



Christchurch and East Dorset Core Strategy EiP Statement

Background

The AONB Partnership is grateful for the opportunity to contribute to the EiP.

The AONB responded to earlier consultation opportunities on 19th June 2012 and 18th December 2012. Those consultation responses are attached to make reference to them easier.

Introduction

The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by East Dorset District Council early in 2009.

The National Planning Policy Framework states (paragraph 109) that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. It also states (paragraph 115) that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in these areas.

A landscape character assessment of the AONB, along with greater details of the landscape, buildings and settlement characteristics can be found in the Landscape Character Assessment (2003) on our web site www.ccwwdaonb.org.uk The Historic Landscape Characterisation (2008) and the Historic Environment Actions Plans (2012) are also found there. These should be included as valuable background evidence for the Core Strategy.

Concerns

The name of the AONB is incorrect on page 145, paragraph 12.1 and new policy ME8, and should be corrected.

This AONB welcomes the additional references to the AONB Management Plan. However, we suggest greater consistency of wording within this Core Strategy and with other Core Strategies that relate to this AONB. We would, therefore, respectfully recommend that in policy HE3, page 168, ‘...will need to have regard to the relevant Management Plan.’ should be changed to ‘...will need to demonstrate that account has been taken of the relevant Management Plan’.

Session Agendas

Matters and issues 1 (overall strategy), 7 (housing), 8 (economic development / employment), 10 (environmental issues).

NPPF indicates, for example paragraph 14, footnote note 9, that there should be policies to distinguish how the designated AONB would be treated differently from undesignated countryside. Without that distinction, it appears that the Core Strategy could be unsound.

Whilst welcoming the pre-submission changes in this respect, for example policies ME8, HE3, and PC3, this AONB partnership remains to be convinced that these changes are sufficient to make the Core Strategy sound in this respect.

Matters and Issues 6 (Bournemouth Airport)

NPPF is clear that the landscapes of National Parks and AONBs are equally important (paragraph 115). Tranquillity is an especial aspect of this AONB (and see NPPF para 123) so the impacts of overflying of the AONB are a relevant concern. This AONB partnership is of the view that policy BA1, page 79, is unsound without the inclusion, along with the New Forest National Park, of this AONB.

That could be remedied by amending the currently proposed change to ‘...New Forest National Park and Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and their statutory purposes.’

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For and on behalf of the CCWWD AONB Partnership
3 September 2013

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Dear Planning Policy Team

Consultation response to East Dorset elements of the Christchurch and East Dorset Core Strategy Changes

The AONB Partnership is grateful for the opportunity to respond to the proposed changes to the Core Strategy Pre-submission Document

The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.

The National Planning Policy Framework states (paragraph 109) that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. It also states (paragraph 115) that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in these areas.

The AONB Team identified policy topics for Core Strategies in relation to the AONB in its Fact Sheet and Good Practice Notes Number 2, Policies for the AONB in Local Plans and Local development Frameworks (2008), available on the AONB website. Although that relates to the earlier AONB Management Plan it also assumes higher level, regional and national, policy guidance

would continue to exist. The demise of the suite of PPGs / PPSs and regional guidance and spatial strategies emphasises the importance of including AONB specific policies in current Core Strategies / Local Plans.

I have looked at both the extract document that identifies all the changes and the analysis document that records all the consultation responses received. I have been in correspondence with the East Dorset Planning Policy Manager and also the Officer dealing with the Infrastructure Delivery Plan and the Community Infrastructure Levy. In connection with these matters I attach, for the record and ease of reference, the current position of the AONB on Infrastructure Development and CILs (Annex A). You will see there are a number of reasons associated with applying CILs to developments within the AONB along with the scope and range of projects to which CILs could be applied for development within or associated with the AONB.

Whilst welcoming the changes to the Core Strategy in so far as they go, it appears to this AONB that those changes do not cover the whole range of additional policies highlighted in the National Planning Policy Framework as being appropriate to core strategies / local plans. I attach a list of the topics that appear to fall into that category (Annex B). In that connection it is particularly relevant that there should be policies that indicate how the AONB parts of the District will be treated so as to conserve and enhance natural beauty, and in ways that differ from policies relating to undesignated countryside.

In order to facilitate this inclusion of policies relevant to the AONB and policies that arise from the NPPF a series of potential policies was circulated to all of the constituent planning authorities of this AONB on the 12th September 2012, prior to the finalisation of the document currently being consulted upon and the start of that consultation period. The AONB believes that policies on the topics identified should be included and a copy of those potential policies is attached (Annex C).

I hope these comments are helpful to you and I would, of course, be happy to discuss or elaborate on any of the attached documents or comments made.

Yours sincerely

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Landscape and Planning Advisor

For and on behalf of the CCWWD AONB Partnership

Encs: Annex A, B, and C.

