



## **Analysis of Responses**

**Core Strategy Pre-Submission Consultation April – June 2012**



Prepared by Christchurch Borough Council and  
East Dorset District Council

**November 2012**



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## 1 Introduction

**1.1** This document sets out a summary of the responses made to the Pre-Submission Core Strategy received during the consultation period 2nd April to 25th June 2012. Responses have been made to the summarised comments and using these responses, changes have been proposed to the Pre-Submission Core Strategy. The responses also indicate why some requested changes were not made.

**1.2** Further changes have been made following changes in national planning guidance, published in the National Planning Policy Framework (NPPF) in March 2012.

**1.3** The proposed changes have been taken forward to the "Schedule of Proposed Changes to the Pre-Submission Core Strategy" which is a formal statutory stage in the production of the Core Strategy, as set out in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

**1.4** For information on making comments on the "Schedule of Proposed Changes to the Pre-Submission Core Strategy", please see the Schedule. The consultation period starts on 5th November and finishes on 21st December. Comments received after that date are deemed inadmissible and cannot be accepted.

## 2 Responses and Analysis of Chapter 1 Introduction

### The Core Strategy Pre-Submission Consultation

**2.1** Paragraphs 1.1 - 1.15

**2.2** What is the Core Strategy?

**2.3** A Joint Core Strategy

**2.4** The Pre-Submission Consultation Document

**2.5** How you can respond to the Consultation

**2.6** Preparation to date

### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
3	10	1	13	6	5	7	5	8	4	7	4	9

Table 2.1

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

**2.8** *Consultation Procedures and Matters*

- The Coal Authority - Whilst the Coal Authority remains a Specific Consultation Body for emerging development plans, in the interests of efficient use of resources, as your administrative area lies wholly outside of the current defined coalfield. It is not necessary to specifically consult the Coal Authority on your emerging planning policy documents.
- Defence Infrastructure Organisation - The MOD does not have any specific comment on the detailed content of the Core Strategy at this stage. The Defence Fuels Group (DFG) at West Moors is expected to support Defence outputs for the next 15 years.
- I have not be informed of every step of the document.
- The response forms provided on the Dorsetforyou website do not allow the type of submission that I wish to make.
- Christchurch Labour Party - The short response form (e.g. as in the Christchurch Courier pullout) circulated widely is inadequate for purpose as it does not address all the key issues.
- I am sure that this document and form of response complies with the requirements however I am in doubt that it is cumbersome and almost impossible for the layman to understand and use easily.
- This round of consultation has been very poorly advertised and therefore has had very few comments made on it. That is because all the people that commented last time, assumed that they would not have to comment again. Publicity for this round of consultation has not been handled correctly and one can only assume with an organisation this big that it was done on purpose to make sure that the final version did not have to have too many changes.
- Question 3 (question 5 on the response form in Word) has not been worded in a way that is easily understood by the consultees. It reverses the sense of the previous two questions in that disagreement requires an affirmative answer. Many comments already submitted show that this has been completely misunderstood.
- I question if this document has been detailed with the respect of the thoughts needs and ideals of the local residents. I feel that it has been provided based on the pressure of central Government without the feeling of the people who live in the area in question. Even though there is a consultation, it is felt by most that it is a fruitless exercise as it's already a done deal.

### 2.9 *General Comments on Content the Document*

- Dorset County Council is supportive in principle. However it considers that compliance with the Duty to Co-operate will only be addressed in full once an agreement is in place to resolve in an integrated way, matters of a strategic nature, and any consequent infrastructure investment plan is also in place. It is also important that any emerging economic strategy of the Dorset Local Enterprise Partnership (LEP) and local plans are aligned. Until there is agreement on these issues, the County Council seeks assurance from Christchurch and East Dorset Councils that they will work with neighbouring authorities and other bodies on a 'memorandum of understanding' between local, unitary and county authorities within the Dorset LEP area, including a commitment to establish appropriate officer working and member governance arrangements for considering matters of a strategic nature.
- Royal Society for the Protection of Birds - there is much to support in this, particularly the high importance the Councils attach to the protection of internationally important wildlife sites in the Councils' area. We are conscious of the constraints on development that this causes and seek to continue to work positively with the councils to address key issues such as housing whilst addressing the need for effective mitigation measures such as suitable alternative natural green spaces (SANGS).

- Knowlton Parish Council - The over-concentration on urban concerns and needs has marginalised the rural issues and effectively stifled meaningful sustainable development in the villages and hamlets of East Dorset. The Strategy must be re-balanced to ensure that the needs of rural communities over the next 15 years are properly researched and addressed before it can be accepted as sound.
- Christchurch Conservation Trust - lack of any form of index in this Core Strategy document.
- Christchurch Conservation Trust asks why this volume could not be made more amenable to reading and reference by separation into two distinct sections, one for Christchurch and one for East Dorset.
- Home Builders Federation (South West) - The LP needs to express clearly the intended plan period. This is not clear from the document. We note the statement in paragraph 1.2 that the plan is for 15 years but it is not altogether the period of time that the plan is intended to operate from. We assume that this will be from year 2013 running to 2028. This would provide a period of 15 years. This should be clearly stated from the outset, including on the front cover.
- Transition Town Christchurch - Our overall planning solution is that the risks posed by climate change and the depletion of fossil fuels and other resources be addressed by the Core Strategy, and that resilience to shocks which arise from this be built in to all areas that the policy covers.
- An excellent document. Well prepared and presented, every success for the future implementation.
- The document should be updated with references to the NPPF.
- This is a legal consultation, not a public consultation. There has been insufficient opportunity to comment on the additional housing site in Verwood; this is the first time the site has included in the plan.
- The Core Strategy Document has not been written so that residents can read it, follow the evidence, and support the conclusions.

## Officer Response

### 2.10 Consultation Procedures and Matters

2.11 The consultation process attempted to inform the local community through press releases, the free Council local magazines - The Courier and East Dorset News - delivered to every household at the beginning of the consultation, as well as free leaflets distributed through local libraries, information centres, leisure centres and the Parish and Town Councils. All previous respondents on our database were notified of the consultation by email or post. Radio interviews were also broadcast during the consultation, and a series of exhibitions throughout Christchurch and East Dorset took place during the 12 week period. Officers also attended Parish or Town Council meetings on request to help inform them about the process. We consider that every effort was made to engage and inform the community of the consultation.

### 2.12 *General Comments on Content the Document*

2.13 The Councils welcome the support expressed in many of these comments, and look forward to working in partnership with other neighbouring authorities and the Dorset LEP to deliver the plan. Revisions to the document have been made to incorporate the changes presented in the NPPF.

### **Proposed Pre-Submission Change**

#### 2.14 Paragraph 1.2

2.15 New Additional Text for paragraph 1.2 to clarify the relationship between the Core Strategy and other documents prepared as part of the Local Plan.:

**2.16 Under recent changes to the development planning system, the Core Strategy effectively forms part of the new style Local Plan. A further set of more detailed development management policies and site allocations will follow in a separate document forming part 2 of the Local Plan. This document will be produced following on from the Core Strategy with a timetable set out in councils local development schemes.**

#### Evidence Base

Paragraphs 1.15 - 1.29

What comes next?

Sustainability Appraisal and Strategic Environmental Assessment

Habitats Regulations Assessment

Equalities Assessment

Health Impact Assessment

Consultation Response

Sustainable Community Strategies and Other Strategies

Delivery

Saved Policies

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
2	11	5	13	9	7	5	12	7	10	11	5	1

Table 2.2

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

### **2.18** *General Comments*

- Dorset Wildlife Trust - It is disappointing that with all the studies undertaken for this Core Strategy, ecological studies of the proposed development sites have not been undertaken to inform the decision process, except for Bournemouth Airport. NPPF (165) states that planning policies and decisions should be based on up-to-date information about the natural environment. All sites put forward for development should be surveyed at appropriate times of year to allow determination of the environmental impacts of developing sites prior to selection and to ensure sustainable development.
- Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB) - 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 Guidance that all Core Strategy documents are in real danger of being insufficiently detailed to provide adequate policy guidance through to 2028. 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 though to 2028 and therefore would have to be regarded as less than sound.
- Environment TAG - East Dorset (ETAG) - The statement that the Scoping Report was consulted on is incorrect. A totally inadequate version was produced in September 2010 and was completely rewritten following consultation on that. We have no objections to the number of objectives being reduced to a manageable level (12) but the new document has failed to guide assessment of sustainability effectively. It was evident the Sustainability Appraisal was flawed and that this stemmed from an inadequate SA Scoping Report. ETAG responded to the SA Scoping Report and commented on this. As a result of not considering all criteria in developing policy, the Core Strategy consistently scores poorly in SA Objective1 Protect, enhance and expand habitats and protected species.

### Officer Response

**2.19** The Core Strategy is supported by a full range of background evidence reports and studies. It is acknowledged that fully detailed nature conservation surveys and habitat assessments will need to be carried out as part of the submission of a planning application for development, but it is not a requirement of the NPPF that they take place at this stage in the process of the development of the Local Plan (para 165 -167). The document will be amended as necessary to meet the requirements of the NPPF which was published as the Pre-Submission document went out to consultation.

**2.20** Consultation was carried out on the Scoping Report. It was re-written and used for the Sustainability Appraisal of the subsequent documents. ETAG has requested the Scoping Report is re-written again, but this is not agreed. The objectives in the Scoping Report have been agreed with the statutory consultees and underpin the assessment of the Core Strategy. To alter these would mean that the earlier Sustainability Appraisal work and work on the later documents would not be made on the same basis and it is not considered that this would be a satisfactory approach. An updated Scoping Report is being prepared to reflect changes in plans, policies and programmes as well as indicators. This reflects the iterative nature of Sustainability Appraisal. No other objection has been made to the Scoping Report.

### Proposed Pre-Submission Change

**2.21** Paragraph 1.27

**2.22** Text amended.

**2.23** ...Proposals contained in the most recent Local Transport Plan and the Dorset Cultural Strategy.

### 3 Responses and Analysis of Chapter 2 A Picture of Christchurch and East Dorset

<b>A Picture of Christchurch and East Dorset</b>	
<b>3.1</b>	<b>(Paragraphs 2 - 2.18)</b>
<b>3.2</b>	The Sub Region
<b>3.3</b>	The Core Strategy Area
<b>3.4</b>	Our Environment
<b>3.5</b>	Rural and Urban Character
<b>3.6</b>	Climate Change
<b>3.7</b>	Water
<b>3.8</b>	Minerals and Waste

#### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	4	5	7	3	4	3	5	4	6	5	3	3

Table 3.1

**3.9** 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:

### 3.10 Culture

- Dorset County Council - Cultural needs should be discussed in this section. Reference should be made to the Dorset Cultural Strategy 2009-14. More emphasis could be given to the importance of good design and means of ensuring this is achieved.

### 3.11 Environment

- Sixpenny Handley with Pentridge Parish Council - We should, perhaps not be surprised that the document remains fundamentally urban centric because it is in the urban ring surrounding the Bournemouth and Poole conurbation where the majority of people in the District live and where the majority of services and hence Council funds have to go. But it is the countryside that is the gem that makes East Dorset so attractive. Despite this the rural factor appears as a sort of unwelcome but 'reluctantly got to be included' tailpiece. This concentration on the urban areas is not an uncommon approach at both County and District level.
- Transition Town Christchurch welcomes the acknowledgement that climate change has the potential to affect not only the environment but the social and economic aspects of Christchurch life.
- Sembcorp Bournemouth Water - From the initial information provided the highlighted areas appear to have sufficient infrastructure in place. However, off-site reinforcement, network extension or protection/diversion works may need to be carried out but this can only be confirmed on receipt of comprehensive on-site proposals including new road layouts and numbers of actual units with their flow requirements/water supply demands.
- The River Allen last flooded on the west side towards the north end of the Town Centre. Amend text referring to the eastern side.

### Officer Response

**3.12** The Cultural Strategy is relevant to para 1.26 - 27 and the text will be amended to reference the Dorset Cultural Strategy 2009-14. Design guidance is discussed in Chapter 14 - Creating High Quality and Distinctive Environments.

**3.13** The Core Strategy contains information about the future changes for the whole plan area, including the rural areas, such as Sixpenny Handley. However, in this locality like many others, there is limited opportunity for development as it is not sustainable being some distance from the main towns and the South East Dorset conurbation. Growth is instead focused on the main towns, as to be expected, where access to public transport, a full range of facilities and amenities, a range of schools and employment is located. The rural areas are not forgotten, and indeed have policies to support their facilities and limited growth, but the main thrust of the document is for growth and development to be focused on the main centres of Christchurch and East Dorset. Additional text to support the rural communities will be included throughout the document.

**3.14** The comments regarding water and flooding concerns are noted, and will be amended as necessary.

### Proposed Pre-Submission Change

#### 3.15 Paragraph 2.5

3.16 Incorrect location reference.

3.17 The District of East Dorset lies to the **north-west** of Christchurch,

3.18 **Paragraph 2.11**

3.19 Text change to support the rural communities.

3.20 .....The north and western part of the District is more rural in character, a large proportion being within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and contains villages, hamlets and isolated dwellings. **Significant areas of the District comprise large, rural estates where there has been a continuity of ownership and stewardship over many generations.**

3.21 **Paragraph 2.15**

3.22 Incorrect location reference.

3.23 In Wimborne there is risk of flooding on the **western** side of the town centre....

## Communities

(Paragraphs 2.19 - 2.53)

People

Housing

Health

Education and Training

Deprivation

Economy

**Consultation Response**

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

Table 3.2

**3.24** 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:

**3.25 Population**

- Tetlow King on behalf of South West HARP Planning Consortium - We welcome the detailed demographic data setting out the issues facing the two local authority areas over the plan period. The population of the area is clearly ageing and the Core Strategy should attempt to provide housing to meet the changing needs of this age group.
- The population figures should be adjusted to take account of the external demand to in-migrate to live in the area, and not focus solely on projected employment and associated housing growth. This impacts rural villages most where there is no growth proposed, yet demand is high from in migrants, particularly the retired.

**3.26 Housing**

- Tetlow King on behalf of South West HARP Planning consortium - We note the very significant income to house price ratio. Average house prices are 11 times average income. This would suggest that stabilising house prices in the area should be a top priority of the Core Strategy.
- Savills on behalf of Barratt David Wilson Homes - Whilst we recognise that there is a problem of affordability in the area, high price:income ratios are a symptom of the problem rather than the cause of it, which is an imbalance between supply and demand. There are potentially suitable sites for new housing available within the District which can make an important contribution to addressing the affordability problems. Many of these sites require a review of Green Belt boundaries to allow their delivery.

- Keep Wimborne Green - The number of Affordable Housing units per annum proposed for the East Dorset area should be reduced in line with numbers proposed as reasonable in the Strategic Housing Market Summary update for East Dorset 2012.
- The market dwellings in the new neighbourhoods should be attractive to prospective house buyers, and the views of local estate agents should be sought.

### **3.27 Deprivation**

- Have you considered additional Police / Fire / Ambulance Services that will be required?

## **Officer Response**

### **3.28 Population**

**3.29** The Councils are working with service providers, including Dorset County Council to consider how best to meet the needs of the ageing population through the Core Strategy. The Core Strategy is unable to pre-determine the level of in-migrants who wish to retire to the area. This is dependent on outside factors, including the national economic situation, and the wider housing market.

### **3.30 Housing**

**3.31** The number of homes to be provided during the plan period is presented in Chapter 4. This reflects a realistic target figure based on the latest household projections, land availability, sustainable locations and the deliverability of land during the plan period. Changes to the Green Belt are suggested in exceptional circumstances, and it is not considered necessary to make further amendments to the Green Belt boundary, other than those already set out in the Core Strategy.

### **3.32 Deprivation**

**3.33** The service providers have been consulted on the Core Strategy and their future requirements.

## **Proposed Pre-Submission Change**

**3.34** No change.

**4 Responses and Analysis of Chapter 3 Challenges, Vision and Strategic Objectives**

### **The Core Strategy Vision**

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

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

The area will adapt to the emerging demands of climate change through clear strategies to reduce risk of flooding, and through encouraging high standards of building design and construction.

The unmet housing needs of the area will be reduced, with housing delivered of a type and tenure which meets the aspirations of those wishing to buy or rent. An element of this housing will be in the form of new, well planned, sustainable residential areas in both Christchurch and East Dorset. These will be attractive new areas, including high quality and sustainable homes, areas of open space, new community facilities, and improved transport links to the surrounding area.

Housing will also continue to be delivered from redevelopment within the existing towns, but developments will now better reflect the character and type of housing found in each local area, and will make appropriate contributions to infrastructure. Almost all new housing development will contribute to the provision of affordable housing, creating a step change in delivery of affordable dwellings and a significant reduction in waiting lists.

The Green Belt policy will be kept in place to protect the character of the area, subject to limited alterations of boundaries to enable its extension and elsewhere to allow for some housing and employment growth to help meet the needs of the local communities.

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.

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

The area will be easier to get around, not just for those who have a car, but for those who wish to use public transport, to walk or to cycle, with major development focused in locations accessible by different means of transport. In Christchurch, development will be focused on the existing public transport corridors on the A35 and A337 and better links will be made to Christchurch and Hinton Admiral stations, with the urban extension also linked to the transport network. Christchurch Borough Council will continue to press for the development of a Christchurch Bypass as a long term solution to the town’s traffic problems.

The Airport will grow sustainably into a significant regional transport hub, providing scheduled and charter flights to a wide range of business and tourist destinations. Both the airport and its business parks will be linked to the surrounding conurbation by public transport services.

In East Dorset, transport corridors will be developed to help to promote a wider choice of transport, including walking, cycling and public transport. These corridors will include linking the towns and villages of Ferndown, West Moors, Three Legged Cross and Verwood, and improving links from Christchurch to Wimborne and Corfe Mullen and to Wimborne from Poole. Improvements to Canford Bottom Roundabout and dualling the A31 from Ferndown to Merley will reduce congestion and improve connectivity with the rest of Dorset and Hampshire.

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.

**Consultation Response**

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

Table 4.1

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

### **Representations on the text of Chapter 3.**

**4.2** 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.
- Infrastructure and facilities in Christchurch will not be able to cope with the levels of growth proposed.
- A number of detailed policies relating to protection of the Green Belt and of conservation areas have been deleted from the old Local Plan and have not been replaced in the Core Strategy.
- Local estate agents should have been consulted on the type and size of housing needed in the area.
- The proposals for housing at North East Verwood are in an unsustainable location.
- Loss of a community hall in Christchurch town centre runs counter to the strategy of helping communities to prosper.
- The statements about housing need are not strongly enough expressed and do not reflect accurate information.

**4.3** In addition to the general comments above, a smaller set of representations did seek changes to the text in Chapter 3. In these cases, a response is provided, and changes made as appropriate.

- The list of challenges should include the human causes of climate change.
- The text at paragraph 3.2 needs updated to reflect the introduction of the National Planning Policy Framework.
- The list of challenges ignores the impacts of a large and increasing elderly population, and specifically the housing needs of this group.
- The challenge of disruption to the economy, to food supplies and years of austerity are ignored.
- There is a general lack of strategy for rural areas, nor acknowledgement of the issues affecting these areas, including loss of facilities and services, poor transport links, and changes to housing and community caused by in-migration from urban dwellers.

### **4.4 Officer Response**

**4.5** It is acknowledged that two challenges need further recognition in this section, namely the impact of an increasing elderly population, and of the need for sustaining growth in rural areas.

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

4.7 A further bullet point is to be added on addressing the challenges posed by a significant elderly population in terms of housing, health and community facilities and services.

4.8 The text relating to climate change is considered adequate, and reference to the causes of such change is not considered necessary.

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

4.10 The text at paragraph 3.2 is proposed to be amended to acknowledge the National Planning Policy Framework.

### Proposed Pre-Submission Change

4.11 Paragraph 3.1 - New text in response to representations to refer to the rural economy and the needs of the elderly and retired population.

- Providing adequate land for employment growth, including major sites such as Bournemouth Airport and Ferndown Industrial Estate, **as well as enabling the rural economy to diversify and flourish through the reuse of buildings and small new employment developments at the major villages.**
- Supporting our communities in urban and rural areas, including ensuring that community facilities support community development, and that the specific needs of older residents and young people are met.
- Tackling inequalities, such as pockets of deprivation and high levels of young people not in education, employment or training, which are often hidden in a relatively affluent area.
- **Addressing the challenges posed by a significant elderly and retired population in the area, in terms of provision of appropriate housing, health and community facilities and services.**

4.12 Paragraph 3.2 -Amendment required in relation to the NPPF.

4.13 ~~Although national planning policy is changing,~~ **National planning policy has been revised and condensed into the National Planning Policy Framework (NPPF).** There is still an expectation that planning should be genuinely plan-led, with succinct Local Plans setting out a positive long term vision for an area. The strategic priorities for Local Plans defined in **the NPPF national policy** and set out below are taken forward in the Christchurch and East Dorset Core Strategy.

## Representations on the Core Strategy Vision

**4.14** A very wide range of comments were received on the Vision, and, as above, many are generic representations about issues, and do not seek a specific change to the Vision itself. Many centre on common themes such as housing, Green Belt, transport, and nature conservation. The representations can be summarised as follows:

### **4.15** *Nature Conservation and ecology*

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

### **4.16** *Representations on policy for rural areas.*

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

### **4.17** *Transport*

- The infrastructure of the area cannot cope, even with existing development. The transport network should be improved before further development is allowed.
- A new relief road is needed from the A338 to the existing Christchurch bypass.
- The Vision should not refer to a new Christchurch bypass as this will have unacceptable impacts upon habitats and landscape.

### **4.18** *Green Belt*

- There should be no development on Green Belt.
- The wording on retaining the Green Belt is unclear as it refers to loss of Green Belt in the same sentence.

### **4.19** *Housing*

- Christchurch is being ruined by development for outsiders.
- Insufficient housing is being provided in the Core Strategy.
- The Vision should refer to meeting housing needs, rather than to reducing needs.

### **4.20** *Bournemouth Airport*

- The airport does not need to grow.
- There should be a clear vision for the airport including the business parks and the transport network around it.
- The Vision should refer to "Bournemouth" Airport.

### 4.21 *Other issues raised in representations*

- The Vision for the natural environment and the economy will be affected by the Navitus Bay Wind Farm proposals.
- The NPPF suggests that local plans should provide detailed policies for areas such as AONBs. The Core Strategy should include such policies, especially those previously contained in the Regional Spatial Strategy.
- The Vision should refer to the development of Neighbourhood Plans.
- The statements on climate change should refer to the impacts of Peak Oil and the global economic downturn.
- 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.

### 4.22 **Officer response.**

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

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

**4.25** Paragraph 10 will refer specifically to "Bournemouth" Airport for clarity. However the remaining wording is considered adequate and detailed policies for the future development of the airport are set out elsewhere in the Core Strategy.

**4.26** References have been added to the Vision with respect to representations elsewhere in the Core Strategy that the challenges posed by a large and increasing elderly population need to be addressed. The reference to support for a community facility in Christchurch town centre will be removed from the Vision as they are not a current aspiration of the Council.

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

- There is a clear strategy to meet housing requirements across the Core Strategy area. However absolute housing need is significant, and demand for housing in this area almost limitless, and thus discussion of meeting needs completely should be realistic.
- Statements on Green Belt protection are considered clear, and some Green Belt release is clearly justified in the Core Strategy.
- References to a Christchurch Bypass relate to an intention to continue to lobby for such a proposal, rather than a specific proposal in the Core Strategy.

- A clear transport strategy is set out in the Core Strategy, and the wording on transport in the Vision is considered acceptable.
- The Vision already refers to protecting and enhancing the AONB. The provision of detailed policies for development in this area will be considered in the Development Management Policies Development Plan Document. Wording on the AONB is considered adequate in the Vision.
- Issues such as the global economic crisis and oil supply are acknowledged to have local impacts, however the policy solutions to these issues primarily rely on national Government, and are not directly addressed in the Core Strategy.
- The Navitus Bay offshore wind farm is a proposal subject to a separate planning process and reference to it in the Core Strategy is unnecessary.
- Equally, Neighbourhood Plans may come forward at any stage and should be in conformity with the Core Strategy. Reference to their preparation is considered unnecessary.

### The Core Strategy Vision

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

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

The area will adapt to the emerging demands of climate change through clear strategies to reduce risk of flooding, and through encouraging high standards of building design and construction.

The unmet housing needs of the area will be reduced, with housing delivered of a type and tenure which meets the aspirations of those wishing to buy or rent. An element of this housing will be in the form of new, well planned, sustainable residential areas in both Christchurch and East Dorset. These will be attractive new areas, including high quality and sustainable homes, areas of open space, new community facilities, and improved transport links to the surrounding area.

Housing will also continue to be delivered ~~from redevelopment within the existing towns, in our towns and villages~~ but developments will now better reflect the character and type of housing found in each local area, and will make appropriate contributions to infrastructure. Almost all new housing development will contribute to the provision of affordable housing, creating a step change in delivery of affordable dwellings and a significant reduction in waiting lists.

The Green Belt policy will be kept in place to protect the character of the area, subject to limited alterations of boundaries to enable its extension and elsewhere to allow for some housing and employment growth to help meet the needs of the local communities.

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.

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

The area will be easier to get around, not just for those who have a car, but for those who wish to use public transport, to walk or to cycle, with major development focused in locations accessible by different means of transport. In Christchurch, development will be focused on the existing public transport corridors on the A35 and A337 and better links will be made to Christchurch and Hinton Admiral stations, with the urban extension also linked to the transport network. Christchurch Borough Council will continue to press for the development of a Christchurch Bypass as a long term solution to the town's traffic problems.

**The Bournemouth** Airport will grow sustainably into a significant regional transport hub, providing scheduled and charter flights to a wide range of business and tourist destinations. Both the airport and its business parks will be linked to the surrounding conurbation by public transport services.

In East Dorset, transport corridors will be developed to help to promote a wider choice of transport, including walking, cycling and public transport. These corridors will include linking the towns and villages of Ferndown, West Moors, Three Legged Cross and Verwood, and improving links from Christchurch to Wimborne and Corfe Mullen and to Wimborne from Poole. Improvements to Canford Bottom Roundabout and dualling the A31 from Ferndown to Merley will reduce congestion and improve connectivity with the rest of Dorset and Hampshire.

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.**

## Objective 1

### To manage and safeguard the natural environment of Christchurch and East Dorset.

The **Green Belt** will be retained and protected, except for strategic release of land to provide new housing, and for employment development in East Dorset and at Bournemouth Airport. Impact **on designated sites** will be avoided, and residential development will contribute to mitigation of development on Heathland habitats. New **greenspace** will be provided as part of major housing proposals. Important **natural features** such as Christchurch Harbour, the coast, rivers and beaches and the Wiltshire Downs and Cranborne Chase Area of Outstanding Natural Beauty will be protected and enhanced.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
2	6	3	10	5	3	6	4	8	3	5	3	4

Table 4.2

**4.28** 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:

**4.29 Protection of the Green Belt**

- Green Belt around the north east Verwood site should be protected as it separates Verwood from Hampshire. The Objective does not make sense as it refers to protecting the Green Belt except where development is needed.

**4.30 Nature Conservation**

- The Objective should make it clear that residential development should mitigate the impact of development near (not just on) Heathland. New greenspace should be provided generally and not just in relation to major housing proposals. The objective should aim to protect all priority habitats and species.

**4.31 New policies for the Area of Outstanding Natural Beauty.**

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

**4.32 Representations on policy for rural areas.**

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

**4.33 Officer Response**

**4.34** The wording on Green Belt is felt to be quite clear. The presumption will be to protect it, other than the strategic release as set out elsewhere in the Core Strategy. No change to wording is proposed on this issue.

**4.35** It is accepted that the Objective should refer to avoiding impacts "close to designated sites" to reflect the principles of the Heathland Interim Planning Framework, and an amendment is proposed to the second sentence. The third sentence has also been amended to indicate that new housing proposals should provide new greenspace and biodiversity enhancements, to reflect representations from Natural England and Dorset Wildlife Trust.

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

**4.37** The representations on policy for rural areas do not make a specific request for amendment of this Objective. Protection of environment and landscape will remain important to any strategy for the rural areas, and as such no amendment is proposed to this objective in response to these representations.

## Objective 2

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

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

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

**Consultation Response**

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

Table 4.3

**4.38** 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:

**4.39 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.

**4.40 Representations on policy for rural areas.**

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

**4.41 Officer Response**

- The strategy proposed is to locate new development close to existing settlements where facilities and services already exist or can be enhanced. This is considered more realistic and less intrusive than a major new settlement.
- This objective primarily relates to protecting the character of settlements throughout the area, rather than the location of development.
- No changes are proposed to this Objective in response to representations.

### Objective 3

#### To adapt to the challenges of climate change.

The impact of **carbon emissions from transport** will be reduced by more sustainable patterns of development in accessible locations, and by encouraging travel by bike, on foot, or by public transport. Developments will be expected to incorporate **carbon reduction, water and energy efficiency measures** as part of measures to reduce impact on climate change. At least 15% of total energy used on developments of 10 or more dwellings or 1,000m<sup>2</sup> of non-residential floorspace will come from decentralised, renewable or low carbon sources. Development will be located in areas at lowest **risk of flooding**. A Supplementary Planning Document for Flood Risk will be produced on how the sequential and exception tests will apply locally.

#### Consultation Response

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

Table 4.4

**4.42** 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:

**4.43** *North Eastern Verwood new neighbourhood.*

- Objections that consider that this location for development is poorly served by public transport and lacks any facilities and services and thus will create the need for people to drive to access any services.

**4.44** *Nature conservation.*

- The objective should make reference to the benefits of ecosystem services in supporting habitats and species. The objective should also include reference to carbon sequestration, reducing greenhouse gas emissions, and improving water and energy efficiency.

**4.45 Officer Response**

- The site at North East Verwood has been selected as a sustainable location for a relatively small amount of new housing, and is in reasonable proximity to services, facilities and employment opportunities.
- A reference to important ecosystem services is proposed in response to representations from Natural England and the Dorset Wildlife trust. Wording on carbon reduction and greenhouse gas emissions is considered adequate.

**Objective 4**

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

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

**Consultation Response**

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

Table 4.5

**4.46** 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:

**4.47** *Representations on policy for rural areas.*

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

**4.48** *Land at Stourbank Nurseries.*

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

**4.49** *Impact on designated habitats and landscapes.*

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

**4.50** **Officer Response**

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

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

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

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

**Objective 5**

**To deliver a suitable, affordable and sustainable range of housing to provide for local needs.**

Sufficient housing will be provided in Christchurch and East Dorset to reduce local needs, whilst maintaining the character of local communities. This housing will include well planned sustainable new communities in appropriate locations. The **size and type of dwellings** (both open market and affordable) will reflect current and projected local need through the Strategic Housing Market Assessment. All residential development resulting in a net increase in dwellings will contribute towards **provision of affordable housing**, at a rate of 35% of total units being developed. Development of 100% **affordable housing schemes may be considered exceptionally** in land adjoining rural and urban settlements. Criteria for the provision of **Gypsy and Traveller** sites will be established.

**Consultation Response**

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

Table 4.6

**4.55** 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:

**4.56 Affordable housing**

- A number of objectors referred to the lack of affordable housing and the need to limit in-migration to the area in some way in order to ensure housing for local people.
- There should not be a specific target for delivery of affordable housing, rather a site-by-site approach.

**4.57 Housing supply**

- Objection to the use of the phrase "reduce local needs", as it was felt that the NPPF requires local authorities to "meet local housing needs".
- Strategy is unsound since it has included land in Green Belt without seeking to work with neighbouring authorities to see if housing requirements can be met in adjoining areas.

#### **4.58 Representations on policy for rural areas.**

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

#### **4.59 Housing at Burton**

- It was felt that housing proposed at CN2 would damage the character of the village, but an affordable housing exception scheme could be supported.
- There is a failure to explain how the housing proposed will meet the specific needs of the village.

#### **4.60 Officer Response**

**4.61** No changes have been proposed to this Objective in response to representations. Housing proposed within the plan addresses housing need and demand as identified in relevant evidence, but it is also noted that absolute housing need cannot be reasonably met through housebuilding. Hence the wording of the objective is considered appropriate.

**4.62** Justification for housing at Burton is set out in Chapter 6. The representations on rural policy do not seek a specific change to the wording of this Objective.

**4.63** Additional wording is however proposed in response to representations seeking greater emphasis placed on the needs of the elderly and retired population. Wording has been added to the Vision on this issue and further wording is proposed to Objective 5 to indicate the objective of providing housing which can meet people's needs at different stages of life.

**Objective 6**

**To reduce the need for our communities to travel, and to do so more easily by a range of travel choices.**

The overall aim will be to reduce congestion in key locations, by reducing the need to travel and encouraging public transport use, walking and cycling as alternatives to the car. Development will be located in **the most accessible locations**, focused on prime transport corridors and town centres. New residential development will be located either close to existing facilities, or where good transport links exist to such facilities.

**Prime transport corridors** will be developed in the short term on the A35 and A337 in Christchurch, the A348 in East Dorset, and the B3073 between the two areas. In the medium term, further prime transport corridors will be developed in East Dorset on parts of the A347, A349, B3074 and B3072, and corridors north of the A31(T).

Key transport schemes proposed to support the Core Strategy will be developed:

- A35 Fountains Roundabout, Stony Lane Roundabout, Staple Cross (Salisbury Road), Somerford Roundabout - junction improvements.
- B3073 junction improvements from Parley Cross to A338 Blackwater Junction and road widening from Chapel Gate roundabout to Blackwater Junction and along the A338 to the Cooper Dean Roundabout.
- A31(T) dualling between Merley and Ameysford.

The development of new Green Infrastructure including footpaths, bridleways and cycleways, will also encourage people to enjoy recreation without the need to travel by car.

### Consultation Response

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

Table 4.7

**4.64** 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:

#### **4.65** *Land at Verwood*

- Representations that the sites at Coopers Lane and Doe's Lane, Verwood were poorly accessible and would result in most journeys being made by car.

#### **4.66** *Impact on nature conservation and climate change*

- There should be recognition that transport schemes may have adverse environmental impacts which should be minimised.
- The proposals for the new neighbourhoods conflict with the Objective as they are not well served by public transport.
- Overall aim of the Objective should be to reduce greenhouse gas emissions and fossil fuel consumption.

#### **4.67** *Representations on policy for rural areas*

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

#### **4.68** *Officer Response*

**4.69** It is considered that the text adequately addresses the issue of reducing the need to travel and hence greenhouse gas emissions. Additional wording regarding environmental impact of transport schemes is considered unnecessary here. The representations on the rural areas do not request a specific change to this Objective.

4.70 The wording of the Objective will be amended to reflect revised information on the nature of strategic transport improvements due to come forward in the plan period.

**Objective 7**

**To help our communities to thrive and to help people support each other.**

The main town centres of Christchurch, Wimborne, Ferndown and Verwood will be **the focus for commercial, retail and community facilities**, with district centres and villages playing a supporting role. **New facilities and services** will be developed alongside the new neighbourhoods, and associated facilities will be provided as part of new employment development at Ferndown and Bournemouth Airport.

**Consultation Response**

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

Table 4.8

4.71 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:

**4.72 A new community hall for Christchurch town centre:**

- There was objection to the removal of specific wording relating to a community facility to replace the existing Druitt Hall in Christchurch town centre.

**4.73 Representations on policy for rural areas.**

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

## Officer Response

- 4.74** There are no firm plans for a community facility in Christchurch town centre and references to such a facility will therefore be removed from the vision.
- 4.75** The representations on the rural areas do not specifically request any change to this Objective, the wording of which is considered appropriate.
- 4.76** No changes to Objective 7 are therefore proposed.

## Proposed Pre-Submission Change

- 4.77** Objective 1 -Amended text in response to representations to clarify avoidance / mitigation of impact on heathlands and added text concerning biodiversity enhancements in line with the NPPF.
- 4.78** Objective 3 - Amended text in response to representations to refer to ecosystem services in line with the NPPF. Percentage change from 15% to 10% in line with amended Policy ME5. The change reflects representations on viability and deliverability of 15%.
- 4.79** Objective 5 - Amended text in response to representations received regarding planning for the housing needs of older people.
- 4.80** Objective 6 - Amended text in response to representations from Dorset County Council regarding the nature of strategic highways improvements scheduled to come forward during the plan period.

### Objective 1

#### To manage and safeguard the natural environment of Christchurch and East Dorset.

The **Green Belt** will be retained and protected, except for strategic release of land to provide new housing, and for employment development in East Dorset and at Bournemouth Airport. Impact **close to** **designated sites** will be avoided, and residential development will contribute to mitigation of development on Heathland habitats. New **greenspace and biodiversity enhancements** will be provided as part of major housing proposals. Important **natural features** such as Christchurch Harbour, the coast, rivers and beaches and the Wiltshire Downs and Cranborne Chase Area of Outstanding Natural Beauty will be protected and enhanced.

**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.

**Objective 3**

**To adapt to the challenges of climate change.**

The impact of **carbon emissions from transport** will be reduced by more sustainable patterns of development in accessible locations, and by encouraging travel by bike, on foot, or by public transport. Developments will be expected to incorporate **carbon reduction, water and energy efficiency measures** as part of measures to reduce impact on climate change and **support important ecosystem services**. At least **105%** of total energy used on developments of 10 or more dwellings or 1,000m<sup>2</sup> of non-residential floorspace will come from decentralised, renewable or low carbon sources. Development will be located in areas at lowest **risk of flooding**. A Supplementary Planning Document for Flood Risk will be produced on how the sequential and exception tests will apply locally.

**Objective 4**

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

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

**Objective 5**

**To deliver a suitable, affordable and sustainable range of housing to provide for local needs.**

Sufficient housing will be provided in Christchurch and East Dorset to reduce local needs, whilst maintaining the character of local communities. This housing will include well planned sustainable new communities in appropriate locations. The **size and type of dwellings** (both open market and affordable) will reflect current and projected local need through the Strategic Housing Market Assessment, **and will include housing capable of meeting people's needs at all stages of life**. All residential development resulting in a net increase in dwellings will contribute towards **provision of affordable housing**, at a rate of 35% of total units being developed. Development of 100% **affordable housing schemes may be considered exceptionally** in land adjoining rural and urban settlements. Criteria for the provision of **Gypsy and Traveller** sites will be established.

**Objective 6**

**To reduce the need for our communities to travel, and to do so more easily by a range of travel choices.**

The overall aim will be to reduce congestion in key locations, by reducing the need to travel and encouraging public transport use, walking and cycling as alternatives to the car. Development will be located in the most accessible locations, focused on prime transport corridors and town centres. New residential development will be located either close to existing facilities, or where good transport links exist to such facilities.

Prime transport corridors will be ~~developed~~ improved in the short term on the A35 and A337 in Christchurch, the A348 in East Dorset, and the B3073 between the two areas. In the medium term, further prime transport corridors will be developed in East Dorset on parts of the A347, A349, B3074 and B3072, and corridors north of the A31(T).

Key transport schemes proposed to support the Core Strategy will include ~~be developed~~:

~~**A35 Fountains Roundabout, Stony Lane Roundabout, Staple Cross (Salisbury Road), Somerford Roundabout - junction improvements.**~~

~~**B3073 junction improvements from Parley Cross to A338 Blackwater Junction and road widening from Chapel Gate roundabout to Blackwater Junction and along the A338 to the Cooper Dean Roundabout.**~~

~~**A31(T) dualling between Merley and Ameysford.**~~

- **Improvements to the A35 corridor through Christchurch**
- **Improvements to the A338/B3073 corridor around Bournemouth Airport**
- **Dualling of the A31(T) around Wimborne**

The development of new Green Infrastructure including footpaths, bridleways and cycleways, will also encourage people to enjoy recreation without the need to travel by car.

**Objective 7**

**To help our communities to thrive and to help people support each other.**

The main town centres of Christchurch, Wimborne, Ferndown and Verwood will be **the focus for commercial, retail and community facilities**, with district centres and villages playing a supporting role. **New facilities and services** will be developed alongside the new neighbourhoods, and associated facilities will be provided as part of new employment development at Ferndown and Bournemouth Airport.

**5 Responses and Analysis of Chapter 4 The Key Strategy**

## 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 5.1

### Consultation Response

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

Table 5.2

5.1 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:

#### 5.2 Settlement hierarchy

- Objection to the classification of Furzehill as a village due to concerns that its identification as such could lead to the pressure for more development. Suggests that the area be allocated as a hamlet instead as it does not function as a village.
- Gleeson Developments Ltd support the identification of main settlements across the area and agree that the settlements identified should deliver housing growth to support the communities, and support Wimborne as a main settlement with the capacity for further development.
- If growth is the objective of the Plan then hamlets should be included in the package. That or go for a New Town approach to meet external demand and use this provision of new supply as the reason why people have to compete for the existing hamlet properties.
- Barton Willmore, on behalf of clients, question whether the Plan proposes sufficient housing to meet the needs of the area. We consider that the policy is broadly sound but question the settlement hierarchy in respect of Wimborne Minster and Colehill. We contend that Colehill be included as a Main Settlement given its close functioning relationship to Wimborne.

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

### 5.3 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.

### Officer Response

#### 5.4 *Settlement Hierarchy*

5.5 There is a general degree of support for the settlement hierarchy set out in Policy KS1, with only minor amendments suggested by respondents.

5.6 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.

5.7 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.

5.8 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.

5.9 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 Pre-Submission Change

5.10 No changes proposed.

## 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 5.3

## Policy KS2

### Green Belt

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

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

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

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
10	6	2	24	15	6	16	5	16	4	11	8	6

Table 5.4

**5.11** 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:

### **5.12 Green Belt Policy and Boundaries**

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

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

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

**5.16** • Tanner and Tilley for Pennyfarthing Homes – The opportunity should be taken to review the Green Belt boundary to accommodate for the needs of development, including housing development, not just for that which will arise during the Plan Period, but also beyond it, in accordance with the requirements of Para 83 of the NPPF.

**5.17** • Paul Newman Property Consultancy – argues that the Local Planning Authority have not identified sufficient land to meet housing need and that additional land in the Green Belt should be allocated for development as a continued reliance on a policy of urban area regeneration will not deliver the affordable housing the district requires.

**5.18** • Gleeson Developments Ltd – Due to the constrained nature of East Dorset Gleeson supports the Council’s intention to release Green Belt land to provide adequate land for future residential development, but wish to see the Policy reinforced by adding the wording ‘intention of the Council to release the land from the Green Belt in the locations allocated for development.’

- 5.19** • Mr Christopher Chope MP – Para 4.19 of Policy KS2 is unsound in asserting that a lack of capacity to meet needs identified in the Housing Market Assessment makes it ‘necessary’ to identify sites in the Green Belt. Para 4.21 is unsound in asserting that ‘the difficulty in meeting housing needs provides the exceptional circumstances required to amend Green Belt boundaries.’
- 5.20** • Savills, on behalf of clients, seek an amendment to Policy KS2 to remove the bullet points from the first part of the policy (not consistent with the guidance in the NPPF), and to extend the reference to local housing needs to include strategic housing needs where these can be sustainably accommodated.
- 5.21** • Barratt David Wilson Ltd echo the views submitted by Savills above, and request a further amendment to the policy to include areas in the Green Belt that are no longer capable of meeting strategic housing needs.
- 5.22** • Terence O’Rourke Ltd, on behalf of Bloor Homes Ltd, supports the alterations to the Green Belt to accommodate growth at North Wimborne, but suggests an alternative wording for policy KS2 to clarify the linkages between the proposed changes to the Green Belt boundary to show that the alterations are an important and justifiable component of the Core Strategy.
- 5.23** • Alliance Planning, on behalf of Eco Sustainable Solutions, argues that Policy KS2 should be amended to make express provision for developments which may represent ‘very special circumstances’ and that the policy should recognise that some renewable energy installations may be considered as ‘very special circumstances’ with reference to their wider environmental benefits and increased production of renewable energy. The policy should recognise that some renewable energy projects have large footprints which cannot be accommodated within built up areas.
- 5.24** • ETAG (and others) - The policy should include reference to the Green Belt function of protecting and preserving the setting and special character of historic towns.
- 5.25** • Savills – Colehill should be one of the Parishes where minor amendments to the Green Belt would be permissible to facilitate local needs, including local housing and the deliverability of local facilities.
- 5.26** • The policy should be amended to allow for minor development in the Green Belt in highly accessible locations, subject to criteria, on sites which adjoin existing boundaries which would allow for a limited number of well planned houses on larger plots, suitable for families and those wishing to engage in more sustainable living.
- 5.27** • Turley Associates – Concern over the use of words ‘meet local needs’, which does not reflect the NPPF requirement to objectively assess and meet local housing needs or provide compelling evidence why only ‘local needs’ can be met. Suggest that ‘local’ is replaced with ‘objectively assessed’ in policy KS2.
- 5.28** • Pro Vision Planning and Design, on behalf of clients, propose that the final paragraph of Policy KS2 be amended to read ‘ Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs, to release large brownfield sites for development and also to include areas in the Green Belt that are no longer capable of providing for these needs.’

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

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

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

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

### **5.33** *Environment*

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

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

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

### **5.37** *Need for the Green Belt*

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

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

## **Officer Response**

### **5.40** *Green Belt Policy*

**5.41** A significant number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Statement, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, for example when planning for larger scale developments such as major urban extensions. The Secretary of State for Communities and Local Government issued a statement on 6th September 2012 about Green Belt policy, which is as follows: "The Coalition

Agreement commits the Government to safeguard Green Belt and other environmental designations. As has always been the case, Councils can review local designations to promote growth. We encourage Councils to use the flexibility set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered on reviewing or drawing up Local Plans, we will support councils to move quickly through the process by prioritising Local Plan examinations." The Christchurch and East Dorset Councils are complying with the above statement.

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

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

**5.44** The response on behalf of Eco Sustainable Solutions requests that reference is made within Policy KS2 to make express provision for developments which may represent 'very special circumstances' in the field of renewable energy projects. The Councils do not agree that this amendment is needed, as paragraph 91 of the NPPF makes it very clear that it is up to the developer to demonstrate very special circumstances if any such renewable energy project is to proceed. 'Very special circumstances' are, by definition, specific to the particular circumstances of each individual proposal. To attempt to define what would constitute a very special circumstance would be contrary to well-established case law that each application has to be considered on the individual merits of the case. However, in light of the guidance set out in the NPPF regarding renewable energy proposals, a policy has been introduced in Chapter 13, Managing the Natural Environment, which addresses this issue.

**5.45** A number of comments have been received regarding the requirement to make reference to the need to protect the environmental quality of the Green Belt. The Councils do not intend to make any amendments to the policy to address this concern because paragraph 80 of the NPPF clearly sets out the five purposes of including land in the Green Belt. Its environmental quality is not included within this list. However, paragraph 81 of the NPPF states that local planning authorities should plan positively to enhance the beneficial use of Green Belt, and this includes visual amenity and biodiversity. Other policies elsewhere in the Core Strategy, for example policies ME1 and ME2 which address safeguarding biodiversity and the creation of Suitable Alternative Natural Greenspaces (SANGs), consider the environmental quality of the Plan area. The majority of the rural area of Christchurch and about 45% of East

Dorset are within the Green Belt and all of the development proposals set out within the Core Strategy are also contained within land that abuts the Green Belt. Therefore there is no requirement to amend Policy KS2 to include reference to biodiversity as it is adequately dealt with under other policies within the Plan.

#### **5.46 *Changes required in response to the National Planning Policy Framework***

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

#### **Proposed Pre-Submission Change**

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

### Green Belt

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

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

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

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

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

### Policy KS3

#### Housing Provision in Christchurch

About 3,020 new homes will be provided in Christchurch between the years 2013 and 2028. This will comprise up to 2,035 homes within the existing urban area and a further 850 homes to be provided as an urban extension at Roeshot Hill, 90 homes to the east of Marsh Lane and 45 homes to the south of Burton. The Council aims for a total of 35% of these new homes to be affordable, as defined in Appendix 2.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	5	0	21	12	5	9	8	12	4	12	5	27

Table 5.5

**5.49** 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:

### **5.50 Green Belt**

- The Policy does not comply with the NPPF because of loss of Green Belt. Paragraph 14 of the National Planning Policy Framework states that in addressing plan making 'local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless...specific policies in this framework indicate development should be restricted – as with land designated as Green Belt (see Footnote 9).
- The Strategy proposes to protect the Green Belt but involves amending the Green Belt.
- **Roeshot Hill Allotments Association:** The proposals would adversely affect the Green Belt by releasing some of the 'best and most versatile agricultural land at Roeshot Hill and substituting unspecified land of lesser value.

## Officer Response

**5.51** Paragraph 83 of the National Planning Policy Framework states that, 'Local Planning authorities with Green Belts in their area should establish Green Belt boundaries in their local plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.....'

**5.52** A statement issued by Eric Pickles MP on the 6th September 2012 (Secretary of State for Communities and Local Government) further clarifies the Government's position in relation to Green Belt,

**5.53** *'As has always been the case, councils can review local designations to promote growth. We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of the Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up Local Plans, we will support local councils to move quickly through the process of prioritising their Local Plan examinations'.....*

**5.54** The difficulty in meeting housing needs provides the exceptional circumstances required to amend Green Belt boundaries, where appropriate. The Green Belt areas allocated in the Core Strategy have been identified through a rigorous process, as set out within the Key Strategy Background Paper (Feb 2012) and Masterplan Reports consistent with the NPPF.

**5.55** An assessment of the function of settlements has been undertaken to identify those where housing would be best located in terms of proximity to services, facilities and employment. This identifies Christchurch, Wimborne, Colehill, Verwood, Corfe Mullen, Ferndown and West Parley as suitable settlements for growth. A limited amount of housing is also proposed for Burton based on the specific need for new housing to serve the needs of the village. A sieve map exercise has been undertaken to identify which areas on the edge of these settlements are not subject to the absolute constraints of proximity to protected heathlands and floodplains.

**5.56 *Need for Additional Housing / Land Supply / Duty to Co-operate***

- There is nothing in this plan or any other that has been put forward for South East Dorset since 1947 which has been able to meet the demand from financially disadvantaged sectors of the community to live in areas attractive to those able to price them out of the market.
- **Tanner and Tilley Planning Consultants** – it is considered that para 4.16 should acknowledge not only that the population of the Plan area is ageing but that there is a need for the Core Strategy to encourage and provide for the delivery of specialist housing and care facilities to provide for their needs.
- **Jamie Sullivan (Tetlow King)** -There is a need for the Council to make up the shortfall in provision over the last 5 years in addition to the housing requirement currently set out in the Core Strategy. Strategic Housing Market Assessment: There is a need to provide for 332 affordable dwellings per annum. The target of 40% affordable housing will not deliver sufficient housing to meet the need. As demonstrated, the proposed housing target does not meet the objectively assessed housing need and the Local Plan does not set out any 'adverse impacts' which would outweigh delivering a larger provision of housing. The Council will need to assess whether it can deliver a higher level of housing to ensure it is sound and positively prepared as per the requirements of the NPPF.
- **Tom Whils (TOR)**- Policy KS3 does not meet the housing need identified in the Strategic Housing Market Assessment (355 dwelling shortfall). A holistic approach should be taken with East Dorset in order to meet the housing requirement identified in the Strategic Housing Market Assessment. The overall housing allocation in East Dorset should be increased from 5,250 to 5,605 in order to meet the shortfall in Christchurch. The authorities may wish to consider allocating one or more 'overflow' sites specifically to meet the additional housing requirement arising from Christchurch. The Perry Family Trust holds land which could be made available as a suitable additional allocation to meet the overflow requirements arising from Christchurch.

- Policy KS3 conflicts with strategic Objective 5 - in delivering a suitable affordable and sustainable range of housing to provide for local needs. Sufficient housing will be provided in Christchurch and East Dorset to meet local needs. Not meeting the Strategic Housing Market Assessment requirement fails to comply with this Objective.
- **Lisa Jackson (Jackson Planning)** -The Core Strategy must address objective housing needs as they are identified. The Core Strategy must address a more positive and proactive approach to affordable delivery that is sensitive to market conditions as required by the NPPF. The Council must look at other solutions to do this. For example an increase in allocation at Burton could lead to greater delivery of affordable housing in the early part of the plan period which goes some way to meeting needs. The delivery of housing and in particular the need to boost supply as required by the NPPF is not being addressed in the early part of the plan period. MEM have proposed an alternative solution that would boost supply in the first 5 year period of the Core Strategy and have provided evidence to show how the site at Burton can deliver more housing within the plan period.
- **Carol Evans (Evans and Traves)** -Increase the 5 year portion of the housing target by 20%. There has been a persistent case of under delivery on the 5 year housing supply
- The Strategic Housing Land Availability Assessment is a flawed piece of evidence as it includes back gardens. Paragraph 48 of the NPPF states that 'Strategic Housing Land Availability Assessments...should not include residential gardens.' It is therefore considered that the 5 year and subsequent years housing supply is overly optimistic in the context of this methodology.
- Reliance on the identified urban extensions through the post 5 year period in the Strategic Housing Land Availability Assessment will not comply with the objectives on the NPPF as it will not ensure choice and competition in the market for land. (Para. 47 of the NPPF).
- The Strategic Housing Land Availability Assessment is unsound and cannot be justified and is unlikely to effectively deliver the level of needed housing both market and affordable.
- **Ryan Johnson (Turley Associates on behalf of Burry & Knight)** - The Council has not tabled sufficient evidence as yet to meet the NPPF requirement to 'objectively assess' their housing need, including any unmet requirements from adjoining authorities (NPPF 182). Nor have the Council assessed and consulted on alternative ways of meeting such housing needs either within or outside the borough through the duty to co-operate requirements of the Localism Act and the NPPF.
- **Savills on behalf of Canford Estate and Harry J Palmer** - Paragraph 4.18: It is unclear how the housing target has been reached, or if any allowance has been made for second homes and vacancy rates. It is potentially a significant underestimate of the true housing needs of the area. The housing figure is a projection forward of past demographic trends and should be considered alongside other indicators of housing need and demand such as affordability and economic growth targets.

- Believe that we need to meet Strategic Housing Market Assessment target of 332 affordable units per annum. We have reviewed the council's evidence base and cannot find any evidence to suggest that they have explored and consulted on a range of options to meet the identified need of 332 units per year.
- The Council will need to provide evidence to justify why they have only assessed a single trend based option of 225 homes per year. The Council have not produced and tested alternative options to this, particularly ones that factor in employment growth. Christchurch's provision is 355 short of the Strategic Housing Market Assessment figure.
- The Council needs to obtain evidence to demonstrate that all potential identified in the Strategic Housing Land Availability Assessment is available and achievable during the plan period. Assess what the objectively assessed need is in relation to the unmet need of other local planning authorities. Why the Council is unable to accommodate more than 201 dwellings per annum
- Residential garden land should not be included within the Strategic Housing Land Availability Assessment in accordance with paragraph 48 of the NPPF. These types of site fall under the definition of 'windfall' under paragraphs 47-49 of the NPPF. This does not satisfy the soundness tests of the NPPF in terms of being effective and deliverable.
- The Council has not consulted on alternative options to development at Roeshot Hill, East of Marsh Lane or South of Burton.
- The evidence base informing the policy should be updated as indicated above. Further consultation should be undertaken on this, along with any material revisions to the plan that may arise from this.
- **Home Builders Federation South West** - The assessment of the housing need over the plan period does not meet the requirements of the Framework as set out in paragraphs 47 and 159 in terms of assessing market as well as affordable housing needs. The planned level of provision in both districts fails to address the assessed level of need for affordable housing, let alone market (and potentially other housing needs) in addition to this. The proposed housing requirements fail to take account cross boundary impacts including unmet needs of neighbouring authorities. The Strategic Housing Market Assessment fails to meet the Core outputs set out in the DCLG Practice Guidance (2007). The reports fail to identify market and affordable housing needs. For Christchurch the annual requirement for affordable housing provision is 332. It is not clear how the figures for projected housing growth at 219 per year relate to affordable housing requirements. The affordable figure should be added to the market figure 332 + 219? NPPF 47 and 159, Objectively assessed needs are not being met.
- The expression of housing targets set out in KS3 and KS4 is imprecise and creates uncertainty. The expression of housing figures needs to be precise. The use of the word 'about' needs to be deleted. The targets should be treated as minimum targets, so if other suitable sites materialise over the plan period that satisfy the provisions in the framework, these will enable the councils to exceed the targets.

- **Tanner and Tilley** - There is a need for the Core Strategy to encourage and provide for the delivery of specialist housing and care facilities to provide for their needs. Christchurch are unable to demonstrate a 5 year land supply or the additional 5% buffer required by the NPPF. Strategic Housing Land Availability Assessment assumes that the majority of development will be 30dph minimum which has been removed from national policy. Reliance on a high level of windfall development questions whether this is deliverable in addition to development on garden land which will be resisted. We consider that the local authority needs to revisit the evidence base and to more realistically identify how it will provide for delivery of a 5 year housing supply together with an additional buffer of 5% to accord with the requirements of the NPPF.

