorspace in West Moors in the plan period.
- 4. Residents will continue to have access to a variety of community services and cultural facilities in the district centre, such as the doctors' surgeries and the Library. These will be retained, supported and, where, possible enhanced.
- 5. The promotion of evening economy uses such as restaurants, cafés and pubs will be supported in the district centre to enhance the vibrancy of the afternoon and evening economy of the town.
- 6. The townscape quality of the district centre will continue to be enhanced; only high quality development proposals that respect and enhance the local character of the centre, and improve ease of movement and legibility will be permitted.
- 7. In order to improve the vitality of the district centre and improve pedestrian safety around the town, traffic management and calming measures will be considered in Station Road to reduce pedestrian/vehicular conflict, and the use of sustainable modes of transport will be supported.
- 8. Residential and commercial development will take place alongside the projected requirement for retail to provide for a balanced, mixed-use environment.
- 9. To minimise congestion and air pollution, the use of sustainable modes of transport will be supported.

The District Centre as defined by the District Centre Boundary will be the focus for district centre uses including higher density residential, employment, retail, leisure and entertainment, offices, arts and culture and tourism development subject to compliance with other national and local policy.

Consultation Response

	ally	Sou	ınd	Core Strategy is unsound because it is not:						
Com	pliant			Positively Prepared	Positively Prepared Justified		Effective Consistent with National Policy			
Yes	No	Yes No						or soundness		
0	0	0 0		0	0	0	0	0		

Table 4.10

4.139 List of Consultee Reference Numbers

4.140 None were received on this Policy.

4.141 Summary of Responses

4.142 No responses were received in respect of Policy VSTW9 at Schedule of Proposed Changes consultation.

4.143 Councils' Position

4.144 The Councils propose the amended policy.