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ANNEX A

Infrastructure Delivery Plans and draft Community Infrastructure Levy Schedules



1. The Planning Act 2008 indicated what 'infrastructure' should include, ranging from roads and flood defences across educational and medical facilities to open spaces. Community Infrastructure Levies are a way of new developments funding aspects of that infrastructure. However the Regulations and the governmental overview of May 2011 do not include Affordable Housing as infrastructure that can be funded by CILs.
2. It seems that different authorities categorise infrastructure in different ways. Some have two major divisions, Essential and Place-making, which then have three categories; physical, social and community, and green infrastructure. Another approach is to structure the process around the three categories [grey, social, and green], and then assess their significance as critical, essential, necessary, or desirable. Others combine all the hard, constructed, and built environment focussed aspects into Grey / Transportation, with all the softer, greener aspects into Green Infrastructure.
3. The more refined approach has advantages, however at this relatively early stage where this AONB is identifying the range of topics and potential projects the simpler structure is used. Nevertheless, it should be fairly simple to transfer to the more refined format.
4. The AONB Management Plan [policy K4] states 'Encourage local planning authorities to direct Community Infrastructure levies [Developer Contributions] towards appropriate AONB Management Plan objectives and activities.'
5. Other policies identify more precise topics, such as undergrounding power and telecommunication lines and the provision of available and affordable parking at transportation nodes to encourage AONB residents and visitors to use public transport.
6. The AONB Partnership does, therefore, look to its constituent Local Planning Authorities to include explicitly the AONB in their Infrastructure Delivery Plans and CILs Schedules, and to engage with the AONB in the associated processes.
7. For example, in connection with trains, the AONB team is aware that the potential for sustainable travel via railways in the AONB is not being achieved. This AONB has two railway lines passing through it but on one of those lines there are no stopping points and on the other there is only a single station with limited parking. Inhabitants of the AONB and visitors to it are, therefore, severely limited in their options for sustainable travel by

railway. This AONB Partnership would, therefore, like to see a policy in the Wiltshire Core Strategy, linked to the Infrastructure Development Plan, that would effectively encourage, facilitate, and require provision of additional stopping places (stations or halts) so as to achieve greater sustainable travel opportunities. Gillingham and Wilton stations, just outside the AONB, are likely to be increasingly important for tourist links, and substantial and affordable parking at them both will be critical.

8. Clearly there is an inherent view that the special landscapes of the AONB are themselves vital infrastructure that require capital inputs to help conserve and enhance them. Associated with that is the equally obvious situation that the fine landscapes of the AONB support a premium on the sale of houses and that new development / extensions should contribute to the sustaining and enhancing those nationally important landscapes.
9. Whilst Green Infrastructure may appear as the obvious aspect of IDPs / CILs for the AONB there are community facilities that contribute to sustaining a living and working countryside that would fit in the Grey / Transportation Infrastructure categories.
10. The AONB Sustainable Development Fund could be an umbrella for infrastructure projects associated with the AONB and its setting. It has the advantages of an accountability, decision-making, and reporting structure and currently has an immediate [within the financial year] spend policy. Alternatively, it could be the enabling vehicle for the grey / transportation infrastructure aspects.

Grey / Transportation Infrastructure

Affordable car parks at public transport nodes

Cycle parks / racks at bus stops & key visitor facilities

Community bus stations / garages

Community transport vehicles [eg community mini-buses, cycle hire facilities]

Wheels for work

Hard landscape enhancements [eg village centre improvements]

Enhancing village pavements

Tackling climate change measures [eg enhanced rural flood control [grips / gullies]]

Village / community halls restoration / enhancement

Clubhouse / Sports pavilion enhancement

Development of Play Trails

Community buildings enhancements [foul drainage / energy efficiency / PV panels, water conservation, reed-bed filtration]

Village Hub creation and establishment

Wifi in all rural village halls

Mobile phone reception; eliminate 'no reception spots' and provide at least 3G to all areas

Dark night sky compliant street lighting

Countryside Training Centre

Rural Roads signage / Finger post restoration & enhancement
AONB Enhanced Access Projects [new multi-purpose trails, access bridges, linking walking routes to public transport, enhanced disabled access]

Establishment of roadside lay-bys in connection with views, heritage features, etc on all classes of roads.

Community arts [eg permanent sculptures linking to current seasonal arts trails, heritage events]

Community engagement activities [eg food festivals promoting local produce]

Establishing a network of certified Community Tourism Businesses

RoW route signage

Inter-linkages between RoWs to create round routes and off-road routes

Easy access gates to replace stiles on RoWs

'Local Distinctiveness'; encouraging the use of local materials

AONB gateway features to identify and enhance awareness

AONB villages signage and heritage trails

Reordering AONB churches with enhanced facilities for wider activities

Diversifying tourism facilities and community benefits [eg cafes in community shops / churches, TICs in pubs]

Establishing visitor payback schemes

Green Infrastructure

Heritage Trails

Rural 'pocket parks' with educational linkages

Public spaces enhancements

River Avon / Tributaries enhancements

Protected and key habitat and species enhancements [eg Bat habitat, roost, and hibernation enhancements]

Habitat linkage enhancements

Chalk downland enhancement and scrub removal

Fencing and water provision for habitat enhancement

Further / larger sports fields for rural communities

Riverside walks / trails

Bridges for enhanced riverside access

All terrain vehicles for disabled access to RoWs

Provision of community allotments

Establishment and enhancement of Village Greens

RB + DB + DeB 5 12 12 rev RB 18 12 12

ANNEX B

NPPF and implications for planning within the AONB.