### Officer Response

**5.57** In accordance with the NPPF, Core Strategy policies KS3 and KS4 will be amended to provide a single policy and housing figure for the plan area which will also provide a 5% buffer to the 5 year housing land supply and enable a 5 year housing supply to be demonstrated across the district and borough. Paragraph 47 of the NPPF refers to a requirement to provide a 20% buffer when there is a persistent under delivery of housing. In examining housing delivery in Christchurch it is important to look at a reasonable time frame. Over the Structure Plan period (1994 - 2011) there was a requirement to deliver 2,000 net new dwellings and over this period Christchurch delivered 2,552 which exceeded the Structure Plan target by 552. The draft Regional Spatial Strategy for the South West proposed a housing target of 3,450 for the period 2006 - 2026 which equates to 173 dwellings per year. As of 2007 onwards Christchurch has not demonstrated a 5 year land supply in relation to the draft Regional Spatial Strategy figures and subsequently the Pre Submission Core Strategy housing figure based on the 2012 strategic housing market assessment. However, on balance it is considered over the period 1994 - 2012 that there has not been a 'persistent under delivery of housing' and that a 5% buffer to the 5 year land supply is appropriate.

**5.58** In East Dorset the Structure Plan housing requirement was met. Despite the Council objecting to the draft Regional Spatial Strategy it has demonstrated a 5 year land supply as well as in relation to the housing figure contained in the strategic housing market assessment and the Dorset County Council household projections (based on the 2011 census). Additional detail in this respect is set out in response to the comments on KS4 below. It is therefore appropriate to apply a 5% buffer to the 5 year land supply.

**5.59** Paragraph 48 of the NPPF refers to windfall allowances and that where a windfall allowance is included in the Strategic Housing Land Availability Assessment this should not include residential gardens. The Strategic Housing Land Availability Assessments do not include a windfall allowance and all sites are specifically identified and their impact and deliverability assessed in 5 year land supply. Some of the identified sites do involve the loss of garden space, but only where this does not adversely affect the character and amenity of the area.

**5.60** The Strategic Housing Land Availability Assessments have taken an exhaustive street by street approach to the identification of sites in the existing urban area which has also considered some potential on selected commercial sites. In this respect there is no further housing potential to be unlocked within the existing urban area. The suitability, availability and achievability of the sites in the Christchurch and East Dorset Strategic Housing Land Availability Assessments have been assessed in accordance with the NPPF.

**5.61** Evidence to demonstrate the objectively assessed housing need is set out in the Councils' Strategic Housing Market Assessment Update (2012) and figures which have been produced by Dorset County Council in the light of new census data. In accordance with the Duty to Co-operate the Councils have worked jointly with neighbouring authorities to assess housing needs over the Bournemouth and Poole Housing Market Area through production of the Strategic Housing Market Assessment and updated Dorset County Council housing figures. The County figures have been calculated using new data from the 2011 Census which estimate that household growth for the plan area is about 500 dwellings per year. This is lower than the Strategic Housing Market Assessment Update (2012) which estimated the household growth figure being 575 dwellings per year and substantially lower than the first Strategic Housing Market Assessment which estimated household growth at about 800 dwellings per year. All of these figures represent estimates and it is clear that changing data is resulting in variations. On this basis the proposed housing target for the plan period lies within the range of the estimates.

**5.62** Christchurch and East Dorset Councils are able to meet the objectively assessed housing needs identified in the updated DCC figures through a joint housing figure which will supersede current policies KS3 and KS4. Neighbouring authorities are at differing stages in the production of Core Strategies / Local Plans. Bournemouth, Poole and New Forest District Councils have adopted Core Strategies and Purbeck District Council has completed their examination. Wiltshire has submitted its Core Strategy and North Dorset are able to meet their objectively assessed housing needs within their district and the New Forest National Park has a very low housing target which can be met in their district. Additionally, neither North Dorset or Wiltshire are within the same Strategic Housing Market Area as they border the sparsely populated rural parts of East Dorset. Christchurch and East Dorset Councils will work closely with neighbouring authorities through Local Plan updates to meet ongoing housing requirements across the Bournemouth and Poole housing market area.

**5.63** The Strategic Housing Market Assessment Update (2012) identifies that the absolute housing need figure across the plan area, if all needs are to be met, is about 770 dwellings. If this scale of delivery represented 35% of all housing delivery the plan target would be 2,200 dwellings per year (33,000 over the plan period). This scale of delivery is not achievable as it would have a major environmental impact. On this basis the housing figure has been calculated in terms of household growth over the plan period through trends analysis.

**5.64** In addition to sites identified in the Strategic Housing Land Availability Assessments two Green Belt sites have been identified for housing development in Christchurch. In East Dorset four main areas of search for new neighbourhoods have been assessed on the edge of Corfe Mullen, Wimborne/Colehill and Ferndown/West Parley, along with smaller ones at Verwood. A total of 12 new neighbourhood housing sites have been identified in the pre-Submission document. A further 18 have been put forward as alternatives, or in addition to these, all of which have been assessed previously and not taken forward. There are no other Green Belt sites to consider as alternatives which have not already been assessed and dismissed as part of an earlier consultation stage.

**5.65** The Core Strategy will be revised to include a policy that addresses the issue of specialist housing and care facilities. Further discussion of this issue is set out in the response analysis for the Meeting Local Needs chapter.

**5.66** Housing densities considered in the Strategic Housing Land Availability Assessments have been determined in relation to densities that are appropriate for the character of local areas and reflect historical housing delivery that has been monitored through the Annual Monitoring Report. The NPPF also sets out a requirement for local authorities to meet their objectively assessed housing needs in full and a significant reduction in housing densities

would fail to meet the projected requirements identified in the Strategic Housing Market Assessment Update (2012). Core Strategy Policy LN2 states that a minimum density of 30dph will be encouraged, unless this would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Therefore, the policy approach is not overly prescriptive.

### **5.67 Housing Trajectory**

### **5.68 Home Builders Federation South West**

**5.69** The plan is unsound as it is inconsistent with the framework since it does not include a housing trajectory or a housing implementation strategy that shows how the councils will maintain delivery of a five year housing supply. This is a requirement of the framework (paragraph 47).

### **Officer Response**

**5.70** Housing trajectories are produced and monitored through the Councils' annual monitoring reports. Further detail will be included in the Core Strategy Infrastructure Delivery Plan setting out a housing implementation strategy, demonstrating how the Councils will maintain a five year land supply to meet the joint housing target.

### **5.71 Housing Need of the Older Population**

- **McCarthy & Stone Retirement Lifestyles Ltd** -The Core Strategy needs to plan for specialist accommodation for the older population.
- A specific policy or reference to the needs of the ageing population should be included to identify the wide ranging issues that will be associated with a larger proportion of people in need of accommodation, care and other facilities which cannot be addressed under the wider 'residential' heading. There is opportunity to provide a dedicated policy or acknowledgement within policies KS3 and KS4 to outline the benefits of older persons' accommodation including owner occupier retirement and extra care housing.
- Paragraph 50 of the NPPF makes reference to assessing the housing need of the older population. Specialised retirement housing meets a number of Core Strategy aims yet is given little weight in the overall document.

### **Officer Response**

**5.72** The Core Strategy will be revised to include a policy that addresses the issue of specialist housing and care facilities. Further discussion of this issue is set out in the response analysis for the Meeting Local Needs chapter.

### **5.73 Development Viability**

- The strategy has not considered the impact of an increased requirement for affordable housing on development viability

### Officer Response

**5.74** In accordance with paragraphs 173 - 177 of the NPPF the viability of the Core Strategy has been assessed. This has included an assessment of the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards and infrastructure contributions. The Councils' affordable housing policy requirement from new development is set out in Policy LN3 which provides a flexible approach to consider a lower level of affordable housing provision on grounds of financial viability.

**5.75** The Councils have also undertaken further viability work as part of the preparation of Community Infrastructure Levy charging schedules which have assessed the implications on viability of the Core Strategy and CIL. This has provided further evidence on affordable housing viability.

**5.76** The councils flexible approach to affordable housing takes account of the current economic climate to enable development to come forward with the ability to deliver a higher level of affordable housing over the plan period, when it is anticipated that the economy will improve.

### **5.77 Environment**

- **Roeshot Hill Allotments Association** - The Borough cannot accommodate the level of residential development proposed without adverse impact on the character of the Borough and environmental qualities.

### **5.78 Officer Response**

**5.79** Master planning has been undertaken for the North Christchurch Urban Extension which provides a framework for a planning application. The master planning work has considered issues of design and densities and relationship to adjacent housing character areas in the existing urban area and Burton village. An ecological assessment has been undertaken as part of planning for the urban extension which assesses impact on habitats and species.

### **5.80 Transport**

- Impact of development on the transport network
- Need for a Christchurch Bypass
- Impact on transport network into Hampshire

### Officer Response

**5.81** The impact of development proposed in the Core Strategy in Christchurch and East Dorset has been assessed through the preparation of the South East Dorset Multi Modal Study and the A35 Route Management Study. Policies KS9 and KS10 of the Key Strategy set out improvements to the transport network which will be required to enable development set out in the Core Strategy to take place. The Core Strategy identifies key junctions where improvements

will be required, however it is not currently possible to determine specific schemes for these junctions as these will be determined by Dorset County Council and rely on the availability of future government funding. Further transport assessments will be undertaken at the planning application stage which will determine the detail of site specific improvements.

**5.82** The Christchurch Bypass is not included in Local Transport Plan 3 and does not form part of the South East Dorset Transport Strategy, therefore cannot be included in the Pre -Submission policy. The Christchurch bypass has been assessed as part of the South East Dorset Multi Modal Study and there is currently no ecologically acceptable route and the scheme is not financially deliverable during the plan period. Objections to these schemes have also been received from the Highway Authority, Natural England, the RSPB and Dorset Wildlife Trust.

### **5.83 Infrastructure**

- Impact on the capacity of schools, doctors, hospital
- The infrastructure in Christchurch cannot support the level of growth that is proposed.

### **Officer Response**

**5.84** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new or larger, replacement schools will be required and these are included in the proposals.

**5.85** 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.

**5.86** The implications for impact on the transport network has been assessed as above.

### **5.87 North Christchurch Urban Extension**

- Roeshot Hill Allotments Association - The Core Strategy does not ensure that new market housing will be taken up by local people or the reduction in demand for market homes by local people
- Why were options UE3 and UE4 discounted when they received the most public support?
- There is no actual indication where exactly the allotments will be relocated other than north of the railway
- The density is too high and the location is unattractive, between the A35 and the railway
- Transport access is inadequate to the site

### Officer Response

**5.88** The Core Strategy cannot prescribe for new market housing to be only available to local people.

**5.89** The Pre Submission background paper (Feb 2012) for the North Christchurch Urban Extension sets out the consideration of options from previous consultation stages. This is also summarised in the introduction of chapter 6 for the Christchurch New Neighbourhoods.

**5.90** The Core Strategy policy did refer to a specific location for the relocation of the allotments north of the railway line. Since the Pre submission consultation was under taken further potential sites are being considered for relocation of the Roeshot Hill Allotments. As there are a number of potential options the Core Strategy policy (CN1) will be amended to state that the Roeshot Hill Allotments will be relocated to a suitable site in accordance with statutory requirements. This will be undertaken in consultation with the Roeshot Hill Allotments Association.

**5.91** The policy has been amended to reflect advice from the Planning Inspectorate that we should set one housing target for the whole plan area. Policies KS3 and KS4 will be merged.

### Proposed Pre-Submission Change

**5.92 Paragraph 4.17** - Amended text to reflect the recent household projections which in combination with the SHMA have informed the councils' housing target:

**5.93** A housing strategy for Christchurch and East Dorset has been established for the plan period (2013 - 2028) informed by local evidence including the Bournemouth and Poole Strategic Housing Market Assessment (2012), **Bournemouth, Dorset and Poole Population and Household Projections (2012)**, Strategic Housing Land Availability Assessments (2011) and master planning work undertaken for new greenfield sites.

**5.94 Paragraph 4.18** - Amended text to reflect the recent household projections which in combination with the SHMA have informed the councils' housing target:

**5.95** The Bournemouth and Poole Strategic Housing Market Assessment (2012) provides an assessment of need for market and affordable housing. ~~In Christchurch the study identified re is a need for 3,375 new market and affordable homes and for 5,250 in East Dorset between 2013 and 2028. Further evidence has been prepared by Dorset County Council for Bournemouth, Dorset and Poole which provides population and household projections re based to new data from the 2011 census. Based on this data there is a need for 7,500 new market and affordable homes in Christchurch and East Dorset between 2013 and 2028. The SHMA and Dorset County Council data have informed a single housing target for the plan area. In order to provide additional flexibility and to give a tolerance for potential non delivery of some proposals, the joint housing target has been set at 8,200 dwellings. This provides flexibility of approximately 10% over and above the baseline need figure. This also provides some allowance for possible future changes in statistical data which affect household projections.~~ In establishing housing targets for Christchurch and

East Dorset the assessment of housing need must be balanced against the level of housing that can be delivered sustainably. In this respect, the Strategic Housing Land Availability Assessments (2011) undertaken for Christchurch and East Dorset provide a detailed assessment of the capacity for housing development.

**5.96 Paragraph 4.19** - The text has been amended as policies KS3 and KS4 will be replaced by a single policy and housing target which meets the overall housing requirement for the district and borough identified in the Bournemouth, Dorset and Poole Population and Household Projections (DCC, 2012),

**5.97** In Christchurch there is capacity to build approximately 2,140 new homes in the urban areas and 2,800 in East Dorset over a 15 year period. This does not meet the needs identified in the evidence base referred to above Housing Market Assessment, so it has been necessary to identify sites in the Green Belt. ~~Even so, within Christchurch there is insufficient suitable land available to deliver the identified need set out in the Housing Market Assessment, due to the particular constraints of flood risk and proximity to heathland, which affect significant areas of the Borough.~~

**5.98 Paragraph 4.20** - This text has been amended as the Christchurch Strategic Housing Land Availability Assessment does not apply a discounting rate.

~~**5.99** The Strategic Housing Land Availability Assessment reports do and will continue to take into account a discounting rate for the non-implementation of planning permissions in the existing urban area.~~

#### Housing Provision in Christchurch and East Dorset

About 8,200 new homes will be provided in the plan area between the years 2013 and 2028. This will comprise up to 4,800 homes within the existing urban areas and a further 3,400 provided as new neighbourhoods at Christchurch, Burton, Corfe Mullen, Wimborne/Colehill, Ferndown/West Parley and Verwood. The location of these strategic sites are identified in the relevant settlement chapters along with illustrative plans setting out how they can be delivered. Development briefs will need to be agreed with the Councils in advance of planning approval being granted with the exception of the Christchurch Roeshot Hill urban extension where the Councils Masterplan is to be applied. The Councils aim for a total of 35% of the new homes to be affordable, as defined in Appendix 2.

The Councils will carefully monitor the delivery of housing. If this falls significantly below the housing target set out in this policy the Councils will undertake a partial review the Core Strategy.

**5.100** Map 4.2 Christchurch Absolute Constraints - Proposed Change

**5.101** Removal of 'East of Marsh Lane New Neighbourhood' from the map.

**Policy KS4**

**Housing provision in East Dorset**

About 5,250 new homes will be provided in East Dorset between the years 2013 and 2028. This will comprise about 2,800 homes within the existing urban areas and about a further 2,500 homes to be provided as new neighbourhoods. The Council aims for a total of 35% of these new homes to be affordable, as defined in Appendix 2.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
10	1	2	19	10	4	12	4	12	3	11	3	3

Table 5.6

**5.102** 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:

**5.103 *Need for Additional Housing***

**5.104** There is nothing in this plan or any other that has been put forward for South East Dorset since 1947 which has been able to meet the demand from financially disadvantaged sectors of the community to live in areas attractive to those able to price them out of the market.

**5.105 **Tanner and Tilley Planning Consultants**** – it is considered that para 4.16 should acknowledge not only that the population of the Plan area is ageing but that there is a need for the Core Strategy to encourage and provide for the delivery of specialist housing and care facilities to provide for their needs.

**5.106** All the internal demand for new housing can be met from the release of houses from the ageing population as they pass on.

**5.107** The excess demand for housing comes from migration. This should be tackled by building a New Town somewhere in Dorset for retired migrants coming into the area.

#### **Officer Response**

**5.108** Housing need has been established through the councils evidence base which includes the Bournemouth and Poole Strategic Housing Market Assessment (2012) and Bournemouth, Dorset and Poole Population and Household Projections (Dorset County Council, 2012). This evidence has informed the councils housing policy alongside the Strategic Housing Land Availability Assessments and master planning work for the new neighbourhoods.

**5.109** The Core Strategy will be revised to include a policy that addresses the issue of specialist housing and care facilities. Further discussion of this issue is set out in the response analysis for the Meeting Local Needs chapter.

#### **5.110 *Housing Numbers***

**5.111 Mr Kenneth Brooks** – makes reference to the NPPF requirement that the Strategic Housing Land Availability Assessment should not include residential gardens (para 48) and considers that this will result in the next Strategic Housing Land Availability Assessment for East Dorset showing a significant reduction in the potential for residential development in St Leonards and St Ives.

**5.112 Savills, for Barratt David Wilson Homes**, argue that paragraph 4.18 is unsound. It does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. They argue that the figures are based on a projection forward of past demographic trends and does not take account of other indicators of housing need and demand such as affordability and economic growth targets. In translating these figures into housing provision for the District, allowance also needs to be made for vacancy rates and second homes.

**5.113 Tanner and Tilley Planning Consultants, for Pennyfarthing Homes** – Policy KS4 relies on the delivery of the identified housing need through the provision of 2,800 of the 5,250 dwellings on existing brownfield sites. However, unless clear policy guidance is given within the Core Strategy accepting that the character of some of those areas will necessarily have to change in terms of density and appearance, and unless there is clear policy requiring minimum densities of at least 30 dwellings per hectare to be achieved, unless it is in areas specially designated as ‘special character areas of low density’, it is considered that this level of housing will not be achieved. The Core Strategy needs to make it clear that certain parts of existing residential areas will need to accommodate higher densities of development which may change their character and appearance.

**5.114 Paul Newman Property Consultants** - does not feel that the local planning authority has fully assessed the true level of housing need and demand in the district. Further allocation of land is required which will involve the need to roll back the Green Belt further to ensure that a sufficient supply of housing land is to be provided, in particular those allocations in Wimborne and Ferndown have and hold the potential for a natural expansion and continuation of development which will bring additional housing to the district.

**5.115 Gleeson Developments Ltd.** – support the proposed housing provision across the joint districts during the plan period, and support the proposed residential allocations within the Core Strategy. Gleasons recognise that there is a shortage of affordable housing in the area and suggest that if the councils were to increase their overall housing targets, then this would result in the provision of more affordable housing.

**5.116 Barton Willmore** – provide a detailed argument to demonstrate that the housing target set out in KS4 is not robust. They argue that the policy is unsound on the basis that it is neither fully justified with respect to evidence or in accordance with national planning policy, specifically the requirements to take account of economic signals and to meet household and population projections, taking account of migration and demographic change. It is therefore not ‘positively prepared’ in that it fails to address objectively assessed need. This policy required review and additional work undertaken to ensure it meets the requirements of the NPPF and the tests of soundness referred to above. At present it is considered that the policy fails to plan positively for economic growth and the high level of identified affordable housing need, and that insufficient regard has been and to net-migration trends, which would be likely to produce a housing demand figure in excess of the figures used to support the Core Strategy. They suggest that the Core Strategy housing requirements should be as a minimum the same as set out in the Regional Strategy – i.e. 6,400 new dwellings across the plan period. This figure was objectively assessed and in the absence of a robust alternative would represent a suitable benchmark and one founded on a robust evidence base.

**5.117 West Parley Parish Council** – The policy is unsound. The figure of 5250 new homes in East Dorset in the Plan period is not justified by evidence. The proposed scale of house building will destroy whole swathes of important Green Belt throughout East Dorset, and the Core Strategy uses a figure for which there is no realistic quantitative evidence and gives no reasons at all for its qualitative choice.

**5.118 Savills, for Barrett David Wilson Homes,** – the policy is unsound as it is not justified. It does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. The recognition in policy KS2 of the need to provide extensions to the existing urban areas to meet development needs is welcomed. However, the evidence base suggests the need for new housing is potentially significantly higher than the level of housing provision set out in Policy KS4. The level of housing provision set out in policy KS4 should therefore be considered a minimum and the wording of the policy amended to state that ‘At least 5,250 new homes .....

**5.119 Tetlow King** – comment that the proposed housing target will need to demonstrate that it will meet objectively assessed housing need to accord with the NPPF. They consider that the current target will not achieve this, based on figures in the 2011 Strategic Housing Market Assessment, which states that the demographic growth is 6,714 households between 2011 and 2031 (336 households per annum) and 440 affordable housing dwellings per annum. Therefore the target of 350dpa is not sufficient to meet this need, even taking into account overlap between the affordable and demographic figures. They therefore recommend that the Council assess a much higher housing target given the findings of the 2011 Strategic Housing Market Assessment, in order to ensure this policy is sound and positively prepared as per the requirements of the NPPF.

**5.120 Ferndown Town Council** – Lack of information about numbers of people who are on more than one local authorities’ housing register needs to be rectified since this deficiency may lead to an exaggerated housing need for S E Dorset.

**5.121 Terence O’Rourke Ltd, for the Perry Family Trust,** – Policy KS4, setting the housing requirements for East Dorset, meets the housing need for the district as determined through the Strategic Housing Market Assessment, however the housing target for Christchurch is set below the figure in the Strategic Housing Market Assessment to the extent that there would be a shortfall of 355 dwellings within the borough over the plan period. They argue that in order to ensure that an appropriate level of housing can be delivered across both districts, the overall housing allocation for East Dorset should be increased from 5,250 to at least 5,605 for the plan period, in order to meet the shortfall of housing in Christchurch. This change should be supported by an additional paragraph in the supporting text explaining that the increase in East Dorset is to meet the deficit from Christchurch. In order to ensure that such

a policy change does not result in unplanned and speculative development within East Dorset, the authorities may wish to consider allocating one or more 'overflow' sites specifically to meet the additional housing requirement arising from Christchurch. The suitability of any overflow site should be assessed in terms of the normal plan making process.

**5.122 Intelligent Land** – Argue that the housing land supply is insufficient to meet local needs.

**5.123 Turley Associates, for Taylor Wimpey**, argue that the evidence base informing policy should be updated to meet the requirements of the NPPF, and that further consultation should be undertaken on this and any material revisions to the plan that may arise from this. The NPPF requires local planning authorities to objectively assess and meet the needs for market and affordable housing in their area, as far as is consistent with NPPF, including any unmet requirements from neighbouring authorities where reasonable and sustainable to do so. They argue that the housing needs assessment carried out by the council has not fully explored all the alternative options to meeting the needs identified in the 2012 Strategic Housing Market Assessment. No justification is given as to why the Strategic Housing Market Assessment figure of 426 dwellings per annum cannot be provided, and they consider that the 350 dwellings per annum included in the Core Strategy is a single trend based option. The Council has not produced and tested alternative options that factor in employment growth. The council also needs a robust Strategic Housing Land Availability Assessment to demonstrate suitable and available sources of housing land supply. They argue that the current Strategic Housing Land Availability Assessment does not do this. A significant proportion of the dwellings to be provided in the urban area identified on the Strategic Housing Land Availability Assessment are not confirmed as available, and many rely on the sub-division of existing housing units and building on residential gardens. The latter no longer has the status of previously developed land and should not be included in land supply calculations under para 48 of the NPPF. They consider that there is unlikely to be a 5 year land supply based on the Strategic Housing Land Availability Assessment data, and policy KS4 contains no contingencies to address such shortfalls. To accord with para 47 of the NPPF the Council should include a contingency strategy to address any future shortfalls in the 5 year land supply, which could include the interim release of additional sites to make up the shortfall. Turley Associates also argue that the Council have not objectively assessed housing need and have not then tested the various options to meet this need.

**5.124 Pro Vision Planning and Design, for Wessex Water**, suggest that the housing figure for East Dorset might be revised to include a greater level of housing supply in accord with the most recent evidence available.

**5.125 Home Builders Federation** – the proposed level of housing is unsound as it is deficient in several respects with regard to the requirements of national policy and the assessment of the housing requirement. It is deficient in respect to national policy in the following areas. (a) the assessment of the housing need over the plan period does not meet the requirements of the NPPF, as set out in paras 47 and 159 in terms of assessing market as well as affordable housing needs. (b) the planned level of provision in both districts fails to address the assessed level of need for affordable housing, let alone market (and potentially other housing needs) in addition to this. Consequently the proposed plan fails to meet one of the assessed levels of need, and (c) the proposed housing requirements fail to take into account cross boundary impacts including the unmet needs of neighbouring boroughs. The proposed plan has therefore failed to meet its own assessed level of need plus potentially the unmet needs of neighbouring districts. The HBF consider that given the disparities between the planned levels of provision and need they have identified in neighbouring authorities, Christchurch and East Dorset must meet their own objectively assessed housing needs through the plan since it is very apparent that they cannot rely on any adjoining authorities to do so. They are also concerned about the expression of the targets in KS3 and KS4 and consider them to be imprecise and to create uncertainty. The policy refers to 'about x new homes' The expression of the housing targets needs to be precise for the purposes of calculating 5 year land supply. The word 'about' should

be deleted and the targets should be treated as minimum targets, so if other suitable sites materialise over the plan period that satisfy the provisions of the NPPF, these will enable the Councils to exceed targets. The HBF also do not accept the argument that a weak housing market justifies reducing the housing requirement.

**5.126 Ken Parke Planning Consultants, for Wilton Homes** – The overall strategy of KS4 is supported, but there is insufficient detail and insufficient recognition of the need to plan for the levels of development that will be necessary to maintain the viability of smaller settlements.

**5.127** Too many areas have been identified for development - we will end up with piecemeal housing in all of these without the other facilities provided that are necessary.

**5.128 Location of New Development**

**5.129** No mention at all of brownfield sites. Unacceptable to keep going on about altering the Green Belt boundary.

**5.130 East Dorset Environment Theme Action Group** – (para 4.21) Sustainable development must include all three strands of sustainability – social, economic and environmental. The brief for the master plan was unbalanced and only addressed in-commuting, not out-commuting. There was no consideration of the natural environment, such an approach is inconsistent with NPPF paras 7 - 9.

**5.131 Mr Christopher Chope MP** – Policy KS4 is not compliant as most of the 2500 new homes proposed for ‘outside existing urban areas’ are to be built on land currently designated as Green Belt. He requests the deletion of the reference to the construction of new homes on land currently designated as Green Belt.

**5.132 Eastern Area Dorset Association of Parish and Town Councils** – concerned that the Core Strategy does not fully reflect the situation in the rural area of East Dorset, which represents 72.21% of the area and 14.74% of its population. The Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.

**5.133 Sixpenny Handley Parish Council** – The term New Neighbourhood is not defined.

**5.134 The Planning Bureau, for McCarthy and Stone Ltd**, argue that it is clear from local and national statistical data that the demographics of Christchurch and East Dorset and the UK as a whole is ageing. The Council recognise the current and future increase on the older people in the district and in older person households which will have significant implications on the overall housing market in a district with many physical constraints on residential development. The evidence suggests that there is a current and growing need for specialised forms of private sector accommodation for older persons such as retirement housing and assisted living extra care. The Core Strategy fails to draw out sufficient policy weight on this issue. To comply with national guidance and the NPPF, it is suggested that the opportunity exists to provide a dedicated policy to address the issue, or to amend policy KS4 to outline the benefits of elderly person’s accommodation including owner occupier retirement and extra care housing.

**5.135** Housing plans too ambitious for Wimborne/Colehill. 1,500 new houses, including existing proposals, predicates an increase in population of over 5,000 or 40%. Way above national average. There are no jobs, insufficient services and amenities for the new properties. Concern about loss of Green Belt to accommodate the growth proposed.

**5.136 Wimborne Civic Society** - The present population in Wimborne/Colehill is approaching 15,000. If we assume an average of two people per unit, 1,500 new dwellings would be an extra 20%. There is a considerable danger that the present bespoke character of Wimborne and its infrastructure would be overwhelmed by the off-the-peg suburbia. Other settlements in East Dorset have had their housing targets reduced. We do not Wimborne to become a dormitory town with a leavening of retirement homes and tourist attractions. The area requires a mix of domestic, leisure and commercial operations. A similar comment is submitted by the Brookside Manor Residents Association.

### Officer Response

**5.137** An officer response is set out above under policy KS3 which deals with the following overarching issues that relate to both policies KS3 and KS4:

- **Green Belt** - Justification for limited amendment to the Green Belt to accommodate the need for new housing on new neighbourhoods in Christchurch and East Dorset.
- **Housing Need** - The evidence base that underpins the Core Strategy housing figures.
- **Housing Land Supply** - Housing land supply based on Strategic Housing Land Availability Assessments to meet housing targets and 5% buffer in accordance with the NPPF.
- **Housing trajectories** - The incorporation of housing trajectories in the Core Strategy.
- **Housing targets and the Duty to Co-operate** - How the councils have worked with neighbouring authorities on identifying housing need and delivery of housing requirements.
- **Affordable housing targets and development viability** - How the viability of the Core Strategy as a whole has been assessed and the implications for affordable housing policy.
- **Elderly persons accommodation** - How the Core Strategy considers a policy approach for elderly person's accommodation.

**5.138** With regard to the issue of a five-year land supply in East Dorset, the Council can demonstrate that it has successfully provided for the housing need of the District since at least 1994. The Structure Plan target during the period 1994 to 2011 was 4,400 (gross figure). During that time the number of actual completions in the District exceeded this target by 527 net new dwellings, which is a significant over-provision of units. It is recognised that the rate

of housing completions in the last 5 years has reduced to an average of 129 dwellings per year net, which is lower than the first 10 years of the Structure Plan period when on average 345 dwellings per year net were completed. This tailing off of provision represents the substantial completion of the allocated sites in the subsequent East Dorset Local Plan and the national fall in housebuilding rates due to the recession.

**5.139** The Council considers that it has an adequate housing land supply to meet the needs of the area, and the 368 new dwellings per year needed to meet this target can be delivered. This is based on the number of extant planning permissions within the district (591), sites identified within the Strategic Housing Land Availability Assessment, and most significantly the number of dwellings proposed on greenfield sites in the Core Strategy. Discussions with a number of prospective developers of the allocated sites have indicated that there is the potential for a number of these sites to come forward for development within the first five years of the Core Strategy's adoption, subject to favourable economic conditions.

### **Proposed Pre-Submission Change**

**5.140** Policy KS4 is to be deleted and replaced by new policy KS3, as set out above.

#### **Policy KS5**

##### **Provision of Employment Land**

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

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
15	0	0	13	1	11	1	11	2	10	1	10	2

Table 5.7

**5.141** 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:

### 5.142 *General Comments*

- **Dorset County Council** - The County Council supports this approach, where exceptional circumstances exist to allow changes to the green belt boundary to accommodate economic growth at Ferndown and at the Airport. The linkage to housing provision should be clarified to ensure that there is an appropriate balance with workforce projections - background evidence should be updated. The delivery of the proposed amount of employment land will place significant demands on local infrastructure - particularly transport. The County Council will wish to continue work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.
- **Ferndown Town Council** - considers that the broad locations for land suitable for employment are Bournemouth airport area and Ferndown Industrial Estate. Although use of sustainable forms of transport (bus, cycle) will be encouraged, there is likely to be a net detrimental effect on the local highway network and beyond by the use of private cars and commercial vehicles, including HGVs which can have a major impact on highway surfaces.
- **Quantum Group** - We note the former QinetiQ site is identified as part of the provision of Employment Land in Christchurch. Whilst the site was formerly in employment use, it has been vacant for a prolonged period and will not be reoccupied for such purposes, as it has a Committee resolution to grant permission for a food store to replace the B class accommodation on site. Reference to the site in employment use should be removed throughout the Core Strategy.
- **ETAG** - The wording of the policy appears to seek environmental acceptability only for live/work units. This should be corrected to apply to all forms of development.

### 5.143 *Alternative Locations for Employment Land*

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

#### 5.144 *Workshops and Live/work Units*

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

### Officer Response

#### 5.145 *General Comments*

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

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

**5.148** *Alternative Locations for Employment Land*

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

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

**5.151** *Workspace and Live/work units*

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

**5.153** *Evidence Study Updates*

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

## **Proposed Pre-Submission Change**

**5.155** **Paragraph 4.26**

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

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

**5.158** Paragraph 4.27

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

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

## Policy KS5

### Provision of Employment Land

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

**5.161** Map 4.3 Provision of Employment Land - Proposed Change

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

## 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.

## Consultation Response

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

Table 5.8

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

### 5.164 *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.

### 5.165 *Town Centre Hierarchy*

### 5.166 *Christchurch*

- 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 or 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.

### 5.167 *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 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.

## Officer Response

### 5.168 *General Comments*

5.169 No comments.

### 5.170 *Christchurch*

5.171 The NPPF does not provide a definition of a 'district centre'. The most up to date definition is contained within Annex B of PPS4;

5.172 ***'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'.***

5.173 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.

5.174 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.

5.175 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.

### 5.176 *East Dorset*

**5.177** 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.

**5.178** 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 Pre-Submission Change

**5.179** Paragraph 4.33

**5.180** Updated text to reflect the latest retail study that informs floorspace requirements in the plan area.

**5.181** ~~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.~~

**5.182** Paragraph 4.35

**5.183** 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.

**5.184** 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: **Barrack Road**, Purewell, Corfe Mullen and West Parley.

Parades: All other clusters of shops.

## **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).

## Consultation Response

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

Table 5.9

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

### **5.186** *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).

### **5.187** *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.

#### **5.188 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.

### **Officer Response**

**5.189** 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.

**5.190** 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.

**5.191** 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.

**5.192** 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.

**5.193** 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.

**5.194** 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 Pre-Submission Change**

## 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 **Gores-Frontages** are defined.

1. At ground floor level, support will be given within the Primary Shopping ~~Gores-Frontages~~ 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 ~~Gores-Frontages~~. 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 ~~Gores-Frontages~~ the same uses will be supported as for Primary Shopping ~~Gores-Frontages~~ along with drinking establishments (Use Class A4), hot food take-aways (Use Class (A5) and hotels (Use Class C1).

## Policy KS8

### Future Retail Provision

In order for key retail centres in Christchurch and East Dorset to maintain and enhance their vitality and viability, it is important that provision is made for additional retail floorspace to meet the needs of a growing population with associated increasing levels of available retail expenditure. It is also important for our retail centres to maintain their market share of retail expenditure within the South East Dorset sub region and provide the opportunity to increase this market share. In Christchurch there is a projected requirement for in the region of 10,000sqm - 11,000sqm net additional comparison floorspace for the period to 2028 and no requirement for additional convenience floorspace. In East Dorset there is a projected requirement for in the region of 5,000sqm net convenience floorspace and 12,000 - 13,000 net comparison floorspace to 2028. The broad location and level of retail floorspace that could come forward in retail centres across Christchurch and East Dorset contributing towards overall projected requirements is set out below. The Site Specific Allocations Development Plan Document will determine specific sites within the centres where retail development can take place.

#### Christchurch:

Christchurch Town Centre:

- Comparison Retail Floorspace: 8,000sqm
- Convenience Floorspace: No additional requirement to 2028

Highcliffe Centre:

- Comparison Floorspace: 800sqm
- Convenience Floorspace: No additional requirement to 2028

#### East Dorset:

Ferndown

- Comparison Floorspace: 5,200 sqm
- Convenience Floorspace: 3,600 sqm

Verwood

- Comparison Floorspace: 1,150 sqm
- Convenience Floorspace: 700 sqm

West Moors

- Comparison Floorspace: 550 sqm
- Convenience Floorspace: 110 sqm

Wimborne Minster:

- Comparison Floorspace: 6,650 sqm

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	0	1	9	1	3	6	2	1	3	3	2	2

Table 5.10

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

**5.196 General Comments**

- Sixpenny Handley with Pentridge Parish Council - The fact that it is limited to urban provision should be stated - Future Urban Retail Provision.

**5.197 Specific Comments relating to Christchurch**

- Savills Commercial on behalf of Saxon Square Management Committee - The Retail Study 2008 is out of date for Christchurch and new evidence is required to reflect a more realistic comparison retail requirement for Christchurch.

- GVA Planning and Development on behalf of The Co-operative - The Co-operative supports (and agrees with) the prediction that no additional convenience goods retail floorspace will be required within Christchurch and Highcliffe up to 2028. The Co-op store lies within Saxon Square and it is noted that this is one of five strategic sites identified as being able to deliver the town centre vision. Whilst not all of these five sites actually lie within the town centre (both Stony Lane sites), it will be important for Policy KS8 to state that these sites should deliver uses/development which is in line with the retail and other land uses proposed by KS8.
- Turley Associates on behalf of Dorset Development Partnership - There is a large amount of convenience expenditure (53%) out-flowing from Christchurch to other areas, particularly Bournemouth. It is therefore considered that a qualitative need exists to provide further convenience goods floorspace in Christchurch town centre in order to provide greater choice and competition and retain a greater amount of the available spend within Christchurch. Consequently, whilst we support the proposal to increase the amount of comparison goods retail floorspace in Christchurch town centre (8,000sq m), Policy KS8 should not preclude further convenience goods floorspace coming forward, particularly where such development could provide other significant benefits to Christchurch, by for example, providing a further anchor to the town centre, drawing further trade into the centre and increasing the potential for linked trips. This view has recently been supported by the Inspector at the Meteor Retail Park appeal (Dec 2011). A centrally located foodstore located at the Magistrate Court's site would provide significant benefits to the town, and draw people to the Bargates area in linked trips.

#### **5.198 Specific Comments relating to East Dorset**

- WYG Planning and Design on behalf of Sainsbury's Supermarkets Ltd - We seek clarification on how the convenience and comparison floorspace figures have been identified and why they are significantly lower for some settlements in East Dorset than the retail capacity identified in the Joint Retail Study 2008. It appears the retail capacity figures are inconsistent with capacity figures given elsewhere in the document, including area based policies. It is essential that the retail capacity figures given in the Core Strategy are consistent throughout and it is clear and transparent how they have been derived.
- GVA Planning and Development on behalf of The Co-operative - We consider the additional capacity of 5000sqm convenience retail floorspace identified is overly optimistic for East Dorset, and recommend a more up to date retail capacity assessment is undertaken.
- 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.
- West Parley Parish Council - It is not justified, in that although it establishes a need for 3600 sq meters of retail floor space in Ferndown, it goes on in Policy FWP6, without any further evidence or discussion, to site a 3000 sq. metre store in the separate community and administration of West Parley. The need for the store is not obvious to or supported by West Parley.

- DC Planning on behalf of Wyatt Homes - Policy KS8 could usefully have amendment to add clarity and reflect the Council's approach within FWP6 whereby a convenience foodstore of about 3000sqm is endorsed. KS8 should thus mention West Parley as a place and this quantum of development as need which is to be met in this location. It is unhelpfully silent on the matter.
- This policy establishes a need for 3600sqm or retail space in Ferndown, but the store is to be sited in West Parley. This is not justified.
- Increasing retail floorspace in Verwood town centre will impact on the town's car parks. Verwood's public car parks are not big enough to support any further growth of the centre for daytime use. The strategy should highlight not only floorspace but parking too.

### Officer Response

**5.199** A Retail Study Update (Sept 2012) by NLP has recently been completed and provides an overview of the local retail trends for Christchurch and East Dorset up to 2031. It takes into account recently completed supermarkets, projected population growth and national economic and local trends. The broad floorspace projections have therefore been reviewed in light of this study, and are set out below.

**5.200** Policy KS8 sets out the broad distribution for retail floor space in the borough and district over the plan period. Further work will be undertaken through the Site Specific Allocations DPD to determine the detailed allocations for the strategic sites identified in Policy CH1 of the Core Strategy and the distribution of retail floorspace identified in policy KS8.

#### **5.201 Paragraph 4.42**

**5.202** Change in text to take account of the Retail Study Update (2012) which supersedes projections contained in the 2008 study.

**Proposed Pre-Submission Change**

## Policy KS8

### Future Retail Provision

In order for key retail centres in Christchurch and East Dorset to maintain and enhance their vitality and viability, it is important that provision is made for additional retail floorspace to meet the needs of a growing population with associated increasing levels of available retail expenditure. It is also important for our retail centres to maintain their market share of retail expenditure within the South East Dorset sub region and provide the opportunity to increase this market share. In Christchurch there is a projected requirement for in the region of 40,000sqm - 44,000sqm net additional comparison floorspace for the period to 2028 and no requirement for additional convenience floorspace. In East Dorset there is a projected requirement for in the region of 5,000sqm net convenience floorspace and 12,000 - 13,000 net comparison floorspace to 2028. The broad location and level of retail floorspace that could come forward in retail centres across Christchurch and East Dorset contributing towards overall projected requirements is set out below. The Site Specific Allocations Development Plan Document will determine specific sites within the centres where retail development can take place.

#### Christchurch:

##### Christchurch Town Centre:

- Comparison Retail Floorspace: 8,000sqm
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#### East Dorset:

##### Ferndown

- Comparison Floorspace: 5,200 sqm
- Convenience Floorspace: 3,600 sqm

##### Verwood

- Comparison Floorspace: 1,150 sqm

- ~~Convenience Floorspace: 700 sqm~~

#### **West Moors**

- ~~Comparison Floorspace: 550 sqm~~
- ~~Convenience Floorspace: 110 sqm~~

#### **Wimborne Minster:**

- ~~Comparison Floorspace: 6,650 sqm~~

In order for key retail centres in Christchurch and East Dorset to maintain and enhance their vitality and viability, it is important that provision is made for additional retail floorspace to meet the needs of a growing population with associated increasing levels of available retail expenditure. It is also important for our retail centres to maintain their market share of retail expenditure within the South East Dorset sub region and provide the opportunity to increase this market share. In Christchurch there is a projected requirement for in the region of 8,100 square metres net additional comparison floorspace for the period to 2031 and 2,300 square metres net additional convenience floorspace.

In East Dorset there is a projected requirement for in the region of 5,200 sqm net additional comparison floorspace and 4,000 sqm net additional convenience floorspace to 2031.

Floorspace projections are based on Christchurch and East Dorset Councils Retail and Town Centre Uses Study (2012). Future updates to the retail study during the plan period will inform on-going strategic requirements for retail provision in Christchurch and East Dorset.

The broad location and level of retail floorspace that could come forward in retail centres across Christchurch and East Dorset to deliver the overall projected requirements is set out below. The Site Specific Allocations Development Plan Document will determine specific sites within the centres where retail development can take place.

#### **Christchurch:**

Comparison Retail Floorspace: Christchurch town centre will be the main focus for meeting the borough wide projection for comparison floorspace. Highcliffe centre will provide a small scale contribution towards the overall borough wide figure.

Convenience Retail Floorspace: Christchurch town centre will be the focus for meeting the borough wide projection for convenience floorspace.

Further detail on the retail strategy for Christchurch is set out in Chapter 5 of the Core Strategy

#### **East Dorset:**

**Comparison Retail Floorspace:**

**Wimborne Minster and Ferndown will be the main focus for comparison retail floorspace provision in the district. Verwood and West Moors will also deliver additional comparison floorspace of a smaller scale to contribute to the overall district projection.**

**Convenience Retail Floorspace:**

**Ferndown and West Parley will be the focus for convenience floorspace provision in the district. Corfe Mullen, Verwood, West Moors and Wimborne Minster have potential to deliver smaller scale provision contributing to the overall district figure.**

**Further detail on the retail strategy for the East Dorset retail centres is set out in Chapters 8, 10 and 11.**

## Policy KS9

### Transport Strategy and Prime Transport Corridors

In accordance with the Local Transport Plan (LTP3) development will be located along and at the end of the Prime Transport Corridors in the most accessible locations and supported by transport improvements that will benefit existing and future communities. Higher density development will be located in an around town centres and Prime Transport Corridors in order to reduce the need to travel.

Improvements will be made to Prime Transport Corridors to include junction improvements, traffic management, enhanced public transport services and improvements to walking and cycling. The following corridors are proposed for improvement:

- **A35 Iford Bridge - Fountains roundabout - Stony Lane roundabout - Somerford roundabout - Roeshot Hill - Hampshire boundary.**
- **B3073 Christchurch town centre - Bargates - Fairmile - Blackwater Interchange. (A338 junction)**
- **B3073 Wimborne town centre - Longham mini roundabouts - Parley Cross - Chapel Gate - Hurn roundabout - Blackwater Interchange. (A338 junction)**
- **B3073 Wimborne town centre - Wimborne Road West and East – Ferndown.**
- **B3072 Ferndown - West Moors - Three Legged Cross – Verwood.**
- **A348 Bournemouth boundary - Longham mini roundabouts - Ferndown.**
- **A347 Bournemouth boundary - Parley Cross - A348 junction.**
- **A337 Somerford roundabout - Highcliffe - Hampshire boundary.**
- **B3074 Poole boundary through Corfe Mullen.**
- **A349 Poole through to Wimborne Minster.**

The Local Transport Plan (LTP3) includes the following proposals which will support the development proposed in this Core Strategy:

- Improve walking, cycling and bus access to Christchurch and Hinton Admiral railway stations to help encourage greater use of rail services. This will be supported by the improvement of the facilities provided at the stations such as cycle parking, co-ordinated bus and rail timetables and improved waiting facilities,
- Improvements to public transport (bus and rail) with more frequent services within the urban areas in particular, bus priority measures, an expansion of Real Time Information at bus stops and use of smartcard technology,
- Walking and cycling improvements within and between the urban areas,
- Travel Plans to encourage working from home and car sharing to work to help reduce congestion levels and the level of parking provision required at employment locations,
- In the rural area, community travel planning will be encouraged for example Community Travel Exchanges will provide opportunities for car sharing, community car clubs and access to other shared services,

- Enhancement and protection of the existing rights of way network and trailways to provide off road walking and cycling links between suburban and rural areas,
- Traffic management measures will be implemented to improve junctions, reduce vehicle speeds, improve road safety, enhance the environment for pedestrian and cyclists in urban and rural areas and reduce the diversion of traffic on to inappropriate routes, and
- Provide opportunities for sustainable freight movement where possible.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
14	0	5	18	10	3	11	4	11	3	5	6	7

Table 5.11

**5.203** 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:

**5.204 Transport**

- Poor existing public transport which needs to be improved.
- The A348 through Ferndown and the A31 are very busy routes.
- B3081 (Verwood) should be improved for walking and cycling.
- Prime Transport Corridor proposals need more detail.
- The improvement of the junctions identified is desirable but where is the funding going to come from?
- Questions are raised over the transport modelling work undertaken to assess the impacts of traffic generated by proposed development in Wimborne.

- Keep Wimborne Green – Number of dwellings proposed in Wimborne should be reduced due to traffic impact.
- The Highways Agency supports policy KS9.
- West Parley Parish Council agree that Parley Cross needs improving but is concerned about the availability of funding.
- Verwood Town Council – the B3081 should be identified as a Prime Transport Corridor.
- Dorset County Council (as Highway Authority) supports this policy.
- New Forest District Council and Hampshire County Council – More work is needed to assess the impact of proposed development in Christchurch and East on the Hampshire transport network.
- Somerford Community Partnership – Off road cycle routes should be provided.
- Sixpenny Handley with Pentridge Parish Council and the Eastern Area DAPTC - the rural northern part of the district and particularly the rural road system is not given enough prominence in the document.
- Environment TAG – Sustainability Appraisal and Habitat Regs must be considered and satisfied in the design of the improvement schemes.
- The Malmesbury Estate (DTZ Planning) - Policy is inconsistent with LTP3 and fails to make provision for a Bournemouth Airport strategic park and ride. This should be added to the policy which purports to list the proposals from LTP3 but excludes this one.
- Burton Parish Council - The Council supports the policy to improve public transport but very strongly opposes the inclusion of housing for Burton in Policy KS9.
- British Horse Society – Equestrian routes should be protected and improved.

Ferndown Town Council – Through traffic, particularly HGVs, should be diverted away from Ferndown town centre and on to to the A31 Ferndown bypass.

### Officer Response

**5.205** The B3081 will be looked at in the Verwood urban area in conjunction with development proposals. This is a strategy document and therefore not the place to provide detail, this will come later as proposals are developed. A mix of Local Transport Plan, developer contributions and other government funding will be used.

**5.206** This work is robust but the report may be too technical for public consumption. Further assessment work will be undertaken now the Canford Bottom roundabout and Wimborne town square improvements have been implemented as these changes will have an effect on the movement of traffic. The effect of these network changes will be assessed in conjunction with the revised development proposals. This will identify where potential congestion problems might occur and what developers will need to do to mitigate their impact on the network.

**5.207** The Highway Authority will be working closely with developers to ensure the negative impact from each development is assessed and mitigated through the provision of and / or contribution towards transport network improvements.

**5.208** Much of the B3081 falls within Hampshire so Dorset CC as Highway Authority does not have control over its improvement. There is a long standing aspiration to improve the Bakers Hanging junction in Dorset and accidents will continue to be monitored here. Development in the area may be able to pay towards a solution here. Off road cycle routes are currently being investigated.

**5.209** Regular cross border liaison meetings between Dorset CC, New Forest NPA, New Forest DC and Hants CC will ensure cross border transport issues are addressed.

**5.210** Off road cycle routes will be provided where possible.

**5.211** The vast majority of development is focused in the south of East Dorset as this is a more urban area with more scope and need for improvement in terms of reducing congestion and encouraging sustainable transport.

**5.212** The rural northern part of East Dorset has been investigated by Dorset CC Traffic Management team to consider whether it would be appropriate to re-route traffic from Ferndown Town Centre onto the A31. This has shown that if a re-designation of the road network were to occur vehicles are unlikely to adhere to a diversion which would lengthen their journey. The police would be unlikely to enforce the change and the Highways Agency are unlikely to support a change which would add more traffic to their network at Canford Bottom roundabout.

**5.213** The list of improvements included in this policy is not intended to replicate the entire set of proposals contained within the LTP merely to reflect the main concepts. The proposal at Bournemouth airport contained in LTP3 is for improvements to the transport interchange facilities to create an enhanced transport hub at the airport. A firm proposal for a Park and Ride is uncertain at this stage because of available land constraints, aspirations of the airport etc so it cannot be included in the Core Strategy.

**5.214** Policy KS9 does not propose housing.

### **Proposed Pre-Submission Change**

**5.215** Delete A349 improvements. The majority of this route (A349) is in Poole so Borough of Poole will deliver improvements. Numbering has been included for ease of reference.

### Transport Strategy and Prime Transport Corridors

In accordance with the Local Transport Plan (LTP3) development will be located along and at the end of the Prime Transport Corridors in the most accessible locations and supported by transport improvements that will benefit existing and future communities. Higher density development will be located in an around town centres and Prime Transport Corridors in order to reduce the need to travel.

Improvements will be made to Prime Transport Corridors to include junction improvements, traffic management, enhanced public transport services and improvements to walking and cycling. The following corridors are proposed for improvement:

- **A35 Iford Bridge - Fountains roundabout - Stony Lane roundabout - Somerford roundabout - Roeshot Hill - Hampshire boundary.**
- **B3073 Christchurch town centre - Bargates - Fairmile - Blackwater Interchange. (A338 junction)**
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- **B3073 Wimborne town centre - Wimborne Road West and East – Ferndown.**
- **B3072 Ferndown - West Moors - Three Legged Cross – Verwood.**
- **A348 Bournemouth boundary - Longham mini roundabouts - Ferndown.**
- **A347 Bournemouth boundary - Parley Cross - A348 junction.**
- **A337 Somerford roundabout - Highcliffe - Hampshire boundary.**
- **B3074 Poole boundary through Corfe Mullen.**
- **~~A349 Poole through to Wimborne Minster.~~**

The Local Transport Plan (LTP3) includes the following proposals which will support the development proposed in this Core Strategy:

- Improve walking, cycling and bus access to Christchurch and Hinton Admiral railway stations to help encourage greater use of rail services. This will be supported by the improvement of the facilities provided at the stations such as cycle parking, co-ordinated bus and rail timetables and improved waiting facilities,
- Improvements to public transport (bus and rail) with more frequent services within the urban areas in particular, bus priority measures, an expansion of Real Time Information at bus stops and use of smartcard technology,
- Walking and cycling improvements within and between the urban areas,
- Travel Plans to encourage working from home and car sharing to work to help reduce congestion levels and the level of parking provision required at employment locations,
- In the rural area, community travel planning will be encouraged for example Community Travel Exchanges will provide opportunities for car sharing, community car clubs and access to other shared services,

- Enhancement and protection of the existing rights of way network and trailways to provide off road walking and cycling links between suburban and rural areas,
- Traffic management measures will be implemented to improve junctions, reduce vehicle speeds, improve road safety, enhance the environment for pedestrian and cyclists in urban and rural areas and reduce the diversion of traffic on to inappropriate routes, and
- Provide opportunities for sustainable freight movement where possible.

### Policy KS10

#### Strategic Transport Improvements

The South East Dorset Transport Strategy recommends the following strategic transport improvements to support future development. Development will contribute towards their delivery through the payment of the Community Infrastructure Levy: **Medium Term (2014 – 2019)** In Christchurch the following improvements are required to accommodate borough wide development to 2028 including the Christchurch Urban Extension:

- A35 Fountains roundabout, Stony Lane roundabout, Staple Cross (Salisbury Road), Somerford roundabout junction improvements.

The following improvements and road widening are required to accommodate wider growth across the South East Dorset sub region including further employment development at Bournemouth Airport, the Airport Business Park and any new neighbourhoods created in the West Parley area:

- B3073 junction improvements from Parley Cross to A338 Blackwater.
- B3073 road widening from Chapel Gate roundabout to Blackwater Junction and along the A338 to the Cooper Dean junction.

#### Long Term (2020 - 2026)

- A31(T) dualling between Merley - Ameysford (Highways Agency scheme).

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
7	3	2	12	6	3	6	4	5	4	5	4	47

Table 5.12

**5.216** 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:

### 5.217 *Transport*

- Junction improvements alone will not reduce the traffic congestion through Christchurch, an A35 Christchurch bypass is needed.
- Road improvements are needed before the development occurs.
- Concern was raised about how these strategic transport schemes are to be funded.
- Concern was raised that these strategic transport schemes do not support sustainable transport.
- Representations were made against the provision of extra housing in Burton and the negative impact this will have at Stony Lane roundabout.
- The Highways Agency - Support the recognition of concerns on the Ameysford to Merley link, however the delivery mechanism for this proposal (A31 dualling) is yet to be clarified.
- Barton Willmore LLP (on behalf of Stour Valley Properties) - Concern is raised regarding the deliverability of the A31 dualling between Merley and Ameysford. Highways Agency evidence shows that this scheme is dependent on Government funding and may not be brought forward in the plan period, certainly not within 20 years and there is no funding allocated to such works.
- West Parley Parish Council - KS10 is a statement of ambition rather than a deliverable policy. There is a big funding gap, unlikely to be closed in the foreseeable future. This applies particularly to the A31(T) dualling, which is fundamental to the success of nearly all the proposed new housing schemes.

- Dorset County Council – Support.
- Somerford Community Partnership – The Partnership strongly supports improvements to the road junctions at the Stony Lane and Somerford Roundabouts. It does not support improvements to facilities for walkers, cyclists and pedestrians which result in deterioration of conditions for motorists.
- Wimborne Civic Society – It's important to give priority to the dualling of the A31(T) from the Ameysford to Merley roundabouts, in conjunction with a better route from the A31 to Poole and Wessex Way. If Policy WMC6 goes ahead a spur is needed from the new development directly to the A31 between the Canford Bottom and Merley roundabouts.
- Yellow Buses - Insufficient emphasis and detail on developing and supporting public bus transport network improvements and infrastructure within the core strategy.
- John Reid and Sons (Strucsteel) Ltd – Policy does not address the matter of traffic congestion in the centre of Christchurch.
- Queues of traffic along Christchurch Bypass are in-consistent with the shared objectives for Christchurch town centre vision.
- Town centre will only thrive if it is easy to go there, park and leave as a pleasant experience.
- Environment TAG – Concerned that the A31 and B3073 improvements, increase in HGVs, flights will result in environmental damage, loss and or impact on habitat.
- Bournemouth Borough Council - The SEDMMTS includes the A338 widening as a separate scheme to that of B3073 road widening and the Blackwater Junction improvements. SEDMMTS refers to this scheme occurring post 2026. We would therefore suggest that the text within the Core Strategy is amended to reflect this delivery timetable. The junction improvements at Parley Cross referred to in Policy KS10 and Policy FWP5, the West Parley Village Centre enhancement scheme, differ from those recommended by the SEDMMTS which promotes the provision of a gyratory.
- Jackson Planning Ltd - Remove reference to Christchurch Urban Extension as the strategic network and junctions need upgrading even without the development of the urban extension.

### Officer Response

**5.218** The transport strategy provides a positive, balanced approach to reduce congestion in Christchurch by widening travel choice and improving junctions. New road building to increase capacity in the area is not deliverable due to severe environmental constraints and a lack of funding for major new roads.