Within NPPF it is quite clear, Paragraph 2, that applications for planning permission will be determined in accordance with the Local Development Plan. The document goes on to emphasise the importance of a Local Plan being in place.

Sustainable development, Paragraph 7, is identified as having three elements; economic, social, and environmental. Taken at its face value the environmental aspect is quite robust; 'contributing to protecting and enhancing a natural, built and historic environment; and as part of this helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy'.

Paragraph 8 emphasises the importance of achieving economic, social and environmental gains jointly and simultaneously. There is a clear implication that simple economic proposals are not automatically sustainable.

Paragraph 9 goes further goes further in identifying that 'sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment'. It is clear that for development to be sustainable there should be positive improvements in the natural environment.

The presumption in favour of sustainable development identifies, Paragraph 12, that proposed development should accord with an up-to-date Local Plan and similarly development that conflicts should be refused. There are, throughout, exceptions when material considerations indicate otherwise.

The key Paragraph 14 sets out the 'presumption in favour of sustainable development' looking at both plan making and decision taking. In the plan making section emphasis is made that LPAs meet the development needs of their areas and 'Local Plans should meet objectively assessed needs' and 'unless; adverse impacts would significantly outweigh the benefits' or 'specific policies in this Framework indicate development should be restricted'. Reference is then made to footnote 9.

Similarly in decision taking the emphasis is on approving development that accords with the development plan and also granting permission where the development plan is absent, silent, or relevant policies are out of date. Nevertheless, there is the significant caveat that development should not be granted if adverse impacts significantly outweigh the benefits, and 'specific policies in this Framework indicate development should be restricted'. This again refers to footnote 9.

Footnote 9 refers to sites designated under the Habitats Directives, SSSIs, land designated as Green Belt, an Area of Outstanding Natural Beauty,

heritage coast, or a National Park, designated heritage assets, and locations at risk of flooding or coastal erosion.

It is, therefore, quite clear that the NPPF is expecting Local Plans to have specific policies relating to, inter alia, Areas Of Outstanding Natural Beauty. As Core Strategies are taking over from old Local Plans, and now becoming the pre-cursor of a new form of Local Plans and Neighbourhood Plans, these Core Strategies should include specific policies or AONBs as indicated on Paragraph 14 and Footnote 9 of NPPF.

Paragraph 17 of NPPF sets out 12 principles that are regarded as the core elements of land use planning. Priority is given to the whole process being plan led and up-to-date and being a creative exercise in finding ways to enhance and improve the places in which people live. Economic development and housing are qualified by the requirement to seek high quality design and a good standard of amenity.

Principle 5 is quite clear that plans should take account of the different roles and different character of different areas, particularly in terms of 'recognising the intrinsic character and beauty of the countryside'. In supporting the transition to a low carbon future and encouraging the use of renewable resources it is noticeable that no reference is made to this being done at the expense of the environment.

Bullet point 7 focussing on planning contributing to conserving and enhancing the natural environment. Encouragement is given to the re-use of brown field land that is not of environmental value and mixed use developments are also promoted. Emphasis is given to conserving heritage assets in bullet point 10 whilst management of patterns of growth and the delivery of community and cultural facilities and services comprise the final two core principles.

It is, therefore, clear that considerable emphasis is given to conserving and enhancing the natural environment, conserving heritage assets, focussing on the character of different areas, and the provision of high quality design and amenity. All of these elements are relevant to the AONB and these indicate that these issues should, as identified in Paragraph 14, be covered in policies relevant to the AONB.

Supporting a prosperous rural economy includes enterprise and diversification of agriculture and land based industries as well as rural tourism. There are clear indications in Paragraph 28 that these developments should respect the character of the countryside and that the retention of local services and community facilities are promoted.

Sustainable transport focuses on the reduction of the need to travel as well as focussing on accommodating efficient delivery of goods and services with priority to pedestrians and cyclists with safe and secure layouts that avoid street clutter. Policies, says Paragraph 37, should aim for a balance of land uses to minimise journey lengths for employment, shopping, leisure, and education.

High quality communications infrastructure is identified as a particular element of the NPPF whilst, Paragraph 43, aiming 'to keep the numbers of radio and telecommunication masts and the sites for such installations to a minimum'. Also it is quite explicit that 'where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate'.

On the difficult question of providing a wide choice of quality homes a focus is given on new settlements that follow the principles of Garden Cities. Local Planning Authorities are encouraged to consider, Paragraph 53, the case for setting out policies to resist inappropriate development of residential gardens. Rural exception sites are still retained for affordable housing Paragraph 54, although examples in Dorset and Wiltshire tend to show these are not particularly sustainable in the sense of being close to shops and schools and main transport routes.

Promoting sustainable development in rural areas and the need to avoid new isolated homes in the countryside are identified unless there are essential needs for a rural worker, or to enable the future protection of heritage assets, or where the re-use of redundant and disused buildings would lead to an enhancement of the immediate setting. Truly exceptional or innovative design should, nevertheless, be considered where it is truly outstanding, reflects higher standards, significantly enhances the setting, and is sensitive to the characteristics of the local area.