**5.219** Developer contributions and government funding will be required for these major schemes to be delivered. Developer contributions are already being collected towards these schemes through the SED Transport Contributions policy which will roll forward into Community Infrastructure Levy (CIL). Significant new development will pay significant financial contributions to mitigate negative impacts of traffic from their site on the network.

**5.220** Developer contributions and government funding will be required for these major schemes to be delivered. Developer contributions are already being collected towards schemes through the SED Transport Contributions policy which will roll forward into CIL. Significant new development will pay significant financial contributions to mitigate negative impacts of traffic from their site on the network.

**5.221** Selective junction improvements and road widening will ensure that we make the best use of the existing network through the provision of targeted capacity enhancements. Junction improvements will also support the sustainable transport measures being promoted within the transport strategy as they will help bus journey reliability and provide safe crossings for pedestrians and cyclists. Road widening creates the opportunity for Bus and High Occupancy Vehicle Lanes.

**5.222** New development will provide or pay financial contributions towards junction improvements in order to mitigate the negative impacts of traffic from their site on the network. They will also provide or contribute towards sustainable transport improvements to and from their sites.

**5.223** Developer contributions and Highways Agency funding will be required for the A31 major scheme to be delivered. Developer contributions are already being collected towards this scheme through the SED Transport Contributions policy which will roll forward into CIL. Local authorities will continue to work with the Highways Agency to address local and strategic transport issues. The Local Economic Partnership (LEP) will also lobby government to provide improvements to this vital route for SE Dorset and beyond.

**5.224** The concerns of West Parley are noted. However, the Councils wish to plan positively for growth and transport infrastructure improvement in the area and are therefore collecting developer contributions towards this strategic scheme through the SED Transport Contributions policy (along with Borough of Poole and Bournemouth Borough Council) which will roll forward into CIL. The Highways Agency are working in partnership with the SED authorities and the LEP on this issue and will continue to lobby for government funding to deliver this scheme in the long term.

**5.225** Government guidance encourages authorities to improve conditions for pedestrians, cyclists and public transport users at every opportunity to reduce congestion, pollution and to encourage active travel to improve people's health and fitness levels.

**5.226** A Poole link road is unlikely within this plan period and the Highways Agency would not allow a new access point on to the trunk road to serve development.

**5.227** This is a strategy document and therefore not the place to contain detailed proposals. The Highway Authority's Passenger Transport team will work with the bus operators to develop proposals for Christchurch and East Dorset.

**5.228** Impacts of proposals are being assessed through the Environmental Appraisal of the Core Strategy and will be assessed in more detail as individual proposals are developed.

**5.229** The widening schemes have now been split within the policy to reflect potential different timescales for delivery. The Councils have consulted with Dorset CC to discuss their current position on the most suitable improvements at Parley Cross in conjunction with the proposed development. The gyratory would have sterilised land which under these new proposals can now be used for development, and the associated development link roads will remove enough traffic from Parley Cross to allow for its enhancement for all users.

**5.230** Technical work has been undertaken to show that the additional vehicular trips generated by the development at Roeshot Hill will have a significant impact on the A35 junctions and therefore development will need to mitigate this impact. The Highway Authority will work with developers to ensure sustainable access to the site is excellent and that the residual traffic impact is mitigated through developer contributions towards or the provision of junction improvements.

### **Proposed Pre-Submission Change**

**5.231** Changes are required to the timescales and therefore the way the schemes are listed. The Highways Agency has not yet identified funding to deliver their scheme to dual the A31 before 2026, but this is being pursued. Developer contributions are being and will be collected to mitigate the impact of development as required by the Highways Agency Numbering has been added for ease of reference to the schemes.

## Strategic Transport Improvements

~~The South East Dorset Transport Strategy~~ The Local Transport Plan recommends the following strategic transport improvements to support future development. Development will contribute towards their delivery through the payment of the South East Dorset Transport Contributions which will be replaced by the Community Infrastructure Levy:

### Short Term 2013 – 2017

#### 1.B3073 Hurn roundabout improvement

#### 2. A338 reconstruction from A31 junction - A3060 Cooper Dean and widening to 3 lanes from B3073 Blackwater to A3060 Cooper Dean

### Medium Term 2018 - 2022

~~In Christchurch the following improvements are required to accommodate borough wide development to 2028 including the Christchurch Urban Extension:~~

#### 1. A35 Fountains roundabout, Stony Lane roundabout, Staple Cross junction and potentially Somerford roundabout improvements.

~~The following improvements and road widening are required to accommodate wider growth across the South East Dorset sub region including further employment development at Bournemouth Airport, the Airport Business Park and any new neighbourhoods created in the West Parley area:~~

#### 2. B3073 Parley Cross junction improvements and associated development link roads

#### 3. B3073 Blackwater junction improvements

#### 4. B3073 Chapel Gate junction improvements

#### 5. A31(T) Merley roundabout improvements (Highways Agency scheme)

### Long Term 2023 - 2028

#### 1.B3073 widening between Chapel Gate to Blackwater junctions

#### 2. A31(T) dualling between Merley - Ameysford roundabouts (Highways Agency scheme)

### 5.232 Map 4.6 Strategic Transport Routes - Proposed Changes

5.233 Remove reference to Christchurch and East Dorset after each scheme proposal.

5.234 Point 6 suggest Cooper Dean is in Christchurch.

### Policy KS11

#### Transport and Development

The Councils will use their planning powers to influence development so that it reduces the need to travel, provides improved access to key services and facilities and promotes alternative modes of travel. Development will be permitted where mitigation against the negative transport impacts which may arise from that development or cumulatively with other proposals is provided. This shall be achieved through the submission of a transport assessment or transport statement, and where appropriate:

1. contributions towards local and strategic transport improvements in line with the authorities' contributions policy;
2. contributions to transport modelling work;
3. the provision of new and the improvement of existing public transport, pedestrian and cycle routes;
4. the provision of travel plans to promote sustainable travel patterns such as park and change, car sharing and car clubs; and
5. the implementation of works to the highway.

Development should be in accessible locations that are well linked to existing communities by walking, cycling and public transport routes.

Development must be designed to:

1. provide safe, permeable layouts which provide access for all modes of transport, prioritising direct, attractive routes for walking, cycling and public transport;
2. provide safe access onto the existing transport network;
3. allow safe movement of development related trips on the immediate network; and
4. minimise the number of new accesses on to the primary route network.

## Consultation Response

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

Table 5.13

**5.235** 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:

### **5.236** *Transport*

**5.237** Highways Agency – Support the policy and endorse the need for robust Transport Assessments for those development proposals which have significant transport implications. We will work with the Councils to ensure that the transport impact of development is mitigated, primarily through measures which reduce the need to travel.

**5.238** Environment TAG – Support but the wording of the policy needs strengthening.

**5.239** The councils thank ETAG for its support but feels the policy wording to reduce the need to travel is strong enough.

**5.240** Cranborne Chase and West Wiltshire AONB - 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.

**5.241** Dorset County Council – Support the policy.

### **5.242** *Officer Response*

**5.243** Policy KS9 includes provision for transport solutions in rural areas.

## Proposed Pre-Submission Change

**5.244** Amended policy to provide greater clarity for developers.

### Transport and development

The Councils will use their planning powers to influence development so that it reduces the need to travel, provides improved access to key services and facilities and promotes alternative modes of travel. Development will be permitted where mitigation against the negative transport impacts which may arise from that development or cumulatively with other proposals is provided. This shall be achieved through the **implementation of measures identified within a submitted transport assessment or transport statement, including where appropriate submission of a transport assessment or transport statement, and where appropriate:**

**i. contributions towards local and strategic transport improvements in line with the authorities' contributions policy;**

1. contributions to transport modelling work;
2. the provision of new and the improvement of existing public transport, pedestrian and cycle routes;
3. the provision of travel plans to promote sustainable travel patterns such as park and change, car sharing and car clubs; and
4. the implementation of works to the highway.

**Developers will be required to contribute towards local and strategic transport improvements through site specific legal agreements and payment of the community infrastructure levy....**

Development should be in accessible locations that are well linked to existing communities by walking, cycling and public transport routes. Development must be designed to:

1. provide safe, permeable layouts which provide access for all modes of transport, prioritising direct, attractive routes for walking, cycling and public transport;
2. provide safe access on to the existing transport network;
3. allow safe movement of development related trips on the immediate network; and
4. minimise the number of new accesses on to the A338.

## Policy KS12

### Parking Provision

**5.245** Adequate vehicle and cycle parking facilities will be provided by the developer to serve the needs of the proposed development. Cycle and vehicle parking for residential development should be of the highest quality design and use land efficiently. Development proposals should make provision for parking in accordance with the Local Transport Plan parking guidance, including provision for parking for people with disabilities.

### Consultation Response

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

Table 5.14

**5.246** 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:

#### **5.247** *Transport*

**5.248** Vale of Allen Parish Council – Support

**5.249** Environment TAG – Support

**5.250** Cranborne Chase & West Wiltshire Downs AONB - 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.

**5.251** Eastern Area DATPC – The rural area of East Dorset is not considered enough in this document.

**5.252** Dorset County Council - Support

**5.253** Sixpenny Handley Parish Council - Parking provision in the rural communities needs to recognise that the paucity of public transport infrastructure results in more vehicles per household.

**5.254** Environment TAG - Support

### **Officer Response**

**5.255** The Councils will not necessarily have control over setting parking charges as car parks often fall under the control of other organisations such as private bodies, town councils etc and on street parking is controlled by Dorset County Council. The need to ensure that car park pricing compliments the wider transport strategy to encourage sustainable travel is contained as a policy within the LTP3.

**5.256** No specific mention of parking issues is made in the representation but the information given is noted.

### **Proposed Pre-Submission Policy**

**5.257** No change to policy

#### **Parking Provision**

Adequate vehicle and cycle parking facilities will be provided by the developer to serve the needs of the proposed development. Cycle and vehicle parking for residential development should be of the highest quality design and use land efficiently. Development proposals should make provision for parking in accordance with the Local Transport Plan parking guidance, including provision for parking for people with disabilities.

**5.258** **New Policy KS13**

**5.259** In accordance with the NPPF, a new model policy on presumption in favour of sustainable development will be introduced.

## **Policy KS13 (New Policy)**

### **Presumption in favour of sustainable development:**

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

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

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

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

**6 Responses and Analysis of Chapter 5 Christchurch and Highcliffe Centres**

### 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.

## Consultation Response

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

Table 6.1

**6.1** 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:

### 6.2 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”.

### 6.3 *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.

### 6.4 *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”
- 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.

### **6.5 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 of 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”.

### **6.6 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 (NPPF 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.

### 6.7 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".

### 6.8 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.
- 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.

### **6.9 Townscape Quality**

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

### **6.10 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”.

### **6.11 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: Environment 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.

## **Officer Response**

### **6.12 General Comments**

**6.13** 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.

**6.14** 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.

**6.15** 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.

**6.16** 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.

**6.17** 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.

**6.18** 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.

**6.19** 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.

**6.20** 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.

#### **6.21 Additional Floorspace**

**6.22** 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."

**6.23** 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.

**6.24** 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.

**6.25** 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.

**6.26** 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.

### **6.27 Community Facilities, Druitt Hall and Gardens**

**6.28** 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.

### **6.29 Evening Economy**

**6.30** 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.

**6.31** 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.

### **6.32 Stony Lane and Land between Bridge Street /Stony Lane South /Civic Offices**

**6.33** 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.

**6.34** 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.

**6.35** 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.

**6.36** 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.

### **6.37 Office Development**

**6.38** 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.

### **6.39 *Transport, Traffic and Parking***

**6.40** 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).

**6.41** 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.

**6.42** 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.

**6.43** 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.

### **6.44 *Employment***

**6.45** 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.

### **6.46 *Flood Risk***

**6.47** 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.

**6.48** 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 Pre-Submission Change

**6.49 Paragraph 5.4 Key Facts Environment** Last Bullet Point.

**6.50** Additional informative words at the end of the last bullet point in response to DCC's comment.

**6.51** 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)**

**6.52 Paragraph 5.4 Key Facts Strategic Requirements**

**6.53** 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 ~~7,5008,000~~sqm net of additional comparison retail floorspace to ~~203128~~ in Christchurch town centre (Christchurch and East Dorset Retail Update (2012)), ~~(Joint Retail Study, 2008)~~

**6.54** Amend second bullet point to correct text.

**6.55** The Christchurch Strategic Housing Land Availability Assessment (2011) identifies potential for 251 new dwellings in the town centre ~~by 2028~~.

**6.56 Paragraph 5.5**

**6.57** Amend references to shop names in response to CCTC's comment

**6.58** In second sentence - ~~Marks and Spencer Simply Food Marks and Spencer (Food)~~ and ~~The Co-operative Food Co-Op~~

**6.59 Paragraph 5.10**

**6.60** Amend text to take account of the Retail Study Update (2012) which supersedes projections contained in the 2008 study:-

**6.61** 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 ~~9,000 — 11,000sqm 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.

**6.62 Paragraph 5.16**

**6.63** Correct reference to CCTC in response to CCTC's comment.

**6.64** In second sentence - **Christchurch Chamber of Trade and Commerce Chamber of Trade.**

**6.65** 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.

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

Table 6.2

**6.66** 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:

**6.67 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.

### Officer Response

**6.68** The majority of the comments consider the boundary is drawn too 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.

**6.69** 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."

**6.70** 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.

**6.71** 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.

**6.72** 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 Pre-Submission Change**

**6.73** 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.

#### **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 Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
3	0	0	6	1	0	0	5	0	3	0	5	1

Table 6.3

**6.74** 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:

### **6.75 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.

### **6.76 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.

### **6.77 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.

### **Officer Response**

**6.78** 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.

**6.79** Comments on 30% threshold are addressed in comments on Policy CH 6.

**6.80** 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.

**6.81** It is not considered that the Primary Shopping Frontage boundary is drawn too widely. It is drawn closely around the main shopping areas.

**6.82** 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.

**6.83** 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.

**6.84** 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 Pre-Submission Change

#### Christchurch Town Centre Primary Shopping Area and Retail ~~Cores~~Frontages

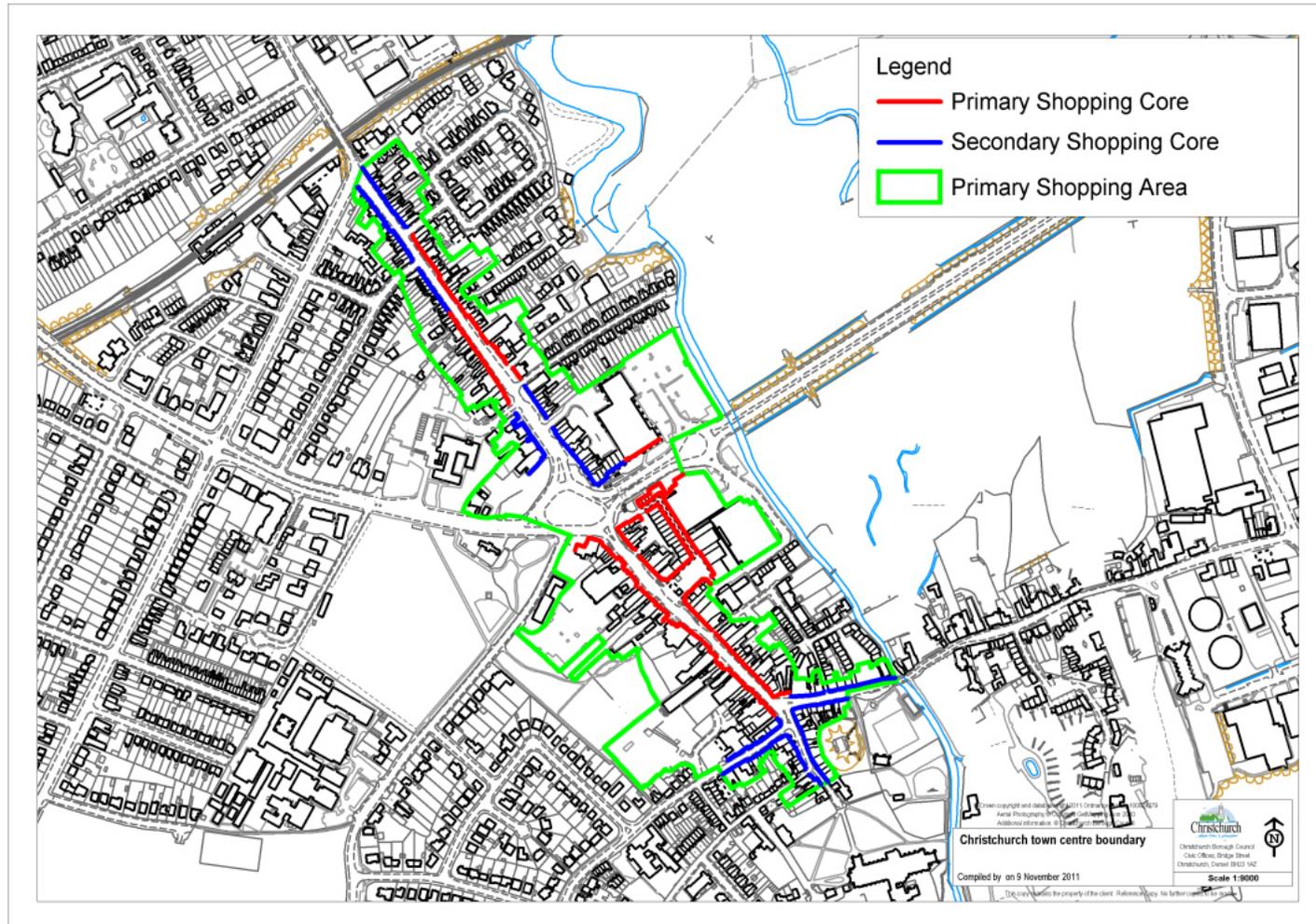
The policy defines the Christchurch town centre Primary Shopping Area, where retail development will be concentrated, and the primary and secondary shopping ~~cores~~frontages.

### 6.85 Map 5.3

**6.86** 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.

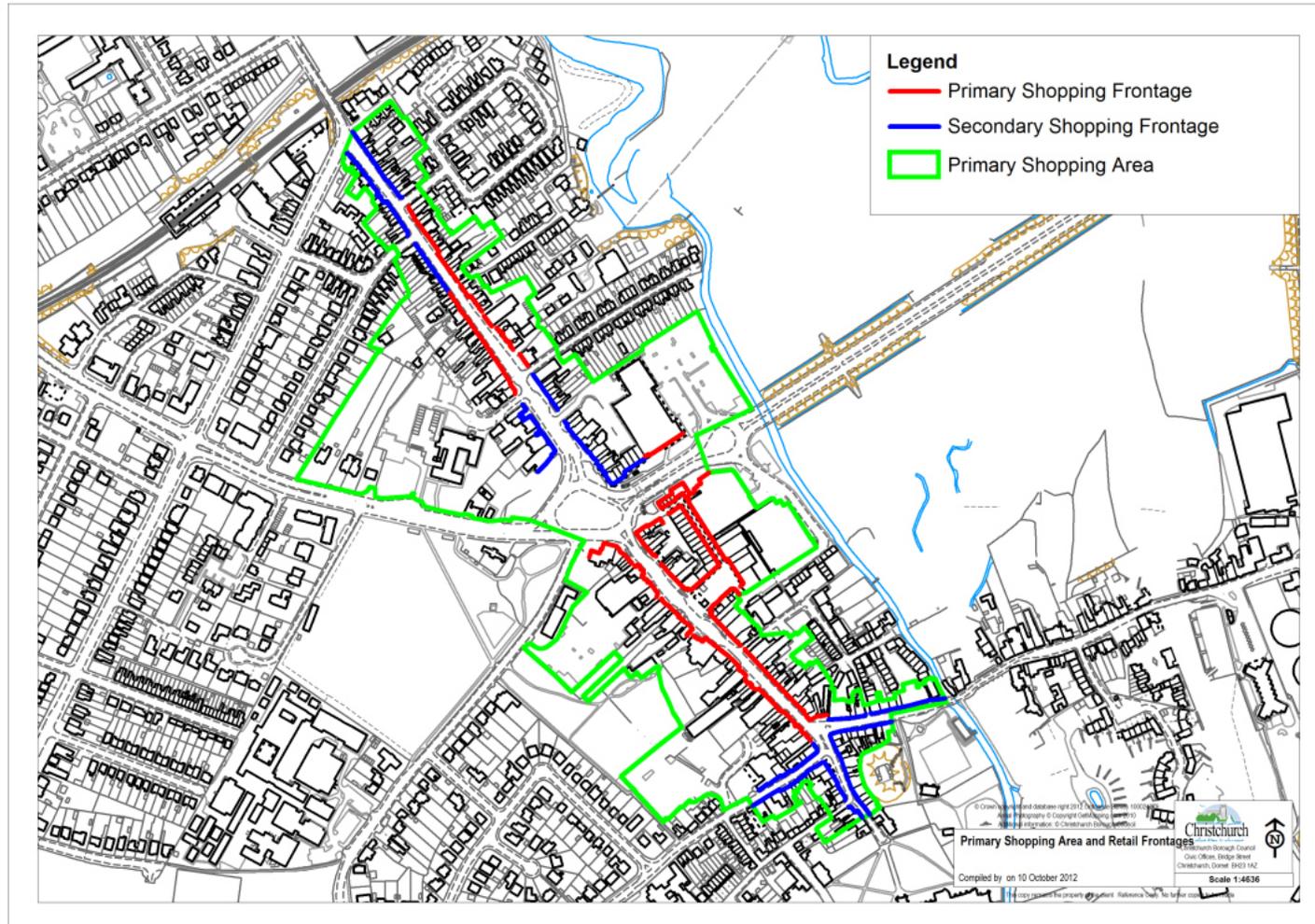
**6.87** Amend title and legend to refer to Shopping Frontages not Cores, in accordance with the NPPF.

### 6.88 Map 5.3 Existing



Map 5.3 Primary Shopping Area & Shopping Cores (EXISTING)

6.89 Map 5.3 Proposed Change



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

### 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 Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
2	1	1	6	2	0	2	4	2	4	2	4	10

Table 6.4

**6.90** 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:

### 6.91 *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.

### 6.92 *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.

**6.93 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.

**6.94 Strategic Requirements**

- 2nd bullet point - The need for new supermarket floorspace was on a quantitative rather than qualitative basis 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).

**6.95 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.

**Officer Response****6.96 Retail Hierarchy**

**6.97** 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.

**6.98** 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'.

**6.99** 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.

**6.100** 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.

**6.101** 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.

#### **6.102** *Shopping Requirements*

**6.103** 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.

#### **6.104** *Strategic Requirements*

**6.105** 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.

**6.106** 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.

**6.107** *Transport, Traffic and Parking*

**6.108** 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.

**6.109** Paragraph 5.24 - This paragraph is necessary and does not duplicate the previous paragraph.

**Proposed Pre-Submission Change**

**6.110** Paragraph 5.22

**6.111** Additional text to refer to the preparation of policy and design guidance to protect the character of Highcliffe.

**6.112** 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.**

**6.113** Paragraph 5.22 Key Facts: Strategic Requirements

**6.114** 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 ~~500 800sqm~~ additional non food comparison retail floorspace to ~~2031 28~~. **(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)**

**6.115** Paragraph 5.24

**6.116** Amend text to take account of the Retail Study Update (2012) which supersedes projections for Highcliffe district centre contained in the 2008 study.

**6.117** 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.

**6.118** **Policy CH4**

**6.119** 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.

### Highcliffe Shopping Cores

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

### Consultation Response

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

Table 6.5

**6.120** 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:

#### 6.121 *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".

### Officer Response

**6.122** 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 Pre-Submission Change

#### 6.123 Paragraph 5.30

**6.124** Replace the word "cores" to "frontages" in accordance with the NPPF

**6.125** The Primary Shopping **Frontage Core** 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 **Frontage Core** to the east of Waterford Road a greater diversity of uses will be permitted in accordance with Policy CH7.

**6.126 Policy CH5**

**6.127** 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 ~~Cores~~Frontages.

**6.128 Map 5.4**

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

**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:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
0	0	0	2	0	0	0	2	0	2	0	2	0

Table 6.6

**6.130** 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:

#### **6.131** *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%.

### Officer Response

**6.132** 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.

**6.133** 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 Pre-Submission Change****6.134 Paragraph 5.31**

**6.135** 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.

**6.136** The main function of the **Primary Shopping Frontages** 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. **This approach has been appraised 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.**

**6.137 Policy CH6**

**6.138** 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 ~~Core~~Frontage, and the Primary ~~cores~~Frontages 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.

### 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:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
0	0	0	2	0	0	0	2	0	2	0	2	1

Table 6.7

**6.139** 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:

#### 6.140 *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".

**Officer Response**

**6.141** 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.

**6.142** 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.

**6.143** 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 Pre-Submission Change**

**6.144** Change reference from shopping cores to shopping frontages in accordance with the NPPF.

**6.145** 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**

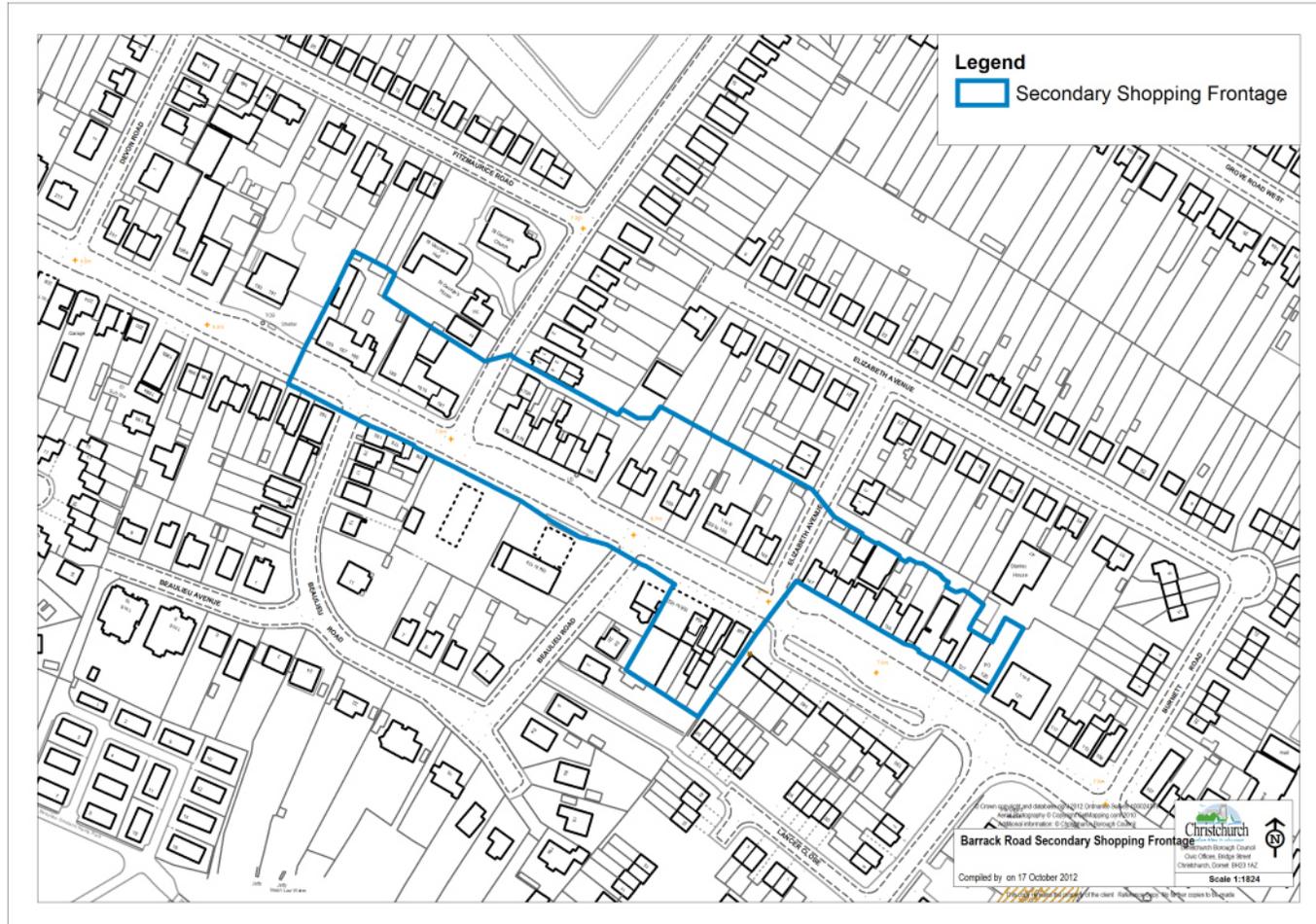
Proposals for the change of use of existing non residential premises located within the Secondary ~~cores~~ Frontages at Bargates, Wick Lane, Church Street, Castle Street, Barrack Road, Purewell and Highcliffe as identified on ~~the proposals map~~ **Maps 5.3, 5.4, 5.5 and 5.6** will be permitted provided 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**

**6.146** Insert a new Map 5.5 showing the boundary of Barrack Road secondary shopping frontage to provide clarity in the Core Strategy document.

**6.147** Insert a new Map 5.6 showing the boundary of Purewell secondary shopping frontage to provide clarity in the Core Strategy document.



Picture 6.1 Map 5.5 Barrack Road Secondary Shopping Frontage



Picture 6.2 Map 5.6 Purewell Secondary Shopping Frontage

## 7 Responses and Analysis of Chapter 6 Christchurch New Neighbourhoods

## **Policy CN 1**

### **Christchurch Urban Extension**

Land south of the railway line to the east of Salisbury Road to the borough boundary at Roeshot Hill is identified for a strategic housing allocation and will be released from the Green Belt.

The Urban Extension will act as an attractive gateway to the north of the borough connecting to the existing historic settlement of Christchurch. Development within the site will achieve a high standard of design which reflects high quality examples of local vernacular, respects local densities, historic and environmental features. The development will comprise two walkable neighbourhoods and be well connected to the existing urban area and the wider rural countryside through enhanced bus connections, footpaths and cycle ways.

A local centre at the heart of the development will form the focal point for the development where local services will be enhanced. A central green space within the development will create an attractive and usable environment within a network of open spaces that link to a green infrastructure network to the countryside in the north and southwards along the Mude Valley to the coast. The River Mude will become a key green spine through the heart of the site that will create an area of biodiversity and recreational value.

The Roeshot Hill Allotments will be relocated north of the railway line as part of a larger hub site for the borough and the overhead power cables will be moved underground in order to maximise the potential of the site for housing, and to create a high quality development.

### **Housing Strategy**

About 850 dwellings will be delivered on the allocated site and located in accordance with the Council's Strategic Flood Risk Assessment. It is envisaged that development will be phased over a period of 9 years with possible commencement in 2014/15.

The mix of housing delivered in the Urban Extension will be informed by the Council's Strategic Housing Market Assessment and the master plan which provides the basis for an appropriate housing mix and proportion of housing type.

### **Affordable Housing**

A minimum of 35% of all housing on the site will be affordable. The Council will seek to maximise affordable housing provision in accordance with Policy LN3 and may require a higher proportion of affordable housing subject to changes in viability.

### **Densities**

The Urban Extension Masterplan sets out residential plots of varying densities across the site which will inform development proposals and provide the basis for acceptable densities. Acceptable densities will be in the region of 20 – 45dph.

### **Design**

The Urban Extension will achieve a high quality of design consistent with the principles set out in the master plan. The buildings within the site will pick up on the town's high quality examples of local vernacular, whilst also appreciating local densities and typologies and the need to provide sustainable, marketable and flexible units. New development will also avoid adverse impacts on the adjoining Burton and Verno Lane conservation areas and the setting of the Staple Cross Scheduled Ancient Monument will be enhanced.

### **Local Centre and Central Park Area**

The western and eastern neighbourhoods will be anchored by a local neighbourhood centre adjacent to a central greenspace. The local centre will provide a community hub and cater to local day to day needs with small scale retail provision. The existing Sainsbury's, retail units and Stewarts Garden Centre will form part of the centre.

The Sainsbury's store within the Urban Extension and food stores nearby on Somerford Road provide a good range of convenience goods provision to meet local need over the plan period. Proposals for additional provision of convenience and comparison floorspace within the Urban Extension must demonstrate no adverse impact on the vitality and viability of Christchurch and Highcliffe Centres.

The central greenspace adjacent to the local centre will provide the focus for recreational facilities including new playing pitches, formal open space provision, areas of informal recreation and natural green space.

**On Site Ecology**

A river buffer will be established within the Urban Extension along the River Mude to conserve natural habitats and protected species.

**Open Space and Recreation**

The quality of provision must also reflect the relationship of the Urban Extension to provision in the adjoining 'Local Needs Areas' of Christchurch North, Central and East as defined in the PPG17 study. The provision of on site sports, recreation and open space will be consistent with the recreational strategy set out in the master plan.

**Allotment Provision**

The Roeshot Hill Allotments will be relocated to land north of the railway line to the east of Salisbury Road, bounded by Summers Lane and Hawthorn Road. This site will serve as a 'hub' site for the Borough in delivering a level of allotment provision contributing towards projected borough wide allotment requirements to 2028. The specification for replacement allotments should be consistent with the Council's Allotments Strategy (2012).

**Protection of Sensitive Habitats and Species**

Suitable Alternative Natural Greenspace will be provided north of the railway line in an area extending eastward from Salisbury Road to Burton Common SSSI to avoid and mitigate any impact of the development on the South East Dorset Heathlands, the New Forest and the SSSI. This SANG will link to a wider green infrastructure network, including a provision of links in the Urban Extension and a southern link through the Mude Valley to the coast.

SANG provision must be in accordance with the criteria set out in Policy ME3 of the Core Strategy. The Christchurch Urban Extension SANG Strategy (2012), agreed with Natural England demonstrates an acceptable approach to mitigating the impact of the Urban Extension.

**Overhead Power Cables**

The overhead high voltage power cables will be realigned and undergrounded within the railway noise buffer zone and shall also contribute to the green infrastructure of the Urban Extension with adequate access, lighting and natural surveillance from properties.

**Sustainable Construction and Renewable Energy**

The Urban Extension will be required to comply with climate change policies in Chapter 13 (Managing the Natural Environment). Future energy requirements for the site will include dwelling based sources, e.g. heat pumps, solar photo voltaic and solar thermal.

The provision of technologies, such as site wide combined heat and power will also be encouraged, subject to feasibility and viability. Any planning application should consider a site-wide energy and/or heating solution unless it can be demonstrated that a better alternative for reducing carbon emissions for the development can be achieved.

**Flood / Water Attenuation**

Sufficient land should be identified for the provision of surface water storage. The level and location of flood storage required to support this option should be agreed with the Environment Agency.

### Transport and Accessibility

Access will be established to the site consistent with the master plan with access points envisaged at Staple Cross, the Sainsbury's access road (bus only) and two further points along the Lyndhurst Road. These routes will be connected through an internal road network to enable buses to be routed through the development to the Sainsbury's bus interchange, and to allow the interconnection of the eastern and western sections of the development.

As part of the pedestrian and cycle network to promote sustainable travel patterns from the outset and support SANG function, the transport strategy for the site must include:

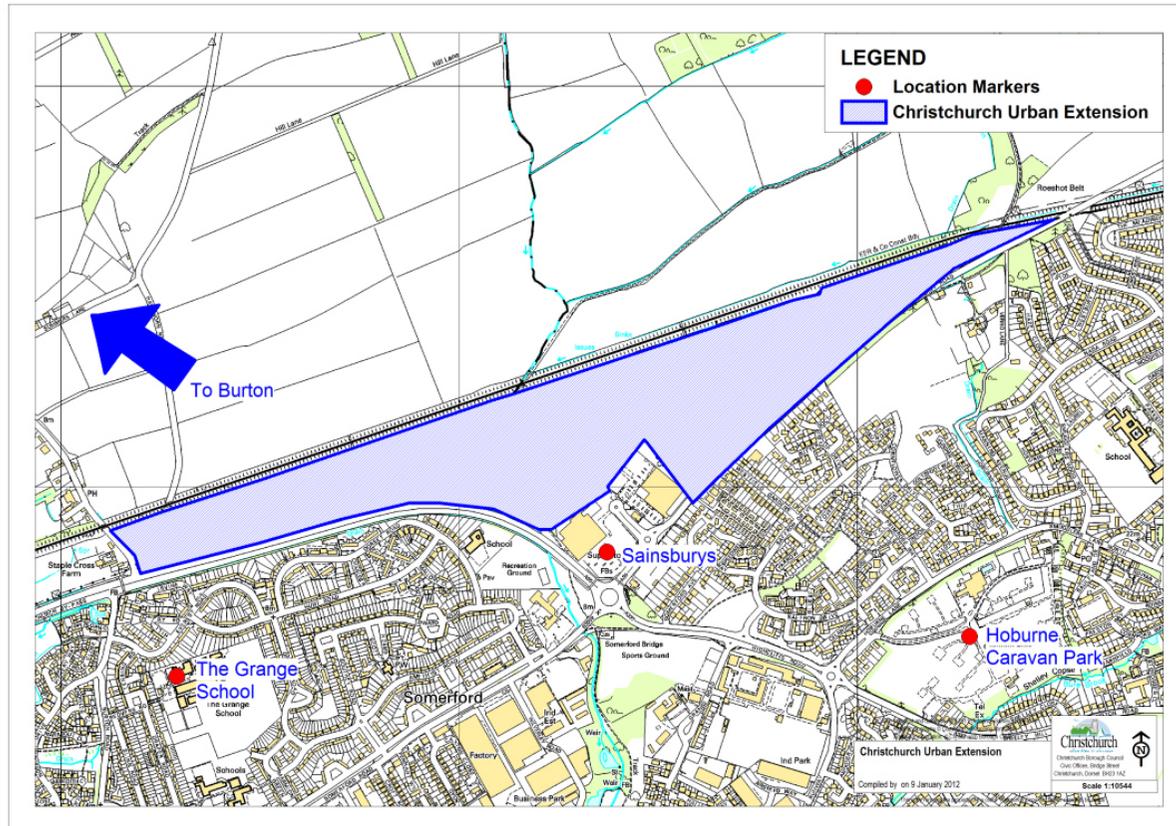
- A pedestrian / cycle link through the urban extension site from the bridleway at Roeshot Hill (north section of Verno Lane) to Hawthorn Road and from Ambury Lane to Old Lyndhurst Road.

The development will be required to mitigate its impact on the transport network with the provision of improvements to the following:

- A35 Lyndhurst Road
- A35 Staple Cross Junction

Contributions towards the following junctions may also be required including:

- A35 Somerford Roundabout
- A35 Stony Lane Roundabout
- A35 Fountains Roundabout



Map 7.1 Christchurch Urban Extension



Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
22	26	2	77	37	16	46	21	47	20	32	20	371

Table 7.1

**7.1** The comments from key stakeholders and the general public in respect of this draft policy have been grouped together into various themes which are set out below. Firstly, Issues that are common to policies CN1, CN2 and CN3 are discussed followed by the analysis of issues relating to each policy in turn.

### **7.2 *Burton and Winkton Villages Petition***

**7.3** The Council received a petition from Burton and Winkton Villages on the 30th October 2012 after the close of the consultation on the pre submission Core Strategy (Closed 25th June 2012). The petition has requested that Policy CN2 and all parts of Policy CN1 which relate to land South of Burton Village (specifically the relocation of the Roeshot Hill Allotments) are removed from the Core Strategy.

### **7.4 *Responses Received to Alternative UKIP Consultation***

**7.5** An alternative consultation document was circulated by the UK Independence Party which referred to options included in the previous Core Strategy 'Options for Consideration' consultation which are no longer relevant. A further option was also included which is also not part of the Pre Submission consultation which referred to no destruction of the Green Belt, no increase in traffic, small scale affordable housing on existing brownfield sites. These responses are afforded very limited weight as they refer to options that are not part of the this consultation, no longer relevant and include an option objecting to the principle of the urban extension which was established at issues and options stage.

### **7.6 *Sustainability Appraisal***

**7.7 **Roeshot Hill Allotments Association:**** The sustainability assessment is not on consultation. Not satisfying stage D of the SA and the Core Strategy is unsound. This could be subject to judicial review.

### **7.8 *Officer Response***

**7.9** The SA was published alongside the Pre Submission Core Strategy consultation and representations have been accepted on the SA.

### 7.10 *Housing Need / Justification for Changes to the Green Belt / Consideration of Brownfield Sites*

**7.11** The justification for considering the Green Belt sites identified in policies CN1, C2 and C3 was questioned in relation to the robustness of the evidence base to support the housing requirement identified in the Core Strategy and the availability of alternative brownfield sites in the existing urban area.

**7.12** In relation to the proposed development to the south of Burton (CN2) reference was made to the North Christchurch Urban Extension Master Plan Context Report (2010) which included a Green Belt assessment which cross referred to the South East Dorset Joint Study Area Report (SED 04) 'development options' and the Green Belt review undertaken by the strategic authorities as part of the preparation of the South West Regional Spatial Strategy.

**7.13** The South East Dorset Green Belt Review (SED04 report, referred to in the North Christchurch Urban Extension Masterplan Context Report 2010). The review of the Green Belt identifies the town of Christchurch and the village of Burton as settlements whose separate physical identity is protected by the Green Belt. Figure 10 of the Green Belt review identifies the key gaps that provide this separate physical identity and which form a strategic element of the south east Dorset Green Belt. The area immediately south of Burton is identified as a 'key edge'.

**7.14 **Roeshot Hill Allotments Association:**** Housing proposals are unjustified because based on the principle that 'housing trumps the environment'. The Borough cannot accommodate all the development that is proposed. An additional 45 dwellings at Burton changes the status of the village. Impact on the Green Belt by releasing agricultural land. New housing should be reserved for local people.

**7.15** They are non compliant with paragraphs 83 and 84 of the NPPF in that the proposed altering of the Green Belt boundaries is inadequately addressed and thus unjustified.

#### **Officer Response**

**7.16** Paragraph 47 of the National Planning Policy Framework states that local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in this framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

**7.17** Paragraph 159 of the National Planning Policy Framework states that local planning authorities should have a clear understanding of housing needs in their area. They should:

- Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.....
- Prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified housing need over the plan period.

**7.18** In Meeting the requirements of the NPPF the Bournemouth and Poole Strategic Housing Market Assessment (2012) and the Bournemouth, Dorset and Poole Population and Household Projections (2012) provide evidence of the need for market and affordable housing in Christchurch and East Dorset over the plan period.

**7.19** The Christchurch SHLAA has undertaken an exhaustive search of the urban area to determine housing land suitability, availability and viability over a 15 year period. This process has also included an appraisal of all brownfield options within the existing urban area and an assessment of sites in existing employment / retail use outside the town centre. In Christchurch there is capacity to build approximately 2,140 (2011) new homes in the urban area over a 15 year period. This does not meet the needs identified in the Housing Market Assessment, so it has been necessary to identify sites in the Green Belt. Even so, with the inclusion of Green Belt sites CN1, CN2 and CN3 there is insufficient suitable land available to deliver the identified need set out in the Housing Market Assessment, due to the particular constraints of flood risk and proximity to heathland, which affect significant areas of the Borough.

**7.20** Paragraph 83 of the National Planning Policy Framework states that, 'Local Planning authorities with Green Belts in their area should establish Green Belt boundaries in their local plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.....'

**7.21** A statement issued by Eric Pickles MP on the 6th September 2012 (Secretary of State for Communities and Local Government) further clarifies the Government's position in relation to Green Belt, 'As has always been the case, councils can review local designations to promote growth. We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of the Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up Local Plans, we will support local councils to move quickly through the process of prioritising their Local Plan examinations'.....

**7.22** The difficulty in meeting housing needs provides the exceptional circumstances required to amend Green Belt boundaries, where appropriate. The Green Belt areas allocated in the Core Strategy have been identified through a rigorous process, as set out within the Key Strategy Background Paper (Feb 2012) and Masterplan Reports for the new neighbourhoods consistent with the NPPF.

**7.23** An assessment of the function of settlements has been undertaken to identify those where housing would be best located in terms of proximity to services, facilities and employment. This identifies Christchurch as a suitable settlement for growth. A limited amount of housing is also proposed for Burton based on the specific need for new housing to serve the needs of the village. A sieve map exercise has been undertaken to identify which areas on the edge of these settlements are not subject to the absolute constraints of proximity to protected heathlands and floodplains.

**7.24** The North Christchurch Urban Extension is bounded by the railway line and this is a natural limit to the outward spread of the Christchurch urban area. This effectively prevents the development encroaching into the wider countryside and restricts urban sprawl to a limited and defined area of urban expansion. Development in this area of land does not conflict with these Green Belt purposes.

**7.25** The proposed development of 45 dwellings to the south of Burton is of limited scale and adjoins the south of the village. A development of this scale still maintains a significant gap between Burton and the railway line which is consistent with the review of the Green Belt conducted as part the preparation of the South West Regional Spatial Strategy (South East Dorset Joint Study Area Report (SED04). Therefore the separate physical identify of the town of Christchurch and Burton is maintained. This is consistent with Green Belt policy set out in the NPPF.

**7.26** Further discussion relating to the housing strategy (draft policies KS3 & KS4) is set out in Chapter 4: The Key Strategy.

### **7.27 *Duty to Co-operate***

**7.28 RHAA:** Proposals are not complaint with Section 110 of the Localism Act 2011 (Duty to Co-operate). Despite some reference to joint working with neighbouring authorities (but not Hampshire) there is no evidence of any specific arrangement whereby unmet requirements in Christchurch might be met by neighbouring authorities, particularly Bournemouth.

### **Officer Response**

**7.29** Evidence to demonstrate the objectively assessed housing need is set out in the Councils' Strategic Housing Market Assessment Update (2012) and the Bournemouth, Dorset and Poole Population and household Projections (DCC, 2012). The latest DCC work has been produced in the light of new census data that has recently become available. In accordance with the Duty to Co-operate the Councils have worked jointly with neighbouring authorities to assess housing needs over the Bournemouth and Poole Housing Market Area through production of the Strategic Housing Market Assessment and updated Dorset County Council housing figures. The County figures have been calculated using new data from the 2011 Census which estimate that household growth for the plan area is about 500 dwellings per year. This is lower than the Strategic Housing Market Assessment (2012) which estimated the household growth figure being 575 dwellings per year and substantially lower than the first Strategic Housing Market Assessment which estimated household growth at about 800 dwellings per year. All of these figures represent estimates and it is clear that changing data is resulting in variations. On this basis the proposed housing target for the plan period lies within the range of the estimates.

**7.30** Christchurch and East Dorset Councils are able to meet the objectively assessed housing needs identified in the updated DCC figures through a joint housing figure which will supersede current policies KS3 and KS4. Neighbouring authorities are at differing stages in the production of Core Strategies / Local Plans. Bournemouth, Poole and New Forest District Councils have adopted Core Strategies and Purbeck District Council has completed their examination. Wiltshire has submitted its Core Strategy and North Dorset are able to meet their objectively assessed housing needs within their district and the New Forest National Park has a very low housing target which can be met in their district. Additionally, neither North Dorset or Wiltshire are within the same Strategic Housing Market Area as they border the sparsely populated rural parts of East Dorset. Christchurch and East Dorset Councils will work closely with neighbouring authorities through Local Plan updates to meet ongoing housing requirements across the Bournemouth and Poole housing market area.

### **7.31 *Transport Impact***

**7.32** Dorset County Council support close working with DCC and Hampshire County Council to ensure appropriate developer contributions to improvements required on the road network in Dorset (6.49).

**7.33** The New Forest National Park Authority has stated that the South East Dorset Multi Modal Study and the A35 Route Management Study only identifies improvements in South East Dorset and not Hampshire. The impact of traffic through Lyndhurst should be assessed which is an air quality management area. The impact of increased traffic on the National Park roads should be assessed. The urban extension should not be progressed if these impacts are shown to be unacceptable.

**7.34** The New Forest District Council state that the transport impacts within NFDC must be properly assessed. A transport assessment should be carried out to assess impacts of the proposed development north of Christchurch on roads within the New Forest District. The proposed development north of Christchurch should not be progressed if these impacts are shown to be unacceptable. NFDC have concerns about impacts on the B3347 (Avon Valley Road and the A35 including through Lyndhurst. These impacts should be properly assessed and development should only proceed if impacts are acceptable.

#### **Officer Response**

**7.35** The New Forest District Council and New Forest National Park Authority have been involved as part of the preparation of the South East Dorset Multi Modal Study that was led by the Borough of Poole. Dorset County Council as highway authority has established a strategic cross border group with NFDC and NFPA to address the outcomes of the SEDMMTS in terms of cross border transport impacts. Dorset County Council will continue to work closely with these authorities and will consider the need to undertake further transport assessments if required.

#### **7.36 *Impact on Wider Transport Network***

**7.37** A number of issues were raised in relation to transport impact of proposed development on the transport network in Christchurch. These are summarised as follows:

- Transport improvements need to be put in place before the development comes forward.
- Respondents raised concern regarding existing capacity issues on the A35 and the capacity of key junctions such as Stony Lane roundabout. Requests were made for the Core Strategy to identify specific junction improvements schemes that will be required in order to accommodate development.
- Improvements are required to the transport network before development can take place.
- Proposed traffic improvements will not deal with future growth / Demonstrate how mitigation measures will alleviate congestion.

#### **Officer Response**

**7.38** The impact of development proposed in the Core Strategy including policies CN1, 2 and 3 has been assessed through the preparation of the South East Dorset Multi Modal Study and the A35 Route Management Study. Policies KS9 and KS10 of the Key Strategy set out improvements to the transport network which will be required to enable development set out in the Core Strategy to take place. The Core Strategy identifies key junctions where improvements

will be required, however it is not currently possible to determine specific schemes for these junctions as these will be determined by Dorset County Council and respect of the availability of future government funding. Further transport assessments will be undertaken at the planning application stage which will determine the detail of site specific improvements.

### 7.39 *Christchurch Outer Relief Road*

7.40 An outer relief road should be considered for Christchurch to address existing congestion issues and the impact of planned development.

#### **Officer Response**

7.41 The Christchurch Bypass is not included in Local Transport Plan 3 and does not form part of the South East Dorset Transport Strategy, therefore cannot be included in the Pre -Submission policy. The Christchurch bypass has been assessed as part of the South East Dorset Multi Modal Study and there is currently no ecologically acceptable route and the scheme is not financially deliverable during the plan period. Objections to these schemes have also been received from the Highway Authority, Natural England, the RSPB and Dorset Wildlife Trust.

### 7.42 *Impact on the Burton Transport Network*

- Concern has been raised regarding the impact of draft polices CN1 and CN2 concerning traffic volumes on Salisbury Road, Summers Lane, Hawthorn Road.
- Bus services are limited to Christchurch and Bournemouth. How will people walk from the new development into the village?
- Not sufficient buses to serve Burton (Martins Hill Lane), increasing car traffic.
- No mention of transport improvements in Burton Village i.e. traffic calming, speed enforcement, street lighting.

#### **Officer Response**

7.43 The impact of development proposed in the Core Strategy including policies CN1, 2 and 3 has been assessed through the preparation of the South East Dorset Multi Modal Study and the A35 Route Management Study. Policies KS9 and KS10 of the Key Strategy set out improvements to the transport network which will be required to enable development set out in the Core Strategy to take place. The Core Strategy identifies key junctions where improvements will be required.

7.44 Schemes to improve pedestrian and cycle movements between Burton and Christchurch coupled with expected development related mitigation schemes at Stony Lane Roundabout and Staple Cross will improve sustainable links with destinations in the town. Contributions would be anticipated from development to the south of Burton towards, pedestrian and cycle links, especially on Salisbury Road.

7.45 Bus services currently operate on an hourly basis from Burton and the council will work with bus providers to seek enhancement to current service provision.

**7.46** The exact level and type of mitigation would be subject to examination and discussion as part of the planning application process and may be linked with development at Roeshot Hill.

**7.47** *Ambury Lane / Hawthorn Road*

**7.48** Ambury Lane and the southern end of Hawthorn Road should be protected.

**7.49** Plan for pedestrians and cyclists / need to maintain provision for cyclists and horse riders who use Ambury Lane to access Burton Common.

**Officer Response**

**7.50** The master plan layout set out in the Pre Submission Core Strategy is indicative and therefore not prescriptive in terms of site layout which will be formally established at the planning application stage. The Core Strategy policy CN1 provides for a pedestrian / cycle link through the site from the bridleway at Roeshot Hill to Hawthorn Road and from Ambury Lane to Old Lyndhurst Road.

**7.51** *Hinton Admiral Park and Ride*

**7.52** A park and ride facility should be considered at Hinton Admiral Station

**Officer Response**

**7.53** Local Transport Plan 3 includes proposals for improving walking and cycling and bus access to Christchurch and Hinton Admiral railway stations to encourage greater use of rail services. This will be supported by improvements of the facilities provided at stations such as cycle parking, co-ordinated bus and rail timetables and improved waiting facilities (As set out in Policy KS9).

**7.54** *Realignment of the A35*

**7.55** Move A35 north of the railway accessed from a roundabout adjacent to the tunnel on the Hants border then linked to the A338 off Hurn Road

**Officer Response**

**7.56** This scheme is not included in the Local Transport Plan 3 and is not deliverable during the plan period.

**7.57** *Provision of bus services*

**7.58** **Yellow Buses:** Insufficient emphasis and detail on developing and supporting public bus transport improvements and infrastructure within the Core Strategy itself. Bus priority measures should be considered at both the site accesses and nearby junctions and where appropriate segregated bus lanes along the main link roads in the vicinity of the sites. It is imperative that the internal link roads can safely accommodate bus traffic, bus stops and passenger waiting facilities whilst offering safe pedestrian integration. Core Strategy should give consideration to financially supporting bus services. Improvements

need to be made to bus stop and passenger waiting facilities nearby and inside the development site along with suitable and safe areas for buses to enter and exit and where necessary lay over. More emphasis should be given to LPA, developers and passenger transport providers working together to achieve a sustainable and accessible bus network and bus passenger facilities for the development.

### **Officer Response**

**7.59** Policy CN1 sets out detail of bus access to the North Christchurch Urban Extension and bus access through the site to an interchange at Sainsbury's. Further detail on bus transport improvements and infrastructure will be addressed at the planning application stage.

### **7.60 *Affordable Housing***

**7.61** 35% affordable housing not enough for local people.

**7.62** Should be restricted for local people.

**7.63** Housing will not be affordable for young people.

### **Officer Response**

**7.64** In relation to the North Christchurch Urban Extension viability work undertaken as part of the master planning work by White Leaf has informed the percentage of affordable housing. It is not currently viable to request in excess of 35% affordable housing.

### **7.65 *Affordable Housing Additional Evidence***

**7.66** Following the Pre Submission consultation and additional viability work undertaken as part of the the production of the Councils Community Infrastructure Levy the wording of the policy referring to affordable housing will be amended to require '**up to**' 35% affordable housing rather than '**A minimum of**'. Text will also be deleted referring to requiring a higher percentage of affordable housing.

### **7.67 *Infrastructure to support development***

**7.68** Concern was raised regarding whether essential infrastructure would be provided to accompany new development including doctors, dentists, schools.

### **Officer Response**

### **7.69 *Education***

**7.70** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new or larger, replacement schools will be required and these are included in the proposals. No new schools are required in relation to policies CN1, 2 and 3.

**7.71 Health**

**7.72** 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.

**7.73** From consultation with the health authorities the policy will be amended to state that health facilities will be provided as part of the local centre.

**7.74 Services**

**7.75 Gas, electricity and water**

**7.76** Service providers have been contacted throughout the preparation of this document and no concerns have been raised.

**7.77 Sewerage**

**7.78** Wessex Water have been contacted throughout the preparation of this document. Their proposals for sewage treatment works are set out in the Infrastructure Development Plan. Any other requirements which result from development will be discussed with developers.

**7.79 Combined impact with gravel extraction proposals**

**7.80** The council is working closely with Dorset County Council and Hampshire County Council and the land owner regarding the combined impact of planned housing development and minerals working to ensure that this development can come forward sustainably.

**7.81 Employment Opportunities**

**7.82** Concern was raised through the consultation regarding the creation of job opportunities to support population growth from new development.

**Officer Response**

**7.83** The Core Strategy plans for the delivery of new employment development which has been informed by the the employment land projections set out in the Bournemouth Dorset and Poole Workspace Study (2012). This will assist in providing employment opportunities across South East Dorset to serve the needs of a growing population.

### 7.84 *Environment*

7.85 Dorset Wildlife Trust welcome requirement to conserve natural habitats and species and to create a buffer zone along the River Mude.

7.86 Recommend amendment to 6.29 and policy CN1 to seek positive gains for biodiversity in line with the NPPF to ensure no harm to the River Mude. Policy needs strengthening to ensure no harm to the River Mude down stream. Biodiversity gains should include enhancements to natural habitats and protected species on site, incorporation of biodiversity within and around the development and enhancement of local ecological networks. Mude Valley SNCI should be shown on the plan.