Achieving good design is obviously a key element in relation to the AONB (Paragraph 56) and policies and plans should provide a strong sense of place responding to local character and history as well as reflecting local identity. Good architecture and appropriate landscape treatments are encouraged to promote and reinforce local distinctiveness as well as ensuring that planning policies and decisions address the connections between people and places and the integration of new development into the natural, built and historic environment. The thorny question of advertisement clutter in relation to natural beauty is touched upon in Paragraph 67 and it may well be that the AONB could be an Area of Special Control Order on the grounds of the adverse impacts on amenity.

The promotion of healthy communities tends to focus on urban areas. However, there is emphasis on protecting open space, sports and recreational buildings and land from development as well as planning policies being established that should protect and enhance public Rights of Way and access as well as providing better facilities through the provision of links between existing Rights of Way. It is also proposed that there should be a new designation of 'Local Green Space', however Paragraph 77 limits this designation to areas which are local in character, special to a local community, and in close proximity to the community.

Protection for Green Belt land is maintained and the south eastern sector of the AONB also falls within the Poole and Bournemouth Green Belt. It is emphasised that local authorities should plan positively to enhance the

beneficial use of Green Belts (Paragraph 81) including the provision of access and retaining and enhancing landscapes, visual amenity, and biodiversity. Generally speaking the construction of new buildings will be regarded as inappropriate for the Green Belt with the exceptions being those for agriculture and forestry, outdoor sport and recreation, cemeteries, extension to existing buildings or replacement buildings. It is also noted that limited affordable housing could be an exception to the no new buildings in the Green Belt approach. It is also quite explicit (Paragraph 91) that 'many renewable energy projects will comprise inappropriate development' in connection with the Green Belt. Community forest plans are mentioned in connection with Green Belts with the obvious implication that these are seen as appropriate elements within a Green Belt.

In planning to meet the challenge of climate change the NPPF urges local planning authorities to expect new developments to take 'account of land form, layout, building orientation, massing and landscaping to minimise energy consumption'. Local Planning Authorities should (Paragraph 97) have a positive strategy to produce renewable and low energy carbon energy whilst addressing adverse impacts including cumulative landscape and visual impacts. Consideration should be given to identifying suitable areas for renewable and low carbon energy sources, supporting community led initiatives, and locating potential heat customers and suppliers.

Footnote 17 specifically identifies the likely impacts of energy development and following the approach set out in the National Policy Statement on Renewable Energy Infrastructure (read with the relevant section of the Overarching National Policy Statement for Energy Infrastructure). The NPS clearly gives considerable weight to the landscapes of AONBs and National Parks as previously emphasised in PPS7. Whilst Paragraph 98 indicates that planning authorities should approve applications for renewable energy Footnote 18 is quite explicit 'unless material considerations indicate otherwise'. That clearly indicates renewable energy proposals do not take precedence over other issues.

Paragraph 109 is quite clear that the planning system should contribute to and enhance the natural and local environment. It is very clear that protecting and enhancing valued landscapes, recognising the benefits of ecosystem services, and minimising impacts on biodiversity are key priorities. Local Planning Authorities are encouraged, Paragraph 111, to consider setting local targets for brown field land.

Paragraph 113 is quite explicit that Local Authorities should set criteria based policies against which proposals for any development for protected wildlife or geo diversity sites or landscape areas will be judged. The inclusion of landscape areas is particularly relevant in this situation as the paragraph goes on to build distinctions between the hierarchy of national and locally designated sites so that protection is commensurate with their status.

Paragraph 114 exhorts Local Planning Authorities to set out a strategic approach in their Local Plans for the creation, protection, and enhancement

and management of networks of biodiversity and green infrastructure as well as maintaining the character of the undeveloped coast and protecting and enhancing distinctive landscapes. This is followed by Paragraph 115 which points out that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'. It then comments that the conservation of wildlife and cultural heritage are important considerations in all of these areas.

Paragraph 116 points out that planning permission should be refused for major developments in these designated areas except in exceptional circumstances where they can be demonstrated to be in the public interest. Critically this paragraph also says that consideration of such applications should include an assessment of the need for development including in terms of any national considerations and the impact on the local economy, the scope for developing outside of the designated area, or the detrimental effects on the environment, landscape, and recreational opportunities. Clearly this indicates that in designated areas it would be relevant to consider the need for development even though on more general terms the need for renewable energy is taken as not being open for question.

Whilst Paragraph 117 covers the key principles previously covered in PPS 9 in connection with biodiversity and geodiversity Paragraph 118 gives guidance on conserving and enhancing biodiversity when considering determining planning applications. It is noticeable that protection is specifically identified for European sites and reference is made, in Paragraph 119, that the presumption of sustainable development (Paragraph 114) does not apply for development requiring appropriate assessment under the Birds or Habitats Directives.

In seeking to cover the full scope of planning issues in a single relatively short document issues of noise and pollution tend to run together and Paragraph 123 identifies the need for planning policies and decisions to identify and protect areas of tranquillity 'which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason'. There does seem to be an element of prejudging tranquillity as being largely related to noise. Nevertheless, Paragraph 125 encourages good design with policies and decisions limiting the impact of light pollution on 'local amenity, intrinsically dark landscapes and nature conservation'.

The principles of PPS5, Historic Environment, had been largely reiterated in the NPPF and Paragraph 128 is quite specific that the significance of any heritage assets should consider their settings when applications are being determined. This is clarified further in relation to designated heritage assets in Paragraph 132, where substantial harm to or loss of heritage assets should be wholly exceptional. Paragraph 134 covers the issue of less than substantial harm being weighed against public benefits of development proposal. Non-designated heritage assets are still included (Paragraph 135) and a very wary pointer is given to the possibilities of 'enabling development' in Paragraph 140.

Mineral extraction is not a significant issue in this AONB nevertheless Local Plans should provide for mineral resources of national importance but new sites and extensions of sites for peat extraction are not to be included. Restoration and after care of mineral sites is emphasised and in the provision of long term resources 'provide for the maintenance of land banks of non-energy minerals from outside National Parks, the Broads, Areas Of Outstanding Natural Beauty and World Heritage Sites, Scheduled Monuments and Conservation Areas'. There should also be no unacceptable adverse impacts on the natural and historic environment although consideration should be given to how any demand for small scale extraction for building stone for the repair of heritage assets could be included in plans and decisions.

Turning to the plan making process, Paragraph 153, identifies that additional Development Plan Documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants to make successful applications or aid infrastructure delivery rather than being unnecessary burdens on development.

'Local Plans should be aspirational but realistic' (Paragraph 154). Of the five strategic priorities (Paragraph 156) for an area bullet point 5 is particularly relevant where it refers to 'conservation and enhancement of the natural and historic environment, including landscape'.

These Local Plans should (Paragraph 157) have a fifteen year time horizon, be based on a key diagram, and indicate land use designations on a proposals map. Crucially for the AONB, Local Plans should identify where development would be inappropriate because of its environmental or historic significance as well as containing a clear strategy for enhancing the natural, built, historic environment.

In terms of both the historic environment (Paragraph 169) and the natural environment (Paragraph 165) plans should be based on up-to-date evidence. Landscape character assessments should be prepared, integrated with assessments of historic landscape character, and where major expansion plans are under consideration landscape sensitivity should also be specifically considered.

Community Infrastructure Levy charges are only briefly touched upon (Paragraph 175 – 177).

The duty to co-operate on planning issues that cross administrative boundaries is not new to AONB working practices where Management Plans have been established across many boundaries. It does, therefore, seem as though there is a role for AONB teams to facilitate the collaborative cross border working as well as ensuring coordination and consistent policies in local plans (Paragraph 179).

For those that have concerns about neighbourhood planning potentially getting out of hand it is quite explicit in Paragraph 184 that 'Neighbourhood

plans must be in general conformity with the strategic policies of the Local Plan’.

Paragraph 196 confirms that ‘The planning system is plan-led’. Decisions must be determined in accordance with the development plan. The latest guidance on Planning Conditions and Obligations are succinctly set out (Paragraphs 203 – 206).

Annex 1 focuses on implementation with full weight being given to relevant policies adopted since 2004 for 12 months even if there is some limited conflict with the NPPF. Following that weight will depend on their consistency with the Framework and from the outset weight can be given to relevant policies within the emerging plans according to the stage of preparation and the extent of unresolved objections to the parties. Of particular relevance to AONBs in Paragraph 218 which identifies that in the process of preparing or amending Local Plans regional strategy policies can be reflected by undertaking a partial review focussing on the specific issues involved. It goes further to say that Local Planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies. It is a clear indication that those policies that were not in dispute in Regional Spatial Strategies should be brought forward into Local Plans to avoid the potential policy vacuum that was identified when the abolition of regional guidance and strategies was proposed.

ANNEX C

Local Development Framework / Local Plan Policies that flow from NPPF and would benefit the AONB

National Importance of the AONB

The national importance and the national designated landscape of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty will be conserved and enhanced. In achieving this, the due regard will be given to the current AONB Management Plan. Priority will be given to the landscape over other considerations and development proposals likely to be detrimental to the special landscape character will not be permitted.

Protecting and Enhancing the District's Natural and Historic Environment

The quality, character, diversity and local distinctiveness of the natural and historic environment in the District will be protected and enhanced, and developments which support their positive management will be encouraged. Where development and changes in land use are planned which would affect these assets, the local authority will first seek to avoid loss of or damage to the assets, then mitigate any unavoidable damage, and compensate for loss or damage through offsetting actions. Priority will be given to preserving and enhancing sites of international or national landscape, nature conservation, geological, archaeological or historic importance. Tools such as characterisation and surveys will be used to enhance local sites, features and distinctiveness through development, including the setting of settlements and buildings within the landscape and contributing to the regeneration and restoration of the area.

Protected Landscapes

In the Area of Outstanding Natural Beauty, the conservation and enhancement of the natural beauty, wildlife and cultural heritage will be given priority over other considerations in the determination of development proposals. Development will only be provided for where it would:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the Area of Outstanding Natural Beauty, or
- Promote the understanding and enjoyment of the special qualities of the Area of Outstanding Natural Beauty, or
- Foster the social or economic well-being of the communities within the Area of Outstanding Natural Beauty, provided that such development is compatible with the pursuit of the Area of Outstanding Natural Beauty purposes.