#### **Officer Response**

7.87 Policy CN1 will be amended to include reference to biodiversity enhancements within the buffer zone within the site along the River Mude. Without further guidance from DWT and Natural England on specifically which biodiversity enhancements should be incorporated in the policy it is not possible to amend the policy wording further. In relation to potential harm to the River Mude down stream, this also needs to be considered in relation to proposals for minerals development north of the railway line. Detailed mitigation measures will be established at the planning application stage.

### 7.88 *Provision of Suitable Alternative Natural Green Space (SANG)*

7.89 Can a suitable location for the SANG be provided south of the railway?

#### 7.90 **RSPB:**

7.91 No detailed SANGs strategy put forward. The SANG must operate in perpetuity.

7.92 Object to CN1 pending progression of mitigation strategy necessary to avoid adverse effects on European sites. We do support the principles in CN1 for creating a river buffer, in scheme open space and SANG delivered north of the railway in line with ME3.

7.93 The urban extension is separated from open space by the railway line which does not enable appropriate access.

7.94 The RSPB question the effectiveness of SANGS as a form of mitigation

#### **Officer Response**

7.95 Natural England have confirmed that a SANG located south of the railway line would not provide effective mitigation to meet the requirements of the habitats regulations and SANGs guidelines established for the Dorset Heathlands Plan.

**7.96** The Council has worked closely with Natural England and the landowner towards the production of a SANGs strategy that will provide mitigation to avoid harmful impacts on the heathlands. The Core Strategy also includes a SANGs criteria policy which has been agreed with Natural England. A SANGs strategy will be published which will demonstrate what is considered to be an effective approach to SANGs provision.

**7.97 Dorset County Council:** The area identified for SANG provision north of the railway is also identified for potential minerals extraction.

#### **Officer Response**

**7.98** The Council has worked with Natural England and the landowner on a SANGs strategy that also considers the location of planned minerals extraction.

#### **7.99 Natural England (Nick Squirrel)**

**7.100** Natural England objects to policy CN1: Key details of SANG provision are not available, No clear mechanism outlined for how the SANG will be secured. No evidence has been provided that NFDC and the National Park have been engaged in developing the SANGs strategy in line with the duty to co-operate. The SANGs strategy is also substantially zoned as a minerals site in the Hampshire Minerals Plan which would prevent the development from being brought forward. There is no evidence of a joint formal commitment to delivery. This creates uncertainty on the delivery of the SANG and the soundness of the Core Strategy.

**7.101** NE: The Core Strategy SANGs policy should be reworded to reflect the SANGs criteria put forward in the Dorset Heathlands SPD. The policy should reflect government policy to secure biodiversity gains (NPPF para 9). NE support the changes requested by DWT on this matter.

#### **Officer Response**

**7.102** The council has worked closely with Douglas Kite of Natural England and the landowner towards the production of a SANGs strategy that will provide mitigation to avoid harmful impacts on the heathlands. The Core Strategy also includes a SANGs criteria policy which was agreed with Douglas Kite of Natural England prior to publication of the Pre Submission Core Strategy. A SANGs strategy will be published which will demonstrate what is considered to be an effective approach to SANGs provision.

**7.103** Policy ME3 of the Core Strategy sets out SANGs criteria which will be amended in light of the SPD guidelines and policy wording that has been agreed with Natural England.

**7.104** NFDC and NFNPA have been consulted in the preparation of the SANGs strategy and at meetings attended with the council have raised no objection to the strategy.

#### **7.105 New Forest District Council**

**7.106** The proposal to create A SANG is broadly supported by NFDC and it is hoped that the proposal will reduce pressure on sensitive sites in the New Forest. NFDC would like to be fully involved in the progression of proposals regarding the SANG. Wishes to be invited to further meetings of the Xch urban extension advisory group.

#### **Officer Response**

**7.107** NFDC have been consulted on the draft SANGs strategy and continue to be involved in the progression of the strategy.

#### **7.108 New Forest National Park Authority:**

**7.109** The authority supports the location of housing south of the railway.

**7.110** The authority welcomes the principles behind the provision of SANGs. Lack of detail provided in the Core Strategy on the proposed SANG

**7.111** Authority informed in April 2012 about the principle location for the SANG. The principle SANG is located within the National Park adjacent to a SSSI in unfavourable condition. This proposal could run directly contrary to the stated aim of relieving pressures on the New Forest arising from the new development. The authority is not able to comment on the precise details of the SANG without details being published. Planning permission would be required for the authority for provision of a SANG on what is currently agricultural land in the National Park. We have not been involved in the urban extension advisory group over the past 4 years. The Authority is concerned that there has been limited opportunities to be involved with discussions with the landowner, Natural England, Christchurch Borough Council and other interested parties on the future development of the SANG. Under the duty to cooperate the Council needs to liaise with the NFNPA. It would appear that the principal eastern SANG will be traversed by the main lorry route for the proposed minerals working. This raises questions about how effective the SANG will be in relieving pressure on the National Park.

#### **Officer Response**

**7.112** The National Park Authority has been consulted on the SANGs strategy by the council and the landowner and had raised no principle objection. The council will continue to engage the authority in the progression of the SANGs strategy.

#### **7.113 Habitats and Biodiversity**

**7.114 Natural England:** There is a need to carry out a basic biodiversity survey for the urban extension sites e.g. phase 1 habitat survey. Proposals have been brought forward in the absence of adequate information and assessment of the biodiversity features held by the policy land. The NPPF requires that planning policies should be based on up to date information on the natural environment (para 165). These policies are not shown to be compliant with this requirement. The policies may need to include specific paragraphs about features of biodiversity importance which are to be secured or enhanced. Need to be moving from net gains in biodiversity on priority habitats and species.

**Officer Response**

**7.115** An ecological survey has been undertaken by Fieldwork Ecological Surveys in 2007 'Assessment of Ecological Issues East of Burton, Dorset'.

**7.116** Loss of farmland

**7.117 Meyrick Estates:**

**7.118** Reference in paragraph 6.27 to a 'Country Park' north of the railway should be removed as this is not available within the Core Strategy time scale.

**Officer Response**

**7.119** Reference to a 'country park' will be deleted from the Core Strategy as the focus of the Core Strategy is upon delivering the SANGs strategy in compliance with Core Strategy policy and it is uncertain what form possible SANG enhancements may take during the plan period.

**7.120** *Progression from 'Options for Consideration' stage to 'Pre Submission'*

**7.121** Why was option UE1 selected when all 4 were viable?

**7.122** Why were options UE3 and UE4 discounted when they received the most support through the consultation?

**7.123 Roeshot Hill Allotments Association:**

**7.124** The process by which the Council eliminated UE2 to 4 was flawed. UE4 was the public's choice, followed by UE3 and UE1 was third rated.

**7.125** Burying the pylons would have removed the concerns of UE3 and UE4 which were 'marketability' and 'pinch point' without significantly reducing the housing potential which is now proposed.

**7.126 RHAA (Alan Ruck):** Public opinion ignored on options considered at Preferred Options. Decisions made around the least popular options. All housing could be built without moving or realigning the allotment site. Plans show only up to 35% affordable housing. How people will enter and exit the development onto a very busy A35. Insufficient detail about transport improvements that will be put in place and how they will provide mitigation.

**Officer Response**

**7.127** Chapter 6 of the Core Strategy summarises the consideration of options previously put forward in the 'Options for Consideration' Core Strategy. The Christchurch Urban Extension Background Paper (Feb 2012) sets out in detail the consideration of options that were the subject of the last consultation and the reasoning behind the option that was taken forward to the Pre Submission Stage. Further detail is also available in the Stage 1 and Stage 2 master planning reports for the North Christchurch Urban Extension prepared on behalf of the council by Broadway Malyan.

**7.128 Location of Housing**

**7.129** It is a reasonable alternative to build housing north of the railway?

**Officer Response**

**7.130** The principle of locating development south of the railway line as the most sustainable option was established after the issues and options consultation in 2008.

**7.131 Settlement Impact**

**7.132** Impact on the status of Burton Village / new development should not merge with the village

**7.133** Impact on Somerford

**Officer Response**

**7.134** A development of 45 dwellings directly adjoining the south of Burton will not change the status of Burton as a village and is consistent with its place in the Core Strategy settlement hierarchy. As discussed in relation to the issue of Green Belt, a gap will be maintained between the village and the railway line maintaining the separate identity of Burton.

**7.135** The relationship of the proposed development at Roeshot Hill to the adjoining areas has been considered through the master planning process and the detailed Stage 2 master planning work which provides a planning framework to inform a planning application for the site.

**7.136 Urban Extension Master Planning**

**7.137** Joint representation has been made by Taylor Wimpey and Bodorgan Properties which refers to references in Policy CN1 to the Broadway Malyan master plan for the North Christchurch Urban Extension. They have stated that there are shortcomings to the policy wording and undue reliance is placed on the council's master plan which should be utilised for illustrative purposes only which leads to an issue of soundness with the plan.

**7.138** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- **Christchurch Urban Extension**
- Land south of the railway line to the east of Salisbury Road to the borough boundary at Roeshot Hill is identified for a strategic housing allocation and will be released from the Green Belt.

- The **allocation offers the opportunity to provide an urban extension to** will act as an attractive gateway to the north of the borough connecting to the existing historic settlement of Christchurch. Development within the site will achieve a high standard of design which reflects high quality examples of local vernacular, respects local densities, historic and environmental features. The development will comprise two walkable neighbourhoods and be well connected to the existing urban area and the wider rural countryside through enhanced bus connections, footpaths and cycle ways.
- A **local** centre at the heart of the development will form the focal point for the development where local services will be enhanced. A central green space within the development will create an attractive and usable environment within a network of open spaces that link to a green infrastructure network to the countryside in the north and southwards along the Mude Valley to the coast. The River Mude will become a key green spine through the heart of the site that will create an area of biodiversity and recreational value.
- **It is proposed that** the Roeshot Hill Allotments will be relocated north of the railway line **as part of a larger hub site for the borough** and the overhead power cables will be moved underground in order to maximise the potential of the site for housing, and to create a high quality development.

### Officer Response

**7.139** The Urban Extension will need to act as an attractive gateway to the borough, consistent with the council's master plan.

**7.140** The Local Centre is the centre of the proposed development and not designated as a retail centre. It is important not to elevate its status to a retail centre in order to avoid potential adverse impacts on the vitality and viability of Christchurch town centre and Highcliffe district centre in accordance with the NPPF.

**7.141** Following consultation on the Pre Submission Core Strategy alternative options are being considered for the relocation of the Roeshot Hill Allotments. On this basis, the policy will be amended to refer to the relocation of the Roeshot Hill Allotments to a suitable site in accordance with statutory requirements. It is important to maintain reference to establishing a hub site for the borough as part of the Council's allotments strategy to provide additional allotments to address local need.

### Housing Strategy

**7.142** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- About 850 dwellings will be delivered on the allocated site and located **in accordance with taking into account** the Council's Strategic Flood Risk Assessment. It is envisaged that development will be phased over a period of 9 years with possible commencement in 2014/15.
- The mix of housing delivered in the Urban Extension will be informed by the Council's Strategic Housing Market Assessment **and the master plan** which provides the basis for an appropriate housing mix and proportion of housing type.

**Officer Response**

**7.143** The location of development will need to be in accordance with the councils SFRA in accordance with flood risk policy set out in the NPPF. Master planning work undertaken for the urban extension does not locate housing within flood risk affected areas.

**7.144** The housing mix set out in the master plan is informed by the Strategic Housing Market Assessment (2012) and as such the reference is appropriate and not overly prescriptive.

**Affordable Housing**

**7.145** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- A **minimum target** of 35% of all housing on the site will be affordable. The Council will seek to maximise affordable housing provision in accordance with Policy LN3 and may require a higher proportion of affordable housing subject to changes in viability.

**Officer Response**

**7.146** The policy will be amended to state that '**up to 35% of all affordable housing will be affordable**' which takes into account viability work undertaken by White Leaf as part of the master planning work for the urban extension and also the council's recent CIL viability work (Oct, 2012). This will provide flexibility in relation to development viability.

**7.147 Densities**

**7.148** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- The Urban Extension Masterplan **is to be used for illustrative purposes only but** sets out residential plots of varying densities across the site which will inform development proposals and provide the basis for acceptable densities. Acceptable densities will be in the region of 20 – 45dph.

**Officer Response**

**7.149** The policy states that the masterplan will inform acceptable densities and is not considered to be overly prescriptive. Policy CN1 will be amended to include a housing figure of 950 dwellings in order to meet the council's housing target. This higher figure has been assessed as part of the master planning work undertaken by Broadway Malyan. The policy will be amended to refer to a density range of between 26 - 46 dph in order to deliver 950 homes.

**7.150 Design**

**7.151** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- The Urban Extension will achieve a high quality of design consistent with the principles set out in the **illustrative** master plan. The buildings within the site will pick up on the town's high quality examples of local vernacular, whilst also appreciating local densities and typologies and the need to provide sustainable, marketable and flexible units. New development will also avoid adverse impacts on the adjoining Burton and Verno Lane conservation areas and the setting of the Staple Cross Scheduled Ancient Monument will be enhanced.

### Officer Response

**7.152** The policy refers to the need for consistency with the design principles set out in the master plan which is not overly prescriptive and the master plan provides a framework to inform a planning application. It is not felt necessary to refer to the master plan as illustrative.

### **7.153 Local Centre and Central Park Area**

**7.154** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- The western and eastern neighbourhoods will be anchored by a ~~local neighbourhood~~ centre adjacent to a central Greenspace. The ~~local~~ centre will provide a community hub and cater ~~to local day to day needs with small scale retail provision for the retail needs of the existing and future local residents~~. The ~~existing~~ Sainsbury's ~~store~~, retail units and Stewarts Garden Centre will form part of the centre.
- The ~~existing~~ Sainsbury's store ~~and Stewarts Garden Centre~~ within the Urban Extension **may be extended or redeveloped to meet current standards. These stores along with other** and food stores nearby on Somerford Road provide a good range of convenience goods provision to meet ~~community local~~ need over the plan period. Proposals for additional provision of convenience and comparison floorspace within the Urban Extension must demonstrate no adverse impact on the vitality and viability of Christchurch and Highcliffe Centres.
- The central Greenspace adjacent to the ~~local~~ centre will **need to be designed in a form which complements the layout of the local centre and which** provides the focus for recreational facilities including new playing pitches, formal open space provision, areas of informal recreation and natural green space.

### Officer Response

**7.155** The urban extension local centre forms the centre of the development but is not being allocated as a 'Local Centre' for retail purposes. The proposed change in wording elevates this central area beyond the status set out in the policy and provides flexibility for the extension of the Sainsbury's store which may not be appropriate in respect of national and local policy and potential impact on the vitality and viability of Christchurch town centre and Highcliffe district centre. Any future proposed expansion of the Sainsbury's store will be considered through a planning application and national and local policy.

**7.156** The detailed layout of the local centre and open space provision will be determined at the planning application stage, informed by the master planning work. The additional proposed text is considered inappropriate as it may be considered that open space provision is compromised in relation to provision of retail and local services.

**7.157** *On Site Ecology*

**7.158** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- A ~~river~~ buffer will be established within the Urban Extension along the River Mude to conserve natural habitats and protected species.

**Officer Response**

**7.159** The buffer is along the River Mude and functions as a river buffer as requested by Natural England.

**7.160** *Open Space and Recreation*

**7.161** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- The quality of provision must also reflect the relationship of the Urban Extension to provision in the adjoining 'Local Needs Areas' of Christchurch North, Central and East as defined in the PPG17 study. ~~The provision of on-site sports, recreation and open space will be consistent with the recreational strategy set out in the master plan. The railway buffer area will contribute to the green infrastructure of the Urban Extension with adequate access, lighting and natural surveillance from properties.~~

**7.162** *Officer Response*

**7.163** Open space provision will be consistent with provision identified in the master planning work which is consistent with the PPG17 requirements.

**7.164** The final sentence regrading the railway buffer will be included in the amended policy as this will contribute to on site green infrastructure provision.

**7.165** *Allotment Provision*

**7.166** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- ~~It is proposed that~~ the Roeshot Hill Allotments will be relocated to land north of the railway line ~~to the east of Salisbury Road, bounded by Summers Lane and Hawthorn Road. This site will serve as a 'hub' site for the Borough in delivering a level of allotment provision contributing towards projected Borough wide allotment requirements to 2028.~~ The specification for replacement allotments should be consistent with the Council's Allotments Strategy (2012).

### Officer Response

**7.167** Following consultation on the Pre Submission Core Strategy alternative options are being considered for the relocation of the Roeshot Hill Allotments. On this basis, the policy will be amended to refer to the relocation of the Roeshot Hill Allotments to a suitable site in accordance with statutory requirements. It is important to maintain reference to establishing a hub site for the borough as part of the Council's allotments strategy to provide additional allotments to address local need.

### **7.168** *Protection of Sensitive Habitats and Species*

**7.169** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- Suitable Alternative Natural Greenspace (SANG) will be provided north of the railway line in an area extending eastward from Salisbury Road to Burton Common SSSI to avoid and mitigate any impact of the development on the South East Dorset Heathlands, the New Forest and the SSSI. This SANG will link to a wider green infrastructure network, including a provision of links in the Urban Extension and a southern link through the Mude Valley to the coast. **Part of the SANG provision may will fall outside the Borough Boundary.**
- SANG provision must be in accordance with the criteria set out in Policy ME3 of the Core Strategy. The Christchurch Urban Extension SANG Strategy (2012), agreed with Natural England demonstrates an acceptable approach to mitigating the impact of the Urban Extension.

### Officer Response

**7.170** The policy will be amended to include reference to the possible location of part of the SANG outside the borough boundary.

### **7.171** *Overhead Power Cables*

**7.172** Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- **It is proposed that** the overhead high voltage power cables will be realigned and undergrounded (possibly within the railway noise buffer zone). **and shall also contribute to the green infrastructure of the Urban Extension with adequate access, lighting and natural surveillance from properties.**

### Officer Response

**7.173** The overhead high voltage power cables will need to be realigned and undergrounded in order to deliver the level of housing required in the Core Strategy and to improve the market attractiveness of the site. The final sentence shall be deleted from this section of the policy as it is now referred to in the open space and recreation section.

#### 7.174 *Sustainable Construction and Renewable Energy*

7.175 Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- The Urban Extension will be required to comply with **nationally derived** climate change policies **as set out** in Chapter 13 (Managing the Natural Environment). ~~Future energy requirements for the site will include dwelling based sources, e.g. heat pumps, solar photo voltaic and solar thermal.~~
- The provision of technologies, such as site wide combined heat and power will also be encouraged, subject to feasibility and viability. Any planning application should consider a site-wide energy and/or heating solution unless it can be demonstrated that a better alternative for reducing carbon emissions for the development can be achieved.

#### Officer Response

7.176 No change is required in the policy as in meeting the requirements of Core Strategy policies set out in Chapter 13 renewables provision will include dwelling based sources alongside any potential that may exist for site wide combined heat and power.

#### 7.177 *Flood/Water Attenuation*

7.178 Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- Sufficient Land ~~should~~ **will be** identified for the provision of surface water storage at ~~a~~ **The** **level** and location of flood storage required to support ~~this option should be agreed with~~ the site, **in consultation with the** Environment Agency.

#### Officer Response

7.179 The suggested text will be included in the amended policy as it provides more certainty for the implementation of flood water / attenuation measures.

#### 7.180 *Transport and Accessibility*

7.181 Taylor Wimpey and Bodorgan Properties have suggested the following amendments:

- ~~Access will be established to the site consistent with the master plan with access points envisaged at Staple Cross, the Sainsbury's access road (bus only) and two further points along the Lyndhurst Road. These routes will be connected through an internal road network to enable buses to be routed through the development to the Sainsbury's bus interchange at the neighbourhood centre, and to allow the interconnection of the eastern and western sections of the development.~~

- As part of the pedestrian and cycle network to promote sustainable travel patterns from the outset and support SANG function, the transport strategy for the site must will include:
- A pedestrian/cycle link through the urban extension site from the bridleway at Roeshot Hill (north section of Verno Lane) to Hawthorn Road and from Ambury Lane to Old Lyndhurst Road.
- The development will be required to mitigate its impact on the transport network with the provision of improvements to the following through the following measures:
- A35 Lyndhurst Road
- A35 Staple Cross Junction
- Contributions towards the following junctions may also be required including:
- A35 Somerford Roundabout
- A35 Stony Lane Roundabout
- A35 Fountains Roundabout
- - Implementation of one or two site access junctions on the A35 Lyndhurst Road
- - Implementation of improvements to the A35 Staple Cross junction'
- These routes will be connected through an internal road network to enable buses to be routed through the development to the Sainsbury's bus interchange at the local centre, and to allow the interconnection of the eastern and western sections of the development.
- As part of the pedestrian and cycle network to promote sustainable travel patterns from the outset and support SANG function, the transport strategy for the site will include:
- A pedestrian/cycle link through the urban extension site from the bridleway at Roeshot Hill (north section of Verno Lane) to Hawthorn Road and from Ambury lane to Old Lyndhurst Road
- Contributions towards junction improvements on the strategic and local highway network may also be required. Junctions that may require improvement include:
- - A35 Somerford Roundabout

- **- A35 Stony Lane Roundabout**
- **- A35 Fountains Roundabout**

### Officer Response

**7.182** The proposed text loses reference to the master plan which provides the framework to inform a future planning application. The access points to the site have been established through the master planning work and in consultation with the Dorset County Council highways authority and are considered appropriate. The policy states that site access will be established 'consistent' with the master plan and that it is 'envisaged' that site accesses will be provided as set out in the policy. The policy does not prescribe that site accesses can only be established in accordance with those identified in the master plan.

**7.183** The remaining proposed amendments do not differ substantially from the current policy text and it is not considered necessary to amend the policy.

### **7.184** *Urban Extension Local Centre*

**7.185** White Young Green (on behalf of Sainsbury's) support change to the Green Belt boundary to bring forward the urban extension. They are also supportive of those elements of the policy which integrate the Sainsbury's store into the new centre.

**7.186** **Burton Parish Council:** Accept that there is a need to prepare the Local Plan / Core Strategy. The Core Strategy provided the opportunity to protect services and facilities in the village and to develop new ones e.g. extensions to public transport, protect local shops, and secure improvements to the transport network. The Parish Council welcomes the commitment to allowing a development of 100% + affordable housing and will seek the adoption of a rural exception policy for Burton. The Council notes the need to maintain the separate identity of Burton by maintaining the green wedge between the village and Somerford. This wedge will be eroded from the south with the inclusion of Ambury Lane in the proposed urban extension. The boundary of the parish runs along the centre of Ambury Lane. The Council is concerned about the loss of this green wedge and development that would be within the parish.

**7.187** **GVA Planning Development** (on behalf of the CO-OP.) Object to Sainsbury's forming part of the local centre but supports small scale retail development. Objects to the lack of retail floorspace that should be provided. Allowing the Sainsbury's store to form part of a new local centre would remove any existing controls over what is a large stand alone out of centre supermarket. It could lead to significant adverse effects if the store wishes to expand in the future. This could compromise the ability to maintain and enhance the health of Christchurch town centre and other defined centres in the local area.

**7.188** New retail development should not adversely affect Christchurch town centre

### Officer Response

**7.189** Comments made by Burton Parish Council are responded to within the Green Belt section set out above.

**7.190** The urban extension local centre forms by definition the centre of the development but is not being allocated as a 'Local Centre' for retail purposes. On this basis national and local retail policy will apply to any possible future proposed expansion of the Sainsbury's store in respect of the sequential approach and impact assessment.

**7.191 *Burton Farm***

**7.192** The proposal would render the farm unviable

**7.193** Loss of agricultural land making the farm unviable (CN1 and CN2).

**Officer Response**

**7.194** This is not a planning issue and is an consideration for the landowner.

**7.195 *Burton Conservation Area***

**7.196** Impact on Burton Conservation Area.

**Officer Response**

**7.197** Master planning work undertaken for the urban extension has considered impact on the conservation area and this will be considered in further detail at the planning application stage.

**7.198 *Hoburne Farm Estate***

**7.199** Ryan Johnson, Turley Associates (Burry & Knight Ltd):

**7.200** Christchurch Borough Council's housing trajectory should be updated prior to formal submission of the Core Strategy to the Secretary of State.

**7.201** The housing trajectory for the North Christchurch Urban Extension needs to be amended as it is not considered that 100 units will be delivered before 2016. Detailed evidence regarding the housing trajectory for this site should be presented for comment prior to submission of the Core Strategy.

**Officer Response**

**7.202** These comments are noted and are discussed further in the Key Strategy response chapter.

**7.203 *Floodrisk***

**7.204** Dorset County Council - Para 6.13: Amend to read 'Development will be located in areas of low floodrisk according to the Council's Strategic Flood Risk Assessment (Level 2 2009) and Dorset Surface Water Management Plan (July 2011). Open space will be provided in the centre of the site where there are areas affected by flood zone 2 and 3a and areas of local flood risk (Dorset Surface Water Management Plan 2011).

**Officer Response**

**7.205** Paragraph 6.13 will be amended to incorporate the proposed wording.

**7.206 Minerals Planning & Planning for the Urban Extension**

**7.207 Hampshire County Council:** HCC welcome the opportunity to work with the mineral authorities regarding the delivery of minerals development. Requested change in policy text: Mineral resources: *'The potential for prior sand and gravel at this site before development, and compatible workings of minerals sites across the county boundary in Hampshire will be considered'*.

**Officer Response**

**7.208** Development of the urban extension has a possible commencement of 2014/15 so it would be inappropriate to include additional policy text referring to prior extraction of sand and gravel at this site before development.

**7.209 Impact on Staple Cross Scheduled Ancient Monument**

**7.210** Should be enhanced and setting, policy should be amended

**7.211** The Christchurch Antiquarians: More details of how the setting of the SAM will be enhanced. (the restoration of the SAM should be secured by S106.)

**7.212** Access to site should not be provided at Staple Cross as this will prevent the ability to preserve the setting of the Staple Cross monument.

**Officer Response**

**7.213** These comments are noted and the need to avoid adverse impact on the Staple Cross SAM will be further considered at the planning application stage.

**7.214 Proposed Relocation of Roeshot Hill Allotments**

- Implications of relocating the Roeshot Hill Allotments:
- Does new site meet the legislation of statutory allotments i.e. distance.
- Suitability of replacement site for allotments (proposed site in a floodrisk area and soil not suitable).

- There is insufficient provision for allotments. Has the Council undertaken a detailed survey of the demand for allotments? Additional allotments are needed rather than their replacement.
- Require the permission of the SOS to sell the allotments to a developer.
- Option UE3 could be progressed with the power lines moved underground and this would provide the level of housing the Council needs.
- Details need to be provided of the assistance given for relocation, facilities, types of plots and how the ground will be fertile.
- Impact of the urban extension and relocated allotments on the conservation area
- No direct contact with Roeshot Hill Allotments Association
- Review the issue of retaining the allotments, is the proposed new site accessible for all residents?
- No proper survey of the demand for allotment plots
- The site identified for relocation floods
- Compensation for allotment holders
- Need access road from the development to the new allotments / general accessibility of the replacement allotments / Access to the replacement allotments by means other than the car.
- New allotments should be increased in number
- Expand Roeshot Hill allotments using the nursery land
- Parking will need to be created to serve the new allotments / impact on the Green Belt
- Relocation site – access roads not sufficient capacity
- Allotment provision should be closer to the existing urban area / not sufficiently accessible

**7.215 RHAA:** Consider CN1 to be unjustified, ineffective, and non compliant:

**7.216** They are ineffective in that a segregation of the bulk of Christchurch's allotment amenity runs counter to key 'neighbourhood' principles in the Christchurch Allotment Strategy and the document itself. It also fails to exploit the virtues of 'shared space' as contemplated by paragraph 70 of the NPPF.

**7.217** They are ineffective in that para 6.54 does not adequately address arrangements for the proposed relocation of the allotments. CBC does not own any land within the statutory geographic limits for the relocation of the allotment site, nor has it made any proposals to offset the losses and expenses of relocation.

**7.218** They are non complaint with paragraph 112 of the NPPF in that the land at Roeshot Hill is designated among the 'best and most versatile agricultural land'.

#### **Officer Response**

**7.219** It is proposed that the Roeshot Hill Allotments are relocated to a suitable site in accordance with statutory requirements. The council has consulted the Roeshot Hill Allotments Association directly through the production of the Core Strategy and has attended meetings of the Association. The RHAA has also sat on the Christchurch Urban Extension Advisory Group which has met on a regular basis through the production of the Core Strategy. The Allotments association will continue to be involved in the consideration of options for the relocation of the Roeshot Hill Allotments.

**7.220** As stated in the policy the relocation of the allotments will form part of the Council's borough wide allotments strategy and is intended to form part of a larger hub site which will assist in addressing some of the unmet need for allotments in the borough.

#### **7.221 Renewables**

**7.222** Anne Mason, Transition Town Christchurch: Add water harvesters and grey water recycling. Concern about CHP plant and use of forest fuel.

#### **Officer Response**

**7.223** Comments are noted.

#### **Proposed Pre-Submission Change**

**7.224 Paragraph 6.2 Change:** The Coalition Government is currently in the process of revoking the South West Regional Spatial Strategy through the Localism Act, which received royal assent in November 2011. However, the Government maintains an emphasis on meeting local housing need through locally established housing targets. **There remains a high level of local housing need to address over the plan period to 2028 as identified in the Council's evidence base which includes the Strategic Housing Market Assessment (2012) and the Bournemouth, Dorset and Poole Population and Household Projections (2012).** There is also a shortage of housing land supply and the North Christchurch Urban Extension provides the opportunity to deliver a significant level of new housing. On this basis the Urban Extension remains as part of the housing strategy for the Borough as it remains the most sustainable option for new greenfield development in Christchurch.

**7.225 Reason:** New additional text to reflect the addition to the evidence base of the Bournemouth, Dorset and Poole Population and Household Projections (2012) which inform the Councils' joint housing target which replaces KS3 and KS4.

**7.226 Paragraph 6.4 Change:**

**7.227** • Suitable Alternative Natural Greenspace Strategy ~~(2012)~~.

**7.228** • Bournemouth & Poole Strategic Housing Market Assessment ~~Update~~ (2012).

**7.229** • **Bournemouth, Dorset and Poole Population and Household Projections (2012)**

**7.230** • Christchurch Strategic Housing Land Availability Assessment (2011)

**7.231 Reason:**

**7.232** New additional text to reflect the addition to the evidence base of the Bournemouth, Dorset and Poole Population and Household Projections (2012) which inform the Councils' joint housing target which replaces KS3 and KS4.

**7.233 Paragraph 6.9 Change:**

**7.234 Key Facts**

- There is potential to accommodate between **765 – 950** ~~33~~ dwellings on the site with densities ranging from **26 - 465** dwellings per hectare.
- ~~The standard adopted by Natural England for the provision of Suitable Alternative Natural Greenspace is 8 – 16 ha per 1,000 people.~~

**7.235 Reason:**

**7.236** Change reflects increased potential of the site from 850 to 950 dwellings which remains consistent with the Broadway Malyan master planning.

**7.237** The standard for SANGs provision is deleted following representations from Natural England and a change to the Core Strategy heathland mitigation and SANGs policy (ME2 & ME3).

**7.238 Paragraph 6.11 Change:** The Bournemouth and Poole Strategic Housing Market Assessment ~~(2012)~~ and **Bournemouth, Dorset and Poole Population and Household Projections (2012)** identifies a requirement for 3,375 dwellings to be provided during the Core Strategy plan period 2013 - 2028. The Christchurch Strategic Housing Land Availability Assessment (2011) identifies a housing potential of **in the region of 2150** ~~2140~~ in the existing urban area. Due to the shortage of housing land supply in the existing urban area and in order to make a significant contribution towards local housing need it is important to maximise development potential within the urban extension. This can be achieved at appropriate densities which positively integrate

the development with the existing urban area and the village of Burton. More detailed master planning undertaken for Stage 2 has identified a potential of between 765 and ~~95033~~ dwellings with densities ranging across the site from ~~260 - 465~~ dwellings per hectare. This has informed the development potential set out in Policy CN1 of ~~9850~~.

**7.239 Reason:**

**7.240** New additional text to reflect the addition to the evidence base of the Bournemouth, Dorset and Poole Population and Household Projections (2012) which inform the Councils' joint housing target which replaces KS3 and KS4. Change reflects increased potential of the site from 850 to 950 dwellings which remains consistent with the Broadway Malyan master planning.

**7.241 Paragraph 6.18 Change:**

**7.242** The Joint Retail Study Update Assessment (2012~~08~~) ~~identifies a projected requirement for in the region of 2,300sqm net additional convenience floorspace in Christchurch town centre to 2031. concludes that there is no requirement for additional convenience floorspace over the plan period.~~ The Urban Extension is served by a good range of food stores including Sainsbury's and Lidl, and is close to Christchurch town centre.

**7.243 Reason:**

**7.244** Change in text to take account of the Retail Study Update (2012) which supersedes projections contained in the 2008 study

**7.245 Paragraph 6.27 Change:**

**7.246** The Council will work closely with the Dorset and Hampshire minerals planning authorities and the landowner in relation to opportunities for increased recreational provision that may be secured north of the railway line post minerals working. Opportunities may exist for further SANGs enhancements. ~~which could take the form of a country park north of the railway line to the east of Burton to Burton Common.~~

**7.247 Reason:**

**7.248** Deleted text following representations received from Meyrick Estates and uncertainty of the form of possible future SANGs enhancements.

**7.249 Paragraph 6.40 Change:**

**7.250** The Roeshot Hill statutory allotments will be relocated ~~to a suitable site in accordance with statutory requirements. north of the railway line to land to the east of Salisbury Road bounded by Hawthorn Road and Summers Lane.~~ The allotments are to be relocated in order to deliver more housing within the Urban Extension required in relation to local housing need ~~identified in the Council's evidence base. Strategic Housing Market Assessment (2011)~~ and to improve the design quality of the site by removing a 'pinch point' to the development at Roeshot Hill. The Council has prepared

a borough wide allotments strategy ~~(20124)~~ which has identified current and future requirements for allotment provision across the borough over the plan period and sets out standards to be applied to the provision of new allotments. The replacement allotments for Roeshot Hill will form part of a larger 'hub site' contributing towards current unmet need and future requirements.

**7.251 Reason:**

**7.252** Alternative sites are bring considered for the relocation of the Roeshot Hill Allotments and a such reference to a specific location has been removed. The evidence base now includes the SHMA and the DCC Household projections (2012).

**7.253 Paragraph 6.51 Change:**

**7.254** The timing for key junction improvements along the A35 as set out in the policy ~~is identified in the Local Transport Plan 3 and~~ will be dependant on major scheme bids and contributions from the Urban Extension and development in the wider area. Key junction improvements, as identified in the LTP, such as Fountains Roundabout and Stony Lane are anticipated to come forward ~~identified in the LTP to come forward~~ in the medium term between ~~2018 4 - 2022 49~~. Short term improvements such as implementation of the Bus Showcase Corridor along the A35 will be implemented in the period to 2014.

**7.255 Reason:**

**7.256** Updated text in response to representations from DCC which the time scales for infrastructure improvements.

**7.257 Paragraph 6.54 Change**

**7.258** The Council will work closely with the Roeshot Hill Allotments Association, the landowner and developer to deliver replacement allotments ~~north of the railway line~~ in accordance with statutory requirements and the standards of provision set out in the Council's Allotments Strategy(2012).

**7.259 Reason:**

**7.260** Alternative sites are bring considered for the relocation of the Roeshot Hill Allotments and a such reference to a specific location has been removed.

## Policy CN 1

### Christchurch Urban Extension

Land south of the railway line to the east of Salisbury Road to the borough boundary at Roeshot Hill is identified for a strategic housing allocation and will be released from the Green Belt.

The Urban Extension will act as an attractive gateway to the north of the borough connecting to the existing historic settlement of Christchurch. Development within the site will achieve a high standard of design which reflects high quality examples of local vernacular, respects local densities, historic and environmental features. The development will comprise two walkable neighbourhoods and be well connected to the existing urban area and the wider rural countryside through enhanced bus connections, footpaths and cycle ways.

A local centre at the heart of the development will form the focal point for the development where local services will be enhanced. A central green space within the development will create an attractive and usable environment within a network of open spaces that link to a green infrastructure network to the countryside in the north and southwards along the Mude Valley to the coast. The River Mude will become a key green spine through the heart of the site that will create an area of biodiversity and recreational value.

**The Roeshot Hill Allotments will be relocated to a suitable site and the overhead power cables will be moved underground in order to maximise the potential of the site for housing, and to create a high quality development.**

### Housing Strategy

**About 950 dwellings will be delivered on the allocated site and located in accordance with the Council's Strategic Flood Risk Assessment. It is envisaged that development will be phased over a period of 9 years with possible commencement in 2014/15.**

The mix of housing delivered in the Urban Extension will be informed by the Council's Strategic Housing Market Assessment and the master plan which provides the basis for an appropriate housing mix and proportion of housing type.

### Affordable Housing

**A minimum of Up to 35% of all housing on the site will be affordable. The Council will seek to maximise affordable housing provision in accordance with Policy LN3. and may require a higher proportion of affordable housing subject to changes in viability.**

### Densities

The Urban Extension Masterplan sets out residential plots of varying densities across the site which will inform development proposals and provide the basis for acceptable densities. **Acceptable densities will be in the region of 26 – 46dph.**

### **Design**

The Urban Extension will achieve a high quality of design consistent with the principles set out in the master plan. The buildings within the site will pick up on the town's high quality examples of local vernacular, whilst also appreciating local densities and typologies and the need to provide sustainable, marketable and flexible units. New development will also avoid adverse impacts on the adjoining Burton and Verno Lane conservation areas and the setting of the Staple Cross Scheduled Ancient Monument will be enhanced.

### **Local Centre and Central Park Area**

The western and eastern neighbourhoods will be anchored by a local neighbourhood centre adjacent to a central greenspace. The local centre will provide a community hub and cater to local day to day needs with small scale retail provision **and local health services.** The existing Sainsbury's, retail units and Stewarts Garden Centre will form part of the centre.

The Sainsbury's store within the Urban Extension and food stores nearby on Somerford Road provide a good range of convenience goods provision to meet local need over the plan period. Proposals for additional provision of convenience and comparison floorspace within the Urban Extension must demonstrate no adverse impact on the vitality and viability of Christchurch and Highcliffe Centres.

The central greenspace adjacent to the local centre will provide the focus for recreational facilities including new playing pitches, formal open space provision, areas of informal recreation and natural green space.

### **On Site Ecology**

A river buffer will be established within the Urban Extension along the River Mude to conserve natural habitats and protected species. **Biodiversity enhancements will be provided within this buffer zone.**

### **Open Space and Recreation**

The quality of provision must also reflect the relationship of the Urban Extension to provision in the adjoining 'Local Needs Areas' of Christchurch North, Central and East as defined in the PPG17 study. The provision of on - site sports, recreation and open space will be consistent with the recreational strategy set out in the master plan. **The railway buffer area will contribute to the green infrastructure of the Urban Extension with adequate access, lighting and natural surveillance from properties.**

### **Allotment Provision**

The Roesht Hill Allotments will be relocated to a suitable site in accordance with statutory requirements ~~land north of the railway line to the east of Salisbury Road, bounded by Summers Lane and Hawthorn Road.~~ This site will serve as a 'hub' site for the Borough in delivering a level of allotment provision contributing towards projected borough wide allotment requirements to 2028. The specification for replacement allotments should be consistent with the Council's Allotments Strategy (2012).

#### **Protection of International, European and Nationally Designated Habitats.**

Suitable Alternative Natural Greenspace will be provided north of the railway line in an area extending eastward from Salisbury Road to Burton Common SSSI to avoid and mitigate any impact of the development on the South East Dorset Heathlands, the New Forest and the SSSI. This SANG will link to a wider green infrastructure network, including a provision of links in the Urban Extension and a southern link through the Mude Valley to the coast. **Part of the SANG provision may fall outside the borough boundary.**

SANG provision must be in accordance with the criteria set out in Policy ME23 of the Core Strategy. The Christchurch Urban Extension SANG Strategy (2012), agreed with Natural England demonstrates an acceptable approach to mitigating the impact of the Urban Extension.

#### **Overhead Power Cables**

The overhead high voltage power cables will be realigned and under-grounded within the railway noise buffer zone. ~~and shall also contribute to the green infrastructure of the Urban Extension with adequate access, lighting and natural surveillance from properties....~~

#### **Sustainable Construction and Renewable Energy**

The Urban Extension will be required to comply with climate change policies in Chapter 13 (Managing the Natural Environment). Future energy requirements for the site will include dwelling based sources, e.g. heat pumps, solar photo voltaic and solar thermal.

The provision of technologies, such as site wide combined heat and power will also be encouraged, subject to feasibility and viability. Any planning application should consider a site-wide energy and/or heating solution unless it can be demonstrated that a better alternative for reducing carbon emissions for the development can be achieved.

#### **Flood / Water Attenuation**

Sufficient land will ~~should~~ be identified for the provision of surface water storage. The level and location of flood storage required to support this option will ~~should~~ be agreed **in consultation** with the Environment Agency.

#### **Transport and Accessibility**

Access will be established to the site consistent with the master plan with access points envisaged at Staple Cross, the Sainsbury's access road (bus only) and two further points along the Lyndhurst Road. These routes will be connected through an internal road network to enable buses to be routed through the development to the Sainsbury's bus interchange, and to allow the interconnection of the eastern and western sections of the development.

As part of the pedestrian and cycle network to promote sustainable travel patterns from the outset and support SANG function, the transport strategy for the site must include:

- A pedestrian / cycle link through the urban extension site from the bridleway at Roeshot Hill (north section of Verno Lane) to Hawthorn Road and from Ambury Lane to Old Lyndhurst Road.

The development will be required to mitigate its impact on the transport network with the provision of improvements to the following:

- A35 Lyndhurst Road
- A35 Staple Cross Junction

Contributions towards the following junctions may also be required including:

- A35 Somerford Roundabout
- A35 Stony Lane Roundabout
- A35 Fountains Roundabout

## **Policy CN 2**

### **Land south of Burton village**

Land to the west of Salisbury Road to the south of Burton village is allocated for residential development. The Green Belt boundary will be amended to exclude land identified for new housing.

### **Housing Strategy**

- The strategic amendment to the Green Belt will allow limited residential development to meet the local housing needs of Burton Village, including the provision of affordable housing.
- Approximately 45 houses will be delivered on the allocated site and located in accordance with the Council's Strategic Flood Risk Assessment. Development will be phased over a period of 3 years with possible commencement in 2014/15. A minimum of 50% of all housing will be affordable consistent with Policy LN3.

### **Design and Density**

- The layout and design of the development will be consistent in scale and character with Burton Villlage and the Conservation Area.

### **Open Space and Recreation**

- Open space provision will be in accordance with the standards for quantity, quality and accessibility as defined in Policy HE4 of the Core Strategy. Provision of open space must be appropriate to the needs of the Christchurch North Local Needs Area.

### **Protection of Sensitive Habitats and Species**

- The development will contribute to the Suitable Alternative Natural Greenspace provided for the North Christchurch Urban Extension, and will provide linkages to this new greenspace.

### **Sustainable Construction and Renewable Energy**

- The development will need to comply with policies ME4 and ME5 of the Core Strategy in relation to sustainable standards of construction and provision of renewable energy.

### **Community Facilities**

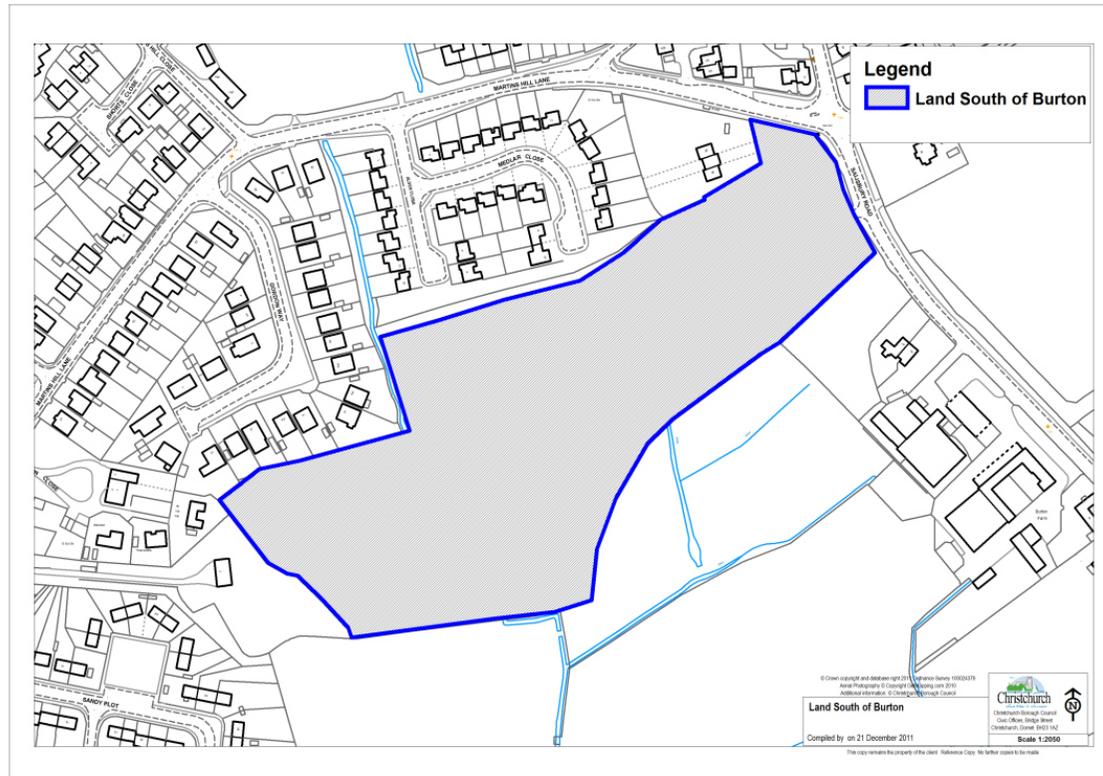
- There is an opportunity for new development to provide funding toward the improvement of community facilities within the village, particularly a village hall. The Council will seek to negotiate a contribution toward such facilities from this development.

**Flood / Water Attenuation**

- A flood management strategy will be prepared to address on site flood risk.

**Transport and Access**

- The main access to the site will be from Salisbury Road in order to avoid areas of flood risk and provide safe access and egress.
- The development will provide necessary works and make appropriate contributions to mitigate its impact on the transport network.
- The site should provide pedestrian and cycle access to integrate the site with the rest of the village.



Map 7.3 Land south of Burton village

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
16	27	0	56	28	13	41	15	35	15	34	16	140

Table 7.2

## Key Issues and Comments

**7.261** 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:

### **7.262** *Burton and Winkton Villages Petition*

**7.263** The Council received a petition from Burton and Winkton Villages on the 30th October 2012 after the close of the consultation on the Pre -Submission Core Strategy (Closed 25th June 2012). The petition has requested that Policy CN2 and all parts of Policy CN1 which relate to land South of Burton Village (specifically the relocation of the Roeshot Hill Allotments) are removed from the Core Strategy.

### **7.264** *Inclusion of Policy CN2 at Pre-Submission Stage*

**7.265** **Burton Parish Council:** There was no mention of the proposal at issues and options or preferred options. The policy has not been subject to sufficient public scrutiny. The Council notes that neither itself, its officers nor the elected Borough Councillors for the village were consulted at any time in the preparation of this policy.

## Officer Response

**7.266** Following consultation on the 'Options for Consideration' Core Strategy in 2010 the Council jointly prepared a Strategic Housing Market Assessment (2012) and Bournemouth, Dorset and Poole Population and Household Projections (2012) which identified a need to provide 3,375 homes over the 15 year plan period. The council's Strategic Housing Land Availability Assessment (2011) identified a potential for 2,140 homes in the urban area and a potential of 850 dwellings had been identified for the North Christchurch Urban Extension. Further limited Green Belt release has been identified to the south of Burton to help address the housing shortfall in Christchurch and to contribute towards affordable housing requirements in Burton.

**7.267** Borough councillors have been engaged in the preparation of this policy prior to publication of the Pre-Submission Core Strategy. The Council has undertaken a 3 month public consultation on the policy as part of the Pre-Submission Core Strategy and attended meetings of the parish council to discuss this policy and the Core Strategy as a whole.

**7.268** *Location of Development*

- Suitability of area for development as opposed to land behind the Manor Arms

**Officer Response**

**7.269** The consideration of this site on the Bowers land has been considered as part of previous consultation stages on the Core Strategy. This site has been appraised in detail in the 2010 Christchurch Urban Extension Key Issues Paper which accompanied the 'Options for Consideration' Core Strategy and further in the 2012 Christchurch Urban Extension Background Paper which accompanied the Pre-Submission Core Strategy (April, 2012).

**7.270** *Green Belt*

**7.271** **Burton Parish Council**

- Insufficient reasons have been put forward to justify Green Belt release. The Council believes there is no proven need for this type of development in terms of housing need in Burton.
- There is a need to maintain the Green Wedge between Burton and Christchurch.

**Officer Response**

**7.272** Justification in relation to limited release of the Green Belt is discussed above in relation to CN1.

**7.273** *Housing Need / Duty to Co-operate / Affordable Housing*

- Housing should be 100% affordable
- Reduce level of affordable housing
- There are alternative sites for affordable housing in Burton village

**7.274** **Roeshot Hill Allotments Association (John Campbell)**

- Proposal for housing development at Burton is unjustified
- Christchurch cannot accommodate the level of development planned without adversely affecting the character of the Borough

- The proposal for 45 dwellings at Burton fail to explain how this will serve the specific needs of the village
- The document is non compliant with Section 110 of the Localism Act (Duty to Co-operate). There is no evidence to demonstrate that the unmet housing needs of Christchurch can be met in neighbouring authorities.

**7.275 Meyrick Estates:**

**7.276** The policy is not sound as it is not justified by evidence.

**7.277** The allocation of 45 dwellings does not reflect the housing need in the borough and there is capacity on the land south of Burton for a greater level of development.

**7.278 Meyrick Estates:** 50% affordable housing provision is not viable and there is no evidence or justification for 50%. The SHMA (paragraph 6.13) is clear that a 50% affordable housing requirement may not be supported by the current market. Viability work undertaken by Meyrick Estates indicates that a maximum of 40% affordable housing will be viable. Fixed costs for infrastructure, utilities, flood mitigation, SANG & CIL / S106 in combination with the low revenues from affordable housing units only allow for acceptable developer profit margin at 40% affordable.

**7.279 Suggested Changes:** The policy should be altered on the second bullet point to say, 'Approximately 90 dwellings will be delivered on the allocated site in accordance with a site specific flood risk assessment. Development will be phased over 4 years with commencement in 2013/14/ A maximum of 40% of all housing will be affordable consistent with policy LN3.'

**7.280** The fifth bullet point should be altered to read: 'A full suite of technical reports on the site at Burton including: community consultation, flooding, green belt, transport, landscape and visual impact assessment, phase 1 ecology, heritage impacts, SANG/heathland mitigation has been submitted in support of the site. The technical evidence provided with this submission shows that the site is available and deliverable within the first 5 years of the plan.'

**7.281 Burton Parish Council**

**7.282** The Parish Council objects to the need for this development being justified on the basis of affordable housing need in Burton. This survey in fact identified that the need in Burton was for a Local Exceptions Policy to enable the provision of a smaller number of 100% affordable homes solely to meet the need of local residents. The Parish Council does not accept the affordable housing needs of the borough as a whole and the waiting list. Policy CN2 has not, unlike other policies, been tested in any way against the vision and aspiration of the community of Burton (therefore not justified).

**7.283** 45 dwellings could be accommodated within the North Christchurch Urban Extension.

### Officer Response

**7.284** In relation to the provision of affordable housing the policy will be amended to state that '**up to**' 50% of housing will be affordable which will provide flexibility in the policy in relation to viability over the plan period. The proposed settlement extension is required in addition to housing potential identified in the SHLAA in Burton village to address local housing need identified in the Strategic Housing Market Assessment (2012) and through further projections undertaken by Dorset County Council which are re based to the 2011 census and contribute towards local affordable housing requirements in Burton. Therefore, these additional dwellings could not be accommodated within the existing Burton settlement boundary.

**7.285** A response in relation to the issue of compliance with the Duty to Co-operate is set out above for CN1.

**7.286** The Core Strategy Policies KS3 and KS4 will be superseded by a single housing target for both districts which meets the combined housing requirement identified in the Dorset County Council household projections (2012) which also allows for a 5% buffer to be applied to the 5 year land supply in accordance with the NPPF.

### **7.287 Settlement Impact**

- Development not appropriate to Burton as a village, it will change the village status.
- A green wedge should be maintained between Burton and Christchurch

### Officer Response

**7.288** A development of 45 dwellings directly adjoining the south of Burton will not change the status of Burton as a village and is consistent with its place in the Core Strategy settlement hierarchy. As discussed in relation to the issue of Green Belt, a gap will be maintained between the village and the railway line maintaining the separate identify if Burton.

**7.289** The relationship of the proposed development at Roeshot Hill to the adjoining areas has been considered through the master planning process and the detailed Stage 2 master planning work which provides a planning framework to inform a planning application for the site.

### **7.290 Consistency with other Core Strategy Policy**

- The policy is not consistent with Policy LN4 (Rural Exception Sites)

### Officer Response

**7.291** Policy LN4 is a separate policy that relates to rural exception sites and does not apply to this proposal.

### **7.292 Burton Conservation Area**

- **English Heritage:** NPPF Section 12: Conserving and Enhancing the HE para. 129: Has the significance of the heritage asset been taken into account when considering the impact of a proposal on it, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal? There is limited assessment of the impact on the character of the CA and the development would appear to contradict its appraisal report (open linear rural character). More convincing evidence is required in relation to the impact on the significance of both the CA and the LB.
- Paragraph 5.50.1 of the conservation area appraisal
- Destruction of working farmland and wildlife
- Contribution of Burton Farm to the Conservation Area.
- Erodes / adversely affects the character of Burton Village
- Impact on the Conservation Area: Adverse impact on Burton farm, contrary to conservation area appraisal (Burton Parish Council)

#### **Officer Response**

**7.293** Master planning for the urban extension has considered the impact on the conservation area and the Staple Cross Scheduled Ancient Monument and Policy CN1 refers to avoiding adverse impacts on Burton conservation area and the SAM. Further consideration of this issue will be given at the planning application stage.

**7.294** The future of Burton Farm is an issue for the landowner.

#### **7.295 *Combined Impact with Proposed Minerals Working (Loss of countryside, transport impact)***

#### **Officer Response**

**7.296** The combined impact of planned minerals working has been considered as part of the South East Dorset Multi Modal Study and the A35 Route Management Study.

**7.297** Loss of countryside in relation to planned minerals development is an issue for the Dorset and Hampshire minerals planning authorities. The North Christchurch Urban Extension will provide SANGs north of the railway which will provide an enhancement to the countryside.

#### **7.298 *Floodrisk***

- Plan is not deliverable in view of floodrisk, available infrastructure.
- The proposed area for development is part of a floodplain
- The proposal is contrary to the Core Strategy Vision para 3. And Policy ME6 which states that planning should demonstrate that flood risk does not increase as a result of development.
- The site should not have been brought forward if alternative sites are available in lower flood risk areas (Burton Parish Council)

**Officer Response**

**7.299** As stated in Policy CN2 development will be located in accordance with the council's Strategic Flood Risk Assessment. The site area identified on the plan in the Core Strategy includes areas where open space will be provided and development will be directed outside the flood zone.

**7.300 *Transport Impact***

- Relocate A35 bypass north of the railway
- Salisbury Road, Hawthorn Road
- Impact on Stony Lane
- What improvements will there be to public transport? Are there suitable public transport services currently?
- Delivery of transport infrastructure in step with development
- Combined impact with minerals HGVs
- Proposed improvements not based on credible and robust data
- Burton Parish Council: The Parish Council believes the proposed development would have a severe impact on traffic flows in and around the village and would be contrary to the NPPF. The Parish Council states that infrastructure should be in place before development takes place.

**Officer Response**

**7.301** The impact of development proposed in the Core Strategy including policies CN1, 2 and 3 has been assessed through the preparation of the South East Dorset Multi Modal Study and the A35 Route Management Study. Policies KS9 and KS10 of the Key Strategy set out improvements to the transport network which will be required to enable development set out in the Core Strategy to take place. The Core Strategy identifies key junctions where improvements will be required.

**7.302** Schemes to improve pedestrian and cycle movements between Burton and Christchurch coupled with expected development related mitigation schemes at Stony Lane Roundabout and Staple Cross will improve sustainable links with destinations in the town. Contributions would be anticipated from development to the south of Burton towards, pedestrian and cycle links, especially on Salisbury Road.

**7.303** Bus services currently operate on an hourly basis from Burton and the council will work with bus providers to seek enhancement to current service provision.

**7.304** The exact level and type of mitigation would be subject to examination and discussion as part of the planning application process and may be linked with development at Roeshot Hill.

**7.305 *Infrastructure***

- Schools capacity, doctors, hospitals etc.