Consideration will also be given to proposals which promote the understanding and enjoyment of the special qualities of the Area of Outstanding Natural Beauty. Particular care will be taken to ensure that no development is permitted outside the Area of Outstanding Natural Beauty which would damage their natural beauty, character and special qualities or otherwise prejudice the achievement of the Area of Outstanding Natural Beauty purposes.

Countryside and AONB

Development in the open countryside will be strictly limited and will not be permitted unless it would benefit the local economy and maintain or enhance the environment. Within the AONB development which could harm the natural beauty of the landscape will not be permitted.

Landscape Character Areas

The distinctive qualities and features of the District's landscape character areas will be sustained and enhanced by the Local Planning Authority undertaking assessments of landscape character at a strategic level and in partnership with adjoining authorities (where landscape character areas cross administrative boundaries) in order to identify priority areas for the maintenance, enhancement and/or restoration of that character and provide an appropriate policy framework in LDDs for each area.

Landscape Conservation

Within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty development will not be permitted if it would harm the natural beauty of the landscape. Major industrial or commercial development proposals would not be permitted unless there is a proven national need and no suitable site is available outside of the AONB.

Within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty small scale development proposals will only be permitted where they are in accordance with the policies of the LDF / Local Plan and provided that;

- 1 the siting and scale of development are sympathetic with the landscape of the AONB in general and that the particular locality:
and
- 2 standards of landscaping and design are high, using materials which are appropriate for the locality and reflect the character of the area. Outside domestic curtilages indigenous species, preferably of local provenance, will be used.

In order to maintain the quality and variety of the countryside new development which would result in the loss of trees, hedges and/or other features that could contribute to the character of the landscape will only be permitted where provision is made for replacement planting and the creation of new landscape features.

In accordance with the policies of the current AONB Management Plan the Local Planning Authority will use the powers available to it to seek to prevent the loss of woodland or landscape of historical or nature conservation value and to encourage the planting of indigenous tree species appropriate to the area. Tree planting proposals which are detrimental to the landscape or nature conservation of down land or river valley meadows will not be supported.

Planning permission will not be given for development which would adversely affect the water quality, amenity, visual quality or public enjoyment of a river or flood plain or its value as a wildlife habitat.

Approval will not be granted for culverting the water course unless there is a demonstrable need for granting an exception.

Bank protection works, which will only be permitted where property or statutory rights are threatened, should involve the use of appropriate materials and should protect nature conservation interests.

Signs and Advertisements

A sign or advertisement in the AONB will only be permitted provided that:

- 1 It is appropriate in size, colour, materials, lettering and height to its surroundings;
- 2 It will not detract from the visual amenity of the area or have an unacceptable effect on the local landscape; and
- 3 The cumulative impact of signs does not clutter the local scene or have adverse impacts on the local landscape.

The incorporation of tourist information in combined road signage will be encouraged.

Historic Parks and Gardens

The protection, retention of and, if appropriate, the restoration of Historic Parks and Gardens will be encouraged. Development which would adversely affect these Parks and Gardens or their settings will not be permitted.

A list of locally important Historic Parks and Gardens will be maintained.

Sport and Recreation

In the countryside proposals for new outdoor recreational facilities will be subject to the following considerations:

- 1 where the proposal involves the Area of Outstanding Natural Beauty, Site of Special Scientific Interest, an area of high ecological value, or an area of high historical significance, such development will be permitted only if there will be no adverse impact on these designated areas;
- 2 elsewhere in the plan area, outdoor recreational facilities will be allowed provided there will be no significant adverse impact on the surrounding landscape or nature conservation value of the area, there is a satisfactory means of access, the local highway network is adequate, and appropriate services can be made available;
- 3 the proposal is not dependant upon the construction of large buildings or other large structures; and
- 4 there is no adverse impact on the amenities of residents or other recreational users.
- 5 Lighting is strictly controlled so that there is no upwards or sideways escape of light and dark night skies are not prejudiced.

Golf Courses

Golf course developments and golf driving ranges will not be permitted within the Special Area of Conservation, Special Protection Areas, or a Site of Special Scientific Interest.

Within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty, a Scheduled Ancient Monument, Area of Archaeological significance, or an Historic Park and Garden, golf course developments, together with associated buildings and facilities including golf driving ranges, will only be permitted if they would have no adverse effect on the area or interests in question, and the criteria set out below are satisfied.

Elsewhere, golf course development will be permitted, subject to the following criteria;

- 1 it will not detract from the character of the landscape or nature conservation value of the area;
- 2 the local highway network is adequate and satisfactory means access can be achieved;
- 3 an adequate water supply can be secured without unacceptable effects on existing extraction river flows or water quality;
- 4 the viability of a farm unit which is not adversely effected; and
- 5 the proposal will not result in the irreversible loss of Grade 1, 2 or 3A agricultural land.

Tourism Attractions and Facilities

In the countryside proposals for the development of new tourist attractions or improvement to existing ones, will be considered against the following criteria:

- 1 where a proposal effects a Site of Special Scientific Interest, an area of high ecological value, a Scheduled Ancient Monument or an area of special archaeological significance, the development will be permitted only if there will be no adverse impact on the designated area;
- 2 within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty proposals will be permitted only where they are small scale and would be compatible with the special landscape quality of the area;
- 3 otherwise proposals will be allowed provided they do not entail the erection of large buildings or structures.

In the open countryside, unrelated to any settlement, proposals for the development of new hotels will not be permitted.

Within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty, the establishment of large scale sites for touring caravans and tents will not be permitted. Permission for small scale sites will be granted where it can be demonstrated that the site is adequately screened and the development and use of the rural roads will not have an adverse effect on the tranquillity of the locality and the quality of the landscape.

Telecommunications

Notwithstanding Permitted Development Rights, proposals for a new telecommunication development will be subject to the following considerations:

- 1 where the proposal involves the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and its setting, Conservation Areas or areas and buildings of architectural historic importance, such development will only be permitted where technical considerations mean that there are no satisfactory alternative locations available. In such circumstances a landscape and visual impact assessment will be required and the environmental impact of the development should be minimised by the judicious use of siting, design, camouflage and landscaping.
- 2 elsewhere in the District proposals will be allowed provided that their siting and design minimise environmental impacts of the apparatus; and
- 3 applications for large masts should show evidence that the possibility of erecting antennae on an existing building, mast or other structure has been explored. Where such development is no longer required its removal will be sought.

Renewable Energy

Proposals for a renewable energy project will be permitted provided that;

- 1 within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and its setting, Historic Parks and Gardens and their settings, and Conservation Areas such development will only be permitted where it is in accordance with the current AONB Management Plan and there will be no unacceptable adverse impacts on these designated areas;
- 2 the development will not result in an unacceptable intrusion on the landscape; and
- 3 there are no unacceptable adverse effects on the amenities of local residents of noise, electrical disturbance or other environmental effects arising from the development.

Light Pollution

Within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and its setting external lighting will be strictly controlled. Essential light fittings and schemes that do not allow the upward or sideways escape of light, and which allow the light source only to be seen from the surface intended to be lit, will be approved.

Community Infrastructure Levies / Developer Contributions

For all developments within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty the Local Planning Authority will seek CIL payments for AONB Management Plan purposes in accordance with the current AONB Management Plan.

Transport

Within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty, Conservation Areas, and the settings of Historic Parks and Gardens the retention and restoration of traditional and locally characteristic highway signs and infrastructure will be encouraged. Schemes to improve safety and driver behaviour that avoid urbanising rural situations, integrate with local character, distinctiveness, and materials, and enhance the local landscape will be encouraged and supported.

Sustainability

Minimising waste and recycling will be encouraged through the provision of space for storing recyclable materials, in advance of collection, in all new domestic, employment and institutional developments.

Community recycling and treatment of locally generated waste will be encouraged. All new developments should incorporate renewable energy schemes. In the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty such schemes must integrate with the landscape character, not be visually intrusive or harmful to wildlife, and be of an appropriate scale to their location and siting.

Within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and its setting the importation of waste for treatment will not be permitted.

Design Materials

Special attention will be given to the use of materials, designs, and scale of proposed developments in the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty. Farm buildings should integrate with the character of the landscape, particularly those that seek to enhance animal welfare and product storage requirements. The use of reflective materials and extensive areas of light coloured materials will not be approved.

RFB 20/06/2012 / 12 9 12

Judith Plumley
Christchurch and East Dorset Planning Partnership
Planning Policy
Christchurch Borough Council
Civic Offices
Bridge Street
Christchurch BH23 1BR

19th June 2012

Dear Judith

Response to Christchurch and East Dorset Core Strategy Pre Submission Consultation

Thank you for consulting the AONB on this important policy document. As the AONB considers there are some quite fundamental matters for discussion this letter is being sent simultaneously to Richard Henshaw and yourself.

The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.

The AONB has looked with considerable interest at your Core Strategy Pre-Submission Document. We are acutely aware, with the production of the National Planning Policy Framework (NPPF), the revocation of the Regional Spatial Strategy (RSS), and the removal of the whole suite of Planning Policy Statements and Planning Policy Guidance that all Core Strategy documents are in real danger of being insufficiently detailed to provide adequate policy guidance through to 2028.

It is, however, clear from the NPPF that Government envisages the re-emergence of Local Plans with considerable detail within them to cover policy and decision making needs. It is noticeable that the NPPF puts equal weight on achieving economic, social and environmental gains jointly and

simultaneously through sustainable development. There is a clear implication that solely economic proposals are not automatically sustainable.

Crucially Paragraph 14, in association with Footnote 9, clearly indicates that there should be special policies in these emerging Local Plans to cover special situations. Those special situations include designated landscapes such as AONBs. Paragraph 218 also indicates that it would be in order for Local Plans to take on board those policies that have been lost in the revocation of the RSS.