- The proposal will not contribute towards improved community facilities in Burton
- Infrastructure provision in Burton is already insufficient and new development will overload it further
- Proximity to sewage works

#### **7.306 Officer Response**

#### **7.307 Education**

**7.308** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new or larger, replacement schools will be required and these are included in the proposals. No new schools are required in relation to policies CN1, 2 and 3.

#### **7.309 Health**

**7.310** 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.

#### **7.311 Services**

#### **7.312 Gas, electricity and water**

**7.313** Service providers have been contacted throughout the preparation of this document and no concerns have been raised.

#### **7.314 Sewerage**

**7.315** Wessex Water have been contacted throughout the preparation of this document. Their proposals for sewage treatment works are set out in the Infrastructure Development Plan. Any other requirements which result from development will be discussed with developers.

**7.316** New development will contribute to the improvement of community facilities in Burton Village as set out in the policy.

**7.317** New residential development is planned directly adjoining the south of Burton Village which is further away from the sewage works than other existing properties in the south of Burton Village.

#### **7.318 Community Facilities**

**7.319** The policy makes reference to the improvement of community facilities in the village and refers to a village hall. From representations received it is uncertain whether a new village hall will be required so the policy will be amended to refer to the improvement of community facilities in the village without specific reference to a village hall.

**7.320** *Commercial development*

**7.321** The proposal includes commercial development

**Officer Response**

**7.322** Policy CN2 does not make provision for commercial development in addition to residential.

**7.323** *Environment / SANGs*

**7.324** Natural England (Nick Squirrell) made the following responses:

- Natural England raise a need to carry out a basic biodiversity survey e.g. Phase 1 habitat survey including assessment of the likely presence or evidence of other features likely to restrict or delay development e.g. Badger sets, priority species such as reptiles, water voles etc in time for consideration at the EIP. In many cases this will simply be a statement as the proposer has already engaged an ecological advisor. These policies appear to have been brought forward in an absence of adequate information and assessment on the biodiversity features held by the policy land. There is reason to suspect that on some there may be a significant biodiversity interest owing to close proximity with the designated sites and other biodiversity sites. The NPPF requires that planning policies should be based on up to date information on the natural environment (paragraph 165). These policies are not shown to be compliant with this requirement. It is not possible to identify whether the policies are compliant with policy considerations in the NPPF on sustainable development for sites alone, especially the aspect on sustainable development set out in paragraph 9 of moving from a net loss of biodiversity to achieving net gains (for example on priority habitats and species).
- Natural England object to Policy CN2 with reference to the protection of sensitive habitats and species section. This section is incorrectly titled and worded. SANGs requirements relate to avoidance of harm to European sites in the vicinity rather than the undefined 'sensitive habitats and species'. The text is too specific and should simply state that the development should provide a SANG of suitable quality and functionality to avoid adverse effects. This SANG may link to the North Christchurch Extension however this should not be a policy requirement.
- No SANG proposal map or master plan is available for consideration of this proposal at strategy level so it is difficult to consider if an area of suitable quality and functionality can be delivered.
- The policy is not sound or legally justified because, whilst there is adequate available land to enable the authority to consider at this time that a SANG may be provided, which is both effective functionally and in its quality and size, this work has not been carried out. Paragraphs 6.61 and 6.62 identify the need to avoid adverse effects however the evidence to show this has not been made available. The NPPF affords significant policy protection on

European and internationally protected sites and species (para 14, 117, 118 and 119). It is not therefore at this time possible to demonstrate that this proposal would not give rise to adverse effects on the nearby sites. Further the policy does not reflect the NPPF policy guidance requiring the need to 'moving from a net loss of biodiversity to achieving net gains for nature' which the provision of a SANG and suitable biodiversity enhancements in and around the development could achieve.

**7.325** RSPB: Wish to clarify whether the policy will require provision of on site SANG or whether it will link to the Roeshot Hill SANG. The RSPB object to the policy on the basis of uncertainty over the SANG within Policy CN1 which they assume will be delivering the mitigation for CN2. The Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as identified in the HRA) and there remains uncertainty over the delivery of appropriate and effective mitigation measures.

#### Officer Response

**7.326** The Council is working closely with the landowner to ensure that appropriate ecological surveys are undertaken.

**7.327** Paragraph 109 of the NPPF refers to 'minimising impacts on biodiversity and providing net gains in biodiversity where possible.....' In order to make a change to the policy wording regarding net gains in biodiversity guidance from Natural England will be welcomed for where this should be achieved.

**7.328** The policy text will be amended to provide clear reference to the protection of international, European and nationally designated sites in line with Natural England's representation. In accordance with Natural England's representations aspect of the policy dealing with SANGs will be simplified to state that SANGs will be provided in accordance with the revised Policy ME2 and associated SANGs criteria. The policy will not state that it is a requirement for SANG provision related to this site to link to the North Christchurch Urban Extension SANG.

**7.329** The Council has been working with Natural England and the landowner regarding a SANGs strategy that considers links to the North Christchurch Urban Extension which will comply with revised Policy ME2.

#### Proposed Pre-Submission Change

**7.330** Paragraph 6.57 Change:

**7.331** In contributing towards local housing need identified in the Strategic Housing Market Assessment (2012~~4~~) and the Bournemouth, Dorset and Poole Population and Household Projections (2012), a ~~two~~ further site has been identified for limited residential development to the south of Burton. These sites ~~have~~ been identified through a strategic review of housing land informed by the Council's Strategic Housing Land Availability Assessment (2011). The shortage of available housing land in the Christchurch urban area and the extent of local housing need provide exceptional circumstances for amendment to the Green Belt boundary in these two locations.

**7.332** Reason

**7.333** Amendment reflects the change to the evidence base and the deletion of the Marsh Lane site from the Core Strategy.

**7.334** Paragraph 6.60 Change:

**7.335** ~~Land to the east of Marsh Lane in Jumpers Ward adjoins the existing urban area and provides the opportunity to deliver in the region of 90 dwellings accessible to local facilities and Christchurch town centre.~~

**7.336** Paragraph 6.61 Change:

**7.337** ~~This site is located adjacent to the Avon Valley Special Protection Area / Ramsar Site and within close proximity of the River Avon Special Area of Conservation and Town Common Site of Special Scientific Interest component of the Dorset Heaths Special Area of Conservation and Dorset Heaths Special Protection Area / Ramsar site. The northern part of the site is within 400m of Town Common where residential development will not be permitted commensurate with the Dorset Heathlands Interim Planning Framework. This development will provide on site Suitable Alternative Natural Greenspace in order to minimise its impact on Town Common.~~

**7.338** Reason:

**7.339** Natural England are not satisfied that effective mitigation measures can be put in place to avoid / mitigate harm to the heathlands and other nearby designations in order to satisfy the Habitats Regulations. On this basis, the allocation has been deleted.

### **Land south of Burton village**

Land to the west of Salisbury Road to the south of Burton village is allocated for residential development. The Green Belt boundary will be amended to exclude land identified for new housing.

### **Housing Strategy**

The strategic amendment to the Green Belt will allow limited residential development to meet the local housing needs of Burton Village, including the provision of affordable housing. Approximately 45 houses will be delivered on the allocated site and located in accordance with the Council's Strategic Flood Risk Assessment. Development will be phased over a period of 3 years with possible commencement in 2014/15. Up to 50% of all housing will be affordable consistent with Policy LN3.

### **Design and Density**

The layout and design of the development will be consistent in scale and character with Burton Village and the Conservation Area.

### **Open Space and Recreation**

Open space provision will be in accordance with the standards for quantity, quality and accessibility as defined in Policy HE4 of the Core Strategy. Provision of open space must be appropriate to the needs of the Christchurch North Local Needs Area.

### **Protection of International, European and Nationally Designated Habitats**

Suitable Alternative Natural Green Space must be provided in accordance with the criteria set out in Policy ME23 of the Core Strategy. The provision of SANGS should also consider linkages to SANGs provided as part of the North Christchurch Urban Extension.

The development will contribute to the Suitable Alternative Natural Greenspace provided for the North Christchurch Urban Extension, and will provide linkages to this new greenspace.

### **Sustainable Construction and Renewable Energy**

The development will need to comply with policies ME4 and ME5 of the Core Strategy in relation to sustainable standards of construction and provision of renewable energy.

### **Community Facilities**

There is an opportunity for new development to provide funding toward the improvement of community facilities within the village, **particularly a village hall**. The Council will seek to negotiate a contribution toward such facilities from this development.

### **Flood / Water Attenuation**

A flood management strategy will be prepared to address on site flood risk.

### **Transport and Access**

The main access to the site will be from Salisbury Road in order to avoid areas of flood risk and provide safe access and egress. The development will provide necessary works and make appropriate contributions to mitigate its impact on the transport network. The site should provide pedestrian and cycle access to integrate the site with the rest of the village.

## **Policy CN 3**

### **Land east of Marsh Lane**

Land to the east of Marsh Lane off Fairmile Road is allocated for residential development. The Green Belt boundary will be amended to exclude land identified for new housing.

### **Housing Strategy**

- The strategic amendment to the Green Belt will allow limited residential development to meet the local housing needs, including the provision of affordable housing.
- Approximately 90 houses will be delivered on the allocated site. Development will be phased over a period of 3 years with possible commencement in 2016/17. A minimum of 50% of all housing will be affordable consistent with Policy LN3.
- Residential development will be located outside of the 400m heathland exclusion zone to avoid adverse impacts on the Town Common component of the Dorset Heaths Special Area of Conservation and Dorset Heaths Special Protection Area / Ramsar site.

### **Design and Density**

- The layout and design of the development will be consistent in scale and character with the surrounding urban area.

### **Open Space and Recreation**

- Open space provision will be in accordance with the standards for quantity, quality and accessibility as defined in Policy HE4 of the Core Strategy. Provision of open space must be appropriate to the needs of the Christchurch West Local Needs Area.

### **Protection of Sensitive Habitats and Species**

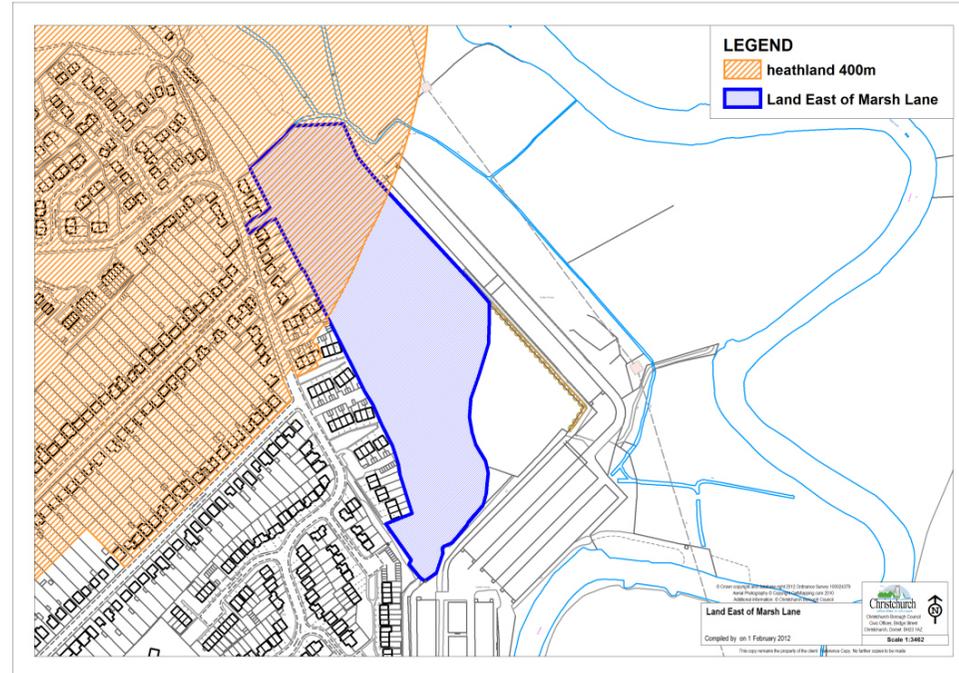
- Suitable Alternative Natural Greenspace will be provided within the site in accordance with the standards set out in Core Strategy Policy ME3.
- To avoid adverse impacts on off-site areas used by qualifying species of the Avon Valley Special Protection Area and Ramsar Site and Dorset Heathlands Special Protection Area appropriate survey work will be undertaken prior to development in order to allow suitable mitigation measures to be devised and implemented.

### **Sustainable Construction and Renewable Energy**

- The development will need to comply with policies ME4 and ME5 of the Core Strategy in relation to sustainable standards of construction and provision of renewable energy.

### **Transport and Access**

- The main access to the site will be from Marsh Lane.
- The development will provide necessary works and make appropriate contributions to mitigate its impact on the transport network.
- The site should provide pedestrian and cycle access to integrate the site with the existing urban area.



Map 7.4 Land east of Marsh Lane

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
6	39	1	53	40	7	43	7	42	10	43	8	638

Table 7.3

### Key Issues and Comments

**7.340** 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:

#### **7.341** *Justification for amendment of Green Belt boundary.*

#### **Officer Response**

**7.342** Justification for limited changes to the Green Belt boundary in Christchurch for policies CN1, 2 and 3 is set out above in the assessment of responses to CN1.

#### **7.343** *Transport*

- Concern about traffic along Fairmile Road
- Site access
- Traffic noise
- Cumulative impact of developments at Parley Cross, Roeshot Hill, and Marsh Lane
- Christchurch relief road should be built
- Limited transport measures that could be put in place to alleviate traffic congestion on the B3073

#### **Officer Response**

**7.344** The assessment of transport impact and discussion of transport improvements related to development proposed in the Core Strategy is set out above under policy CN1.

**7.345** Site access can be achieved between existing properties to the north of the site from Marsh Lane.

#### **7.346** *Floodrisk*

#### **Officer Response**

**7.347** The site is located outside the floodzone in accordance with the council's Strategic Flood Risk Assessment Level 2.

#### **7.348** *Infrastructure*

- Utilities, schools (Christchurch Junior School capacity), doctors

### Officer Response

**7.349** Impact on the capacity of local infrastructure is discussed above in relation to policies CN1 and CN2 and the conclusions apply to this proposal.

### **7.350** *Impact on character of surrounding area*

- Density of development out of character with surrounding area
- Poor environment for new homes

### Officer Response

**7.351** The policy sets out a requirement for the layout and design of the development to be consistent in scale and character with the surrounding urban area.

### **7.352** *Environment*

**7.353** Christchurch Harbour Ornithological Group:

- The Core Strategy is not consistent with achieving sustainable development due to impact on on wildlife in the vicinity, including internationally protected sites and species.
- Policy CN3 is not based on robust and credible evidence
- The potential impact of development and increased recreational pressure on nearby heathland and wetland habitat which support birdlife and other wildlife
- It is not clear whether the wildlife interest of the proposed housing site in itself has been assessed.
- It is not clear whether the policy is effective as there is uncertainty that suitable mitigation measures could be put in place to address the potential harm of the proposed development
- Policy CN3 is not consistent with national policy which seeks to protect nationally and internationally important wildlife sites from harmful development.
- The Pre-Submission Core Strategy could be made sound by deleting all of the following: Policy CN3; those parts of paragraphs 6.57 to 6.63 which relate to the proposed housing site at Marsh Lane, Christchurch and Map 6.4: land to the east of Marsh Lane.

### **7.354** *Dorset Wildlife Trust*

- No ecological survey has informed this allocation. The site is in an area of high biodiversity value and could support priority habitats and species. NPPF (165) states that planning policies and decisions should be based on up to date information about the natural environment.

- Housing development would have potential impacts on European designated sites, which would require significant mitigation. Given the scale of the development in relation to the size of the site and the lack of any further land for mitigation, we consider there is insufficient certainty that this mitigation could be provided and the policy deliverable.
- The housing proposal would impact on the management of the adjacent designated sites by removing important grazing land and there is insufficient certainty that mitigation could be provided for this.
- DWT support Natural England's view that paragraphs 6.60-6.62, policy CN3 and map 6.4 should be deleted.

### 7.355 RSPB

- The RSPB are unclear as to the nature of potential impacts on the non heathland European sites, but not that the HRA concludes 'uncertain effects'. In recognition of the uncertainty over possible adverse impacts we object to this policy.

### 7.356 Highcliffe Residents Association Community Interest Company:

- Object to impact on European designated habitat

### 7.357 Christchurch Conservation Trust:

- Impact on Avon Valley SSSI, Ramsar Site, SPA
- No scientific assessment has been undertaken to assess the effect of the proposed development

### 7.358 Lisa Jackson (Jackson Planning on behalf of Meyrick Estates):

- The policy is not sound as there is no evidence to show that appropriate on site SANG provision can be made in compliance with Policy ME2 and ME3 to mitigate potential harm to the Dorset Heaths SPA. It has not been demonstrated by evidence that this allocation is consistent with paragraph 110 of the NPPF.
- The proposal must demonstrate that SANG on site will meet the criteria of Policy ME3 and will create a sufficient diversion to trips to Town Common to satisfy the European Habitat Regulations. Evidence must be provided to satisfy Natural England that on-site mitigation will be effective, if this cannot be satisfied the site should be omitted from the Core Strategy.

### 7.359 Natural England:

- Policies; CN 1, CN 2, CN 3, WMC 3, WMC 4, WMC 5, WMC 6, FWP 3, FWP 4, FWP 6, FWP 7, FWP 8, VTSW 2, VTSW3, VTSW 4, VTSW 8 etc are all proposing development and or mitigation in the form of SANGs on greenfield locations. In order to avoid a conflict with policy ME1 at a later stage in the planning process Natural England advise the authorities to bring to the attention of those with an interest in these locations the need to carry

out a basic biodiversity survey e.g. Phase 1 habitat survey including assessment of the likely presence or evidence of other features likely to restrict or delay development e.g. badger setts, priority species such as reptiles, water voles etc in time for consideration at the EIP. In many cases this will simply be a statement as the proposer has already engaged an ecological advisor.

- These policies appear to have been brought forward in an absence of adequate information and assessment on the biodiversity features held by the policy land. There is reason to suspect that on some there may be a significant biodiversity interest owing to close proximity with designated sites and or other biodiversity sites. The NPPF requires that planning policies should be based on up-to date information on the natural environment (paragraph 165). These policies are not shown to be compliant with this requirement. Thus, irrespective of the above matters concerning other nearby designated sites, it is not possible to identify whether the policies are compliant with policy considerations in the NPPF on sustainable development for the sites alone, especially the aspect on sustainable development set out in paragraph 9 of moving from a net loss of biodiversity to achieving net gains (for example on priority habitats and species).
- This policy is not legally compliant and unsound because:
  1. The housing proposal is of a scale and location likely to generate off site recreational and other pressures, including cat predation on ground nesting/feeding birds, on the Dorset Heathlands SPA, SAC and Ramsar site, especially the area at Town Common SSSI. These pressures raise a likely significant effect on the designated sites. There will be a need for significant mitigation, including but not solely the provision of SANG, to demonstrate that there would be no adverse effect on the integrity of the SPA/SAC/Ramsar site (under the Habitats Directive/Regulations) or harm to the SSSI. There is insufficient land at the site to provide both the proposed scale of housing and a SANG of sufficient size and quality to be confident that there would not be additional adverse pressures on the designated sites given the very close proximity and accessibility of the designated land and the high attractiveness of this land for access. There is no other land available to provide an adequate SANG in the locality, other than land in the Avon Valley SPA/Ramsar site and SSSI where provision a SANG would be contrary to Habitats Directive/Regulations requirements and policy for the protection of these sites.
  2. The housing proposal is of a scale and location likely to generate off site recreational and other pressures, including cat predation on ground nesting/feeding birds, on the Avon Valley SPA and Ramsar site and SSSI. These pressures raise a likely significant effect on the designated sites, especially in relation to the designated bird features. The policy site has a long boundary that directly borders and almost borders land in these designated sites and we suggest this will not enable an adverse pressure from cat predation to be removed with any certainty. In respect of access, there will be a need for mitigation, such as land to divert access away from the Access Land in the designated sites, to demonstrate that there would be no other adverse effect on the integrity of the SPA/Ramsar site (under the Habitats Directive/Regulations) or harm to the SSSI. There is insufficient land at the site to provide both the proposed scale of housing and land of sufficient size and quality to be confident that there would not be additional adverse pressures on the designated sites given the very close proximity and accessibility of the Access Land in the designated sites and the attractiveness of this land for access. There is no other land available to provide an adequate alternative land for recreational access in the locality.

- 3. The housing proposal will undermine the delivery of management on adjacent grazing marsh in the Avon Valley SPA and Ramsar site and SSSI that is essential to the conservation of the designated features. This is because the housing site will remove the availability of high land that currently acts to support grazing management of the designated grazing marsh by providing safe pasture for livestock to retreat to when the grazing marsh floods and other livestock management such as feeding that would be inappropriate if displaced onto the designated land and possibly not practicable on this land. These matters also raise a likely significant effect on these designated sites. Mitigation will be required in the form of available support land for grazing management of the designated sites. A land area, unless large in size and the scale of housing proposal does not provide this, will not be suitable to adequately perform both SANG functions for the heathland designated sites and grazing/management support functions for the Avon Valley designated sites. The pre-submission document does not demonstrate that adequate mitigation on this matter is deliverable.
- 4. The policy appears to have been put forward in an absence of adequate information and assessment on the biodiversity features held by the policy land. There is reason to suspect that there may be a significant biodiversity interest owing to its close proximity with designated sites, the history of non-intensive agricultural management and similarity of habitat with other high land nearby included within the Avon Valley SSSI for grassland interest features. The NPPF requires that planning policies should be based on up-to date information on the natural environment (paragraph 165). The policy is not shown to be compliant with this requirement. Thus, irrespective of the above matters concerning adjacent designated sites, it is not possible to identify whether the policy is compliant with policy considerations in the NPPF on sustainable development for the site alone, especially the aspect on sustainable development set out in paragraph 9 of moving from a net loss of biodiversity to achieving net gains (for example on priority habitats and species).
- Delete paragraphs 6.60-6.62, policy CN 3 and Map 6.4. The policies may need to include specific paragraphs about features of biodiversity importance which are to be secured or enhanced.

### Officer Response

**7.360** The Council is working closely with the landowner to ensure that appropriate ecological surveys are undertaken.

**7.361** Paragraph 109 of the NPPF refers to *'minimising impacts on biodiversity and providing net gains in biodiversity where possible.....'* In order to make a change to the policy wording regarding net gains in biodiversity guidance from Natural England will be welcomed for where this should be achieved.

**7.362** Policy CN3 requires SANGs provision in accordance with Policy ME3 of the Core Strategy to meet the requirements of the Habitats Regulations. Natural England have responded to state that the area of the site where SANGs would be provided is of insufficient size and quality to mitigate any increased recreational pressure on the Dorset Heathlands and Town Common in particular. At this stage, without an effective SANGs strategy to meet the requirements of the Core Strategy Policy ME2 (As revised) the site will be deleted from the Core Strategy.

**7.363** In order to address the Council's housing requirement and consistent with master planning work undertaken for the North Christchurch Urban Extension policy CN1 will be amended from 850 dwellings to 950 dwellings.

**7.364** Peter Atfield on behalf of Sembcorp Bournemouth Water:

- Sembcorp Bournemouth Water is supportive of the allocation of the land east of Marsh Lane for residential development. The site is not required for operational use by the company and therefore has the potential to deliver housing in order to meet the acknowledged shortfall in Christchurch. However, there are some detailed matters in the policy that require amendment in order to make it more effective.
- 1. The site boundaries should be altered to be consistent with the plan reproduced at the end of this form of representation. Here, the boundaries represent the position of the fences on the site. These are fixed features that can be used to establish a revised boundary to the green belt in this part of Christchurch. This excludes the filter bed that has been constructed on the eastern part of the site, with the area now 'squared off' when compared against Map 6.4.
- 2. Mains drains are situated below ground running generally parallel to the western boundary. The construction of houses over, or in close proximity to these, must be avoided. However, this does offer the opportunity to create an area of open space to the rear of the existing properties in Marsh Lane. This potentially allows for footpath links to connect to the existing paths to the south of the site that ultimately lead to Mill Lane and beyond.
- 3. An open space strategy will need to be agreed, taking into account the matter referred to in Paragraph 2 (above), for the on site provision of a Sustainable Alternative Natural Green Space (SANGS) and to meet the requirements of Policy HE 4. It is therefore submitted that the wording of the second bullet point is amended so as to refer to "Up to 90 houses". This will introduce greater flexibility into the policy, if appropriate allowing for a lower density of development to be accommodated on the site. This approach would also be consistent with the design and density matters set out in the policy, respecting the character of the adjoining residential area.
- The 50% affordable housing requirement is not justified. This is dealt with separately in respect of representations on Policy LN 3.
- Development of the site can be achieved in accordance with the requirements of the criteria set out in Policy CN 3 with regard to transport and access; sustainable construction and renewable energy; open space and recreation; and the protection of sensitive habitats and species. In respect of the latter, the provision of an on site SANGS has the potential to draw pressure away from more ecologically sensitive areas, such as Town Common.
- As set out in Paragraph 6.58 of the Core Strategy (CS), the site adjoins the existing urban area and is accessible to local facilities and Christchurch town centre. Its development offers the opportunity to contribute to the objectively assessed open market and affordable housing needs, as required by Paragraph 47 of the National Planning Policy Framework (NPPF). Although Policy CN 3 anticipates development commencing in 2016 / 17, the relative lack of constraints make the site deliverable in an earlier timescale, if required. It therefore meets the criteria set out in Footnote 11 of the

NPPF; i.e. it is available now and is in a suitable location for development. Construction could therefore commence in the first five years of the CS. This flexibility is advantageous, taking into account the long lead in times associated with the implementation of a larger scale urban extension – which potentially exacerbates the shortfall of housing need in the borough in the early years of the CS.

- The allocation of the site for residential development also fulfils other requirements of the NPPF. It is a key site, critical to the delivery of the housing strategy of the plan (Para. 47). Without the urban extensions, Christchurch is entirely reliant on the delivery of ‘windfall’ sites to try to meet its identified housing need. The site can deliver a choice of high quality homes and widen the opportunity for home ownership (Para. 50)

### Officer Response

**7.365** Discussion relating to SANGs provision is set out above under the Environment theme.

**Proposed Pre-Submission Change**

## Policy CN 3

### Land east of Marsh Lane

Land to the east of Marsh Lane off Fairmile Road is allocated for residential development. The Green Belt boundary will be amended to exclude land identified for new housing.

### Housing Strategy

- The strategic amendment to the Green Belt will allow limited residential development to meet the local housing needs, including the provision of affordable housing.
- Approximately 90 houses will be delivered on the allocated site. Development will be phased over a period of 3 years with possible commencement in 2016/17. A minimum of 50% of all housing will be affordable consistent with Policy LN3.
- Residential development will be located outside of the 400m heathland exclusion zone to avoid adverse impacts on the Town Common component of the Dorset Heaths Special Area of Conservation and Dorset Heaths Special Protection Area / Ramsar site.

### Design and Density

- The layout and design of the development will be consistent in scale and character with the surrounding urban area.

### Open Space and Recreation

- Open space provision will be in accordance with the standards for quantity, quality and accessibility as defined in Policy HE4 of the Gore Strategy. Provision of open space must be appropriate to the needs of the Christchurch West Local Needs Area.

### Protection of Sensitive Habitats and Species

- Suitable Alternative Natural Greenspace will be provided within the site in accordance with the standards set out in Gore Strategy Policy ME3.
- To avoid adverse impacts on off-site areas used by qualifying species of the Avon Valley Special Protection Area and Ramsar Site and Dorset Heathlands Special Protection Area appropriate survey work will be undertaken prior to development in order to allow suitable mitigation measures to be devised and implemented.

### Sustainable Construction and Renewable Energy

- ~~The development will need to comply with policies ME4 and ME5 of the Core Strategy in relation to sustainable standards of construction and provision of renewable energy.~~

#### Transport and Access

- ~~The main access to the site will be from Marsh Lane.~~
- ~~The development will provide necessary works and make appropriate contributions to mitigate its impact on the transport network.~~
- ~~The site should provide pedestrian and cycle access to integrate the site with the existing urban area.~~

**8 Responses and Analysis of Chapter 7 Bournemouth Airport & Business Park**

## Policy BA 1

### Vision for Bournemouth Airport

Bournemouth Airport will develop as a flagship regional airport serving Christchurch and the South East Dorset sub-region. It will enhance its passenger facilities, provide new services for business and leisure travellers and develop as an aviation and local transport hub.

The northern business parks will be redeveloped to provide a range of employment land and premises to serve the local and sub-regional economy. This will include the potential to attract new business sectors in knowledge based industries and other growth sectors to increase opportunities for higher skilled employment and to stimulate economic growth. The business parks will utilise their extensive high quality airside access, to encourage further growth in the aviation and aviation related business sectors.

Development of the airport and business park will incorporate low carbon and energy efficiency measures in accordance with national policy and Policy ME4 of the Core Strategy. New development will also utilise energy from decentralised, renewable and low carbon sources in accordance with Policy ME5.

Growth of the operational airport and business park will be achieved acknowledging and respecting the environmental constraints which exist around the airport, and adopting adequate mitigation and avoidance of environmental impacts if required in accordance with Policy ME1. Development of the airport and business park will be integrated within the high quality natural and water environment. In particular growth of the airport and business park will address the following issues:

**Floodrisk:** (As shown in the Level 2 Strategic Flood Risk Assessment (2009): Strategic measures will be put in place within the airport boundary including flood storage and associated watercourse improvements. Future development will take account of surface water flooding and adopt a sequential approach toward the location of development within the site.

**Emissions from air traffic / road traffic:** In relation to airport and business park growth mitigation measures include implementation of the airport area wide travel plan, landscaping and strategic tree planting as required by the 2007 terminal consent.

**Environmental Designations:** The provision of off site infrastructure including junction improvements to facilitate growth of the airport and growth in the wider area will avoid adverse effects on designated sites of biodiversity and geological importance including European designated sites. Where harm is likely to result, measures will be provided to avoid or mitigate that harm.

**Highway Capacity / Sustainable Transport:** Online junction improvements are required along the B3073 to facilitate growth of the operational airport, business park and development in the wider area. These junction improvements and improvements in public transport and cycle access are set out in the Key Strategy Policy KS10 and in Local Transport Plan 3. Delivery of these improvements will be facilitated by appropriate contributions from airport development and development in the wider area. Successful implementation of the airport's area wide travel plan is required to help facilitate sustainable access to the airport and business park.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
13	0	2	13	3	3	5	3	5	2	1	5	10

Table 8.1

**8.1** 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:

### **8.2** *Economy*

**8.3** A number of positive comments were made in relation to the impact of the airport on the economy and that its growth is supported by national policy.

**8.4** **Bournemouth Borough Council** – Concerns about the proposed strategy for the airport northern business parks in particular as the strategy is promoting particular types of office development more suited to town centre locations. Major office schemes should be resisted at the airport as such development, in particular the uses specified, could adversely impact on the vitality and viability of office development and the wider economy in Bournemouth town centre.

**8.5** **The Malmesbury Estate** objects to Policy BA1 because it fails to realise the strategic opportunity offered by the Airport to provide employment and airport related development in the most logical location opposite the terminal buildings on Estate land identified in the plan DTZ1. The policy also fails to refer to the LTP3 policy requirements for a bus based strategic park and ride development.

### **8.6** *Green Belt*

**8.7 Manchester Airports Group (MAG)** state that the proposed removal of the operational Airport site from the Green Belt will give certainty to future investment, reflect the position on the ground and be consistent with national policy. MAG also feel that it will strengthen the ability to resist airport development outside of the Master Plan area.

**8.8** Concern about loss of Green Belt was raised as a general issue.

### **8.9 Environment**

**8.10** A major concern is the adverse and harmful effect of aircraft noise, particularly at night.

**8.11** Aircraft sounds distract from the amenity of the New Forest – the beauty and peace of the Forest are all too often disturbed by aircraft noise.

**8.12** Any future development proposals to increase air traffic movements or passenger numbers at the Airport must consider impacts on the adjacent National Park, including increased overflying of valued tranquil areas.

**8.13** Development proposals for the Airport must consider impacts on the National Park in respect of the statutory Park purposes. The authority considers it important that reference is made to this statutory duty and requests that such a statement is reinserted into the document.

**8.14** The thrust of the AONB's comments relate to matters that they 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. 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 like to 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 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.

**8.15 Natural England** – BA1 is heavily reliant on Policy ME1 on protection of the natural environment but Policy ME1 is not legally compliant or sound with regard to the requirements of the Habitats Regulations and those of the NPPF set out in paragraphs 113 to 117. These requirements include among others that plan policies should give protection commensurate with the status of wildlife sites and promote priority habitats, ecological networks, and protection and recovery of priority species. The matters on priority habitats, species and ecological networks are especially relevant to policy BA1 owing to the large geographical area over which the policy applies and the position of this area within a wider area of high significance for importance for priority habitats, species and ecological networks. The policy is unsound in that it gives insufficient balance to the three roles of sustainable development – economic, social and environmental – set out in the NPPF in paragraphs 7-9. Notably the policy fails to seek positive improvements in the quality of the natural environment.

**8.16 Dorset Wildlife Trust** consider that this policy, whilst recognising the environmental constraints around the airport, does not give due consideration to the environmental constraints within the airport. This policy does not include any need for positive biodiversity enhancement. As this is a large site with much opportunity for enhancements to local biodiversity, we would expect it to comply with NPPF (9, 109, 114, 117, 118) by providing net biodiversity gains to satisfy the three strands of sustainability. We support the amended wording proposed by Natural England in their response to this policy, and seek similar changes.

**8.17 RSPB** – The Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.

**8.18** The projection of growth to 3 million passengers per year by 2030 is based on the wildly optimistic Air Transport White Paper 2003, which is now totally out of date.

**8.19** We find the text under “environmental designations” difficult to understand. We have not concluded at present whether sufficient safeguards exist within Policies BA1 and BA2 to ensure this, and will be raising the matter with Natural England. In the meantime we wish to object to Policy BA2, pending these discussions.

**8.20 Natural England** – Not clear what environmental constraints ‘around the airport’ refers to.

#### **8.21 Transport**

**8.22** The expansion of the Airport and development of employment land will create additional cross-park traffic (e.g. A35, A31).

**8.23** Transport links to the airport are currently poor as the airport only accesses one road, which is currently already gridlocked at some times.

**8.24** The effects of both the Airport expansion and the creation of a major business park to the north thereof will be to place an unacceptable burden on, not only surrounding roads such as the B3073, but also on the sub-regional transport structure generally. In the absence of major infrastructure improvements to the A31 in particular and also the A338 then this policy will exacerbate those difficulties that already exist resulting in a potential decline in business activity in those areas affected.

**8.25 Hampshire County Council (HCC)** – BA1 evidence is lacking in three areas. 1 – lack of factual evidence relating to the airport’s area wide travel plan and how it will help facilitate sustainable access to the airport and business park . 2 – lack of information on the forecast impact of planned development at the Airport on Hampshire’s roads and possible mitigation measures. 3 – there is limited evidence as to the involvement of stakeholders like Hampshire County Council as a neighbouring authority .

**8.26** HCC is of the view that it should be regarded as a ‘stakeholder’ in the proposed development.

**8.27 Yellow Buses** – Insufficient emphasis and detail on developing and supporting public bus transport network improvements and infrastructure within the core strategy itself.

**8.28 Bournemouth Borough Council** – Currently cyclists attempting to commute from Bournemouth to the airport are presented with a long detour on busy roads which have no quality provision for cyclists. Policies BA1 and BA2 are unclear on this matter, and the policy should be amended to make greater emphasis of accessing the airport by sustainable modes of travel from Bournemouth.

### **8.29 Flood Risk**

**8.30 Dorset County Council** – A number of references in the Core Strategy need updating and new ones included to ensure that it reflects the County Council's responsibilities in respect of flood risk management.

### **8.31 Other / general**

**8.32 MAG** – there are a number of policy tools that the Airport would like to see retained in relation to aerodrome safeguarding, control of development within public safety zones and the control of development susceptible to noise. It would be useful to mention these additional constraints to development in the vicinity of the Airport and point to where details of them may be found.

**8.33** MAG have a number of detailed points of amendment

### **Officer Response**

#### **8.34 Economy**

**8.35** Consent has been granted for 42,000sqm (12 - 15ha) of new employment development in the North West business park which includes a 10% proportion of office. In view of the transport infrastructure constraints it is uncertain that this stage whether further development beyond 42,000sqm will come forward during the plan period. However, there is potential for in the region of 30ha of new employment development with transport infrastructure improvements identified in the Core Strategy. The modest proportion of office development set out in BA1 is unlikely to have a significant impact on Bournemouth town centre. A significant proportion of office development at the airport is currently related to advanced engineering and manufacturing which will not affect Bournemouth town centre. Additionally a number of employment units at the business park require an office component which is ancillary to the main industrial use. Although demand has been identified for financial and business services and ICT this is not envisaged to be of a scale to have a significant impact on Bournemouth town centre. The strategy for the operational airport includes the potential development of hotel accommodation to enhance the services offered by the operational airport and would not be of a scale to adversely affect Bournemouth town centre.

**8.36** Manchester Airport's have not identified this area of land as required for the operational airport or for employment development. Sufficient development can come forward at the North West business park to meet projected employment land requirements over the plan period (identified in the Bournemouth, Dorset and Poole Workspace study (2012) without the need to consider this proposed site within the Green Belt. On this basis there are no exceptional circumstances to permit development in the Green Belt in this location.

#### **8.37 Green Belt**

**8.38** Exceptional circumstances exist for a change in the Green Belt at Bournemouth Airport which include the following:

**8.39** The Future of Air Transport White Paper (2003) as confirmed by the 2006 Progress Report sets out a strategic framework for the development of airport capacity in the United Kingdom over the next 30 years, against the background of wider developments in air transport. The White Paper supports additional terminal capacity within the airport boundary at Bournemouth Airport, subject to action to minimise impacts on environmentally sensitive sites and improved access.

**8.40** In March 2011, the Government launched a scoping exercise towards developing a new sustainable policy framework for UK aviation. The scoping document showed that there was broad agreement that aviation does provide significant economic and other benefits. In July 2012 the Government published the Draft Aviation Policy Framework (for consultation). Following this consultation, it is intended to adopt the Framework by March 2013.

**8.41** The Bournemouth, Dorset and Poole Structure Plan (2001) forms part of the development plan and Economy Policy E identifies Bournemouth International Airport as a major growth point for employment. This site is identified as contributing to the objectives of the plan and the needs of the Dorset population beyond the Structure Plan period. The Structure Plan identifies the airport as offering 'the potential to be developed as a centre of aviation excellence, both as an operational airport and as an attractive environment for high technology firms.....' (4.30) 'The airport offers a unique opportunity for employment generation in South East Dorset and is expected to make a significant contribution to the area's economy during and beyond the plan period of the Structure Plan' (4.31). Transport policy T of the Structure Plan states that 'The facilities of Bournemouth International Airport should be Improved'. The Structure Plan identifies the importance of Bournemouth Airport as the only commercial airport in Dorset and that considerable improvement to the airport's facilities can occur without financial damage. It is stated that 'the strategic authorities strongly support the improvement of existing facilities, and particularly the development of a new replacement passenger terminal (8.65)'.

**8.42** The Structure Plan sets out clear policy support for further employment development at the airport business park and growth of the operational airport. The Core Strategy proposal to remove the operational airport from the Green Belt is consistent with the Structure Plan's emphasis on facilitating improvement of existing airport facilities.

**8.43** In conclusion there remains policy support for the growth of airport facilities which can be facilitated by removing land within the existing airport boundary from the Green Belt. Proposals for new development within the existing airport boundary and associated with the operational airport will need to consider impact on the openness of the Green Belt. Any new retail development to serve the operational airport will be airside for airport passengers and not have an impact on Christchurch and Bournemouth town centres. It is not proposed to remove land to the east of the Airport between Moors River SSSI and the village of Hurn from the Green Belt.

#### **8.44** *Environment*

**8.45** Projected airport growth to 2030 is 3 million passengers per annum which is in line with the 2007 terminal consent. The impact of the increase in passenger aircraft movements has been assessed as part of this existing consent. The Airport has undertaken consultation on a draft Noise Action Plan for a period of 16 weeks which closed on the 21st October 2009. As part of this process the airport has undertaken extensive consultation with the local community. The consultation raised concerns about existing and future night flights and the night noise quota. The Airport has confirmed that night movements

have been decreasing and that operations at the airport are currently well within the quota limit of 3,100 set within the S106 agreement for the 2007 terminal consent and that the situation would not change in the near future. It is also understood that the Government is supporting the airport's approach towards aircraft noise.

**8.46** The AONB has requested that the Core Strategy includes a policy restricting the direction of flights away from the AONB. This is not within the influence of the Core Strategy and is a matter for the Civil Aviation Authority.

**8.47** Policy BA1 has been amended in response to comments received from Natural England and Dorset Wildlife Trust. Policy BA1 now refers to improvements in the extent and quality of priority habitats and species and the conservation of ecological network connections. This amended text has been agreed with Natural England and addresses the requirements of paragraphs 9 and 17 of the NPPF in terms of net gains in biodiversity and measures to conserve and enhance the natural environment. The following text will be added to BA1:

**8.48** *'Growth of the airport and business park will seek positive improvements in the extent and quality of priority habitats and the populations of priority species and shall conserve ecological network connections. The provision of off site infrastructure shall meet the requirements of Policy ME1 and seek to avoid the fragmentation of priority habitats, priority species populations and ecological network connections. Where the need for development outweighs policy for the protection of the natural environment, measures will be provided to mitigate or compensate any harm'.*

**8.49** Policy ME1 has also been revised in response to representations from Natural England and Dorset Wildlife Trust, amendments to this policy are discussed further in the Managing the Natural Environment response chapter.

**8.50** Projected airport growth to 2030 is now in line with the 2007 terminal consent at 3 million passengers per annum. Measures to mitigate any increase in emissions have been agreed as part of the S106 agreement. The Airport Ecological Study (2008), Sustainability Appraisal and Habitats Regulations Assessment (2012) set out detailed mitigation measures to accompany new development. This is also addressed in the Managing the Natural Environment Paper (Policy ME1).

**8.51** The Airport has recently adjusted its projected passenger projections downwards from 4 million to 3 million passengers per annum to 2030 which is permitted by the 2007 terminal consent. The Core Strategy reflect this change in paragraph 7.7.

**8.52** In response to representations received from the New Forest National Park Authority Policy BA1 has been amended to make reference to consideration of the impact of airport growth on the National Park and statutory park purposes.

### **8.53** *Transport*

**8.54** Policy KS10 sets out a strategic package of transport improvements to accommodate wider growth across the South East Dorset sub region including further employment development at Bournemouth Airport and the Airport Business Park.

**8.55** The transport package for the B3073 has been amended following the outputs of the South East Dorset Multi Modal Study, LTP3 and the advice of Dorset County Council.(refer to Airport Background paper for details).

**8.56** Dorset County Council's Travel Plan Co-ordinator has an ongoing working relationship with the Airport Travel Plan Co-ordinator in terms of monitoring and improving sustainable access to the airport and business parks. Further improvements are required and will be delivered alongside development. Impact has been assessed through the South East Dorset Multi Modal Study SEDMMTS, transport studies undertaken by the airport and DCC and TAs which accompany planning applications.

**8.57** Hampshire County Council were consulted as part of the preparation of LTP3 and Core Strategy. They were also consulted as part of SEDMMTS. More regular cross border transport liaison meeting have been set up with DCC, NFDC, NFPA and HCC.

**8.58** The Core Strategy makes reference to improvements in public transport which includes Policy KS9. This is sufficient detail for the Core Strategy.

**8.59** A replacement river crossing at Throop is a joint aspiration of DCC and BBC and transport officers are currently working on a solution which will allow direct access from north Bournemouth to the airport.

### **8.60 Flood Risk**

**8.61** Paragraph 7.23 will be amended to reflect representations made by DCC.

### **8.62 Other / general**

**8.63** MAG have a number of detailed points of amendment which will be made in the Submission version of the Core Strategy.

### **Proposed Pre-Submission Change**

**8.64** Change to reflect the consideration of the National Park purposes within the policy. Change in response to representations from Natural England to reflect the need to seek habitat enhancements and provide clarification on mitigation and compensation measures. Added reference to also include policy KS9 which sets out measures for improvements in public transport and cycle access.

## Policy BA 1

### Vision for Bournemouth Airport

Bournemouth Airport will develop as a flagship regional airport serving Christchurch and the South East Dorset sub-region. It will enhance its passenger facilities, provide new services for business and leisure travellers and develop as an aviation and local transport hub.

The northern business parks will be redeveloped to provide a range of employment land and premises to serve the local and sub-regional economy. This will include the potential to attract new business sectors in knowledge based industries and other growth sectors to increase opportunities for higher skilled employment and to stimulate economic growth. The business parks will utilise their extensive high quality airside access, to encourage further growth in the aviation and aviation related business sectors.

Development of the airport and business park will incorporate low carbon and energy efficiency measures in accordance with national policy and Policy ME4 of the Core Strategy. New development will also utilise energy from decentralised, renewable and low carbon sources in accordance with Policy ME5.

Growth of the operational airport and business park will be achieved acknowledging and respecting the environmental constraints which exist around the airport **and in consideration of possible impacts on the New Forest National Park and statutory park purposes, and adopting adequate mitigation and avoidance of environmental impacts if required in accordance with Policy ME1.**

~~**Development of the airport and business park will be integrated within the high quality natural and water environment.**~~

In particular growth of the airport and business park will address the following issues:

Floodrisk: (As shown in the Level 2 Strategic Flood Risk Assessment 2009): Strategic measures will be put in place within the airport boundary including flood storage and associated watercourse improvements. Future development will take account of surface water flooding and adopt a sequential approach toward the location of development within the site.

Emissions from air traffic / road traffic: In relation to airport and business park growth mitigation measures include implementation of the airport area wide travel plan, landscaping and strategic tree planting as required by the 2007 terminal consent.

Environmental Designations: **Growth of the airport and business park will seek positive improvements in the extent and quality of priority habitats and the populations of priority species and shall conserve ecological network connections. The provision of off site infrastructure shall meet the requirements of Policy ME1 and seek to avoid the fragmentation of priority habitats, priority species populations and ecological network connections. Where the need for development outweighs policy protection of the natural environment, measures will be provided**

~~to mitigate or compensate any harm. The provision of off site infrastructure including junction improvements to facilitate growth of the airport and growth in the wider area will avoid adverse effects on designated sites of biodiversity and geological importance including European designated sites. Where harm is likely to result, measures will be provided to avoid or mitigate that harm.~~

Highway Capacity / Sustainable Transport: Online junction improvements are required along the B3073 to facilitate growth of the operational airport, business park and development in the wider area. **These junction improvements and improvements in public transport and cycle access are set out in the Key Strategy Policies KS9 and KS10 and in Local Transport Plan 3.** Delivery of these improvements will be facilitated by appropriate contributions from airport development and development in the wider area. Successful implementation of the airport's area wide travel plan is required to help facilitate sustainable access to the airport and business park.

## Policy BA 2

### Strategy for the Operational Airport

New passenger departure and arrivals terminal facilities for the operational airport were completed in 2011 to support projected growth to 3 million passengers per annum by 2030. Associated infrastructure will be developed to support the operational airport informed by the adopted Bournemouth Airport Master Plan (May 2007) to include:

- Further administrative accommodation for airlines, handling agents, tour operators, the airport authorities and government agencies.
- Airside airport related retail and catering facilities.
- Public and staff car parking.
- Public transport facilities and enhanced services in accordance with airport travel plan.
- Other facilities for general aviation.
- Cargo facilities, including bonded warehousing and associated infrastructure.
- Connection to the mains foul sewer (Wessex Water).

Associated facilities to enhance the services offered by the airport will also be encouraged subject to consideration of their impact on other Core Strategy policies, including:

- Development of hotel accommodation.
- Training centres for airlines and related services.
- Petrol filling stations.
- Aviation maintenance facilities.

To enable development of these airport operational improvements, the Core Strategy will implement recommendations of national airports policy by removing sufficient further land within the airport boundary from the South East Dorset Green Belt (see Policy BA3 below).

The Council will work with the airport to support the development of new routes and services to business and leisure destinations which will meet the needs of local businesses and communities.

### **Strategy for the Airport Northern Business Parks**

The northern business parks comprising the north west and north east sectors contain 80ha of land of which approximately 60ha is available for development. The business parks are allocated primarily for employment uses (B1, B2 and B8). Non B class employment uses which create high quality employment opportunities and contribute to raising levels of economic productivity will also be supported.

Aviation uses which require airside access will have preference for airside locations, other employment uses including B1, B1c, B2 and B8 uses can be successfully co-located across the business parks.

Non employment uses ancillary to the core employment functions and sufficient to meet the needs of the working population of the northern business park may include:

- Convenience retail
- Restaurant
- Banking
- Amenity space
- Conference and leisure facilities.

The phasing of future employment development in the airport northern business parks will be in line with the necessary improvements required to the highway network to facilitate development. Over the plan period to 2028 it is envisaged that up to 30ha of new employment development may come forward across the north west and north east business parks.

Economic assessments identify the following sectors with significant requirements for land and premises at the airport.

- General manufacturing
- Advanced engineering
- Financial and business services
- ICT
- Distribution / Logistics

The following types of premises are required to support this sector activity:

- Small business units / industrial (B1c, B2 predominantly)
- Larger business units/ industrial
- Small purpose built office units
- Warehousing
- Start up incubator premises

### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
5	1	2	7	4	1	3	2	4	2	3	2	14

Table 8.2

**8.65** 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:

**8.66** *Economy*

**8.67 Bournemouth Borough Council** – The identification of financial and business services and the ICT sectors as appropriate uses at the airport is objected to as these uses will be more appropriately and sustainably located in Bournemouth town centre. It is unclear where the evidence exists to support the assumption made in Policy BA2 that there is ‘significant requirements’ for financial and business services and ICT premises at the airport. The promotion of such sectors is contrary to national and local policy and in effect is unsound. The promotion of such land uses conflicts with the findings of the Christchurch and East Dorset Employment Land Review Stage 1 Report (ELR), therefore the policy fails the ‘justified’ test as it is not based on the evidence base. (wording amendments have been suggested).

**8.68** As stressed in policy BA2 hotel accommodation should only be deemed appropriate where it has an ‘associated’ function to the services offered by the airport. Similarly as stressed in BA2 conference and leisure facilities at the airport should be solely for, and be ancillary to, companies at the airport, the scale of these uses should reflect this. Many such facilities already exist in Bournemouth, we have concerns that the viability and vitality of similar uses in Bournemouth could be compromised. It is a more sustainable approach to concentrate uses such as these in the existing urban area .

**8.69** *Green Belt*

**8.70** The proposal involves, without justification, the removal of a large part of the operational area of the airport from the Green Belt.

**8.71** *Housing*

**8.72** Look here for housing. Do we need more business parks? More heavy traffic.

**8.73** *Transport*

**8.74** All this development underlines the need for an ‘A’ class dual carriageway link road to the A338.

**8.75** In principle **New Forest District Council** supports the proposed employment development at Bournemouth Airport subject to a full Transport Assessment accompanying any possible future major planning application(s) and it being shown how the impacts on roads within the New Forest District will be satisfactorily dealt with.

**8.76** *Other*

**8.77 Dorset County Council** – In Policy BA2 (figure 7.1) incorporates the site at Bournemouth Airport which is identified in the Bournemouth, Dorset and Poole Waste Local Plan (June 2006) for the location of a Mechanical Biological Treatment Plant with Refuse Derived Fuel. The Core Strategy makes no reference to this fact either in the policy wording or supporting text. While the wording of the policy does not preclude the development of a waste treatment facility, this is not made clear. On this basis the Christchurch and East Dorset Core Strategy does not comply with the Bournemouth, Dorset and Poole Waste Local Plan 2006 and is therefore not sound. The supporting text and the policy should be amended to recognise this.

**8.78 The Malmesbury Estate** objects to Policy BA2. The policy takes a short term view based on the views of MAG rather than a proper assessment and fails to include the undeveloped Estate land although it proposes the removal of the existing Estate owned medium / long term car park from the Green Belt even though it is outside the ownership of Manchester Airports. A similar logic would suggest that the remaining land identified in DTZ1 should be removed from the Green Belt to meet employment needs, airport related development needs and park and ride needs for the plan period.

**8.79** The sentence – *‘removal of the land within the operational airport boundary will provide flexibility for improvement in airport facilities in accordance with the adopted Airport Master Plan 2007’* requires urgent clarification.

#### **Officer Response**

#### **8.80 Economy**

**8.81** Although demand has been identified for financial and business services and ICT this is not envisaged to be of a scale to have a significant impact on Bournemouth town centre. The Airport Economic Study (2008) prepared by Nathaniel Lichfield and Partners identified the need for these uses at the airport. This is discussed further in background papers prepared for the Core Strategy at the 'Options for Consideration' stage (2010) and the Pre - Submission Stage (Feb 2012). This policy is not contrary to the Core Strategy evidence base and the economic study undertaken for the airport.

**8.82** BBC raised concerns about the possible range of non employment uses referred to in the policy. The policy states that these uses will be ancillary to the core employment functions of the business park, and sufficient to meet the needs of the working population of the northern business parks. In this respect, these uses are unlikely to have an adverse impact on the vitality and viability of Bournemouth town centre.

#### **8.83 Green Belt**

**8.84** There remains policy support for the growth of airport facilities which can be facilitated by removing land within the existing airport boundary from the Green Belt. Proposals for new development within the existing airport boundary and associated with the operational airport will need to consider impact on the openness of the Green Belt. Any new retail development to serve the operational airport will be airside for airport passengers and not have an impact on Christchurch and Bournemouth town centres. It is not proposed to remove land to the east of the Airport between Moors River SSSI and the village of Hurn from the Green Belt.

**8.85** Further discussion relating to the proposed change in the Green Belt is set out above in relation to BA1.

#### **8.86 Housing**

**8.87** The land directly surrounding the airport and business parks is not appropriate for residential development due to a number of factors including current land uses, airport safeguarding zones, sustainability and environmental issues including proximity to heathlands. National policy also supports locating housing in existing urban areas and close to amenities. This is set out in the methodology for the Christchurch Strategic Housing Land Availability Assessment.

**8.88** The Structure Plan sets out clear policy support for further employment development at the airport business park and growth of the operational airport.

**8.89** The Bournemouth Dorset and Poole Workspace Study (2012) identifies the need for significant further employment development in this location and the business park is a key strategic site contributing to the wider employment land requirements of the South East Dorset sub region.

### **8.90 *Transport***

**8.91** The A338 link road is identified in previous stages of the Core Strategy but this specific scheme is now financially undeliverable during the plan period. Also, this scheme would also require widening of the A338 north of Blackwater Junction which would involve loss of European habitat. On this basis, this scheme will not now be pursued further in the Core Strategy. This scheme is not in the Local Transport Plan 3.

**8.92** Any planning application submitted would need a transport assessment undertaken as part of the application. This was recently undertaken as part of the business park application for 42,000sqm of new development.

### **8.93 *Other***

**8.94** In response to representations made by Malmesbury Estates, Manchester Airports Group has not identified this area of land as required for the operational airport or for employment development. Sufficient development can come forward at the North West business park to meet projected employment land requirements over the plan period (identified in the Bournemouth, Dorset and Poole Workspace study (2012) without the need to consider this proposed site within the Green Belt. On this basis there are no exceptional circumstances to permit development in the Green Belt in this location.

**8.95** Policy BA2 does not preclude an MBT plant coming forward within the Northern business park and therefore, there is not a conflict with the Bournemouth, Dorset and Poole Waste Local Plan 2006. The supporting chapter text will be amended to make reference to the MBT plant with refuse derived fuel.

### **Proposed Pre-Submission Change**

**8.96** Reference to connection to the mains foul sewer has been deleted as improvements in capacity are planned to the sewage works adjacent to the site which subject to agreement with the Environment Agency is anticipated to fulfil the condition to the airport terminal consent (2007).

**8.97** In relation to the associated facilities for the operational airport the policy text has been amended to provide a change in emphasis to state that these uses may be permitted depending on their impact on other Core Strategy policies.

## Policy BA 2

### Strategy for the Operational Airport

New passenger departure and arrivals terminal facilities for the operational airport were completed in 2011 to support projected growth to 3 million passengers per annum by 2030. Associated infrastructure will be developed to support the operational airport informed by the adopted Bournemouth Airport Master Plan (May 2007) to include:

- Further administrative accommodation for airlines, handling agents, tour operators, the airport authorities and government agencies.
- Airside airport related retail and catering facilities.
- Public and staff car parking.
- Public transport facilities and enhanced services in accordance with airport travel plan.
- Other facilities for general aviation.
- Cargo facilities, including bonded warehousing and associated infrastructure.
- ~~Connection to the mains foul sewer (Wessex Water).~~

Associated facilities to enhance the services offered by the airport ~~may also be permitted will also be encouraged~~ subject to consideration of their impact on other Core Strategy policies, including:

- Development of hotel accommodation.
- Training centres for airlines and related services.
- Petrol filling stations.
- Aviation maintenance facilities.