The thrust, therefore, of the AONB's comments relate to matters that we feel should be included in the Core Strategy to overcome the policy vacuum created by the loss of the higher level strategies and policies on which the whole concept of Core Strategies was predicated. Whilst there is much to be supported in the pre-submission Core Strategy the AONB is of the view that without the additional policies to fill the gaps created by the loss of the higher level strategies and policies it will not be fully fit for purpose through to 2028 and therefore would have to be regarded as less than sound.

In particular the AONB would wish to see clear policies that indicate the special character of the AONB, and proposed developments within it, would be handled in ways different from other, undesignated, areas of countryside within the District. Similarly we would commend the RSS suite of policies ENV1, 2, 3, 4, 5, and in particular ENV3 which relates to the setting of AONBs. We would wish to see priority given to conserving and enhancing natural beauty within the AONB and to priority being given to conserving and enhancing natural beauty where there is conflict with proposed development.

The AONB notes that there are references to the AONB Management Plan in parts of the Core Strategy but that it is not identified as a key element of the evidence base in Paragraph 1.17, neither are the Historic Landscape Characterisation and Historic Environment Actions Plan studies included. Whilst the AONB welcomes the reference to the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty in the second paragraph of the Core Strategy Vision and Objective 1 we are **strongly of the view** that the detailed policies that follow have insufficient detail and are not sufficiently robust to achieve those worthwhile objectives and strategic vision.

We note that Cranborne and Sixpenny Handley are two of 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. However, in relation to transport, development, and parking (Policies KS11 and 12) the AONB is **concerned** that the provision of affordable parking to facilitate the use of public transport, a matter promoted in the AONB Management Plan, is not included.

The AONB has commented previously about the development of Bournemouth Airport. As you may recall, the concerns of the AONB relate to the overflying of the AONB rather than the physical structure of the airport

itself. Our concerns are that increased traffic using the airport will spill out into the AONB and additional flights will adversely impact on tranquillity and dark night skies within the AONB. We would, therefore, wish to see a robust policy that direct flights away from AONB airspace and the setting of the AONB.

We note that the Section 13, Managing the Natural Environment, focuses entirely and in some considerable detail on wildlife matters. Whilst we support the attention given to wildlife we note that many of the sites are not nationally designated. The AONB advises that concentrating on just these limited aspects of landscape, rather than the more holistic concept in the standard landscape character assessment guidance works and the AONB Management Plan, unbalances the Core Strategy. We would, therefore, **urge** the Planning Authorities to include policies in relation to landscape and the AONB and natural environment.

Turning to the historic environment there should be, we **suggest**, reference to the Historic Landscape Characterisation and the Historic Environment Action Plans recently completed by the AONB and we would also **suggest** that the AONB Management Plan is relevant evidence in relation to landscape quality and character. Policy HE3 (Landscape Quality) seems insufficiently robust as it appears that the wording could be interpreted as relating to proposals within the AONB or only within the setting of the AONB and excluding the AONB itself. The AONB **recommends** that the policy in relation to landscape quality should relate to landscape character assessments much more explicitly, historic landscape characterisation, and separate policy statements relating to development proposals within the AONB and for those within the setting of the AONB. We would also urge you to consider wording that is rather more robust than '*will need to have regard to the relevant Management Plan*'. A more proactive approach to actively sustaining the landscape characteristics would, we **advise**, be more appropriate.

As I am sure you are aware the AONB recognises the need for affordable housing for those that live and work within the AONB. We are, however, **concerned** that exception sites for affordable housing should be genuinely sustainable. Sites on edges of villages, or villages that do not have shops and schools, are unlikely to be sustainable and are going to require the occupants of those houses to have their own personal transport which, of course, militates against that development being sustainable.

In the light of the problems caused by traveller sites, not just to the actual sites and the immediate surroundings themselves, but the damage to the verges of narrow roads and subsequent loss of rural character, the AONB would wish to see policy LN5 excluding the AONB from locations for these sites.

The AONB is also **concerned** that Section 16, Creating Prosperous Communities, does not appear to focus on renewable energy which is both an important and sensitive issue. There should, we **suggest**, be policy guidance on this matter. We also note that Policy PC3 relating to the rural economy includes the AONB together with the locally determined Areas of Great

Landscape Value. That does not seem to give the AONB the clarity of support that could be anticipated of a national designation that is specifically identified as warranting special policies in connection with Paragraph 14 of the NPPF.

Whilst we **welcome** the support for the aims and objectives of the AONB in Policy PC5, Tourism, we would also wish to see similar support for AONB Management Plan purposes as set out in Management Policy K4 in connection with Community Infrastructure Levy / developer contributions within this Core Strategy.

I realise there are quite a lot of issues raised by the AONB and, as I have said, we would encourage the Planning Authorities to be more robust and more specific in their policies to ensure that policy gaps created by Government are covered by locally determined policies. To assist you with that I attach a paper about the NPPF and the implications for planning within the AONB that I have prepared along with some potential policies that could be included to help fill those gaps.

I hope these comments are helpful to you and I would, of course, be happy to discuss them with you and any of your colleagues.

Yours sincerely

Richard Burden
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On behalf of the CCWWD AONB Partnership

Encs: NPPF paper, Policies Paper