To enable development of these airport operational improvements, the Core Strategy will implement recommendations of national airports policy by removing sufficient further land within the airport boundary from the South East Dorset Green Belt (see Policy BA3 below).

The Council will work with the airport to support the development of new routes and services to business and leisure destinations which will meet the needs of local businesses and communities.

### **Strategy for the Airport Northern Business Parks**

The northern business parks comprising the north west and north east sectors contain 80ha of land of which approximately 60ha is available for development. The business parks are allocated primarily for employment uses (B1, B2 and B8). Non B class employment uses which create high quality employment opportunities and contribute to raising levels of economic productivity will also be supported.

Aviation uses which require airside access will have preference for airside locations, other employment uses including B1, B1c, B2 and B8 uses can be successfully co-located across the business parks.

Non employment uses ancillary to the core employment functions and sufficient to meet the needs of the working population of the northern business park may include:

- Convenience retail
- Restaurant
- Banking
- Amenity space
- Conference and leisure facilities

The phasing of future employment development in the airport northern business parks will be in line with the necessary improvements required to the highway network to facilitate development. Over the plan period to 2028 it is envisaged that up to 30ha of new employment development may come forward across the north west and north east business parks.

Economic assessments identify the following sectors with significant requirements for land and premises at the airport.

- General manufacturing
- Advanced engineering
- Financial and business services
- ICT

#### Distribution / Logistics

The following types of premises are required to support this sector activity:

- Small business units / industrial (B1c, B2 predominantly)
- Larger business units/ industrial
- Small purpose built office units
- Warehousing
- Start up incubator premises

**Policy BA 3**

**Green Belt at Bournemouth Airport**

Land required to meet the operational needs of the Airport will be removed from the Green Belt as identified in the plan below.

Picture 8.1 Proposed Green Belt Amendment

**Consultation Response**

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

Table 8.3

**8.98** 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:

**8.99 Green Belt**

**8.100 Hurn Parish Council** – A separate map of the southern sector land which is suggested for removal from the green belt, should be added. This map should identify land use zones. For example the runway should be shown with prescribed areas around it which cannot be developed; land which will remain as operational open space with no building development, such as car parks, should be outlined; and areas which can be developed with buildings for operational use and facilities should be identified. A zoning map would ensure that the strategy is effective by being able to be monitored.

**8.101 The Malmesbury Estate** objects to Policy BA3. This policy should be amended to include the land identified in DTZ1 and should be reworded “Land required to meet the operational needs of the Airport and the employment and airport related development needs of the region in order to reach the full potential of this strategic asset”.

**8.102 The Christchurch Conservation Trust** opposes BA3. In proposing a new green belt local authorities must demonstrate why normal planning and development policies would not be adequate.

**8.103 Dorset Wildlife Trust** – map 7.2 shows the proposed Green Belt change right up to the Moors River north of the Dorset Wildlife Trust's reserve. If land here in the Moors River floodplain was developed as part of the operational part of the airport it would result in considerable loss of biodiversity and loss of open land. We do not consider this is consistent with the text in para 7.29 or complies with NPPF (109,114, 117). Amend map 7.2 to retain land within the Moors River floodplain and woodland areas within the Green Belt to provide an open area between the airport and the river. See Natural England proposed boundary amendments too.

#### Officer Response

#### **8.104 Justification for Amendment to the Green Belt**

**8.105** The justification for amending the Green Belt boundary at the Airport is set out above for Policy BA1.

#### **8.106 Zoning Approach**

**8.107** In response to representations received from Hurn Parish Council a zoning approach has been applied to the areas of the airport proposed for removal from the Green Belt which provides an added restriction on the type of development that will be permitted to ensure no adverse impact on the adjoining Green Belt areas. In particular the policy approach maintains a gap between the Airport and the Moors river and also maintains the openness of the adjoining Green Belt.

#### **8.108 Malmesbury Estate Land**

**8.109** The Malmesbury Estate comments have been addressed above in relation to BA2.

#### **8.110 Green Belt Boundary Change**

**8.111** The area proposed for removal from the Green Belt includes the land within the Airport's ownership. There is no requirement to alter this boundary for removal from the Green Belt as the controls imposed by the airport's operating licence, combined with the zoning approach and existing policy in relation to SSSIs will ensure that a buffer zone is maintained between the Moors River and the airport runways and taxiways. In particular the zoning approach states that **'Zone C shall remain free from development other than that permitted by the Airport's operating license or that which is essential to the future operation of the airport in order to concentrate built development in the existing built core of the South East Sector'**.

#### Proposed Pre-Submission Change

#### **8.112 Paragraph 7.27 text change:**

**8.113** Policy BA3 proposes to remove the operational airport from the Green Belt in order to facilitate growth of airport facilities which can be achieved within environmental limits. ~~Changes to the Green Belt can be made through the Core Strategy since the abolition of the South West Regional Spatial Strategy and now that the Structure Plan will not be updated.~~ The National Planning Policy Framework states that Green Belt boundaries

should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. ~~Planning Policy Guidance Note 2 states that the Green Belt can be amended in exceptional circumstances.~~ Exceptional Circumstances remain for changes to the Green Belt at the Airport which are as follows:.....

**8.114 Reason:** proposed amendments to ensure text is in accordance with the NPPF.

**8.115** The policy has been amended and a zoning approach applied in order to address representations concerning the need to avoid possible adverse impacts on the openness of the adjoining Green Belt areas and to avoid possible adverse impacts on the Hurn Conservation Area.

### **Policy BA 3**

#### **Green Belt at Bournemouth Airport**

Land required to meet the operational needs of the Airport will be removed from the Green Belt as identified in the plan below.

Within the area to be removed from the Green belt a zoning approach has been applied in order to avoid any adverse impact on the openness of the Green Belt as follows.

- **Zone A will be restricted to uses that retain the predominantly open aspect of this area of land, such as car parking;**
- **Zone B applies to the airport South East Sector and will be restricted to uses as set out in Policy BA2 with respect to the Strategy for the operational Airport;**
- **Zone C shall remain free from development other than that permitted by the Airport's operating license or that which is essential to the future operation of the airport in order to concentrate built development in the existing built core of the South East Sector.**

**This restriction will also maintain a buffer zone between the Moors River and the airport runways and taxiways where development will not take place.**

Picture 8.2 Proposed Green Belt Amendment and Zoning

**9 Responses and Analysis of Chapter 8 Wimborne and Colehill**

### **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:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
7	0	5	8	1	2	4	2	4	2	1	2	13

Table 9.1

9.1 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:

**9.2 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.

**9.3 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.

#### 9.4 *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.

#### 9.5 *Green Belt*

- Green Belt should not be built on.

#### 9.6 *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.

#### 9.7 *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.

#### 9.8 *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.

#### 9.9 *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.

## Officer Response

**9.10** 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.

**9.11** 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.

**9.12** 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.

**9.13** The comments by the Highways Agency will be referred to under the relevant policy headings.

**9.14** 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 Pre-Submission Change

**9.15** 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.

**9.16** Paragraph 8.5

**9.17** Text expanded

**9.18** The Natural Environment

**9.19** Expand text to give clarity on habitats.

**9.20** Wimborne sits at the confluence of the Rivers Allen and Stour. These are not protected in themselves, but they do ~~provide habitat for protected species~~ have ecological value in providing habitats for protected and priority species. 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.

### 9.21 Paragraph 8.24

9.22 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.

### 9.23 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.

### 9.24 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.

### 9.25 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.

### 9.26 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).

9.27 Insert before WMC1 - Inclusion of Town Centre boundary and extent of Shopping Frontages.

9.28 **Wimborne Minster Town Centre Boundary**

9.29 **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.**

9.30 **Wimborne Minster Town Centre Primary Shopping Area and Shopping Frontages**

9.31 **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.**

9.32 **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. **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 Wimborne Minster which forms the area where retail development will be concentrated and comprises the Primary and Secondary Shopping Frontages.**
3. The range of retail uses will be supported and improved; **convenience units of 400 - 500 sqm and comparison units of 2,500 - 2,550 sqm during the plan period** 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 Allenvue 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. ~~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.~~
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.~~

**9.33 Map 8.1 Wimborne Minster Town Centre**

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

## **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:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	0	3	18	2	2	8	6	7	5	1	3	21

Table 9.2

**9.35** 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:

### 9.36 *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.

### 9.37 *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.

### 9.38 *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

## Officer Response

**9.39** 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.

**9.40** 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.

**9.41** 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.

**9.42** 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 Pre-Submission Change

**9.43** No changes proposed.

## **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.

## Policy WMC3

### Cuthbury Allotments and St Margaret's Close New Neighbourhoods, Wimborne

Areas south of Julians Road, at Cuthbury allotments, at Wimborne Town Football Club and to the east of St Margaret's Hill are allocated to provide New Neighbourhoods including 260 homes, open space and 0.4 hectares of land for a future extension to Victoria Hospital. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing and the hospital.

#### Layout and Design

- The layout and design of the schemes must be consistent with the principles set out in the Masterplan.
- A design code will be agreed by the Council, setting out the required high standards.
- Development must be sympathetic to the gateway location of the sites and their proximity to the Wimborne Minster Town Centre Conservation Area.

#### Green Infrastructure

- Land running alongside the river is to be set out as parkland, to provide an attractive informal recreation area.
- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.
- New replacement allotments are to be provided in an easily accessible location within the Town or Colehill Parish. Land is identified to the south of Julians Road and as part of Policy WMC6 to meet the needs of the allotment holders.

#### Transport and Access

- The main access for the Cuthbury site is to be delivered from Julians Road with a secondary access from Cuthbury Gardens. Only pedestrian and cycling access is to be provided from Cowgrove Road.
- Access for the St Margaret's Hill site will come from St Margaret's Close.
- The Cuthbury development must contribute to delivering a traffic light controlled system to improve safety at Julian's Bridge.

- Improved pedestrian and cycle access must be provided across the River Stour to enable access to the wider countryside, the town centre and the settlements to the south.

**Phasing**

- Prior to development of land occupied by the Football Club a new ground must be made available as identified in Policy WMC6.
- Suitable new allotments are to be made available before allotment holders have to vacate the existing site.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
36	4	1	31	4	18	18	14	13	15	6	20	44

Table 9.3

9.44 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:

**9.45 General**

- DC Planning on behalf of Wyatt Homes - The proposal can deliver new homes, recreational and sporting provision, transport enhancement and environmental protection.
- The site selection methodology used in the Structure Plan Review was not used for this site and therefore there is no evidence for its selection.
- Allocation is based on planning guidance which has been superseded by the NPPF and therefore is unsound.
- Is it justified to consult on the basis of 170 dwellings and 35% affordable housing and then propose 260 homes with 50% affordable?

- Map 8.3 suggests that the northern and eastern boundaries of the site will be vegetated. Red line is drawn showing trees outside of site which means the trees will not be delivered as part of the development. Location of trees and red line needs to be amended.
- Is the development deliverable due the number of land owners and uses?

#### 9.46 *Housing*

- Para 8.33-Minor amendments should be made to the Green Belt to allow smaller sites to be developed. Such a site is at Wimborne Rd, Colehill. The Core Strategy fails the tests of soundness as it does not allow such sites to come forward either now or at Site Allocations stage.
- Reduce number of houses on the site.
- Need affordable housing.
- Little or no need for housing.
- Land at St Margaret's Hill is unsuitable for housing.
- With only 15 houses proposed at St Margaret's Hill, is the proposal worthwhile?
- Need 100% low cost housing.
- The percentage of low cost housing should be expressed as maxima and not minima.
- Reference should be made to any delivery target being subject to viability.
- DC Planning on behalf of Wyatt Homes -Figure of 260 homes considered too high for the site and should be amended to 220 homes.
- Pamphill and Shapwick Parish Council - Single storey housing on the football club land would be less intrusive for existing housing.
- Build on football club land and retain allotments.
- Support - Site is close to the town centre and its facilities.
- Too much development in this part of the town.
- Alternative sites exist such as land north of Leigh Road, east of Leigh Lane and west of Cutlers Place, Colehill.

#### 9.47 *Transport*

- Impact on roads and transport.
- A detailed transport assessment is required.
- Does not include road improvement plans or traffic requirements.
- Access to the site is on narrow, busy roads with speeding traffic on Victoria Road.
- Hospital extension would add to traffic impact.
- A commitment should be included in the Core Strategy to provide the bridge from Waitrose to Crown Mead.
- Provision of a secondary access from Cuthbury Gardens is likely to create a "rat run". Any secondary access in Cowgrove Rd and Cuthbury Gardens should be restricted to cyclists, pedestrians and emergency vehicles if required by them.

- The requirement for a traffic light controlled system at Julian's Bridge and for improved cycle and pedestrian access should be combined to be a requirement for a traffic signalled solution at the Bridge which will incorporate pedestrian movement and a new pedestrian cycle bridge to the south of the Bridge which will need to be of a high design standard.
- Concern over access onto Julian's Road- will the traffic lights on the bridge incorporate the new development and new allotments?
- Need a detailed assessment of traffic.
- DC Planning on behalf of Wyatt Homes-Financial contributions could be specifically target to local proposals such as a footpath at St Margaret's Hill.
- Concern over impact on traffic at Pye Corner.
- English Heritage - It is essential that any future "traffic light controlled system" at Julian's Bridge (Grade I Listed) is bespoke and does not adversely affect its historic significance and setting.
- Concern over access to and from St Margaret's Close.
- Welcome proposals for improved traffic, pedestrian and cycle access.
- The high degree of car ownership in the district suggests that people will use car to take children to schools in villages instead of walking them to the town schools.
- Evidence suggests that traffic lights at Julian's Bridge will cause traffic to back up into the town centre.
- The impact of traffic is not clearly understood even with the use of the Saturn model. There is no evidence that the additional traffic which will be generated can be managed.
- It is thought that significant road proposals would be required which would impact on the riverside and further destruction of the local environment and green belt.

#### 9.48 *Environment*

- Natural England- To avoid a conflict with Policy ME1 at later stages of planning process, NE advises the authority to request that those with an interest in the site prepare a basic biodiversity study for consideration prior to the Examination in Public.
- Natural England- The policy appears to have been prepared in an absence of adequate information and assessment of biodiversity. There may be significant interest due to close proximity to designated sites and other biodiversity sites.
- Natural England-Does not meet NPPF requirement that policies are based on up-to-date information on the natural environment. Therefore it is not possible to identify if policies are compliant.
- Dorset Wildlife Trust and Natural England-NPPF requires policies and decisions to be based on up-to-date information on the natural environment. This information is not available.
- Dorset Wildlife Trust-Should the site be of low ecological value then no objection will be made.
- Will impact on the attractive nature of Wimborne.
- Building on allotments will result in flooding.
- Loss of wildlife habitat.
- Dorset County Council - References to flooding need updating to ensure the County Council's responsibilities are reflected.
- Concern raised over impact of development on flooding.

- Green area between the river and the eastern fringes of the town is an important characteristic.
- Development must be harmonious to the gateway location of the site.
- Support for proposal which would improve the approach to the town.
- DC Planning on behalf of Wyatt Homes-Site is well removed from Dorset Heathland SPAs. A package of measures to provide localised SANGs, open space and an enhanced and promoted footpath network which increases riverside access would provide mitigation for new residents and also for existing residents.
- DC Planning on behalf of Wyatt Homes-There is scope for improving biodiversity.
- DC Planning on behalf of Wyatt Homes-There will be visual enhancement of the built environment at the western end of the site.
- Loss of green belt, views and open space.
- Design must consider lighting and light pollution as this affects the environment.
- Pollution must be prevented along the River Stour- this includes light pollution.
- SANG has not been identified therefore deliverability of site is in question.
- If part of a SANG is liable to flooding then an alternative, accessible area should be available.
- People will need to drive to the SANG.
- RSPB-Proposal heavily dependent on the SANG providing mitigation. Testing of the suitability of the SANG is essential and has not been done. Some of the SANGs proposed may be ineffective, particularly those associated with the smaller allocations.
- The corridor between the river and development should be substantially wider and linked to the SANG. This will provide an attractive pedestrian route and natural riverside habitat.
- Is the area proposed for allotments part of a Scheduled Ancient Monument? Deep cultivation could harm this.
- Scoring of the SA Objective 1 will depend on the widening of the riverside area, recognition of existing and potential biodiversity interest and linkages to a SANG.
- Pamphill and Shapwick Parish Council-would like more information on “Focal Building.”
- Proposed level of development is excessive and potentially damaging to the setting of the listed building of Stone Park, views of Pamphill Conservation Area, views from Cowgrove Rd (Sustrans Route 25), scheduled Ancient Monument of Julian’s Bridge, views of listed building of Merley House and views from Eye Bridge.
- Parkland is inappropriate in this riverside setting. Open greenspace should enhance biodiversity and a space suitable for people and wildlife created. Unimproved grassland with mown paths would be preferable.
- The landscape setting of Stone Park needs to be assessed in accordance with English Heritage guidelines and the requirements of the NPPF. The measures required to ensure the setting is preserved and enhanced must be established. As this assessment has not taken place, the plan is unsound.
- A development of 70 houses at the entrance to Stone Park instead of WMC3 would not affect its setting.
- Impact on the Area of Great Landscape Value.
- Development would result in an encroachment into the countryside by housing and by replacement facilities. These would impact on the eastern part of the town and the countryside there.
- Relocation of the football club would impact on the nature of the east of the town.

**9.49 Facilities**

- Friends of Victoria Hospital- believe that 0.8 ha of land will be needed, not the 0.4 ha allocated for following reasons:
  1. There is no current room for expansion
  2. Increased population will put pressure on services
  3. Increasing numbers of older people will need help with independence
  4. Young families moving into new housing will need intervention for the outcomes of unhealthy life styles
  5. Demand for outpatient services will grow as cost of inpatient care grows and budgets diminish
  6. Hospital already provides outpatient care and is well placed to maintain and expand this role
  7. Move of health commissioning to GPs will increase demand as this group are committed to using services here from 2013/14
  8. Would need additional car parking
- Land at St Margaret's Hill will be needed for an expansion to the cemetery with the expansion of the town. Prior to that need, the land could be used for allotments.
- Loss of allotments requires their replacement of comparable size, with running water and in convenient locations round Wimborne for existing users.
- Proposed allotments are too far from homes of existing users.
- Allotment holders do not live immediately local to the site and relocation of sites will be beneficial.
- Location of new allotments should be informed by biodiversity and archaeological study.

**Officer Response**

**9.50** Whilst there continues to be a significant number of objections to this allocation, the Council must ensure there is sufficient housing land available to meet the housing need which has been identified and to meet the tests of soundness.

**9.51** The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development.

**9.52** A significant number of objectors have raised concerns over the selection of sites for residential development. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed masterplanning exercises.

**9.53** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions.

**9.54** 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. The Highways Agency has stated that although the improvements to Canford Bottom are predicted to improve flows, they 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. This requirement applies to this proposal.

**9.55** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public. However, officers at Natural England have not raised an in principle objection to the proposal.

**9.56** Further work on the design and layout of the proposed site shows that this will minimise impact on the historic landscape of the town and its surroundings, including that of Stone Park, a lower figure than the 260 dwellings proposed is appropriate.

**9.57** Some responses have referred to the risk of flooding on this site. Both Councils have completed Strategic Flood Risk Assessments. No objections have been received to this proposal from the Environment Agency. Flood management, mitigation and defence is covered in Chapter 13, Managing the Natural Environment which includes “future proofing” against the effects of climate change and the need for the use of Sustainable Drainage Systems amongst other measures. The policy refers to the County Council's role as Sustainable Drainage Systems Approval Body.

**9.58** Some responses have been concerned with the potential level of light pollution which could result from the proposed development. The NPPF states that by encouraging good design, planning policies should limit the impact of light pollution. It is proposed that this requirement is now included in Policy HE2

**9.59** Whilst the Friends of Victoria Hospital have asked that the land proposed for expansion of the hospital should be increased no information that this alteration is required has been received from the health authority. No change is proposed.

**9.60** A pre-requisite of development is the need to relocate the allotments to nearby suitable locations.

**9.61** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other site requirements. The details of this can be found in replacement Policy KS3 and KS4.

### **Proposed Pre-Submission Change**

**9.62** Amend Policy to refer to 220 homes instead of 260.

## Policy WMC3

### Cuthbury Allotments and St Margaret's Close New Neighbourhoods, Wimborne

Areas south of Julians Road, at Cuthbury allotments, at Wimborne Town Football Club and to the east of St Margaret's Hill are allocated to provide New Neighbourhoods including 260-220 homes, open space and 0.4 hectares of land for a future extension to Victoria Hospital. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing and the hospital.

### Layout and Design

- The layout and design of the schemes must be consistent with the principles set out in the Masterplan.
- A design code will be agreed by the Council, setting out the required high standards.
- Development must be sympathetic to the gateway location of the sites and their proximity to the Wimborne Minster Town Centre Conservation Area.

### Green Infrastructure

- Land running alongside the river is to be set out as parkland, to provide an attractive informal recreation area.
- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.
- New replacement allotments are to be provided in an easily accessible location within the Town or Colehill Parish. Land is identified to the south of Julians Road and as part of Policy WMC6 to meet the needs of the allotment holders.

### Transport and Access

- The main access for the Cuthbury site is to be delivered from Julians Road with a secondary access from Cuthbury Gardens. Only pedestrian and cycling access is to be provided from Cowgrove Road.
- Access for the St Margaret's Hill site will come from St Margaret's Close.
- The Cuthbury development must contribute to delivering a traffic light controlled system to improve safety at Julian's Bridge.

- Improved pedestrian and cycle access must be provided across the River Stour to enable access to the wider countryside, the town centre and the settlements to the south.

**Phasing**

- Prior to development of land occupied by the Football Club a new ground must be made available as identified in Policy WMC6.
- Suitable new allotments are to be made available before allotment holders have to vacate the existing site.

## **Policy WMC4**

### **Stone Lane New Neighbourhood, Wimborne**

The Stone Lane Industrial Estate is identified as suitable for redevelopment for housing with the opportunity to provide about 90 homes.

#### **Layout and Design**

- The layout and design must be consistent with the principles set out in the Masterplan reports.
- A design code will be agreed by the Council, setting out the required standards.
- Development must be sympathetic to the gateway location of the site and its proximity to the Wimborne Minster Town Centre Conservation Area, as well as the Area of Outstanding Natural Beauty.

#### **Green Infrastructure**

- A landscaped open space area is to be provided on the northern and western edges of the site to prevent visual harm impacting on the nearby Area of Outstanding Natural Beauty and to provide an attractive informal recreation area.
- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.

#### **Transport and Access**

- The existing access to the site on to Stone Lane must be improved to standards agreed by Dorset County Council.
- The development must enable a pedestrian and cycle access across the River Allen to link with the New Neighbourhood allocated in WMC5.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
12	2	8	23	8	1	9	13	9	5	5	8	31

Table 9.4

**9.63** 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:

### 9.64 *General*

- The status of the Masterplan Options Report is unclear.
- The content of the Masterplan Option Report should form a Supplementary Planning Document to guide development.
- Support as long as no encroachment into Green Belt and no detriment to River Allen.
- Impact on Wimborne.

### 9.65 *Housing*

- East Boro' Housing Trust - Loss of employment opportunities is not offset by construction of only 90 dwellings.
- I Spiers on behalf of ACG Developments and David Brothers - cost of alterations to access will include the purchase of at least two residential properties which when added to other costs of development, including the cycle and pedestrian bridge, will make housing development unviable.
- Pamphill and Shapwick Parish Council - Prefer the site remains providing employment.
- Support as within walking distance of facilities.
- Concern over the meaning of Higher density and Lower density housing.

### 9.66 *Transport*

- Pamphill and Shapwick Parish Council - concern about increased traffic to and from site with poor pedestrian and cycle links to QE School
- Unsound as no road improvements or traffic requirements are included.

- Impacts of traffic on Stone Lane and on properties on Stone Lane.
- There is no clear justification for providing a pedestrian and cycle bridge across the river.
- It may not be possible to provide the bridge as third parties would need to be involved.
- Development of the site should not be precluded if a bridge is undeliverable.
- Impacts on traffic in general in the town.

#### 9.67 *Environment*

- Natural England - To avoid a conflict with Policy ME1 at later stages of planning process, NE advises the authority to request that those with an interest in the site prepare a basic biodiversity study for consideration prior to the Examination in Public.
- Natural England - The policy appears to have been prepared in an absence of adequate information and assessment of biodiversity. There may be significant interest due to close proximity to designated sites and other biodiversity sites.
- Natural England - Does not meet NPPF requirement that policies are based on up-to-date information on the natural environment. Therefore it is not possible to identify if policies are compliant.
- Dorset Wildlife Trust -The importance of the River Allen is not recognised.
- Dorset Wildlife Trust - Sustainable Drainage Scheme should be implemented to protect the quality of the water.
- Dorset Wildlife Trust - concerns over light pollution.
- Dorset Wildlife Trust - Impacts on AONB.
- Dorset Wildlife Trust - Landscaped natural open space should be provided on the northern and western edges of the site to prevent visual harm to the AONB and to provide informal recreation and wildlife corridor along River Allen.
- ETAG - Sustainable Drainage Systems are required to ensure no harm to river corridor and wildlife.
- Control needed to prevent light trespass into AONB.
- wider corridor required along river to ensure no damage to biodiversity as in NPPF.
- RSPB - Proposal heavily dependent on the SANG providing mitigation. Testing of the suitability of the SANG is essential and has not been done. Some of the SANGs proposed may be ineffective, particularly those associated with the smaller allocations.
- Policy requirements for a design code could result in design policy being unnecessarily prescriptive and over detailed rather than guiding the design of development as advocated in the NPPF.
- Ecological study of River Allen required.
- Maintain tranquillity with no lighting near river.
- Query suitability of land north and west of the River Allen for a SANG as is very wet even in dry weather. Unfair to give residents land for recreational use which is unusable most of the year. This would put pressure on other green spaces especially those within walking distance such as Holt Heath.

#### 9.68 *Employment*

- Para 8.41 states that the proposed allocation north of Wimborne is close to employment opportunities. This is in conflict with the proposed allocation of the Industrial estate for residential use.
- No other sufficiently sized employment land within Wimborne and Poole and businesses would have to relocate to Ferndown or further afield.
- Deliverability is uncertain due to the number of businesses and owners.
- As additional employment areas are proposed, the loss of these units would not cause problems.
- Whilst additional employment provision is proposed, the public transport links to those areas are poor and non-existent from Wimborne. Effective public transport needs to be provided.
- Loss of jobs and services to local people.
- Where are new house owners to work?
- Instead of this proposal, upgrade the current buildings and widen the access road.

#### 9.69 *Facilities*

- No provision has been made for secondary education which will be required as a result of the development.

### Officer Response

**9.70** 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 these show that development can take place. Following the adoption of the Core Strategy a developer will be required to carry out further assessments to identify in more detail 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, they 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. This requirement applies to this proposal.

**9.71** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public. However, officers at Natural England have not raised an in principle objection to this proposal.

**9.72** Some responses have been concerned with the potential level of light pollution which could result from the proposed development. The NPPF states that by encouraging good design, planning policies should limit the impact of light pollution. It is proposed that this requirement is now included in Policy HE2.

**9.73** It is noted that part of the SANG may be at risk of flooding at times, but this is only for short periods. The risk is accepted by Natural England and does not affect the allocation of this land as a SANG, or its overall effectiveness in mitigating harm to nearby heaths..

**9.74** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other site requirements. The details of this can be found in replacement Policy KS3 and KS4.

## Proposed Pre-Submission Change

**9.75** No change

### Policy WMC4

#### Stone Lane New Neighbourhood

The Stone Lane Industrial Estate is identified as suitable for redevelopment for housing with the opportunity to provide about 90 homes.

#### Layout and Design

- The layout and design must be consistent with the principles set out in the Masterplan reports.
- A design code will be agreed by the Council, setting out the required standards.
- Development must be sympathetic to the gateway location of the site and its proximity to the Wimborne Minster Town Centre Conservation Area, as well as the Area of Outstanding Natural Beauty.

#### Green Infrastructure

- A landscaped open space area is to be provided on the northern and western edges of the site to prevent visual harm impacting on the nearby Area of Outstanding Natural Beauty and to provide an attractive informal recreation area.
- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.

#### Transport and Access

- The existing access to the site on to Stone Lane must be improved to standards agreed by Dorset County Council.
- The development must enable a pedestrian and cycle access across the River Allen to link with the New Neighbourhood allocated in WMC5.

## Policy WMC5

### Cranborne Road New Neighbourhood, Wimborne

Approximately 16.7 hectares is allocated to provide a New Neighbourhood to the east and west of Cranborne Road, north of Wimborne. This will include about 600 homes, a First School and a local centre, along with significant areas of greenspace. To enable this, the Green Belt boundary will be amended to exclude the land identified for new housing, the local centre and the school.

### Layout and Design

- The New Neighbourhood will be set out according to the principles of the Masterplan Reports.
- A design code will be agreed by the Council, setting out the required standards.
- Development must be carefully planned to avoid a negative impact on the Burts Hill Conservation Area and the historic character of Wimborne Minster.
- The built form of the New Neighbourhood must not impact on the wider countryside. It will therefore be contained by the ridgelines to the north and east. To the west the strong tree line must be further strengthened to mitigate visual harm that development could cause to the Area of Outstanding Natural Beauty.
- A clear open gap must be maintained between the north of the development and buildings on Dogdean.

### Green Infrastructure

- The implementation of a generous green infrastructure strategy, along with a Suitable Alternative Natural Greenspace strategy, in accordance with Policy ME3, is a fundamental requirement. This is to ensure that the New Neighbourhood provides major informal recreational opportunities along with landscaping to ensure the scheme blends into the gentle and attractive landscape. Key features to be included include:
- Suitable Alternative Natural Greenspaces utilising the River Allen Valley and land to the north of the housing.
- A green corridor running east to west through the housing areas linking with the local centre and school and utilising the existing farm lane in the east.
- A park within the Burts Hill Conservation Area.

- Provision of allotments.

**Transport and access**

- Vehicular access is to be provided primarily from Cranborne Road with a single access coming from Burts Hill.
- Traffic management measures will be required along Cranborne Road to limit speeds to less than 30 mph. Additionally, further measures will need to be put in place to the east of the new Burts Hill junction to make this an unattractive route for those wishing to access the A31(T).
- Public transport routes are to be provided through the scheme.
- A network of dedicated pedestrian and cycling routes are to be provided throughout the scheme, including across the Allen Valley to link to Stone Lane and also towards the town centre.

**Drainage**

A Sustainable Drainage Scheme must be agreed with the Council and Environment Agency with the aims of preventing flooding problems for neighbouring properties and on the River Allen as well as protecting and enhancing nature conservation quality.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
17	12	3	49	15	7	27	14	26	12	15	14	55

Table 9.5

**9.76** 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:

### 9.77 *General*

- English Heritage - Support
- Civic Society - character of Wimborne would be overwhelmed.
- Eastern Area DAPTC - will impact on area to north of town where EDDC previously opposed development.
- Colehill PC - would be urban sprawl, would not integrate with Colehill and Wimborne.
- Holt PC - remove allocation and allocate more land east of Wimborne.
- ETAG - flood risk assessment and biological surveys are required to inform the selection of sites. The proposal may fail as a result of findings.
- Wimborne Town Council - In view of the size of the proposal and the number of impacts, the proposal should be removed.
- Bloors - fully supports allocation of land.
- Bloors - suggests alterations to the policy to make it more positive. Amendments include the need for a map showing the new Green Belt boundaries, the need to specify design principles or to include these in a Development Plan Document which will be consulted on, amend wording on SANG along the River Allen to remove reference to river and replace with a green corridor through the housing area utilising the farm lane in the east, an open space within the Burts Hill CA and the need for traffic management measures east of the proposed access point on Burts Hill. (See CSPA 2052)
- EDDC appears to have ignored a Green Belt principle - "to preserve the setting and special character of historic towns". Doing this has allowed the allocation of this site. The open sweep of land will be lost and new housing will tower over the old road. The abrupt change from country to town will be lost. (Also view of ETAG)
- No consultation with local community of about 30 households.
- Other sites such as land at Leigh Farm could be used instead of this more environmentally sensitive and economically valuable land.
- Wimborne does not need a new village.
- Wimborne would become a commuter town instead of a market town.
- Comments on the Options consultation - there were 53% objections, 26% support and 21% no opinion. The report on responses aggregates the "no opinion" responses with those in favour and says that 47% were either in favour or had no strong opinion. This is wrong. The report on responses on the Options consultation states that a number of objections related to the scale of development rather than the principle itself. However, it ignores the number of supporters whose support was conditional on the scale being reduced.
- The proposal is very different from the previous consultation and runs counter to the responses received.
- Not consistent with NPPF.
- Not justified as is not the most appropriate strategy with alternative sites east of Wimborne and Colehill being available.

### 9.78 *Housing*

- Colehill PC - some development on one side of the road might be acceptable.
- The number of houses keeps increasing and the proposed development is too large, resulting in too many people, cars and water drainage.
- Scale of development too large.
- Scale takes no account of the wider impact such a large concentration of housing would have in the area.

- Scale of development unfairly represents 24% of the ED total. 170% higher than any other development.
- Number of floors of flats will have to be increased to cater for 50% affordable housing.
- Little or no need for housing.
- Need for affordable housing especially for low paid workers.
- Volume will make Wimborne unattractive.
- Emphasis should be on family housing with gardens.
- Affordable housing should include a proportion of “affordable by size and price”.

### 9.79 *Environment*

- Natural England - To avoid a conflict with Policy ME1 at later stages of planning process, NE advises the authority to request that those with an interest in the site prepare a basic biodiversity study for consideration prior to the Examination in Public.
- Natural England - The policy appears to have been prepared in an absence of adequate information and assessment of biodiversity. There may be significant interest due to close proximity to designated sites and other biodiversity sites.
- Natural England - Does not meet NPPF requirement that policies are based on up-to-date information on the natural environment. Therefore it is not possible to identify if policies are compliant.
- Dorset Wildlife Trust and Colehill PC - ecological survey information is not available to inform the allocation. Required by NPPF.
- Dorset Wildlife Trust - if found to be of low ecological value then raise no objection.
- Dorset Wildlife Trust - concern over provision of fragmented areas of SANG.
- Dorset Wildlife Trust and ETAG - Development offers opportunities to enhance River Allen, provide woodland linkages to Catley Copse, The Row and other areas of woodland and protect the road verge on the Cranborne Road which is managed for wildlife.
- Dorset Wildlife Trust - concern over light pollution and its impact on the AONB.
- Civic Society - potential for flooding through tarmac over hydrologically sensitive area.
- Civic Society - considerable impact on the Burts Hill/Merrifield, Colehill Conservation Area, designated September 2006.
- Civic Society - removal of an attractive green space with the potential to destroy the character of Furzehill.
- ETAG
  - concern over the lack of biological survey. This would provide information on land which should not be used and land which can be used for SANGs and allotments.
  - concern over effectiveness of SANGs due to fragmented nature. Will not offer the experience of wide open heathland.
  - concern that there is a need to “future proof” flood risk.
  - concern that the potential impact on the River Allen and its ecology has not been considered fully. Need to ensure that run-off does not reach the River Allen directly. Pollution/balancing ponds may be needed in Allen Valley flood plain.
  - concern over light pollution. Must take into account potential damage to species such as moths, as well as to biodiversity as a whole and intrusion into areas where light levels are currently low.

- Take note of the European Landscape Convention's definition of landscape.
- total area of SANG should allow for maximum occupancy rate of dwellings. If there is potential for this number to be increased then additional land should be safeguarded as SANG.
- RSPB - Proposal heavily dependent on the SANG providing mitigation. Testing of the suitability of the SANG is essential and has not been done. Some of the SANGs proposed may be ineffective, particularly those associated with the smaller allocations.
- Wimborne Town Council - impact on the river.
- Colehill PC - concern over flood risk and potential for contaminated run off to affect River Allen.
- Colehill - drive through modern housing estate to reach historic town.
- Impact on Green Belt.
- Scale of development uses too much of the Green Belt.
- Development wholly dependant on the Green Belt.
- Concerned that the reason of "exceptional circumstances" will be used to justify alterations to the Green Belt again in future.
- Would close gap between Dogdean and Wimborne and Furzehill and Wimborne.
- Would compromise 1 km critical gap of Green Belt between Furzehill and Wimborne.
- Impact on landscape.
- Alternative uses should be considered; solar farm, deciduous forest, rugby and football pitches, allotments or retention as pasture.
- Increased height of building above two floors, required to supply 50% affordable will destroy character of the approach to the town.
- Car parks associated with SANGs will allow dog owners from the urban area to use for their pets.
- Apply Policy ME5 now before including WMC5 in the Core Strategy.
- Need to mitigate any potential flooding to existing dwellings to south of the site.
- Poor drainage with run-off from Giddylake Hill.
- Could increase flood risk to Wimborne.
- Sustainable Drainage Systems will be very costly, would this impact on requirement for 50% affordable housing?
- Within Zone 1 Source Protection Area.
- Impact on River Allen if more water is extracted. A development of this size could result in River Allen running dry.
- Impact on existing dwellings close to the site.
- The proposal is justified and therefore sound as it avoids negative impacts on the Burts Hill Conservation Area, the historic character of Wimborne, the wider countryside and Dogdean.
- Negative effect on Burts Hill Conservation area.
- Negative effect on historic character of town.
- SANG land is shown outside the allocation and concern is raised over this. It may not be effective in delivering SANGs. The land should be included within the policy designation.
- The current proposal, being more extensive than the previous proposal, reduces the area of land available for a SANG.

- Will increase use of heathland as SANG will not mitigate. Residents currently use the heath and the proposed SANG areas are available and more accessible and attractive than they will be under these proposals.
- ETAG and others - SANG is on River Allen floodplain. Would be unusable in wet weather.
- Object to “park” in Burts Hill CA or anywhere but centre of Wimborne. All recreational areas should be left to develop naturally to increase biodiversity.
- AONB policy applies.
- Existing features such as River Allen and Burts Hill provide a natural northern boundary to the town. Development should not take place beyond these.
- Significant road improvements would be required which would impact on the river and the Green Belt.

### 9.80 *Transport*

- Highways Agency - regard the proposal with caution, given the proximity to the highly constrained A31 between Canford Bottom and Merley. The improvements at Canford Bottom, whilst they will reduce delay in the area, will not remove the need for the development to mitigate any transport impacts.
- Civic Society - Burts Hill and Smugglers Lane unsuitable to take more traffic.
- Civic Society - query the sustainability of a substantial increase in demand for transport services.
- Eastern Area DAPTC - will impact on B3078 which has no policies for improvement.
- ETAG - safe crossing of Cranborne Road required to allow access to the larger SANG. A bridge would be preferable to traffic calming to allow access for people and wildlife.
- Colehill PC, Wimborne Town Council and others-Increase in traffic would impact on Colehill and Wimborne.
- Holt PC and others
  - Wrong side of town in respect of vehicle trips especially to employment destinations.
  - Impact of HGVs and other vehicles on road surfacing.
  - Impact on traffic volumes on local lanes and on the horse riders who use the road.
  - Traffic management on Burts Hill will force traffic thorough the town centre, clogging the road network.
- The number of homes cannot be adequately supported by the road system.
- Distance will be too far for people to walk.
- Cycling over Walford Bridge is unsafe.
- The proposed pedestrian and cycle route over the River Allen is supported.
- Access to bridge would be over flood plain of River Allen and can be waterlogged even in dry weather.
- No road improvements or traffic requirements are included.
- Insufficient assessment of the impacts of traffic on Colehill and Wimborne.
- An assessment of the Stone Lane/West Borough junction is required as it is the primary junction for the development.
- Impact on Canford Bottom.

- Impact on Allenvie Road and its residents.
- Impact on children going to school.
- New school proposal will create school run problems.
- Impact on West Borough.
- A commitment should be included in the Core Strategy to provide the bridge from Waitrose to Crown Mead.
- Remove vehicular access onto Burts Hill.
- Burts Hill is unsuitable for increased volume of traffic.
- Creating an access on to Burts Hill would create a “rat run” between Cranborne Road and Burts Hill, through the new development.
- Traffic from the site will use Burts Hill to access the A31, Poole and Bournemouth.
- Traffic management measures are required for the whole of Burts Hill.
- Need to address highways issues on route to town centre.
- Pavements too narrow on route to town.
- Conflict by service station especially at school times.
- Difficult for pedestrians to cross road.
- Impact on Walford Bridge.
- Public transport services should be required to be provided by the developer.
- A pedestrian and cycle route is shown from the western part of the site to Stone Lane with a pedestrian only path linking to Walford Mill car park. This should be amended to be a pedestrian and cycle path to provide a more level route for cyclists avoiding joining Stone Lane.
- No evidence to show people will walk or cycle.
- Already significant parking issues in the town centre.
- A new road structure will be required and will impact on the surrounding lanes.
- Policy KS9 states that “development will be located along and at the end of the Prime Transport Corridors...” Cranborne Road is not a Prime Transport Corridor and no improvements will take place.

### 9.81 *Facilities*

- DCC - Future population increases will put pressure on education facilities. Where new schools are required, these are identified, including the new school on WMC5. Elsewhere, education needs may be met by expansion or re-organisation. The costs and responsibilities of these are identified in the Draft Infrastructure Delivery Plan. County Council officers have worked closely with local planning officers in developing the plan. The Core Strategy and Draft Infrastructure Delivery Plan reflect the County Council’s future requirements in terms of school provision in the area and are supported.
- Civic Society - query the sustainability of a substantial increase in demand for medical and educational services.
- Holt PC - concern that there is lack of consideration for growth in sectors relating to older people, those with learning difficulties and mental health issues.
- Wimborne Town Council and others - impact on schools.

- The school proposed is a replacement for Wimborne First School and therefore will not cater for additional children. Where will they go to school?
- Information on the closure of Wimborne First School does not appear in this section, only in the Infrastructure Delivery Plan.
- School should be sited close to the town so that existing pupils can carry on walking to school. The site should be on the west side of Cranborne Road, immediately north of the access to the Water Works. As a short stay car park would be needed, the local centre should be sited here too.
- The new school will create a “them and us” situation by separating the children from the new estates from the existing primary school intake. Should there be a mix of pupils, there could be resentment as local children would no longer go to the town centre school. The proposal does not meet the requirements of the NPPF to facilitate social interaction and create healthy, inclusive communities.
- Wimborne First School would like to be involved in the design and proposal for the replacement school
- Provision of facilities on this site would benefit new and existing residents and detract from their use of the town centre.
- Is the main sewer capable of accommodating extensive development?
- Impact on already stretched water provision.
- Impact on already stretched electricity supply.
- Impact on already stretched gas supply.
- No provision for additional secondary education which will be required.
- Impact on already stretched medical provision.
- Co-op - new local centres should remain small scale and provide for basic day-to-day needs and complement the role and function of the town centre.
- Insufficient proof of need for further retail space.
- Retail space could have negative impact on surrounding area.
- Lack of clarity over allotment provision.
- Additional housing will require additional land for allotments.
- The community centre could lead to segregation.

### 9.82 *Employment*

- Where will new residents work?
- New residents will have to commute to other areas, increasing congestion.
- Travelling to north Dorset for employment is unlikely.

### 9.83 *Map*

- The map is inaccurate.

## Officer Response

**9.84** Whilst there continues to be a significant number of objections to this allocation, the Council must ensure there is sufficient housing land available to meet the housing need which has been identified and to meet the tests of soundness.

**9.85** The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development.

**9.86** A significant number of objectors have raised concerns over the selection of sites for residential development. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed masterplanning exercises.

**9.87** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions.

**9.88** 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 these show that development can take place. Following the adoption of the Core Strategy a developer will be required to carry out further assessments to identify 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.

**9.89** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public. However, officers at Natural England have not raised an in principle objection to this proposal.

**9.90** The use of SANGs to mitigate the impact of development on heathland has been agreed with Natural England.

**9.91** It is noted that part of the SANG may be at risk of flooding at times but this is only for short periods. The risk is accepted by Natural England and does not affect the allocation of this land as a SANG.

**9.92** Some responses have referred to the risk of flooding on this site. Both Councils have completed Strategic Flood Risk Assessments. No objections have been received to this proposal from the Environment Agency. Flood management, mitigation and defence is covered by Policy ME6 which includes “future proofing” against the effects of climate change and the need for the use of Sustainable Drainage Systems amongst other measures.

**9.93** Some responses have been concerned with the potential level of light pollution which could result from the proposed development. The NPPF states that by encouraging good design, planning policies should limit the impact of light pollution. It is proposed that this requirement is now included in Policy HE2.

**9.94** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new or larger, replacement schools will be required and these are included in the proposals. In this case, the proposed school will replace the existing Wimborne First School and provide additional capacity to cater for the expansion of this part of the town.

**9.95** The service providers 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. Service providers have been contacted throughout the preparation of this document and no concerns have been raised.

**9.96** Wessex Water has been contacted throughout the preparation of this document. Its proposals for sewage treatment works are set out in the Infrastructure Development Plan. Any other requirements which result from development will be discussed with developers.

**9.97** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other site requirements. The details of this can be found in replacement Policy KS3 and KS4.

### **Proposed Pre-Submission Change**

**9.98** No change

## Policy WMC5

### Cranborne Road New Neighbourhood, Wimborne

Approximately 16.7 hectares is allocated to provide a New Neighbourhood to the east and west of Cranborne Road, north of Wimborne. This will include about 600 homes, a First School and a local centre, along with significant areas of greenspace. To enable this, the Green Belt boundary will be amended to exclude the land identified for new housing, the local centre and the school.

### Layout and Design

- The New Neighbourhood will be set out according to the principles of the Masterplan Reports.
- A design code will be agreed by the Council, setting out the required standards.
- Development must be carefully planned to avoid a negative impact on the Burts Hill Conservation Area and the historic character of Wimborne Minster.
- The built form of the New Neighbourhood must not impact on the wider countryside. It will therefore be contained by the ridgelines to the north and east. To the west the strong tree line must be further strengthened to mitigate visual harm that development could cause to the Area of Outstanding Natural Beauty.
- A clear open gap must be maintained between the north of the development and buildings on Dogdean.

### Green Infrastructure

- The implementation of a generous green infrastructure strategy, along with a Suitable Alternative Natural Greenspace strategy, in accordance with Policy ME3, is a fundamental requirement. This is to ensure that the New Neighbourhood provides major informal recreational opportunities along with landscaping to ensure the scheme blends into the gentle and attractive landscape. Key features to be included include:
- Suitable Alternative Natural Greenspaces utilising the River Allen Valley and land to the north of the housing.
- A green corridor running east to west through the housing areas linking with the local centre and school and utilising the existing farm lane in the east.
- A park within the Burts Hill Conservation Area.

- Provision of allotments.

### **Transport and access**

- Vehicular access is to be provided primarily from Cranborne Road with a single access coming from Burts Hill.
- Traffic management measures will be required along Cranborne Road to limit speeds to less than 30 mph. Additionally, further measures will need to be put in place to the east of the new Burts Hill junction to make this an unattractive route for those wishing to access the A31(T).
- Public transport routes are to be provided through the scheme.
- A network of dedicated pedestrian and cycling routes are to be provided throughout the scheme, including across the Allen Valley to link to Stone Lane and also towards the town centre.

### **Drainage**

A Sustainable Drainage Scheme must be agreed with the Council and Environment Agency with the aims of preventing flooding problems for neighbouring properties and on the River Allen as well as protecting and enhancing nature conservation quality.

## Policy WMC6

### South of Leigh Road New Neighbourhood and Sports Village, Wimborne

About 75 hectares of land is allocated for a New Neighbourhood to the south of Leigh Road, east of Wimborne Minster. This will include the following:

1. 350 new homes
2. A Sports Village with a new home for Wimborne Minster Football and Rugby Clubs, 8 hectares of other active sports pitches, with changing facilities and an area for teenage activity.
3. New allotments
4. A local centre providing for day to day needs
5. Land for a First School
6. About 37 hectares as a country park to the north and south of the A31(T)

### Green Belt

- The Green Belt boundary is amended to remove the land required for the new housing. The boundary runs directly south from Brookside Manor and its amendment is not to narrow the sensitive gap between Wimborne Minster and Colehill/Little Canford. Additionally, the buildings associated with the Rugby and Football Clubs are removed from the Green Belt.

### Layout and Design

- The New Neighbourhood will be set out according to the principles of the Masterplan reports.
- A design code is to be agreed by the Council, setting out the required standards.

### Green Infrastructure

- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing, as required by Policy ME3.

- Suitable land is to be made available to enable the relocation of Wimborne Football and Rugby Clubs. This will include clubhouse facilities, pitches and associated car parking. Lighting of pitches is to be carefully designed to have the minimal possible impact on dark skies.

**Transport and Access**

- Vehicular access is to come from Leigh Road to the east of Brookside Manor. Emergency vehicular access only will be made available from Parmiter Drive. However, until the new access is provided from Leigh Road a temporary access will be allowed to enable the Football Club to relocate. Pedestrian and cycling access is to be provided throughout the New Neighbourhood, including the country park.
- Improvements for walking/cycling to link the development to the existing network towards the town centre and the Castleman Trailway.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
27	5	17	30	19	7	20	15	18	11	19	21	49

Table 9.6

**9.99** 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:

**9.100 General**

- Wimborne Town Council - Policy is legally compliant and sound.
- Wimborne Civic Society - despite proposed increase from 200 to 350 units we feel this development could work. There are positive aspects to the proposals.
- Support principles of relocating rugby club but all alternatives should be considered.
- Land at Leigh Farm should be considered.

- The attractive nature of the town is becoming increasingly eroded by development.
- Object to use of designation "Sports Village". This is urban sprawl.
- Should have reversible development of the Green Belt-mobile home parks instead of dwellings. Would allow long term planning unrestricted by development.
- Landowners - Support - Site is highly accessible.
- Landowner Support - Proposal is for a balanced community.
- Landowner Support - Wimborne and Colehill represent one of the most substantial settlements in East Dorset and it is appropriate to create a new neighbourhood here to take advantage of critical mass and add to the range of homes required.
- Landowners Support - will bring benefits to the area.
- Landowners and Developer Support - site is deliverable with landowners and developers co-operating.
- Developer- site critical to bring forward the relocation of the football club and allotments which would enable the highly sustainable site at WMC3 to come forward.
- Developer - site scores highly in sustainability and technical assessments.
- Developer - amend Map 8.6 to reflect the text that the temporary access to the football club via Parmiter Drive will be available ahead of a new access from Leigh Road.
- Agent promoting alternative site -There is an apparent shortfall in the identified housing figures therefore additional sites are required or proposed sites should have boundaries extended.
- Agent promoting alternative site -Not the most appropriate strategy to place 350 homes adjacent to new club sports facilities. Therefore not justified. Placing facilities next to residential area is moving the problem, not dealing with it.
- Agent promoting alternative site - Stour Valley Properties offer an alternative where the Rugby Club facilities will be at a distance from the enabling residential development.
- Concern over the amount of development and encroaching effect onto countryside.
- Concern over amount of development and impact on Wimborne due to insufficient infrastructure and lack of employment.
- Inextricably linked to other sites and there is a need to consider the harm created by those sites.
- Support - the proposal will provide excellent recreational and leisure facilities as well as housing.
- Land north of Leigh Road and adjacent to Leigh Farm should have some of the development.

#### 9.101 *Housing*

- Developer - site has capacity to increase housing quantum if required.
- Developer - site will bring forward much needed affordable homes.
- Landowner support - desperate need for affordable housing.
- Agent promoting alternative site -This Policy does not represent the most appropriate and justified strategy for this part of the Eastern Area of Search. Alternative site is available.
- Colehill PC - residential development should not be multi-occupancy

- Site does not meet need for affordable housing to be near amenities.
- Support-need for homes is huge and must be met by sensible releases of Green Belt land.
- Colehill PC and others - Object to increase in number of houses from Option stage; from 200 to 350.
- Too much housing.
- Proposed dwellings should have 2 parking spaces each.
- Location of medium density development adjacent to existing low density housing is wrong and this should be replaced by low density housing.
- Is market housing saleable?
- Build more houses here instead of at WMC5 to complete infill.
- Environment
- English Heritage - Requires the significance of the heritage asset to be taken into account in the proposal, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. The proposal directly affects the Roman Road, a designated Scheduled Monument. English Heritage recommends the design of the scheme is amended to conserve the monument so it becomes a feature together with suitable interpretation.
- Natural England - To avoid a conflict with Policy ME1 at later stages of planning process, NE advises the authority to request that those with an interest in the site prepare a basic biodiversity study for consideration prior to the Examination in Public.
- Natural England - The policy appears to have been prepared in an absence of adequate information and assessment of biodiversity. There may be significant interest due to close proximity to designated sites and other biodiversity sites.
- Natural England - Does not meet NPPF requirement that policies are based on up-to-date information on the natural environment. Therefore it is not possible to identify if policies are compliant.
- RSPB - Proposal heavily dependent on the SANG providing mitigation. Testing of the suitability of the SANG is essential and has not been done. Some of the SANGs proposed may be ineffective, particularly those associated with the smaller allocations.
- Dorset Wildlife Trust - ecological survey information is not available to inform the allocation. Required by NPPF.
- Dorset Wildlife Trust - if found to be of low ecological value then raise no objection due to Policy ME3 and suggested Country Park which could enhance the River Stour.
- Dorset Wildlife Trust -wildlife quality unknown as not surveyed.
- Colehill PC, ETAG and others - Support intention to maintain Green Belt gap between Colehill and Wimborne. It includes the recently created SANG at By The Way and Leigh Common SNCI.
- ETAG, DWT, Colehill PC and others - need to ensure light pollution does not affect River Stour and the residents surrounding the site and of Colehill.
- ETAG and Dorset Wildlife Trust
  - whilst there is no current designation of wildlife interest, the land has not been surveyed and therefore the site quality is unknown.
  - include links from proposed Country Park to By The Way and Leigh Common
- ETAG

- location of allotments should be informed by biological survey.
  - colour of sports buildings will need to be determined to ensure no impact on biodiversity.
  - design of Country Park should be informed by habitat and protected species survey
- Developer - site is well removed from heathlands and provides appropriate mitigation as well as access to proposed Country Park which would benefit new and existing residents.
  - Developer - should additional housing be required on site then significant mitigation required can be provided by Country Park south of A31. This would provide for new development and the existing population of Wimborne.
  - SANG should be natural grassland not parkland.
  - Risk to flooding due to run-off.
  - Loss of Green Belt.
  - ED states reasons for Green Belt but advocates its destruction here.
  - Green Belt is important to keep character of area.
  - Green Belt is good agricultural land which is needed to provide food.
  - Support-retaining Green Belt other than for this restrained development is very important.
  - Will narrow gap between Wimborne and Colehill.
  - Will allow development north of Wimborne Road.
  - Landowner Support - Green Belt here is nondescript and serves no overriding Green Belt purpose.
  - Developer - proposal will provide long term surety for gap between Wimborne and Colehill.
  - Developer - Support-proposal does not narrow the vital green gap between Wimborne and Colehill.
  - Developer - Support the Council's position on the Green Belt as housing and other development is needed, the setting of the historic town is not compromised and no gaps encroached on.
  - River Stour floods to north of A31.
  - Should not build on flood plain.
  - Contrary to statement, the area has wildlife value.
  - Developer- site has no environmental constraints and scope for improvements to biodiversity.
  - Proposed open space will not replicate the arable farming conditions which currently attract wildlife.
  - Site is highly visible from primary thoroughfares such as Leigh Road and A31, made worse by amount of car parking and floodlighting
  - Pitches will be dual use and be used in evening increasing amounts of light pollution.
  - Spectator stands will be significant development and highly visible.

#### **9.102 Impact on existing dwellings**

- Colehill PC and others - development should not impact on surrounding dwellings.
- Siting of allotments will help reduce impact.

- Any housing adjacent to the existing bungalows should be single storey.
- Buffer required between existing dwellings and new development.
- Light pollution must not affect existing dwellings.
- Roads should be constructed first to prevent access to the site via Parmiter Drive by lorries.
- Understand that football pitch will be developed first and lorries will use Parmiter Drive. Road is unsuited to this traffic.
- Parmiter Drive should not be used as access point to football club.
- Proposal unfairly concentrates noise from sports and spectators on to one set of residents.
- People buying houses near current clubs know they are there, residents close to this proposal have chosen to live there as is quiet.
- Insufficient separation between proposal and existing dwellings.
- Effect on property values and sales.
- Junction of Parmiter Drive and main road is difficult, further use would create congestion and danger.

#### 9.103 *Facilities*

- DCC - Future population increases will put pressure on education facilities. Where new schools are required, these are identified, including the new school on WMC5. Elsewhere, education needs may be met by expansion or re-organisation. The costs and responsibilities of these are identified in the Draft Infrastructure Delivery Plan (IDP). County Council officers have worked closely with local planning officers in developing the plan. The Core Strategy and Draft IDP reflect the County Council's future requirements in terms of school provision in the area and are supported.
- Colehill PC - impact on Middle Schools.
- No consideration of need for additional middle and secondary education facilities.
- ETAG - decision on location of allotments should be informed by habitats survey.
- Will there be car parking in the allotment area for those users?
- Must be sufficient parking for allotment holders within the allotments.
- Allotments will be provided. A considerable amount of the current users at Cuthbury do not live immediately local to them therefore distribution of sites will be beneficial.
- Insufficient water supplies in this part of the country.
- Existing schools can be extended instead of requiring a new school.
- Object to inclusion of school on this site.
- Co-op - new local centres should remain small scale and provide for basic day-to-day needs and complement the role and function of the town centre.
- British Horse Society - Castleman Trailway is important and the section across this area is footpath only. Opportunity to provide a new route for cyclists, horseriders, pushchairs, mobility scooters.
- Infrastructure would be stretched to breaking.
- Should create a larger first school with St John's.
- Sports Provision

- Landowner support - new neighbourhood concept with sports village and potential country park is visionary and introduce private sector capital to recreational provision.
- Landowner support - opportunity for the town to benefit from improved sports provision. There has been no improvement for local outdoor facilities for decades.
- Developer - the replacement of the football ground will be beneficial to the club as an improved ground will allow a move to other leagues if the opportunity arises and also to the community.
- Rugby Club - support principle of replacement facilities but unsure this is deliverable given the scale of the proposed development. Any alternative proposals which come forward through the planning process should be given due consideration.
- Sports arena is too ambitious.
- QE School has facilities.
- Canford Arena is underused, why not share this?
- There is no statutory obligation to rehouse the two clubs. Why has the council spent so much money and time on it?
- Belief that people will still be allowed to walk dogs on rugby pitches.
- Stour Valley option appears to resolve parking and dog issues as well as that of light pollution.
- Rugby Club requires 200 car parking spaces, minimum of 4 pitches and floodlights for training away from residential areas.
- Locating football and rugby clubs together with residential development will create problems especially over parking.
- The rugby club move would not be permanent and would need to move within 20 years.
- Sports facilities should be located to east end of site with access from Wimborne Road at the eastern end.
- Sports facilities should be provided as at the Hamworthy Sports Club.
- Scheme does not appear to be adequate to cater for clubs as they function at present and does not allow for the future.

#### 9.104 *Transport*

- Highways Agency - regard the proposal with caution, given the proximity to the highly constrained A31 between Canford Bottom and Merley. The improvements at Canford Bottom, whilst they will reduce delay in the area, will not remove the need for the development to mitigate any transport impacts.
- No road improvements or traffic requirements included.
- Extra traffic will be generated by the sports clubs, allotments and other facilities. This will impact on the B3078 and on Canford Bottom.
- Will impact on Leigh Road which is already busy.
- A commitment should be included in the Core Strategy to provide the bridge from Waitrose to Crown Mead.
- Construction traffic should enter site off Wimborne Road west and adequate parking provided off this access.
- Would lead to increase in on road parking.
- Colehill PC and others - New access points should be built so that existing access points are not used with Parmiter Drive remaining closed at all times.

- Only one road is proposed to serve 350 dwellings and football and rugby facilities.
- Unsound unless public transport is improved.

## Officer Response

**9.105** Whilst there continues to be a significant number of objections to this allocation, the Council must ensure there is sufficient housing land available to meet the housing need which has been identified and to meet the tests of soundness.

**9.106** The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development.

**9.107** A significant number of objectors have raised concerns over the selection of sites for residential development. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed masterplanning exercises.

**9.108** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions.

**9.109** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public. However, officers at Natural England have not raised an in principle objection to this proposal.

**9.110** The use of SANGs to mitigate the impact of development on heathland has been agreed with Natural England.

**9.111** Some responses have been concerned with the potential level of light pollution which could result from the proposed development. The NPPF states that by encouraging good design, planning policies should limit the impact of light pollution. It is proposed that this requirement is now included within Policy HE2

**9.112** Some responses have referred to the risk of flooding on this site. Both Councils have completed Strategic Flood Risk Assessments. No objections have been received to this proposal from the Environment Agency. Flood management, mitigation and defence is covered in Chapter 13, Managing the Natural Environment which includes “future proofing” against the effects of climate change and the need for the use of Sustainable Drainage Systems amongst other measures.

**9.113** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new or larger, replacement schools will be required and these are included in the proposals.

**9.114** English Heritage has commented on the Ancient Monument on this site. Their requirements will be dealt with through the detailed design and layout work which will follow the allocation. The site of the monument is shown within the area to be used for playing pitches.

**9.115** 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 these show that development can take place. Following the adoption of the Core Strategy a developer will be required to carry out further assessments to identify 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.

**9.116** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other site requirements. The details of this can be found in replacement Policy KS3 and KS4.

### **Proposed Pre-Submission Change**

**9.117** No change

## **Policy WMC6**

### **South of Leigh Road New Neighbourhood and Sports Village, Wimborne**

About 75 hectares of land is allocated for a New Neighbourhood to the south of Leigh Road, east of Wimborne Minster. This will include the following:

1. 350 new homes
2. A Sports Village with a new home for Wimborne Minster Football and Rugby Clubs, 8 hectares of other active sports pitches, with changing facilities and an area for teenage activity.
3. New allotments
4. A local centre providing for day to day needs
5. Land for a First School
6. About 37 hectares as a country park to the north and south of the A31(T)

### **Green Belt**

- The Green Belt boundary is amended to remove the land required for the new housing. The boundary runs directly south from Brookside Manor and its amendment is not to narrow the sensitive gap between Wimborne Minster and Colehill/Little Canford. Additionally, the buildings associated with the Rugby and Football Clubs are removed from the Green Belt.

### **Layout and Design**

- The New Neighbourhood will be set out according to the principles of the Masterplan reports.
- A design code is to be agreed by the Council, setting out the required standards.

### **Green Infrastructure**

- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing, as required by Policy ME3.

- Suitable land is to be made available to enable the relocation of Wimborne Football and Rugby Clubs. This will include clubhouse facilities, pitches and associated car parking. Lighting of pitches is to be carefully designed to have the minimal possible impact on dark skies.

#### **Transport and Access**

- Vehicular access is to come from Leigh Road to the east of Brookside Manor. Emergency vehicular access only will be made available from Parmiter Drive. However, until the new access is provided from Leigh Road a temporary access will be allowed to enable the Football Club to relocate. Pedestrian and cycling access is to be provided throughout the New Neighbourhood, including the country park.
- Improvements for walking/cycling to link the development to the existing network towards the town centre and the Castleman Trailway.

#### **Policy WMC7**

##### **Leigh Park Area of Potential Change, Wimborne**

If Wimborne Rugby Club relocates to the area identified in Policy WMC6 their existing home should be used to benefit the Leigh Park Community. This is to include:

1. The retention of 1.5 hectares of land to be used as open space, within which a multi use games area is to be provided.
2. Youth club facilities.
3. Housing to provide for the needs of residents with local connections to Leigh Park.

An Area Brief is to be agreed with the Council to set out how best to achieve the greatest benefit for residents of Leigh Park.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
1	4	2	6	2	3	2	4	4	3	1	4	8

Table 9.7

### 9.118 *General*

- Wimborne Town Council and Councillor - land is owned by Wimborne Town Council and at a recent meeting the Town Council agreed that Policy WMC7 should be withdrawn from the Core Strategy so that future generations could continue to enjoy this piece of recreation land.
- Wimborne Civic Society - a move by the rugby club and the replacement proposals are supported.

### 9.119 *Housing*

- Why is not the number of affordable homes included?
- Would free up space for more affordable housing close to town centre facilities.
- Too much housing in town.

### 9.120 *Environment*

- Would be a pity to lose more open space to buildings as the attractive nature of Wimborne is being eroded.
- Wimborne Rugby Club - Para 5.2 is misleading. The Club has had a lease from the Town Council for many years to use the site during certain periods of the year for its sole use.
- Wimborne Rugby Club-club will need one more pitch than stated.

### 9.121 *Transport*

- Not enough road improvements or traffic requirements.

## Officer Response

**9.122** Following the comments from the landowner, it has been decided to remove reference to housing from the policy

## Proposed Pre-Submission Change

### Policy WMC7

#### Leigh Park Area of Potential Change, Wimborne

If Wimborne Rugby Club relocates to the area identified in Policy WMC6 their existing home should be used to benefit the Leigh Park Community. This is to include:

1. The retention of 1.5 hectares of land to be used as open space, within which a multi use games area is to be provided.

**2. Youth club facilities:**

3. Housing to provide for the needs of residents with local connections to Leigh Park.

An Area Brief is to be agreed with the Council to set out how best to achieve the greatest benefit for residents of Leigh Park.

## New Policies Required

**9.123** St Michael's Middle School, Colehill and Beacroft Foundation School, Colehill

**9.124** Dorset County Council have requested that the Green Belt boundary is amended at both the above schools to enable the schools to expand:

- St Michael's School, Colehill - the proposed allocations of residential land will increase demand for middle school education. Allenbourn School is constrained and expansion restricted. Expansion of St Michael's will require a significant amount of new infrastructure such as classrooms, specialist rooms, studio spaces, toilets and circulation space. Satisfactory expansion of the school would require an amendment to the Green Belt boundary to accommodate this growth.
- Beacroft Foundation School, Colehill - The school is over capacity already. DCC wish to expand Post 16 facilities to enable students to be able to stay at the school. Additional facilities are required to provide for this facility and the numbers of students. Re-drawing of the Green Belt is required to enable the facilities to be provided.

## Officer Response

**9.125** To enable the schools to expand and provide educational places for the existing and proposed population, the Green Belt boundary will be amended.

### New text

**9.126** It is proposed to amend the Green Belt boundary at St Michael's Middle School and Beacroft Foundation School. The proposed allocations of residential land will increase demand for middle school education. Allenbourn School is constrained and expansion restricted. Expansion of St Michael's will require a significant amount of new infrastructure such as classrooms, specialist rooms, studio spaces, toilets and circulation space.

**9.127** Beacroft Foundation School is over capacity already. Dorset County Council wish to expand Post 16 facilities to enable students to stay at the school. Additional facilities are required to provide for this facility and the number of students.

### Policy WMC8

#### St Michael's Middle School, Colehill

The Green Belt boundary is amended to remove land from the Green Belt to enable the satisfactory expansion of the school.

### Policy WMC9

#### Beacroft Foundation School, Colehill - Green Belt

The Green Belt boundary is is amended to remove land from the Green Belt to enable the satisfactory provision of facilities at the school.

## **10 Responses and Analysis of Chapter 9 Corfe Mullen**

## Policy CM 1

### Lockyer's School and Land North of Corfe Mullen New Neighbourhood

Land at the northern end of the main built area of Corfe Mullen is allocated to provide a new neighbourhood including 250 homes, local facilities and services and a new Lockyer's School. To enable this the Green Belt boundary will be changed to remove land from it to the north of Wimborne Road.

#### Layout and Design

- The New Neighbourhood will be set out according to the principles of the masterplan.
- A design code will be agreed by the Council, setting out the required high standards.
- The original old school buildings are to be retained and reused.

#### Lockyer's School

- A new school is to be provided on land north of Wimborne Road.
- The school playing fields are to be made available for community use when not required by the School.

#### Green Infrastructure

- The recreation ground is to be reorganised to maximise pitch provision. An additional 6 hectares of active sports pitches are to be identified and delivered on the western edge of the village to replace the area lost due to the new school, and also for the wider needs of the community. The development should contribute towards this provision.
- New replacement allotments are to be provided in an easily accessible location within the Parish.
- A Suitable Alternative Natural Greenspace strategy is to be agreed with the Council and implemented as required by Policy ME3.

#### Transport and Access

- Access to the New Neighbourhood is to come from Wimborne Road with the new school being accessed through the housing area north of Wimborne Road.

#### Phasing

- The allotments must be suitably located and established before development can commence on the current allotment site.

- An active sports strategy must be agreed with the Council prior to the relocation of the School to ensure that adequate provision is available to meet existing and future needs.

### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
52	14	24	72	27	21	46	18	31	23	18	22	17

Table 10.1

10.1 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:

#### 10.2 Housing

- The proposed site CM1 is the least damaging if housing is to be forced on Corfe Mullen and the best way of safeguarding the Green Belt elsewhere while providing better facilities and housing.
- Corfe Mullen is a suitable settlement to locate new strategic housing due to the range of services, many of which are available without the use of a car.
- Support limited change to the Green Belt boundary away from the Waterloo Valley, which is an area that has many examples of unimproved grassland.
- Corfe Mullen Parish Council accepts the proposals for building on the fields adjacent to the recreation ground, and also the current allotments subject to an alternative site of equal quality being provided.
- Housing should not be crammed in to Corfe Mullen – extra capacity gives people space, whilst allowing the village to host events such as the carnival. It can also lead to social disorder and will become a less desirable place to live.
- Allotments and recreation ground should not be built on as provide a semi-rural feel for Corfe Mullen, which distinguishes it from the more densely built-up areas adjacent in Poole. They are essential amenities for the people who use them, i.e. allotment holders, sports people and dog walkers
- Moving the school to the recreation ground is no different to building the houses directly on it.
- The new development will mean increased traffic, more pressure on schools, doctors and hospitals, plus the potential for increased crime. They ignore the welfare and privacy of existing residents adjacent to the site.

- Housing development should proceed on brownfield sites and redevelopment of derelict properties in the area. No reference found in the Core Strategy to this or to the number of second homes. A strategy should be put in place alongside measures to stop buying homes purely as financial investments.
- No evidence in the document that all areas surrounding Corfe Mullen have been given equal consideration for new development. As per NPPF, no reasonable alternatives have been considered.
- Majority of people commute to Bournemouth and Poole, so would make sense to put extra houses there or create satellite towns (such as Verwood) – additional development in Corfe Mullen lacks insight and social planning.
- Housing should be built on a green field (not Green Belt) on a site separate from Corfe Mullen where sustainable development for the future can realistically be accommodated.
- No support for argument that there is a choice between the Core Strategy proposals or building at Pardy's Hill/Waterloo Valley – both are out of scale for this part of Corfe Mullen.
- Opposition by Corfe Mullen Community Group and others to development in the Waterloo Valley (including Pardy's Hill and Broadmoor Road), as building on such a prominent Green Belt location will open the floodgates to development.
- Landowners Havelock and Lloyd propose additional residential development could be provided on a new site adjacent to the Windgreen Garage, which could come forward early in the plan period. As with the new neighbourhoods, the Green Belt boundary would need to be redrawn to accommodate this.
- Plans for development on land at Haywards Lane and Pardy's Hill could be built at a lower density and provide affordable housing that will give occupants a desirable place to live. This area is not the Waterloo Valley. Arguments regarding the steepness of slope are not valid – large area of existing settlement is already built like this. Access by older people could be overcome by siting properties along Blandford Road.
- Scrapyard adjacent to Naked Cross Nurseries and the Holmes Bush Pub is suitable for housing if it is offered for sale – good transport links with Poole without having to drive through Corfe Mullen.
- Representations by The Perry Family Trust accompanied by additional supporting documents
  - Request site between Blandford Road and Pardy's Hill is considered for new development
  - As the original proposals for housing sites was based on a masterplanning exercise rather than from an identified strategic housing requirement, it is interpreted that the proposals for Corfe Mullen is a position of minimal development rather than meeting an objectively assessed target. Further evidence is required to justify the level of development proposed in the village meets housing requirements for both district and village
  - The previous Options consultation did not present sufficient alternative options for housing delivery for Corfe Mullen, by not taking to account the benefits other sites could offer and the difficulties of the proposed site to deliver.
  - In light of problems with the delivery of CM1, the Council should allocate one or more reserve sites within the original area of search, with the Perry Family's Trust land between Blandford Road and Pardy's Hill well placed for inclusion by being readily deliverable. Benefits of site are also to provide access improvements by allowing the close of the Pardy's Hill junction. It also does not rely on the relocating of Lockyers School and the current allotments.
- Representations by Taylor Wimpey accompanied by additional supporting documents
  - Request site east and west of Haywards Lane is considered for new development

- Current approach gives no indication of how much of Corfe Mullen's housing need would be met by CM1
- Express concerns over deliverability of CM1 and the number of alternatives development options consulted on for Corfe Mullen
- Unclear how the Council will consider the alternative sites submitted in the Pre-Submission consultation
- Objectively assessed housing need for Corfe Mullen should be defined and sources of supply set out, consulted on and included in the Submission Core Strategy. Based on this, land east and west of Haywards Lane represents a suitable addition or alternative to CM1 which is available, suitable and achievable.
- Further information submitted to address previous concerns raised regarding topography and highway safety.
- Landowners of site within CM1 to the north of Wimborne Road – The Canford Estate and Harry J Palmer – have a series of comments / concerns:
  - Representations on Core Strategy accompanied by a development concept document to illustrate their own views on the site's potential to deliver sustainable development and a mix of dwelling types. It is explained that the site has the potential to accommodate modest development without compromising the key purposes of the Green Belt
  - Given location of the site adjoining a large area of open space (recreation ground), it is not considered necessary to provide on-site SANGs. But off-site provision has the potential to provide wider benefits to Core Mullen. Currently working with Natural England on a series of options on sites within a reasonable proximity to the site.
  - Question the inclusion in policy wording of new neighbourhoods to be set out to principles of the masterplan and a design code to be agreed with the Council – consider this unnecessarily restricts the flexibility of the policy and rules out alternative, equally valid options for the site. A design guide is considered unnecessary for the site's size and the level of protection already given by policy HE2
  - Submission illustrates how access to a potential new school location could be achieved through their site or as an alternative, directly off Wimborne Road. This flexibility should be recognised in policy CM1
  - Due to minimal major infrastructure requirements, the site should be phased to come forward at an early stage
  - Due to uncertainties in the provision of a new school with the plan period, policy CM1 should be sufficiently flexible to allow sites to come forward on a phased basis. Land to the north of Wimborne Road should be the first phase to come forward, independent to the relocation of Lockyers School, with the potential to accommodate up to 12-130 homes
  - Propose detailed wording changes to CM1 to reflect these comments
- The idea that development will make housing more affordable is not valid – developers will always sell at the highest value. New developments will also sell at a premium which in turn pushes up the price of the nearby housing supply
- The local parish council should decide on the level of local housing required, based on actual local demand. It is hard to see how a village of Corfe Mullen's size needs the number of dwelling being discussed.
- The new dwellings proposed should be for the existing Corfe Mullen community only. The provision of a 100% Village Trust on the land is what the government wishes to create.
- Policy should be reworded to allow for as many affordable homes as possible.
- The need for affordable housing is the village's top priority as it is over the whole of East Dorset – current proposals no way satisfies the need.

- Large levels of affordable housing are already being provided in the area by the development of flight refuelling in Wimborne.
- Existing homes for sale in the area confirm that there is no shortage of available housing in the area.
- Questionable Affordable Housing requirement – DCC census profile data shows Corfe Mullen to have a proportionately younger demographic which suggests it is already well balanced.
- Land too expensive now for affordable housing and wages too low. Council housing is the answer, with affordable rents.
- Document is unsound unless details of the provision of additional recreation ground and allotments are provided.
- Waiting for developer funds before resiting the school, then building the homes does not solve the housing problem straight away. Many factors have to be in place before it could take place, i.e. permissions and sales.

### 10.3 *Environment*

- Environment TAG and others respond to say that the Waterloo Valley and area to the west of Corfe Mullen is within the recently defined Wild Purbeck Nature Improvement Area – this should be reflected in the text of the chapter, including defining the types of development that may be appropriate in such an area (as suggested in the NPPF, para 117).
- Dorset Wildlife Trust – hold an objection to the proposal pending ecological and environmental studies, and identification of a suitable and functional area of SANG. If the site is found to have low ecological value and a SANG can be provided, then DWT would have no objection, although some concerns remain regarding the potential increase in use of the nature reserve at Upton Heath and other nearby European designated heaths.
- Amend policy wording that any site short-listed for a SANG or relocated sports pitches and allotments should be the subject of biological survey and recognise landscape, biodiversity and geological constraints, including the Wild Purbeck Nature Improvement Area.
- RSPB – Concern that all housing proposals in the Core Strategy rely heavily on Suitable Alternative Natural Greenspace (SANGs) as a form of mitigation against urban effects on internationally designated heathland sites. Whilst research continues, it is an essentially untested form of mitigation. Long term monitoring and management is also critical to their success. Testing of the suitability of SANGs as a mitigation measure is essential and not yet been undertaken.
- Housing proposals for CM1 are only 600 metres from Corfe Hills Nature Reserve, which is heathlands habitat.
- Further consideration must be given to the strong and dramatic landscape structure around the northern edge of the proposals.
- Noise and light pollution impacts in a currently very rural area.
- No reference is made to the need to carry out an environment impact assessment.

### 10.4 *Green Belt*

- Proposals for New Neighbourhoods contradict national policies (policies protecting Green Belt cannot be overridden by the presumption in favour of sustainable development) and are therefore unsound.

- Green Belt provides recreational areas, clean air, an important habitat for wildlife as well as protecting the character of Corfe Mullen by ensuring development does not exceed a certain boundary. Any building on it is not acceptable and would fundamentally damage the local environment.
- Green Belt was drawn in 1986 to halt development, with a planned review 5 years afterwards – this did not happen, so land has been sterilised from development. Large areas of poor quality land could have been provided for industry and other possibilities such as affordable housing that could come forward immediately.

### 10.5 *Transport*

- Whilst traffic flows well throughout the day, there is peak time congestion, particularly with additional blockages (i.e. road works) – extra residents, all of whom will have cars will create further problems.
- Wimborne Road, roundabouts on Higher Blandford Road are all close to capacity, as is The Broadway, Broadstone. The roundabouts and junctions in the Cogdean area will require extra traffic management or calming measures to address existing problems, let alone accommodate the extra residents / pedestrians.
- Corfe Mullen is already used as a rat-run for commuters from Ferndown/Wimborne travelling to Poole – additional housing at a pinch point on this route will not improve this, which may in turn impact on public transport running to time.
- Concerns that additional development will result in more traffic on the many nearby country lanes – this will make it more dangerous for horse riders, cyclists and walkers
- Pedestrian crossings, lower speed restrictions and essential infrastructure support are required anyway, regardless of the Core Strategy proposals.
- The Perry Family Trust and others - Proposals for alternative development on Pardy's Hill will result in transport improvements by removing dangerous junctions
- The Highways Agency highlights the fact that with the area's high car ownership, any new development will have an impact on the already constrained A31. Emphasis is given to new development mitigating their traffic impacts (as per the Core Strategy's policy KS11). This may include improvements to sustainable transport measures, which should be assessed through an appropriate transport assessment.
- More emphasis and positive policies must be placed on improvements to public transport and no details on the provision for improved access for cyclists and walkers.
- Lack of buses to the Corfe Mullen area, especially with the removal on No 3 bus and transport links between Broadstone and Poole are negligible – improvements to them need to be tied in place legally for ever, not just a few years.
- Corfe Mullen has inadequate public transport links or sustainable employment opportunities, unlike Bournemouth, Poole, Christchurch and Dorchester. DCC Census Profile data for Corfe Mullen also show car ownership levels are significantly higher than other parts of Dorset, and national levels. In addition to this, the average household size is greater in Corfe Mullen compared to the rest of Dorset which will also increase car usage. The scale of development proposed will only exacerbate the problem.

### 10.6 *Recreation Facilities*

- Provide new allotments and sports pitches first of all, to guarantee their provision.

- The recreation ground car park is regularly full; the recreation ground is not suitable for a new school from the point of view of traffic and ruining the much used facility.
- The current ground has the capacity to enable large sporting events and is an invaluable resource to a family orientated community.
- Building on the sports pitches contradicts the identified shortfall of pitches in Corfe Mullen (identified back in the East Dorset Local Plan (2002)), particularly when no alternatives have been identified. Equally the pitches cannot be compensated for by moving them to the north, due to the slope of the land.
- The current sports fields are well drained owing both to soil quality and location. Other sites in the surrounding area slope away to lower quality clay soils that would not be free draining with substantial cost implications to resolve.
- The Corfe Mullen Sports Association or Parish Council could not run facilities in two locations.
- Corfe Mullen Sports Association – The existence of a sports strategy as referred to in the policy does not itself ensure new or additional facilities will be in place, operational and be sufficient prior to the commencement of any development. Any strategy cannot be consistent with sustainable development until
  - New / alternative site for recreational facilities is identified
  - Identify the body responsible for funding, maintaining and sustaining the new facilities
  - The new facilities must be in place and operational including parking and changing facilities prior to any development of the existing site
- Corfe Mullen Sports Association and others are concerned that the location of any new and replacement recreational facilities has not been addressed in the document and the policy does not require any new space to be ready for use before building commences – there should be a requirement that states that it should be in place.
- Whilst the south of the village lacks sport and recreation facilities, the residents in the south have not been asked what they would prefer.
- Relocation of the recreation ground, particularly to the south of the village will involve longer journey for people and increased traffic
- More provision for football and other sports in the south of the village could be provided in the field adjacent to Springdale Road car park.
- For a replacement site, land to the east of the village is in the Borough of Poole so cannot be safeguarded through the Core Strategy. Land to the south is subject to international nature conservation designations. Land to the west would require levelling works, impacting on cost and landscape.
- Any new recreation ground should be in the south of the village, not the west.
- Corfe Mullen Sports Association – the document does not identify any reasonable alternatives. It is not sound unless:
  - The two fields between Violet Farm Close and the present allotments are allocated to sport and recreational use as can benefit from existing changing and parking facilities and can compensate the present sports pitch shortfall. Or;
  - A suitable new / alternative site is identified

### 10.7 School Facilities

- A new Lockyers school should be built as soon as funds available as current facilities are considerably out of date.

- Even a rebuilt Lockyer's School will be inadequate to accommodate the influx of new families as a result of the new development.
- The new school should only be built once the type (i.e. two tier or three tier) has been agreed.
- Dorset County Council comments that in general, current school facilities provision meets the needs of the area. However, where they are required through population increase and residential development, these are identified in the plan and draft Infrastructure Delivery Plan.
- The Perry Family Trust and others question the commitment of the County Council to a replacement school based on responses to previous responses. No details are provided in respect of the funding of the new school, and are not considered that the development of 250 homes would generate sufficient value to do so. Any future change to academy status would also complicate land ownership
- The land currently used by the school was bequeathed to the village, but the document does not state how it will be taken over for other uses and may invoke legal challenges if it does
- The school is not on the County's list of priority re-builds.
- Concern that moving the school away from the main road to a new site on the recreation ground will lead to more vandalism, anti-social behaviour and levels of rubbish in the surrounding area, plus further for people to walk or cycle to that may aggravate 'school run' traffic problems
- The footprint of the proposed school takes a large amount of the available space and does not appear to have enough parking allocated.
- There are no guarantees in the document of the actual final size of the school.
- Corfe Mullen Parish Council is against building a replacement school on part of the recreation ground.
- Corfe Mullen Sports Association and others - The dual use of school playing fields is not a good idea in respect of child safety. The school could also withdraw community use if it so wished. It would also limit the use by those who currently have access 7 days a week.
- Policy to be reworded to state that if the school cannot be redeveloped on existing site, only then could a relocation to the recreation ground be considered
- The new school's location would result in the loss of the dog walking circuit which is well used by local residents
- The retention and reuse of the school building is supported.
- Corfe Mullen Sports Association and others commented that the claim that Lockyers school site cannot be redeveloped whilst still in use is false – this was done at QE School and Allenbourn Middle School, Wimborne
- Rebuilding on the existing site is feasible, particularly if the central section of Wimborne Road is closed to allow permanent access for joint use of the recreation pitches during term time.
- The existing site could be used in its entirety for new school buildings, with the recreation ground fields used as well. If further land is required, the land bordering the recreation ground and Violet Farm Close could also be used, with the road layout being changed. A similar approach was adopted in the East Dorset Local Plan (2002)

### 10.8 Allotments

- Greater emphasis needs to be placed in the document that the planning permission on the existing allotments can only be granted once a suitable new site of agreed quality has been established. The new site should be agreed with a recognised body such as national Society of Allotment and Leisure Gardeners (NSALG) and with the Parish Council – this should also be a requirement of the policy

- No detail in the document of the resiting of the allotments – it is not possible to give a considered opinion without knowing this. (South Western Counties Allotment Association and others)
- Corfe Mullen Allotment Association – No replacement site identified, and not likely to be so within the village boundaries. Proposal should be removed from the plan
- The present allotments provide many positive benefits for the local community, including financial benefits in the current difficult times
- A replacement site will need to be similar but with better facilities such as able to have a shed, good water supply, ample parking and good growing positions with an overlap with the running of the existing site is requested so not to lose any growing time and to be able to harvest crops before leaving the existing site.
- Resiting the allotments is fraught with problems – the existing site is on the old violet farm, with good soil, drainage and aspect. Few sites exist like this in Corfe Mullen, so land is wasted on housing.
- No site available in the Parish with suitable quality of soil, but very high costs if they were moved.
- An existing long waiting list, additional allotments should be set up next to the existing ones. Local Councils have a statutory duty to provide allotments where there is a demand.
- More areas for growing food are required, not less, particularly with respect of infill development that results in the loss of the larger back gardens. Future planning policy should take more account of more personal responsibility for our own food supply.
- Landowners of site within CM1 to the north of Wimborne Road – The Canford Estate and Harry J Palmer – have potential sites for replacement allotments, with illustrative plans provided in the development concept document, at:
  - Broadmoor Road
  - 2 sites off Wareham Road to the south of Corfe Mullen
  - Merley Park Road, Borough of Poole. With this option, it is considered that policy CM1 is too restrictive in requesting a new allotment site can only be provided with the Parish. This site could be provided on a non-statutory basis with security of tenure secured by appropriate ownership arrangements for the residents of Corfe Mullen.

### 10.9 Services / Utilities

- Further consultation with medical services welcomed to best accommodate increases in population, as the present Doctors surgery is at the opposite end of the village. Capacity could be accommodated within the present medical centre, but with improved transport links and possible further development of the surgery itself.
- A health centre on the Lockyers School site would be welcomed by those who struggle to reach the only other centre at the opposite end of the village
- Corfe Mullen is tied to Wimborne, not Broadstone or Poole in terms of recycling facilities and library services.
- Facilities should be created in the village first, or build were they exist already.
- Representations by land owners Havelock and Lloyd propose additional commercial and community uses could be provided on a new site adjacent to the Windgreen Garage. The Green Belt boundary would need to be redrawn to accommodate this. The location would be more commercially advantageous by locating it close to existing facilities rather than as part of the new neighbourhood site.

- Corfe Mullen Parish Council wishes the policy to include specific reference to the retention of a youth centre facility.
- Concern that a significant increase in population is not sustainable for the local amenities or infrastructure and will lead to long waits to see doctors, etc
- Proposals are a 'what if' and 'could be' which is a lost opportunity for Corfe Mullen which is a large settlement, currently deprived of amenities and facilities. The current answer that these can be provided by adjoining settlements is not a credible answer

#### 10.10 *Retail*

- The village has adequate shopping facilities dispersed throughout the village that has built up organically over the years, introducing an additional outlet could drive the others out of business. They would also only duplicate those that are available in a 5-10 mile radius
- New retail units on Lockyers School site would be welcomed and would also provide more employment in the village
- Co-operative Group and others highlight the scale of new floor space with Corfe Mullen is not justified, is based upon an out of date evidence base and out of scale with the role and function of the settlement
  - Supporting text refers to 2,000sq m, which relies on a previous estimate for potential new housing in Corfe Mullen of 800 – the Pre-Submission document proposed 250 homes
  - Population growth and retail expenditure growth forecasts used in the NLP evidence base are out of date
  - The NLP report refers to 1,200sq m convenience goods floorspace, not 2,000sq m
  - The NLP report used a low sales density figure, not reflective of the main grocery operators
- If there is no demand for additional retail, then land allocated should be used only for affordable housing.

#### 10.11 *General*

- No specific details evident on how the plan will be delivered / funded or timescales of when development will take place
- Lack of consultation with the public in Corfe Mullen
- Better referencing of statistics referred to in the document is required
- A local referendum should take place to accurately gauge the opinions of the existing residents
- The plan has been prepared by consultants who did not speak to any local organisations such as the Parish Council.

### **Officer Response**

**10.12** Whilst there continues to be a significant number of objections to this allocation, the Council must ensure there is sufficient housing land available to meet the housing need which has been identified and to meet the tests of soundness.

**10.13** The council considers that sufficient land has been allocated to meet demand and therefore additional sites are not required.

**10.14** Some objectors have raised concerns over the selection of sites for residential development. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed masterplanning exercises.

**10.15** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the EiP.

**10.16** Details of a replacement school are not available at present but Dorset County Council have been involved with the planning process throughout and therefore the requirement to replace the school remains in the document. It is presently unclear whether the school needs to be relocated. If it does the southern part of the recreation Ground is considered to be the best location. This is, however, Green Belt. There is a concern that if the site is removed from the Green belt and the school does not need to be moved, permission could be given for other forms of development. The Council considers the site should only be released from the Green Belt for a new school. Therefore the policy is to be amended to safeguard the land for school use only.

**10.17** Whilst there are concerns over the building on the allotments, the policy requires replacement allotments to be made available. No change is therefore proposed.

**10.18** There are a number of objections to the concept of additional retail facilities in Corfe Mullen. The recent Retail Study 2012 shows that additional floor space is still required in the village. Meeting this requirement would depend on the interest of a suitable retailer.

**Proposed Pre-Submission Change**

## Policy CM 1

### Lockyer's School and Land North of Corfe Mullen New Neighbourhood

Land at the northern end of the main built area of Corfe Mullen is allocated to provide a new neighbourhood including 250 homes, local facilities and services and a new Lockyer's School. To enable this the Green Belt boundary will be changed to remove land from it to the north of Wimborne Road.

#### Layout and Design

- The New Neighbourhood will be set out according to the principles of the masterplan.
- A design code will be agreed by the Council, setting out the required high standards.
- The original old school buildings are to be retained and reused.

#### Lockyer's School

- A new school is to be provided on land north of Wimborne Road.
- The school playing fields are to be made available for community use when not required by the School.
- **The site of the new school is identified as safeguarded land for the construction of a new school alone. Should the school not be required during the plan period the site will return to the Green Belt.**

#### Green Infrastructure

- The recreation ground is to be reorganised to maximise pitch provision. An additional 6 hectares of active sports pitches are to be identified and delivered on the western edge of the village to replace the area lost due to the new school, and also for the wider needs of the community. The development should contribute towards this provision.
- New replacement allotments are to be provided in an easily accessible location within the Parish.
- A Suitable Alternative Natural Greenspace strategy is to be agreed with the Council and implemented as required by Policy ME3.

#### Transport and Access

- Access to the New Neighbourhood is to come from Wimborne Road with the new school being accessed through the housing area north of Wimborne Road.

#### Phasing

- The allotments must be suitably located and established before development can commence on the current allotment site.
- An active sports strategy must be agreed with the Council prior to the relocation of the School to ensure that adequate provision is available to meet existing and future needs.

## 11 Responses and Analysis of Chapter 10 Ferndown & West Parley

## 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

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

Table 11.1

**11.1** 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:

### 11.2 *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.

### 11.3 *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.

#### 11.4 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.

#### 11.5 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.

### Officer Response

**11.6** 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.

**11.7** 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.

#### 11.8 Paragraph 10.7

**11.9** Amend text. ~~1980's~~ to 1980s....

#### 11.10 Paragraph 10.20 - insert Key Facts and an explanation of Shopping Frontages

#### 11.11 Key Facts

#### 11.12 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%.
- In contrast, Ferndown has a relatively low proportion of comparison retail units (36.3%), compared with the national average (48.3%). 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.

### 11.13 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.

### 11.14 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 sqm of comparison floorspace, and 1,400 - 1,500 sqm of convenience floorspace in Ferndown.

### 11.15 Ferndown Town Centre Primary Shopping Area and Shopping Frontages

11.16 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.

11.17 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.

**11.18 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. ~~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 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.~~

**11.19** Map 11.1 Ferndown Town Centre - Proposed Changes

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

**Policy FWP2**

**Forest View Drive and Woodland Walk Green Belt boundaries, Ferndown**

The Green Belt boundary will be redrawn to include land within it at Forest View Drive and Woodland Walk, Ferndown.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	2	10	7	1	4	3	5	1	6	3	2	5

Table 11.2

**11.21** 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:

### 11.22 *General comments*

- Ferndown Town Council – Support
- Dorset Wildlife Trust – Support
- ETAG – We support in part the reasoning for inclusion of these two sites in the Green Belt.
- Mr Christopher Chope MP – Object - Non-compliance with NPPF. New Green Belts should only be established in exceptional circumstances. The exceptional circumstances have not been made out.
- The land is suitable for allotments

### 11.23 *Forest View Drive*

- Natural England – Support - Land at Forest View Drive includes land of biodiversity value as it is a Site of Nature Conservation Interest and should be afforded the protection of ME1.
- Canford Estate (Landowners) – Whilst within 400m of protected heathland, we consider the land has potential for healthcare, a care home or other suitable non-residential use.
- This is a remnant of heathland and should be included in the Green Belt.

### 11.24 *Woodland Walk*

- Messrs RJ & MC Newsome (Landowners) – Object – It is considered the subject site could accommodate up to approximately 9 dwellings, whilst having due regard for the Tree Preservation Order as previously acknowledged in the adopted Local Plan. The Council's justification for extending the Green Belt boundary to include the subject site fails to comply with the NPPF policy guidelines and is unsound.
- ETAG - Land immediately to the east of the site should also be included in the new Green Belt boundary. It has a blanket Tree Preservation Order and is incapable of development because of heathland policies.
- This should be used for housing instead of the large areas at West Parley.
- Woodland Walk is unsuitable for development as access through the Walk is too narrow and wooded; many trees being protected by Tree Preservation Order's.

## **Officer Response**

**11.25** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework (NPPF), published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan. There is a majority of support for the changes to the Green Belt boundary to include these parcels of land within the Green Belt.

Both sites were previously safeguarded in the Local Plan 2001. Since then, Forest View Drive now has no potential for housing development, being within 400m of protected heathland. Woodland Walk is heavily wooded and protected by Tree Preservation Orders, with a difficult access. It does not have potential for development for housing as suggested. Consideration is given at this stage only for the inclusion of the safeguarded sites themselves, and not other alterations to the Green Belt boundary.

**11.26** For these reasons, the Green Belt boundary should be amended to include these sites.

**11.27 Proposed Pre-Submission Change**

**11.28** No change to the policy.

### **Policy FWP2**

#### **Forest View Drive and Woodland Walk Green Belt boundaries, Ferndown**

The Green Belt boundary will be redrawn to include land within it at Forest View Drive and Woodland Walk, Ferndown.

## **Policy FWP3**

### **Holmwood House New Neighbourhood, Ferndown**

A New Neighbourhood is allocated adjacent to Holmwood House, south of Ferndown to provide about 110 homes and large areas of informal open space. To enable this, the Green Belt boundary will be amended to exclude the land identified for new housing.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

#### Green Infrastructure

A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3. This includes open space to be provided south of the allocated housing which will enhance the existing open space at Poor Common and protect the Green Belt gap between Ferndown and Longham.

#### Transport and access

Vehicular access is to be provided from Ringwood Road to the north of Holmwood House.

Dedicated pedestrian and cycling links are to be provided throughout the housing area connecting into the existing networks to the north, east and west.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
14	3	5	18	9	3	5	11	6	9	9	6	7

Table 11.3

**11.29** 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:

**11.30 Housing**

- Libra Homes (Developer) – The site has the potential to deliver a greater quantum of housing to meet the objectives of the NPPF (para 47). It is estimated the site could accommodate up to 140 dwellings on a development site of 4.5ha, whilst still providing 6.4ha of supporting SANG. Additional homes could be provided to the east of Longham Business Centre.
- Ferndown Town Council – support this as a reasonably sustainable development, and in particular the creation of a large SANG in association with Poor Common.
- Christopher Chope MP - Object, it removes designated Green Belt land without justification.
- No justified need for housing here.
- Should be 100% affordable housing, not 50%. Young people and those on low incomes are in great need now.
- The numbers do not seem excessive, but the houses should be built to good design standards.

**11.31 Transport**

- Traffic congestion on Ringwood Road and at Longham roundabouts will be exacerbated.
- The development should have a dedicated right hand turning from the south – not traffic lights.
- Traffic lights should give priority to Ringwood Road and not impede the flow.
- Much traffic is through traffic and should be redirected on to the bypass routes.
- Cannot connect to existing cycle routes as they do not exist. Need to alter wording to provide safe connection viz West Parley – Longham – Hampreston – Ringwood Road - Longham.

### 11.32 *Environment and Open Space*

- Natural England – In order to avoid a conflict with policy ME1 at a later stage in the planning process Natural England advise the authorities to bring to the attention of those with an interest in these locations the need to carry out a basic biodiversity survey, e.g. Phase 1 Habitat Survey. The NPPF requires that planning policies should be based on up to date information on the natural environment.
- RSPB – No objection in principle. It is clear that SANGs offer perhaps the best opportunity of addressing potential adverse impacts on the European sites. Testing of the suitability of SANGs as a mitigation measure is essential and has not yet been undertaken. SANG to be provided in accordance with Policy ME3.
- Dorset Wildlife Trust – Hold an objection until ecological survey information is provided for this site to assess whether the environmental strand of sustainability is satisfied and the allocation is deliverable. We recommend that existing areas of open space are identified on map 10.4, with rights of way and environmental designations to the east to set the allocation in context and draw attention to the need to consider these matters in design.
- ETAG – Absence of site habitat survey. Concern the site has drainage issues, and 2000cu meters of surface water attenuation storage was originally recommended by Broadway Malyan. This could compromise the SANG area with surface flooding and additional open space areas may need to be provided. No proposals for Sustainable Drainage Systems are included. Details of all existing rights of way and public access land would be helpful on all proposed maps.
- Need to guarantee maintaining remainder of the green space to the north of Christchurch Road, and protecting the tree belt.
- Development should be screened from the A348.
- Potential use of SANG for allotment use.

## Officer Response

### 11.33 *Green Belt*

**11.34** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions.

### 11.35 *Housing*

**11.36** A significant number of objectors have raised concerns over the selection of sites for residential development. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of suitable settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed masterplanning exercises.

**11.37** The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. There is also a need to provide additional land for employment uses within the areas. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development. There is no requirement to increase the number of dwellings proposed in this location at this stage.

**11.38** The master plan provides an illustrative approach for the delivery of the site. A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other detailed site requirements. The requirements for this can be found in replacement Policy KS3 and KS4.

#### **11.39 *Transport***

**11.40** 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. The provision of cycle routes is to link in to the existing networks and provide new routes. The text will be amended to take account of this change.

#### **11.41 *Environment and Open Space***

**11.42** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public but officers from natural England have not raised an in principle objection to the proposal.

**11.43** Some responses have referred to the risk of flooding on this site. Both Councils have completed Strategic Flood Risk Assessments. No objections have been received to this proposal from the Environment Agency. Flood management, mitigation and defence is covered by Policy ME6 which includes “future proofing” against the effects of climate change and the need for the use of Sustainable Drainage Systems amongst other measures.

### **Proposed Pre-Submission Change**

**11.44** Minor amendment to text regarding cycle routes.

## Policy FWP3

### Holmwood House New Neighbourhood, Ferndown

A New Neighbourhood is allocated adjacent to Holmwood House, south of Ferndown to provide about 110 homes and large areas of informal open space. To enable this, the Green Belt boundary will be amended to exclude the land identified for new housing.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

#### Green Infrastructure

A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3. This includes open space to be provided south of the allocated housing which will enhance the existing open space at Poor Common and protect the Green Belt gap between Ferndown and Longham.

#### Transport and access

Vehicular access is to be provided from Ringwood Road to the north of Holmwood House.

Dedicated pedestrian and cycling links are to be provided throughout the housing area connecting into the existing **and proposed** networks ~~to the north, east and west.~~

## **Policy FWP4**

### **Coppins New Neighbourhood, Ferndown**

A New Neighbourhood is allocated at Coppins Nursery, south of Ferndown to provide about 30 homes. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

#### Green Infrastructure

A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3. Open space is to be provided to enhance the existing open space at Poor Common, providing green links along the southern fringe of the urban area. This should extend to at least 50% of the identified site.

#### Transport and access

Vehicular access is to be provided from Christchurch Road.

Dedicated pedestrian and cycling links are to be provided throughout the housing area and link into the existing networks to the north, east and west.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	3	4	10	3	2	5	6	5	4	5	2	10

Table 11.4

**11.45** 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:

### 11.46 *Housing*

- Ferndown Town Council supports the proposals for the Coppins site.
- Savills on behalf of Barrett Homes (Developer) could achieve a higher level of development on the site of 45 dwellings, as set out in the original Core Strategy Issues and Options consultation. The whole site could be developed; this would support the objectives of the NPPF and would not compromise Green Belt principles. The criteria to set out the new neighbourhood using a design code is questioned, as are the principles of the Masterplan Reports, which were not previously required for this site. The concept masterplan illustrated in Map 10.5 has not been subject to consultation or detailed testing through the design process, and there are alternative, equally valid options for the scheme.
- Christopher Chope MP – Object, it involves the removal of designated Green Belt without justification.
- The developed area of the site with the nursery buildings on should be developed, and the open area left open.
- Utilise the whole site for development.
- No objection to this land being used for housing.
- The housing content of Policy FWP4 seems to rely on encouraging land owners to leave land derelict so that they can be rewarded with high value development opportunities.

### 11.47 *Environment and Open Space/SANGs*

- Savills on behalf of Barrett Homes (Developer) suggests that even at 45 dwellings, this number is not sufficient to require on-site SANG provision, as suggested by Policies ME2 and ME3 which set the threshold at 50 units. A more flexible approach, with a combination of informal open space provision on-site, in combination with improvements to linkages to adjoining SANGs and off-site improvements are proposed as the most appropriate solution.

- Natural England – In order to avoid a conflict with policy ME1 at a later stage in the planning process Natural England advise the authorities to bring to the attention of those with an interest in these locations the need to carry out a basic biodiversity survey, e.g. Phase 1 Habitat Survey. The NPPF requires that planning policies should be based on up to date information on the natural environment.
- RSPB – No objection in principle. It is clear that SANGs offer perhaps the best opportunity of addressing potential adverse impacts on the European sites. Testing of the suitability of SANGS as a mitigation measure is essential and has not yet been undertaken. SANG to be provided in accordance with Policy ME3.
- Dorset Wildlife Trust – Hold an objection until ecological survey information is provided for this site to assess whether the environmental strand of sustainability is satisfied and the allocation is deliverable. We recommend that existing areas of open space are identified on map 10.4, with rights of way and environmental designations to the east to set the allocation in context and draw attention to the need to consider these matters in design.
- ETAG – Absence of site habitat survey. While supporting the application of the SANG strategy to the site, the area identified is no more than public open space. The exact suitability of the informal recreational opportunities cannot be assessed as it is unclear from the proposals map what land is currently publicly accessible or where there are existing public rights of way. It would be helpful if existing RoW and public access land were shown on all proposals maps. The people and wildlife links to FWP4 and Poor Common should be clarified. Horse riding is popular in the area and the need for safe bridleways with longer distance links should be considered. Rights of Way, Open Access land and habitat data (type and designation) should be shown on the proposals map.
- The footpath shown green on the plan is inaccurate as there is no footpath there and not on land owned by the proposed developer.
- Use part of the SANG for allotment use.
- This site provides an important visual break between Parley and Longham and should revert to farm land if the nursery is no longer financially viable.

#### 11.48 *Transport*

- Concern at the increased number of car movements along Christchurch Road and entering and leaving the site

### Officer Response

#### 11.49 *Green Belt*

**11.50** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions.

#### 11.51 *Housing*

**11.52** The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. There is also a need to provide additional land for employment uses within the areas. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development. There is no requirement to increase the number of dwellings proposed in this location at this stage.

**11.53** The master plan provides an illustrative approach for the delivery of the site. A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, open space, and other detailed site requirements. The requirements for this can be found in replacement Policy KS3 and KS4.

#### **11.54 *Environment and Open Space/SANGs***

**11.55** The Council is in discussion with Natural England and the prospective developer about the best way to mitigate harm to the nearby heaths. Officer advice from Natural England is that there is no need for a SANG to be provided for this site as it adjoins the Poor Common open space. Some open space provision coupled with a financial contribution are considered appropriate for heathland mitigation. This aspect should be deleted from the Policy. Public Rights of Way and links to the existing footpaths to Poor Common and the wider area will be supported and indicated on the Development Brief.

**11.56** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public.

#### **11.57 *Transport***

**11.58** 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 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. The provision of cycle routes is to link in to the existing networks and provide new routes. The text will be amended to take account of this change.

### **Proposed Pre-Submission Changes**

**11.59** Details of SANG requirement have been deleted as Natural England advise that the scheme does not need to provide one on site, so mitigation should be resolved in line with revised Policy ME2.

**11.60** Minor amendment to text regarding cycle routes.

## Policy FWP4

### Coppins New Neighbourhood, Ferndown

A New Neighbourhood is allocated at Coppins Nursery, south of Ferndown to provide about 30 homes. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

#### Green Infrastructure

~~A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.~~ Open space is to be provided to enhance the existing open space at Poor Common, providing green links along the southern fringe of the urban area. This should extend to at least 50% of the identified site.

#### Transport and access

Vehicular access is to be provided from Christchurch Road.

Dedicated pedestrian and cycling links are to be provided throughout the housing area and link into the existing and proposed networks. to the north, east and west.

## Policy FWP5

### West Parley Village Centre Enhancement Scheme

A major environmental enhancement of West Parley Village Centre is to be implemented to improve its vitality and viability. New public spaces, shops, services and facilities are to be provided in conjunction with wholesale changes to the Parley Crossroads and the associated service roads. This relies upon new link roads to be provided in conjunction with the New Neighbourhoods allocated in policies FWP6 and FWP7.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
8	12	3	33	3	3	21	5	16	4	13	5	21

Table 11.5

**11.61** 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:

### 11.62 *General Comments*

- West Parley Parish Council are unable to make responsible detailed comments relating to the new Centre Enhancement Scheme. To do so would require substantial engagement with E.D.D.C. The West Parley Parish Council's conclusion is that putting this policy (and the closely linked policies FWP6 and FWP7) forward for consultation at this stage is premature until the evidence base has been produced, and the NPPF and EDDC policies of community engagement should be properly implemented in this process.
- Christopher Chope - Policies FWP5, 6 and 7 together result in the removal of an essential part of the South East Dorset Green Belt from Green Belt designation. There is no justification for this, consistent with the National Planning Policy Framework which requires that development on land designated as Green Belt should be restricted when plan making is undertaken and that such a restriction should be part of the concept of sustainable development.

### 11.63 *Transport*

- Ferndown Town Council - The Town Council believe that the two link roads, one either side of New Road to the south of Parley Cross, would each require some means of traffic control with the A347. These new signals, together with those at Parley Cross, two sets connected with the Dormy development and the existing lights at Penny's Hill, plus traffic associated with the new greenfield housing, be likely to significantly add to the vehicular journey time from the River Stour to Ferndown centre.
- Bournemouth Borough Council – the junction improvements differ from those recommended by SEDMMTS. Whilst the proposals will improve the situation for east-west movements, concern the improvements should not be at the expense of north-south movements on the A347 between Ferndown and Bournemouth.

- Barrack Road Residents Association – Most traffic is east/west or north/south therefore reduction in traffic at Parley Cross would not be significant and benefit of road improvements is strongly outweighed by loss of Green Belt. Parish Council is seeking to reduce speed limit on main roads in West Parley which will increase capacity of the junction and reduce effect of traffic on environment.
- Create a roundabout making use of the garage site on the crossroads.
- The volume of traffic is the main issue.
- The required funding for the highway improvements has not been adequately considered; the major part of which will have to come from public funds.
- The proposed link roads will cause tailbacks and problems for all traffic trying to join New Road.
- Concern at rat running along local roads to avoid the no right turns.
- Current West Parley traffic problems are of short duration and no more than other spots in the area.
- Further traffic analysis is required.

#### **11.64 Environment**

- There is a lack of car parking spaces with the proposals.
- The images presented are misleading.
- We welcome the proposals to smarten up the shops.

#### **11.65 Shopping and Facilities**

- Barrack Road (West Parley) Residents Association – Parish Plan results do not support new village centre scheme but does support improvement in existing shops.
- The present shops are adequate and do not need enhancing.
- New shops will affect existing businesses.
- A new supermarket will kill off the existing shops.
- Short stay parking should be introduced to avoid people parking all day and commuting elsewhere.

### **Officer Response**

#### **11.66 Green Belt**

**11.67** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Statement, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions.

### 11.68 *Transport*

11.69 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 that show that the proposals do provide a significant reduction in the amount of congestion at Parley Crossroads and provide the opportunity to reduce pedestrian/vehicular conflict. Following the adoption of the Core Strategy further assessments will be required as part of a planning application process.

### 11.70 *Shopping and Facilities*

11.71 A detailed enhancement brief will need to be agreed with West Parley Parish Council for the village centre to ensure the environmental improvements are supported by the community. A further Retail Study update (Sept 2012) has been prepared to consider the strategic retail growth requirement for Christchurch and East Dorset. The Study indicates that there is scope for retail growth in both West Parley and Ferndown during the plan period. The provision of a convenience retail supermarket is therefore considered acceptable in West Parley to meet this future need.

## Proposed Pre-Submission Change

11.72 No change.

### **Policy FWP5**

#### **West Parley Village Centre Enhancement Scheme**

A major environmental enhancement of West Parley Village Centre is to be implemented to improve its vitality and viability. New public spaces, shops, services and facilities are to be provided in conjunction with wholesale changes to the Parley Crossroads and the associated service roads. This relies upon new link roads to be provided in conjunction with the New Neighbourhoods allocated in policies FWP6 and FWP7.

## Policy FWP6

### East of New Road New Neighbourhood, West Parley

A New Neighbourhood is allocated to deliver about 320 homes, and additions to the village centre which could include a convenience foodstore of about 3,000 sq metres. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing and new commercial and community uses.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

#### Green Infrastructure

A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3. This is to incorporate very significant areas of open space to the east of Church Lane, to the south of the allocated housing area and between the allocated development area and housing on Church Lane.

A park is to be provided adjacent to the village centre.

#### Transport and access

Vehicular access is to be provided via a new link road that will join Christchurch Road and New Road to the south of the existing urban area. This road is also to divert traffic from the Parley Crossroads.

Vehicular access to the village centre extension is to come from the link road.

Dedicated pedestrian and cycling links are to be provided throughout the housing area with connections into the existing networks to the north, east, west and south towards Bournemouth.

Improvements to public transport services.

#### Phasing

The link road must be fully operational prior to the opening of a convenience foodstore, or the occupation of 50% of the new homes.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
15	24	6	62	7	10	30	20	26	21	26	23	183

Table 11.6

**11.73** 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:

### 11.74 *General Comments*

- West Parley Parish Council – The scale of the planned development is unsustainable. The 520 houses in FWP6 and FWP7 represent an overwhelming and unsustainable addition of 32% to West Parley’s existing 1630 houses. The 2010 Core strategy Options had said building on a similar scale on this site was a ‘non preferred option’. Moreover the link road was completely new, and the community facilities shown had never been discussed with the community.
- Wyatt Homes – A critical scale of development is required to achieve planning objectives and development viability and Policy FWP6 achieves this; it will provide the delivery of a sufficient quantum of much needed housing and an extensive range of other benefits.
- Multiple Sclerosis Society – With over 70 people with MS attending the centre in Church Lane each day, we are struggling with car park space for them and the 20 to 30 volunteers each day. We wonder if we could have a small area behind the centre as additional car park space – it is proposed as a community green in the plan. Alternatively, could the car park proposed for the SANG for dog walkers on the field opposite the centre, be utilised by the centre on the days it is open. We would appreciate any support you can offer so we do not have to turn people away.
- Barrack Road Residents Association – Significant increase in housing proposed well in excess of Parish Plan suggestions for sustained expansion. Large HGVs would need to use link road and sample drawings of likely layout around housing do not look realistic. Spreads effect of heavy traffic even more around the village.
- It is ironic this proposal was not a preferred option in the last round of consultation, as ‘possible improvements to this junction could result in a pedestrian unfriendly environment and not one around which a new community should be based.’
- The projected improvements would probably be inadequate to solve even the current traffic problems. An additional 520 homes within a short distance of the junction on both sides of New Road plus new shops and facilities would only exacerbate the severe congestion in the area.

- This proposal goes against the key principles of the 2011 Localism Act, as it is a top down approach being imposed, not from the grassroots of the local community.
- Where will people work?

### 11.75 *Housing*

- West Parley Parish Council – A rapid increase in West Parley’s housing stock by one third will have an unsustainable and adverse effect on a West Parley’s distinct and separate community.
- Hurn Parish Council – 100 homes would be more in keeping with the rural aspect and would not encroach towards the properties on Church Lane, as per the Options for Consideration Consultation. Fewer homes would reduce the impact on the highway network.
- Wyatt Homes – The % of affordable housing should be expressed as a maxima, not a minima, with any delivery target subject to viability of the site, as suggested by the Council’s Housing Development and Enabling Manager recently. On this site the list of planning obligations, including a new link road, would give rise to a viability profile not in accord with ‘normal’ greenfield development. Flexibility needs to be maintained in this.
- The site is under a flight path of aircraft taking off and landing at Bournemouth International Airport. There could be pollution, health and safety risks associated with building residential units at this location.
- Density is too high for the existing area.
- Quality buildings are desirable.
- The number of houses proposed is excessive.
- The quality of the environment of the new housing will be compromised by the link roads passing through them with queues of cars, creating unpleasant locations for children to play safely or even for house windows to be open.
- We accept some housing is needed, but not this level.
- The rooms sizes of the new houses are too small with inadequate storage and too many of them being squeezed into too small an area.

### 11.76 *Transport*

- Highways Agency - Whilst not immediately adjacent to the A31, these proposals represent a significant increase to existing housing, and therefore we would highlight the importance of including impacts upon the Strategic Road Network (SRN) in the Transport Assessment and resulting mitigation to ensure that traffic impacts upon the SRN are appropriately managed.
- West Parley Parish Council – We have grave doubts on the effectiveness and deliverability of a link road through FWP6. It would carry major traffic to and from the airport, mineral sites, the Eco waste plant and the Bournemouth waste treatment facility right through the middle of a high density area of housing.
- Ferndown Town Council - Object on grounds of additional traffic movements and journey time, primarily to and from Ferndown on the A347 (see also FWP5) Any additional capacity created around Parley Cross by the two new link roads will be more that offset by the additional traffic from this and the proposed development west of New Road. (FWP7)

- Wyatt Homes – Some residents' concerns over either traffic additions to the Parley Crossroads or the environmental result of new works here on any new community are unfounded. The reverse is actually the case; endorsement of the development is a pre-requisite to achieving both capacity and environmental improvements at this junction and its environs.
- It is already very difficult to access some roads due to the volume of traffic.
- The link roads should not run through residential areas.
- West Parley already experiences serious traffic congestion from all directions in and out of Parley lights and through Longham; the proposed layout changes at Parley lights will offer limited or no improvements.
- It will push the gridlock further up the road.
- Dedicated filter lanes on the junctions, be they roundabouts or traffic lights, must be compulsory, otherwise the traffic will back up.
- The bus services are slow and fares are very expensive.
- The consultation does not propose new slip lanes to turn left into the new road, that will as the existing road layout confirms, be necessary to aid the movement of traffic, and be expensive and have a high impact on the environment.
- Too many traffic lights and roundabouts compromising access to existing properties on New Road and affecting property values.

#### 11.77 *Environment*

- Natural England – In order to avoid a conflict with policy ME1 at a later stage in the planning process Natural England advise the authorities to bring to the attention of those with an interest in these locations the need to carry out a basic biodiversity survey, e.g. Phase 1 Habitat Survey. The NPPF requires that planning policies should be based on up to date information on the natural environment.
- RSPB – No objection in principle. It is clear that SANGs offer perhaps the best opportunity of addressing potential adverse impacts on the European sites. Testing of the suitability of SANGs as a mitigation measure is essential and has not yet been undertaken. SANG to be provided in accordance with Policy ME3.
- Dorset Wildlife Trust – Hold an objection until ecological survey information is provided for this site to assess whether the environmental strand of sustainability is satisfied and the allocation is deliverable. We recommend that existing areas of open space are identified on map 10.4, with rights of way and environmental designations to the east to set the allocation in context and draw attention to the need to consider these matters in design.
- ETAG – The SANG should be informed by biological survey and Policy ME3. The area includes some trees with TPOs and native hedgerows. Subject to safe DDA compliant pedestrian and cycle access across the main roads, it could make a valuable contribution to the community of West Parley. Safe access for horse riders should also be considered.
- Wyatt Homes with the help of ecological practise EPR, and Natural England have carefully explored the issue of impacts to the SPA. A scheme has been drafted which mitigates for the site in SPA terms and brings the diversionary open space for the nearby population for the nearby population as well as offering benefits for walkers on the Stour Valley Way. Wyatts are committed to a single SANGs area of over 16ha.
- Christopher Chope MP - Policies FWP5, 6 and 7 together result in the removal of an essential part of the South East Dorset Green Belt from Green Belt designation. There is no justification for this, consistent with the National Planning Policy Framework which requires that development on land designated as Green Belt should be restricted when plan making is undertaken and that such a restriction should be part of the concept of sustainable development.

- Concern at loss of Green Belt gap between West Parley and Bournemouth.
- The 520 additional houses will result in continuous housing between Bournemouth and Ferndown, creating urban sprawl and joining up communities.
- The proposal runs counter to Green Belt legislation.
- This is Grade 2 agricultural land.
- The policy talks of improved walking, cycling and public transport. There are no good dedicated cycle routes out of Bournemouth that link cycle infrastructure in Bournemouth into wider Dorset, over the Stour.
- This policy has not addressed provisions for the safety of the many horses and horse riders in the area, to separate the animals from severely increased traffic.
- Impact on wildlife, including a bat reserve, and removal of protected oak trees.
- The development may lead to a problem with surface water run-off, potentially putting a strain on the eco-system in flood control.
- Loss of the views of the fields will impact on the amenity of existing local residents.

#### 11.78 *Shops and Facilities*

- The Co-operative Group – The proposal for a new foodstore is based on out dated reports by NLP (2008), for the provision of 800 homes growth at West Parley, not 520. The Study relies on a high growth rate forecast, which is not being used for the Pre-Submission document. It is not made clear why West Parley is able to accommodate 40% of the identified capacity for a different area (Ferndown), or whether the 1500 – 2000sqm of floor space identified is for convenience goods only or convenience and comparison goods. The scale of the new floor space has not been justified and appears to be out of scale with the role and function of the settlement.
- Dorset Fire and Rescue - May require land shown for community development for a Fire and Rescue station.
- Lack of Doctor's surgeries nearby.
- Insufficient school places for children.
- The homes are too far from local schools.
- There is no funding for a new school.
- How will the demand for local nursery places be met?
- No more commercial outlets are required in this area.
- Another supermarket is not needed and will only bring chaos to the already crowded roads of West Parley.
- A previous supermarket was rejected on appeal at this site.
- Plenty of other supermarkets within 2 miles of West Parley, including a large Tesco store which Bournemouth BC has granted permission for in Kinson.
- There are already 2 churches in West Parley.
- There are not enough Plymouth Brethren in West Parley to warrant a new church.
- We do not need allotments.
- A new park is not needed, the existing one has recently been upgraded.

## Officer Response

### 11.79 *Housing*

**11.80** Whilst there continues to be a significant number of objections to this allocation, the Council must ensure there is sufficient housing land available to meet the housing need which has been identified and to meet the tests of soundness.

**11.81** A significant number of objectors have raised concerns over the selection of sites for residential development. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed masterplanning exercises.

**11.82** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other site requirements, such as a new church or fire station. The requirement for this can be found in replacement Policy KS3 and KS4.

### 11.83 *Green Belt*

**11.84** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions or new neighbourhoods.

**11.85** The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. There is also a need to provide additional land for employment uses within the areas. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development.

### 11.86 *Environment*

**11.87** A number of responses, including that of Natural England and the RSPB, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public.

**11.88** The use of SANGs to mitigate the impact of development on heathland has been agreed with Natural England.

### 11.89 *Shops and Facilities*

**11.90** A further Retail Study Update (Sept 2012) has been prepared to consider the strategic retail growth requirement for Christchurch and East Dorset. The Study indicates that there is scope for retail growth in both West Parley and Ferndown during the plan period. The provision of a convenience retail supermarket is therefore considered to be appropriate in West Parley to meet this future need, but the proposed size has been amended to 800 - 900 sqm to reflect the latest evidence.

**11.91** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new or larger replacement schools will be required and these are included in the proposals.

**11.92** 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.

**11.93** Gas, electricity and water - The Service providers have been contacted throughout the preparation of this document and no concerns have been raised.

### **Proposed Pre-Submission Change**

**11.94** Amendment to convenience foodstore figure which has been altered to reflect the recommendations in the Retail Study Update (Sept 2012).

## Policy FWP6

### East of New Road New Neighbourhood, West Parley

A New Neighbourhood is allocated to deliver about 320 homes, and additions to the village centre which could include a convenience foodstore of about ~~3,000~~ **800 - 900** sq metres. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing and new commercial and community uses.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

#### Green Infrastructure

A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3. This is to incorporate very significant areas of open space to the east of Church Lane, to the south of the allocated housing area and between the allocated development area and housing on Church Lane.

A park is to be provided adjacent to the village centre.

#### Transport and access

Vehicular access is to be provided via a new link road that will join Christchurch Road and New Road to the south of the existing urban area. This road is also to divert traffic from the Parley Crossroads.

Vehicular access to the village centre extension is to come from the link road.

Dedicated pedestrian and cycling links are to be provided throughout the housing area with connections into the existing networks to the north, east, west and south towards Bournemouth.

Improvements to public transport services.

#### Phasing

The link road must be fully operational prior to the opening of a convenience foodstore, or the occupation of 50% of the new homes.

## **Policy FWP7**

### **West of New Road New Neighbourhood, West Parley**

A New Neighbourhood is allocated to deliver about 200 homes, and facilitate major improvements to the village centre. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

Development is to be kept at least 75 metres from the Dudsbury Hillfort Ancient Monument. The land between is to be set out as parkland.

#### Green Infrastructure

A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3. This will significantly extend and enhance public access, providing green links along the southern fringe of the urban area.

#### Transport and access

Vehicular access is to be provided via a new link road that will join Christchurch Road and New Road to the south of the existing urban area. This road is to divert traffic from the Parley Crossroads enabling environmental enhancement to the village centre.

#### Phasing

The link road must be operational prior to the occupation of 50% of the new homes.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
13	24	3	64	8	14	29	22	21	23	25	25	174

Table 11.7

**11.95** 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:

### 11.96 *General Comments*

- West Parley Parish Council – Building on this area of green belt, which is a ‘key gap’ and has a high quality landscape and community value, is not justified by the evidence produced for the claimed housing need. This field meets all the requirements in NPPF 77 for a Local Greenspace designation. It is adjacent to the Dudsbury Iron Age Hill Fort. It is crossed by the Stour Valley Walk, one of Dorset’s most celebrated Trans county walks from Christchurch to Stourhead in Wilts. On a clear day one can see all the way to the Needles in the Isle of Wight.

### 11.97 *Housing*

- Not desired by the residents in the West Parley Plan.
- Too much housing for the village.
- Concern at the potential joining up with Bournemouth.
- Not a balanced increase in housing growth.
- The gradient of the field is too steep for housing.

### 11.98 *Transport*

- Highways Agency - Whilst not immediately adjacent to the A31, these proposals represent a significant increase to existing housing, and therefore we would highlight the importance of including impacts upon the Strategic Road Network (SRN) in the Transport Assessment and resulting mitigation to ensure that traffic impacts upon the SRN are appropriately managed.

- West Parley Parish Council - The effect of flooding on FWP7 has been underestimated. The proposed Link Road could also find itself impacted in construction, maintenance and costs by seasonal floods.
- Ferndown Town Council – Object on grounds of increased traffic movements and journey time, primarily to and from Ferndown on the A347. Any additional capacity created around Parley Cross by the two new link roads will be more than offset by the additional traffic from this and the proposed development east of new Road (FWP6).
- Barrack Road Residents Association – Large HGVs would need to use link road and sample drawings of likely layout around housing do not look realistic. Spreads effect of heavy traffic even more around village.
- New Road floods regularly.
- The link road will run across the flood plain.
- West Parley already experiences serious traffic congestion from all directions in and out of Parley lights and through Longham; the proposed layout changes at Parley lights will offer limited or no improvement.
- It is difficult to envisage the effect of the two link roads allocated in FWP6 and FWP7 would have on the acknowledged serious traffic problems already experienced at this junction. The projected scheme would probably be inadequate to solve even the current traffic problems.
- It is the volume of traffic that is the issue, and a wider perspective should be considered in the road layouts, or the gridlock will be pushed further along New Road.
- Diverting traffic from the village centre will not alleviate the existing very severe traffic congestion in Christchurch Road for traffic E - W / W - E just merely move the congestion 400 yards further up the road to the proposed new junction in Christchurch Road.

### 11.99 *Environment*

- Natural England – In order to avoid a conflict with policy ME1 at a later stage in the planning process Natural England advise the authorities to bring to the attention of those with an interest in these locations the need to carry out a basic biodiversity survey, e.g. Phase 1 Habitat Survey. The NPPF requires that planning policies should be based on up to date information on the natural environment.
- RSPB – No objection in principle. It is clear that SANGs offer perhaps the best opportunity of addressing potential adverse impacts on the European sites. Testing of the suitability of SANGS as a mitigation measure is essential and has not yet been undertaken. SANG to be provided in accordance with Policy ME3.

- Dorset Wildlife Trust – Hold an objection until ecological survey information is provided for this site to assess whether the environmental strand of sustainability is satisfied and the allocation is deliverable. We recommend that existing areas of open space are identified on map 10.4, with rights of way and environmental designations to the east to set the allocation in context and draw attention to the need to consider these matters in design.
- West Parley Parish Council – The landscape value of the field has been greatly underplayed in the Broadway Malyan report. When these same ‘areas of search’ were studied in the Regional Spatial Strategy the authoritative report by Colin Buchanan (Feb 2006) characterised them as ‘preventing urban sprawl, preventing coalescence, safeguarding the countryside and protecting the historic setting’ and gave them his landscape value score.
- ETAG – The housing allocation should be informed by biological survey (to ensure that high value BAP grassland, if identified, is not lost) and by flood risk assessment (to ensure that longer term climate change impacts are taken into account. Flood risk assessment should include consideration of the ecosystem services provided by the land and the impact on the SANGs areas that are prone to flood. Additional suitable dry areas should be identified. Because of the open aspect of the site, the policy should include a requirement for avoidance or mitigation of light pollution impacts on the R. Stour. Layout and design of the land between the Hillfort and the development should be informed by existing nature conservation interest of the land. The SANG design should be informed by biological survey to create coherent ecological networks more resilient to current and future pressures. The majority of the SANG should be DDA compliant and accessible from new development on the site. A safe road crossing should be provided at the junction of the new link road and New Road with ecological links to the smaller area of FWP6 SANG.
- Christopher Chope MP - Policies FWP5, 6 and 7 together result in the removal of an essential part of the South East Dorset Green Belt from Green Belt designation. There is no justification for this, consistent with the National Planning Policy Framework which requires that development on land designated as Green Belt should be restricted when plan making is undertaken and that such a restriction should be part of the concept of sustainable development.
- The SANG area is unusable and the link road should be relocated, changing the angle through the woods. This requires an Environmental Impact Assessment and an Arboricultural Impact Assessment for the tree specimens involved.
- Flooding on New Road.
- Problems of surface run-off.

#### 11.100 *Dudsbury Rings*

- English Heritage – It is our expert opinion that this proposal lies too close to the Scheduled Ancient Monument of Dudsbury Camp and that if implemented it will have a negative impact on its setting. The north-western part of the development is of particular concern although the western edge is also likely to have an impact and consideration should be given to pulling this back. This accords with paragraph 129 of the NPPF. Increased public use of the Scheduled Ancient Monument is likely to occur as a result of the development, which will need to be managed positively. Significant archaeological remains may survive beyond the boundary of the Scheduled Monument and these will need to be assessed. We strongly recommend the extent and form of this proposal is reconsidered. Scheduled monuments are considered to be of the highest significance along with World Heritage Sites and similar.
- Dudsbury Girl Guides Camp – In order to safeguard the valuable Dudsbury Hillfort and the future of the Dudsbury Girl Guide Camp. The property ‘Dudsbury Manor’ has not been shown on or referred to in this map or your document. Failure to adhere to the Ancient Monuments and Archaeological Areas Act (1979), NPPF (2012), PPS5 Historic Environment Planning Practise Guide (2010), and The Setting of Heritage Assets, English Heritage (2011).

- West Parley Parish Council – The field is adjacent to an important and secluded site inside the walls of the ancient hill fort, in which is housed a club used by Girls Guides and Brownies throughout the district. The fears are that the monument, not yet properly studied or excavated, will be damaged beyond repair by being used as a natural playground.
- There is a lack of understanding of the significance of this historical site.

### 11.101 *Facilities*

- Lack of school places and medical provision in West Parley.
- Glenmoor Road already has serious problems around pick up and drop off times at Parley First School; this will be exacerbated if the intention is to increase head count at the school.
- This increase will over load the limited resources in the area.

### Officer Response

#### 11.102 *Housing*

**11.103** Whilst there continues to be a significant number of objections to this allocation, the Council must ensure there is sufficient housing land available to meet the housing need which has been identified and to meet the tests of soundness.

**11.104** A significant number of objectors have raised concerns over the selection of sites for residential development. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed masterplanning exercises.

**11.105** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other site requirements, such as setting back the development from the ancient hill fort. The requirement for this can be found in replacement Policy KS3 and KS4.

#### 11.106 *Green Belt*

**11.107** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan, when planning for larger scale developments such as major urban extensions or new neighbourhoods.

**11.108** The Councils have demonstrated evidence of need for additional dwellings within the Plan area, and have also demonstrated that there is insufficient capacity within the existing built-up areas to accommodate this need. There is also a need to provide additional land for employment uses within the areas. National policy requires Local Authorities to demonstrate that the location of new development is sustainable. This situation has given rise to the need to amend the Green Belt boundary in specific, limited locations to accommodate much-needed development.

**11.109 Transport**

**11.110** 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 that show the proposals work and can help to improve the very serious traffic problems in the area. Following the adoption of the Core Strategy a developer will be required to carry out further assessments which will show in more detail the specific issues relating to the site and the improvements which will be required as part of the planning application process.

**11.111 Environment**

**11.112** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public. Officers at Natural England have not raised an in principle objection to the proposals. The impact of potential light pollution on the natural environment will be considered as any other impact might on this site, as required by Policies ME1, HE3 and the saved Local Plan policies.

**11.113** The use of SANGs to mitigate the impact of development on heathland has been agreed with Natural England. It is noted that part of the SANG may be at risk of flooding at times but this is only for short periods so the risk is accepted by Natural England and does not affect the allocation of this land. The SANG will need to meet the requirements of Policy ME3.

**11.114 Dudsbury Rings**

**11.115** A number of responses, including that of English Heritage, are concerned with the need for better protecting the setting of the Scheduled Ancient Monument of Dudsbury Camp. Discussions are underway with English Heritage with a view to preparing a “Statement of Common Ground” prior to the Examination in Public and the Council propose that a Heritage Strategy be produced to safeguard the integrity of the hill fort which will include an access strategy for the area.

**11.116 Facilities**

**11.117** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new or larger replacement schools will be required and these are included in the proposals.

**11.118** 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.

**11.119** Gas, electricity and water - The Service providers have been contacted throughout the preparation of this document and no concerns have been raised.

## Proposed Pre-Submission Change

**11.120** The comments of English Heritage in respect of the settling of the hill fort Ancient Monument have been taken into consideration and a Heritage Strategy will be developed to mitigate the impact of the proposed residential development on the historic environment.

### Policy FWP7

#### West of New Road New Neighbourhood, West Parley

A New Neighbourhood is allocated to deliver about 200 homes, and facilitate major improvements to the village centre. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing.

#### Layout and design

The New Neighbourhood will be set out according to the principles of the Masterplan Reports.

A design code will be agreed by the Council, setting out the required standards.

**Development is to be kept at least 75 metres from the Dudsbury Hillfort Ancient Monument. A Heritage Strategy is to be agreed by the Council which safeguards the integrity of the hill fort, and which includes an access strategy for the area.**

The land between **the hill fort and the residential development** is to be set out as parkland.

#### Green Infrastructure

A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3. This will significantly extend and enhance public access, providing green links along the southern fringe of the urban area.

#### Transport and access

Vehicular access is to be provided via a new link road that will join Christchurch Road and New Road to the south of the existing urban area. This road is to divert traffic from the Parley Crossroads enabling environmental enhancement to the village centre.

#### Phasing

The link road must be operational prior to the occupation of 50% of the new homes.

## **Policy FWP8**

### **Blunt's Farm Employment Allocation, Ferndown**

30 hectares of land to the west of Ferndown and Uddens Industrial Estates is removed from the Green Belt and allocated for employment development.

This should involve:

The provision of B1 (Office and Light Industrial), B2 (General Industrial) and B8 (Warehousing and Distribution) employment uses.

Ancillary support services, such as cafés.

Prerequisites for development include:

Approval of a detailed development brief, subject to public consultation.

Agreement of a comprehensive travel plan including the provision of regular bus services and cycle links towards Wimborne and Ferndown Centres.

A strategy to be agreed with the Council that ensures no harm to the nearby designated nature conservation sites including Uddens Heath SSSI and the Moors River System SSSI will derive from the estate. Particular regard to the water environment will be needed and in this respect the use of Sustainable Drainage Systems to mitigate any potential impacts will be expected to form part of the strategy.

Protection of the Site of Nature Conservation Interest.

Retention of significant landscape buffers within the northern and western parts of the site. This buffer should include heathland habitat which will go towards protecting, enhancing and expanding the habitats of European protected species of which there is a known presence nearby.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
6	1	4	9	1	4	3	6	3	6	1	6	2

Table 11.8

**11.121** 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:

### 11.122 *General comments*

- A modern recycling facility should be provided in Ferndown to reduce the unacceptable pressure that would be placed on the current sub-standard Brook Road Facility in Wimborne.
- Over 40 business premises are Closed or To Let on the Ferndown/Uddens Industrial Estates and the need that may have been identified in 2008 no longer exists for an increased industrial area of 30%.

### 11.123 *Transport*

- Ferndown Town Council – Although the need for additional employment land is accepted, the Town Council believe this development is likely to have a negative impact on the local road network and adjacent nature conservation area.
- The area traffic is already at gridlock in the rush hour times and at Friday/Sat peak times.

### 11.124 *Environment*

- Natural England - The site should be planned as a whole to allow for the proper and proportionate planning of the various uses. NE advise that a Masterplan approach based upon survey data is required to determine existing and potential biodiversity taking account of the potential for road widening along the northern edge and the need to provided compensatory habitats.

- RSPB - No objection in principle. It is clear that SANGs offer perhaps the best opportunity of addressing potential adverse impacts on the European sites. Testing of the suitability of SANGS as a mitigation measure is essential and has not yet been undertaken. A mitigation strategy to be agreed to avoid harm to European sites and SSSI.
- ETAG – The allocation should be informed by full biological survey. The Site of Nature Conservation Interest should be expanded and buffered substantially, recreating areas of priority habitat: provision should be made for its long term management. The policy should include a prerequisite for all surface water from the new and existing estate to pass through a balancing/pollution control feature as agreed by the Council, EA and NE.
- DWT - would like to see full survey information inform the allocation. As a minimum, DWT would recommend a prerequisite of development to be a significant ecological buffer for the Ferndown bypass Site of Nature Conservation Interest to protect it further development along its boundaries and, through this, enhancement of the ecological network to comply with NPPF.

## **Officer Response**

### **11.125 General comments**

**11.126** The employment sites have been selected as sustainable locations close to existing settlements with good access to the road network. We will continue to work with our partner authorities to ensure employment land supply located in Christchurch and East Dorset will contribute in part to meeting the wider strategic requirement across the Bournemouth and Poole Housing Market Area as identified in the 2012 Bournemouth, Dorset and Poole Workspace Study.

**11.127** Waste Disposal - The Service providers have been contacted throughout the preparation of this document and no concerns have been raised about the provision of facilities.

### **11.128 Transport**

**11.129** 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 these 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.

### **11.130 Environment**

**11.131** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public.

**11.132** A Development Brief will need to be agreed with the Council for the development of this employment allocation. This will deal with all detailed matters of delivery of the site, such as general layout, and other detailed site requirements concerning the biodiversity requirements.

### **Proposed Pre-Submission Change**

**11.133** No change.

#### **Policy FWP8**

##### **Blunt's Farm Employment Allocation, Ferndown**

30 hectares of land to the west of Ferndown and Uddens Industrial Estates is removed from the Green Belt and allocated for employment development.

This should involve:

The provision of B1 (Office and Light Industrial), B2 (General Industrial) and B8 (Warehousing and Distribution) employment uses.

Ancillary support services, such as cafés.

Prerequisites for development include:

Approval of a detailed development brief, subject to public consultation.

Agreement of a comprehensive travel plan including the provision of regular bus services and cycle links towards Wimborne and Ferndown Centres.

A strategy to be agreed with the Council that ensures no harm to the nearby designated nature conservation sites including Uddens Heath SSSI and the Moors River System SSSI will derive from the estate. Particular regard to the water environment will be needed and in this respect the use of Sustainable Drainage Systems to mitigate any potential impacts will be expected to form part of the strategy.

Protection of the Site of Nature Conservation Interest.

Retention of significant landscape buffers within the northern and western parts of the site. This buffer should include heathland habitat which will go towards protecting, enhancing and expanding the habitats of European protected species of which there is a known presence nearby.

## 12 Responses and Analysis of Chapter 11 Verwood Three Legged Cross St Leonards St Ives and West Moors

### 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

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

Table 12.1

**12.1** 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:

### 12.2 *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.

### 12.3 *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.

### 12.4 *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.

**12.5** The comments from key stakeholders and the general public set out below refer to 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.

## Officer Response

**12.6** 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.

### **12.7** *Town Centre Uses*

**12.8** 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.

**12.9** 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.

## 12.10 *Transport*

**12.11** 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 Pre-Submission Change

### 12.12 Policy VTSW1

**12.13** Include the word 'Vision' in the title.

**12.14** 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.

**12.15** Floorspace projections have been included in the policy wording.

**12.16** References to residential development in the town centre removed. Most of the town centre is within 400m of heathland, which would preclude residential development.

**12.17** Traffic movement has been merged into one paragraph to avoid repetition.

**12.18** Delete the wording at the bottom of the Policy VTSW1 text box relating to the Town Centre Boundary.

### 12.19 Paragraph 11.7

**12.20** Text change - 'The River Crane that ~~runs flows~~ along the....

### 12.21 Paragraph 11.21 Verwood Town Centre

**12.22** Insert a Key Facts Text box to support policy

### 12.23 Key Facts (2012)

### 12.24 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%.
- 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. 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.

#### 12.25 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.

#### 12.26 Strategic Requirements

- There is a need for 700 - 800 sqm of comparison floorspace, and 600 - 650 sqm of convenience floorspace in Verwood.

#### 12.27 Verwood Town Centre Primary Shopping Area

12.28 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. **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.**
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.**

## Policy VTSW2

### South of Howe Lane Education Allocation, Verwood

Land south of Howe Lane is identified for educational use to enable the provision of upper school accommodation. Implementation will require the completion of the Springfield Distributor Road and the agreement of a travel plan.

## Consultation Response

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

Table 12.2

**12.29** 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:

### **12.30** *Need for the School*

- Dorset County Council, as Education Authority, confirm that there is a need for an upper school to be provided in Verwood towards the end of the Plan period and this policy reflects the County Council's future requirements in terms of school provision in the area and is supported.
- Verwood Town Council acknowledge that there is a need for the school, and that this is the only site available for an upper school. They stress that if the school goes ahead then the Springfield Distributor Road would be essential. A Traffic Management Plan will also need to be addressed before any new proposals are considered.
- Support the policy and the school should be given priority. Bussing the children to Ringwood, Ferndown and Wimborne is not a good option.

### **12.31** *Environment*

- Ecological survey information for this site is not available and therefore it is not possible to fully assess the potential environments impacts of development of this site. (Dorset Wildlife Trust)
- No mitigation of light and water pollution has been proposed.
- Natural England comment that in order to avoid conflict with Policy ME1 at a later stage in the planning process, there is a need to carry out a basic biodiversity survey to consider whether there is the likely presence of features which are likely to restrict or delay development. Any policy will need to be compliant with policy considerations in the NPPF regarding the natural environment and currently the policy does not contain enough information about features of biodiversity importance which are to be secured or enhanced to ensure compliance with national guidance.

### **12.32 Transport Issues**

- There is only one access road to the existing schools and the traffic is at saturation levels during school access times. It makes no infrastructure sense to concentrate three schools in one location. The area around Trinity School would be ideal for an upper school.

## **Officer Response**

**12.33** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. It has established that there is a clear and defined need for the new upper school in Verwood, which has generally been supported locally. The existing policy requires that the Springfield Distributor Road be completed and a travel plan implemented to allow the school to proceed, which should address the concerns of those expressing the need for better access to the school campus site. 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 assessments will be required which will show the specific issues relating to the site and the improvements which will be required as part of the planning application process.

**12.34** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a "Statement of Common Ground" prior to the Examination in Public.

## **Proposed Pre-Submission Change**

**12.35** No change to Policy VTSW2.

**Policy VTSW2**

**South of Howe Lane Education Allocation, Verwood**

Land south of Howe Lane is identified for educational use to enable the provision of upper school accommodation. Implementation will require the completion of the Springfield Distributor Road and the agreement of a travel plan.

**Policy VTSW3**

**Coopers Lane and Doe's Lane Green Belt Boundaries, Verwood**

New Green Belt boundaries will be drawn to include land at Coopers Lane and Doe's Lane and shown on the proposals map. Further land at Coopers Lane will no longer be safeguarded from development and is included in the urban area.

**Consultation Response**

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

Table 12.3

**12.36** 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:

**12.37 Environment**

- The reasoning for including the land in the Green Belt is supported, and part of the Cooper's Lane site is an SNCI adjacent to Stephens Castle SSSI.
- It is suggested that due to the fact that the land at Coopers Lane South is within 400m of protected heathland, has extensive tree cover, the subject of a blanket Tree Preservation Order, which would also preclude development and acts as a buffer between the truly urban area and the heathland Local Nature Reserve at Stephens Castle, the new Green Belt boundary should be drawn to include all the land off Coopers Lane. A number of landowners within the Coopers Lane South area support the site's inclusion in the Green Belt.
- Synergy Housing Association, which owns Coopers Lane North, requests that the site is not included in the Green Belt to allow it to be made available for renewable energy generation use.
- Dorset Wildlife Trust support the inclusion of the northern half of land at Coopers Lane in the Green Belt, but object to the inclusion of the land to the south in the urban area as it is considered of SNCI quality and cannot be developed for housing due to its proximity to protected heathland.
- Natural England support the inclusion of land at Coopers Lane North in the Green Belt, and argue that due to the likely biodiversity value of the land at Coopers Lane South this should also be included in the Green Belt. The policy appears to have been put forward in an absence of adequate information and assessment of the biodiversity features of the land, contrary to the requirements of the NPPF. NE advise that it would be unsound to include this area in the urban area.
- Support the policy to expand the Green Belt in Coopers Lane, however have reservations about the land to be re-designated as urban. If the land is not developable due to its proximity to heathland then what is the reasoning?

### 12.38 *Housing*

- New housing in Verwood should not be permitted unless it is required to meet local needs.
- Release the land at Doe's Lane for 100% low cost housing because there is a need for it.

## Officer Response

**12.39** The majority of the responses support the proposals in respect of Doe's Lane and Coopers Lane north and therefore no change is proposed to the Policy.

**12.40** There are a number of objections to the inclusion of land at Coopers Lane south within the urban area of Verwood from the nature conservation bodies and some local residents on the grounds that the site is in close proximity to protected heathland and therefore has no residential development potential. They also comment that the site is likely to be of nature conservation importance in its own right which would preclude development.

**12.41** In response, it is contended that this land is framed by the existing urban area along almost 80% of its boundary and contains residential properties within it. It would therefore be illogical to place the land in the Green Belt, leaving a small isolated area as an island of urban area. There may be scope for the non-residential re-development of land, which is immediately to the north of the existing town centre, or the residential re-development of existing properties on a one-for-one basis free from the restrictions of the Green Belt policy. Any proposed development would be subject to national and local

policy in respect of the impacts on the biodiversity of the site. The nature conservation factors raised are important and will be taken into account in relation to any planning application as required by policies ME1 and ME2. However, protecting biodiversity is not one of the key purposes for including land in the Green Belt, as set out in the NPPF. On that basis no change is proposed to this policy.

### **Proposed Pre-Submission Change**

**12.42** No change proposed to Policy VTSW3.

#### **Policy VTSW3**

##### **Coopers Lane and Doe's Lane Green Belt Boundaries, Verwood**

New Green Belt boundaries will be drawn to include land at Coopers Lane and Doe's Lane and shown on the proposals map. Further land at Coopers Lane will no longer be safeguarded from development and is included in the urban area.

## **Policy VTSW4**

### **North Western Verwood New Neighbourhood**

A New Neighbourhood to the north west of Verwood is identified to provide about 230 homes. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing.

#### **Layout and design**

- The new neighbourhood will be set out according to the principles of the masterplan.
- A design code will be agreed by the Council, setting out the required high standards.

#### **Green Infrastructure**

- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.

#### **Transport and access**

- Vehicular access is to be provided from Edmondsham Road
- Dedicated pedestrian and cycling links are to be provided throughout the housing area and link into the existing networks.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	2	1	13	3	6	4	7	3	7	2	10	3

Table 12.4

**12.43** 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:

### 12.44 *Housing*

- There is little or no need (as opposed to demand) for new housing here, and certainly not enough to override Green Belt protection.
- New housing in Verwood should not be permitted unless it is required to meet local needs.
- More housing would not be sustainable unless it is related to local employment.
- Building homes for 230 families cannot be justified based on the current infrastructure in Verwood.
- There is a great need for 100% affordable housing stock. You should make builders only build low cost housing (100%) until the need is met – don't give planning permission for anything else.
- Support the land being identified for residential development, but consider that the detailed requirements of policy VTSW4 could be revised.
- Verwood is an unsustainable location. The potential for achieving a high proportion of affordable housing here is high and clearly attractive from a point of view of meeting targets. However, Verwood is not a sustainable location due to high car dependence, poor public transport provision, and lack of adequate shopping facilities.
- Verwood Town Council – the housing density should reflect the site's proximity to the sensitive landscape of the Area of Outstanding Natural Beauty.
- The percentage of affordable homes is too high at 50% and should be no more than 10% - a high proportion of affordable housing brings with it many problems. This will have an adverse effect on the social harmony of the local populace.
- Goadsby Ltd object to the proposed residential development of this site due to its adverse impact on the Area of Great Landscape Value, contrary to existing policy, the loss of Grade 3 agricultural land and the impact on the established, rural nature of the area. It is proposed that policy VTSW4 be deleted in favour of land to the south of Manor Road being allocated for residential development instead.

### 12.45 *Environment*

- I have a letter from my MP confirming the arbitrary re-drawing of the Green Belt boundaries is not consistent with Government policy. The proposal, therefore, is not consistent with national policy and should be legally challenged.
- Dorset Wildlife Trust – Ecological survey information for this site is not available therefore it is not possible to fully assess the potential environmental impacts of development on this site. DWT would like to see full ecological survey information to inform the allocation. They have detailed concerns about the possible impact of the development on surrounding features of biodiversity importance and suggest changes to the plan to accommodate these. If mitigation is not possible then this policy will conflict with the Core Strategy Vision and Objective 1 which protects the AONB and hence will not be deliverable.
- The areas selected for development are in the Area of Great Landscape Value, and on unimproved grassland. There has been no biodiversity survey, and the landscape sensitivity of the area is high.
- North Verwood is unique in terms of tranquillity and intrinsically dark skies. Development proposals must demonstrate how they will comply with NPPF para 125. Consideration should be given to ensure that adequate mitigation can be introduced to help mitigate additional light and protect the tranquillity of the area. Unless the issue can be resolved, the policy is undeliverable.
- The SANG could help to meet the aspirations of local residents expressed in responses to the Town Plan to see the local natural environment to include more wildlife friendly planting in car parks and public places, native trees and hedgerows and tranquil places.
- Any drainage proposals would need to ensure that run off into the River Crane (an SSSI) did not harm this feature.
- The development between Eastworth Farm and Trinity School would adversely affect the character and quality of this historic farm complex. Delete from the policy the development area between Eastworth Road and Trinity First School.
- Verwood Town Council – light pollution must be addressed, especially due to the sloping nature of the site.
- Natural England comment that in order to avoid conflict with Policy ME1 at a later stage in the planning process, there is a need to carry out a basic biodiversity survey to consider whether there is the likely presence of features which are likely to restrict or delay development. Any policy will need to be compliant with policy considerations in the NPPF regarding the natural environment and currently the policy does not contain enough information about features of biodiversity importance which are to be secured or enhanced to ensure compliance with national guidance.
- Part of the site is Grade 2 agricultural land.
- RSPB – SANG to be provided in accordance with policy ME3. The RSPB does not object in principle to the residential allocations, however they do rely heavily on SANGs as a mitigation measure, which are still a relatively untested measure as effective mitigation and further evidence is required.

#### **12.46 Facilities**

- Verwood is the second largest town in East Dorset already but cannot be expanded any further with such a poor town centre.
- Object to the proposal to allow allotments on the site on the grounds of highway danger due to the number of vehicles involved, the amount of litter generated by allotment users, including the litter flying out of cars and the holders not bothering to pick it up, fire hazards from bonfires which will be lit with no regard to any neighbours nearby, unsightly state of untended allotments, sheds which will be built with a jumbled creation of any bits of corrugated iron, asbestos, bits of old timber etc., and increase use of the nearby protected heathlands by bored children who will be allowed to wander off to leave the parents with their vegetables etc.

- The availability of existing healthcare, school, leisure and public services cannot cater for this volume of homes – especially in conjunction with policy VTSW5.
- Verwood Town Council – sufficient provision for children from the new development must be provided by the two nearest schools
- Verwood Town Council – adequate health provision must be made available locally for the increase in population.

#### **12.47 Transport**

- More housing just increases the problems already in Verwood. The traffic on the B3081 is a problem for vehicles during the rush hour, and it is very difficult to cross the roads at this time. There is currently inadequate car parking in Verwood.
- A full Transport Assessment is required as over 80 units are proposed.

### **Officer Response**

#### **12.48 Housing**

**12.49** Evidence provided in support of amended Policy KS3/4 identifies the housing need for the area, and clearly indicates that there is currently an unmet need for both affordable and market housing within the Plan area. Evidence provided in support of Policy LN3 identifies the justification for the proportion of affordable housing required from the allocation, which again clearly shows a significant degree of unmet demand in the area. Work carried out in support of Policy LN3 also considers the viability implications on development of the level of affordable housing proposed. The Council must ensure that there is sufficient housing land available to meet the housing need which has been identified and to meet the tests of soundness.

**12.50** Verwood has been an area of significant housing growth in the past, and the Verwood etc. and East Dorset Local Plans identified a significant amount of residential development for the town in the late 1990's and in 2002. However, due to the increased significance of the internationally protected Dorset heathlands which abut the built-up area of the settlement, two significant residential allocations (at Aggis Farm, 111 units, and Hainault Farm, 70 units) can no longer be developed. The re-development potential of large areas of the existing built-up areas have also been affected by the embargo on development within 400m of protected heathland and therefore the potential of the urban area to provide opportunities to meet local housing need have been curtailed. Therefore the amount of housing proposed within Policies VTSW4 and 5 is equal to that previously allocated in Verwood, that can no longer be built.

**12.51** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other detailed site requirements. The details of this can be found in replacement Policy KS3 and KS4.

### **12.52 Environment**

**12.53** A number of comments were received questioning whether the Council is breaching national Green Belt policy by seeking to remove land from the Green Belt to allocate it for residential development. This matter is addressed in more detail in the response to comments on Policy KS2, and in brief, national policy in the National Planning Policy Framework allows local authorities, when preparing strategic plans (such as the Core Strategy) to amend Green Belt boundaries when very special circumstances can be demonstrated to justify that the need for development cannot be met any other way.

**12.54** The impact of the proposed development on its landscape setting, amongst other considerations, has been thoroughly assessed by the Council's consultants as part of the East Dorset Housing Options Master Plan Report January 2012. This Report concluded that there was the landscape capacity to accommodate additional development in the area without a significant impact on the quality of the surrounding area, and that the large SANG which would be provided with the development provides an opportunity to strengthen the landscape setting of this part of Verwood.

**12.55** The majority of the allocation site is Agricultural Grade 3, with the land to the north of Eastworth Farm being Grade 4. Therefore, there is no fundamental objection to the loss of farmland to residential use in this area.

**12.56** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a "Statement of Common Ground" prior to the Examination in Public.

### **12.57 Facilities**

**12.58** All the service providers have been consulted throughout the preparation of this document. No information has been received by the providers of facilities within Verwood, such as the health authority, to say that additional facilities are required to service the new development. As development takes place throughout the plan period the health authorities and other service providers will monitor the capacity of surgeries and other facilities and determine any requirements at that stage. The only recognised need is for an upper school. This is addressed via Policy VTSW2 above. Additional retail capacity in Verwood is being provided by an expansion of the existing Morrisons store, which has just been granted planning permission.

### **12.59 Transport**

**12.60** 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 to identify the specific issues relating to the site and the improvements which will be required as part of the planning application process.

## **Proposed Pre-Submission Change**

**12.61** No change required to Policy VTSW4.

## **Policy VTSW4**

### **North Western Verwood New Neighbourhood**

A New Neighbourhood to the north west of Verwood is identified to provide about 230 homes. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing.

#### **Layout and design**

- The new neighbourhood will be set out according to the principles of the masterplan.
- A design code will be agreed by the Council, setting out the required high standards.

#### **Green Infrastructure**

- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.

#### **Transport and access**

- Vehicular access is to be provided from Edmondsham Road
- Dedicated pedestrian and cycling links are to be provided throughout the housing area and link into the existing networks.

## **Policy VTSW5**

### **North Eastern Verwood New Neighbourhood**

A New Neighbourhood to the north east of Verwood is identified to provide about 50 homes. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing.

#### **Layout and design**

- The new neighbourhood will be set out according to the principles of the masterplan.
- A design code will be agreed by the Council, setting out the required high standards.

#### **Green Infrastructure**

- Approximately half of the identified land is to be set out as informal open space along with children's play.
- A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.

#### **Transport and access**

- Vehicular access is to be provided from Ringwood Road
- Dedicated pedestrian and cycling links are to be provided throughout the housing area and link into the existing networks.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
13	31	5	46	16	23	20	22	22	23	22	23	16

Table 12.5

**12.62** 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:

### **12.63** *Housing*

- The proposal is not legally compliant as local residents have not been given the opportunity to comment on the policy before, unlike all the other proposals in the document.
- There is little or no need (as opposed to demand) for new housing here, and certainly not enough to override Green Belt protection.
- New housing in Verwood should not be permitted unless it is required to meet local needs.
- More housing would not be sustainable unless it is related to local employment opportunities.
- Preferably build elsewhere because houses to the rear of my property will make me feel ill.
- There is other land at the other end of Verwood which may be more suited for building as it is convenient for shops and bus services.
- There is a great need for 100% affordable housing in high price/low wage Dorset.
- The proposal does not comply with key principles in the NPPF as it is Green Belt, in a flood risk area and has no public transport and is too far to walk or cycle to facilities.
- As a Verwood resident in rented accommodation wanting to buy a house I support the proposal. I work on Ebblake and the site's location here with improved cycle/footpath links to the town centre mean that I could save on the cost of car transport. This plan looks like a positive move and takes into account the needs/requirements of the younger generation.
- The site is too far away from Verwood Town Centre to support vulnerable families without transport.
- I consider there is no room for further development in Verwood.
- I am very much against further development etc. We do need however bungalows built for the over 55's (not any more flats).

- We support this policy. The housing is not so visible and will be shielded from open countryside by both the plantation and existing housing.
- Boyer Planning Ltd's client controls the land comprising VTSW5 and supports the policy and have provided a detailed justification for the release of this land from the Green Belt in accordance with guidance contained in the NPPF, and information to address the biodiversity and hydrological concerns about the possible impact of this development on nearby protected sites, as well as highway and access information.

#### 12.64 *Facilities*

- Verwood is already over developed with housing and does not have enough facilities ie doctors surgeries, shops etc. for the existing population, let alone an increased need from more housing.

#### 12.65 *Environment*

- A full wildlife/biodiversity assessment needs to be carried out, as there is a lot of wildlife using the site.
- The site should be a place protected for wildlife.
- The site would be best used for a graveyard.
- It is not legal to build on the Green Belt.
- The site is liable to flooding. It is in Flood Zone 1.
- Additional development will result in more pollution of the area.
- The proposed SANG is not big enough for the amount of development proposed.
- The impact of excess water flowing into the Ebblake Stream and into an SSSI has not been commented on or assessed.
- There is very little environment left in Verwood.
- The impact on the proposed development of the nearby gravel extraction proposals and existing landfill site have not been assessed.
- Cycle links/footpaths through the forest could impact on designated heathland. Lighting the footpaths in the forest could cause light pollution to other properties and impact wildlife.
- Greater investigation of the social, transport and environmental issues raised by the site's possible development should have been undertaken in more depth.
- Dorset Wildlife Trust consider that the development of this site has the potential to adversely impact on the Ebblake Bog SSSI, which is part of an internationally protected site, as it would drain to the Ebblake Stream. A Sustainable Urban Drainage Scheme and compensatory measures in Ringwood Forest are required.
- Hampshire County Council, as neighbouring Mineral and Waste Authority, note that the proposal is in proximity to a proposed sand and gravel extraction site at Blue Haze and a reserve landfill site at Purple Haze. Any future development at NE Verwood should take account of the current and proposed mineral and waste uses within Ringwood Forest so as to avoid any future conflicts of interest.
- Natural England consider that the policy is unsound and possible not legally compliant as it does not identify the need for hydrological mitigation to avoid harm to the integrity of the internationally protected Dorset Heathlands site at Ebblake Bog. The policy also fails to make reference to the need

to assess the impacts of development on European protected species known to occur in Ringwood Forest up to and beyond 400m from an urban area. They suggest amendments to the policy which will overcome these concerns.

- Goadsby Ltd. argue that the site cannot provide sufficient green infrastructure to mitigate the harm to internationally protected heathland and should be deleted.
- RSPB – SANG to be provided in accordance with policy ME3. The RSPB does not, in principle, object to the housing allocations in the Plan provided the heathland mitigation measures are sound.

### 12.66 *Traffic and Transport*

- A traffic assessment needs to be done along Ringwood Road to assess the safest place to allow children to cross.
- The site is too far from the shops, services and schools in the town for residents not to use their cars, and it is therefore the wrong location for additional housing.
- If the development does go ahead it is essential that a new road for vehicles and pedestrians is created away from the blind corner.
- Roads are not adequate to take additional traffic, in particular the B3081.
- There is no room for a cycle way along the B3081.
- There are no bus services in this part of the town, and unlikely to be any off the back of this development.
- The site is too far from the town centre to be accessed by disabled people.
- Access into the site from Ringwood Road is dangerous, it is near a blind bend where traffic speeds are too high.
- It is currently difficult to cross the busy B3081 without more traffic from new development.
- Verwood Town Council support the policy, and require that a traffic management scheme would need to be put in place.
- Bypass needed to spread the traffic load.
- Rush hour traffic between the A31 and Verwood would be slowed further by traffic turning towards Verwood to reach amenities plus would add more cars to the queue to get onto the A31.

## Officer Response

### 12.67 *Housing*

**12.68** Evidence provided in support of Policy KS3/4 identifies the housing need for the area, and clearly indicates that there is currently an unmet need for both affordable and market housing within the Plan area. Evidence provided in support of Policy LN3 identifies the justification for the proportion of affordable housing required from the allocation, which again clearly shows a significant degree of unmet demand in the area. Work carried out in support of Policy LN3 also considers the viability implications on development of the level of affordable housing proposed.

**12.69** Verwood has been an area of significant housing growth in the past, and the Verwood etc. and East Dorset Local Plans identified a further amount of residential development for the town in the late 1990's and in 2002. However, due to the increased significance of the internationally protected Dorset heathlands which abut the built-up area of the settlement, two significant residential allocations (at Aggis Farm, 111 units, and Hainault Farm, 70 units)

can no longer be developed. The re-development potential of large areas of the existing built-up areas have also been affected by the embargo on development within 400m of protected heathland and therefore the potential of the urban area to provide opportunities to meet local housing need have been curtailed. Therefore the amount of housing proposed within Policies VTSW4 and 5 is equal to that previously allocated in Verwood, that can no longer be built.

**12.70** A number of comments have also been received from local residents claiming that the allocation of this land is not legally compliant as this allocation has not been included in any earlier consultation on the Core Strategy. This is not the case. The Core Strategy Options for Consideration Consultation, which was undertaken in October 2012 - January 2011, was a non-statutory consultation stage of the Core Strategy's preparation. From the responses to this consultation, and other evidence studies undertaken to inform the Core Strategy, the Councils produced their Pre-Submission document, which is a statutory phase of the process, as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the first formal stage of consultation the Councils are required to carry out in respect of the formulation of policy and responses received in respect of this consultation are forwarded to the Inspector appointed to conduct the examination into the soundness of the Plan. No respondent to the Pre-Submission stage of the Plan is disadvantaged at the Examination stage for not having had the opportunity to comment on a proposal at the non-statutory Options consultation.

**12.71** A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other site requirements. The details of this can be found in replacement Policy KS3 and KS4.

#### **12.72** *Environment*

**12.73** A number of comments were received questioning whether the Council are breaching national Green Belt policy by seeking to remove land from the Green Belt to allocate it for residential development. This matter is addressed in more detail in the response to comments on Policy KS2, and in brief, national policy in the National Planning Policy Framework allows local authorities, when preparing strategic plans (such as the Core Strategy) to amend Green Belt boundaries when very special circumstances can be demonstrated to justify that the need for development cannot be met any other way.

**12.74** Some of the responses make reference to the site being within Flood Zone 1 and imply that the site is therefore liable to flooding. This is not the case. Land within Flood Zones 2 and 3 are liable to flooding nationally, whereas land in Flood Zone 1 is not. This is normally land which is suitable for residential development as it is at a low risk of flooding, as set out in the National Planning Policy Framework Technical Guidance March 2012, and the Environment Agency has raised no concerns about the development of the site. Both Councils have completed Strategic Flood Risk Assessments. No objections have been received to this proposal from the Environment Agency. Flood management, mitigation and defence is covered by Policy ME6 which includes "future proofing" against the effects of climate change and the need for the use of Sustainable Drainage Systems amongst other measures.

**12.75** Natural England and other nature conservation bodies have raised concerns about the impact of the development on the Dorset Heathlands SPA, SAC and Ramsar site at Ebblake Bog SSSI. The development would drain to the Ebblake Stream where it would adversely impact on the designated features due to elevated flows arising from drainage in the upstream catchment and inputs of sediment and poor quality urban run-off carried by these flows which, in combination, provide an adverse water environment for the designated wetland habitats. It is also established that urban effects on European protected species, which are present in Ringwood Forest, can occur more than 400m from the urban area. Natural England has advised that the necessary

mitigation measures to address these concerns would require works to land not within the landowners ownership or control and it is therefore uncertain as to whether necessary mitigation could actually be delivered. As a result, the 'Precautionary Principle' applies and the Council, as the Competent Authority for Appropriate Assessment, cannot support the proposal.

**12.76** Hampshire County Council, as the adjacent local minerals and waste authority, has raised concerns about the impact of current and proposed minerals and waste uses within Ringwood Forest, which would need to be taken into account in the design of any development on the site. They have not raised an objection per se and have proposed an amendment to the policy to accommodate their concerns which may limit the development potential of the site.

#### **12.77** *Facilities*

**12.78** The service providers have been consulted throughout the preparation of this document. No information has been received by the providers of facilities within Verwood, such as the health authority, to say that additional facilities are required to service the new development. As development takes place throughout the plan period the health authorities and other service providers will monitor the capacity of surgeries and other facilities and determine any requirements at that stage. The only recognised need is for an upper school. This is addressed via Policy VTSW2 above. Additional retail capacity in Verwood is being provided by an expansion of the existing Morrisons store, which has just been granted planning permission.

**12.79** Other comments have been made about the distance from the proposed site to local facilities, and commenting that the development is not in a sustainable location. The Council have looked again at this situation and have concluded that this small site on the edge of the settlement will not provide the impetus

#### **12.80** *Transport*

**12.81** 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 these show that development can take place. However it is recognised that due to the location of the proposed site at some distance from the existing town centre and facilities, such as schools, the majority of journeys from the site are likely to be by car, which limits the sustainability benefits of the proposal.

**12.82** In conclusion, it is considered that this proposed site located on the edge of the existing settlement, would need to provide sustainable transport improvement as it is relatively remote from the existing facilities within the town. Natural England has advised that the residential development of the site could exacerbate the adverse impacts of sediment and poor quality urban run-off on the nearby Ebblake Bog, which has the highest levels of nature conservation protection nationally and internationally. They also advise that the impacts of residential development on known populations of protected species and habitat need to be addressed. The works necessary to attempt to mitigate this harm require land not currently in the landowner's ownership or control and there is no certainty therefore that the necessary mitigation can be achieved. As a result of this uncertainty it is recommended that the site be deleted from the Core Strategy.

## Proposed Pre-Submission Change

**12.83** Policy VTSW5 is to be deleted from the Core Strategy.

### Policy VTSW5

#### North Eastern Verwood New Neighbourhood

~~A New Neighbourhood to the north east of Verwood is identified to provide about 50 homes. To enable this the Green Belt boundary will be amended to exclude the land identified for new~~

#### housing:

#### Layout and design

- ~~• The new neighbourhood will be set out according to the principles of the masterplan.~~
- ~~• A design code will be agreed by the Council, setting out the required high standards.~~

#### Green Infrastructure

- ~~• Approximately half of the identified land is to be set out as informal open space along with children's play.~~
- ~~• A Suitable Alternative Natural Greenspace strategy is to be implemented as part of the provision of the new housing as required by Policy ME3.~~

#### Transport and access

- ~~• Vehicular access is to be provided from Ringwood Road~~
- ~~• Dedicated pedestrian and cycling links are to be provided throughout the housing area and link into the existing networks.~~

## **Policy VTSW6**

### **Woolsbridge Employment Allocation, Three Legged Cross**

9.7 hectares of land at Woolsbridge Industrial Estate is removed from the Green Belt and developed for new employment.

This should involve:

- The provision of B1 (Office and Light Industry), B2 (General Industry) and B8 (Warehousing and Distribution) employment uses.

#### **Prerequisites for development include:**

- Approval of a development brief by the Council.
- Agreement of a comprehensive travel plan including the support of regular bus services.
- Provision of significant landscape buffers alongside the countryside edges of the site.
- A wildlife strategy to be agreed with the Council that ensures that no harm to the Moors River SSSI will derive from the Estate. Particular regard to the water environment will be needed and in this respect the use of Sustainable Drainage Systems to mitigate any potential impacts will be expected to form part of the strategy.

## Consultation Response

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

Table 12.6

**12.84** 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:

### 12.85 *Employment*

- Symonds and Sampson, acting on behalf of a neighbouring landowner, is suggesting that the site is extended to include this land on the grounds that this land will provide an improved access to the site, and can provide landscape buffers and wildlife mitigation measures, as well as additional employment land, which will make the allocation deliverable and flexible.

### 12.86 *Environment*

- Dorset Wildlife Trust – Ecological survey information for this site is not available therefore it is not possible to fully assess the potential environmental impacts of development on this site. DWT have concerns about the impacts on the nearby sites of national, international and local nature conservation importance, and suggest amendments to the policy to address specific concerns in respect of drainage and landscape buffers.
- ETAG – the allocation should be informed by full biological survey. All designated habitats and flood risk zones should be shown on the proposals map. Propose amendments to the policy to require a wildlife strategy and reduce the risk of light pollution, as well as addressing drainage matters.
- Concerns that the area adjoins Flood Zone 2 and Flood Zone 3 adjacent to the Moors River and therefore the risk of flooding will be difficult to overcome.
- DCC, as Lead Local Flood Authority, has responsibility to develop a strategy to tackle local flood risks and to ensure that other plans are compatible. Amendments to the policy are needed to address this issue.

- Natural England consider the current wording of the policy is unsound and may not be legally compliant in respect of the Habitats Regulations. Suggest changes to the wording of the policy to address concerns regarding landscape buffers, a wildlife strategy and flood attenuation and water quality improvement.
- RSBP – A mitigation strategy to be agreed to SSSI. We are not familiar with this location, and do not object to the policy subject to receiving clarification from Natural England of the issues pertinent to the site, and the likely efficacy of mitigation strategies anticipated by the policy.

### **12.87 Traffic and Transport**

- With no public transport serving the site the increased employment would seriously impact on the traffic using Horton Road through Ashley Heath and Three Legged Cross.
- Verwood Town Council support the policy, but consider that a bus route is a prerequisite to the development and are concerned that the X36 bus route which served it has just been discontinued.

## **Officer Response**

### **12.88 Employment**

**12.89** It has been proposed that an area of land adjacent to that allocated under this policy should also be considered for employment uses. The agents acting on behalf of the landowners of the land in question comment that due to the need to provide sufficient landscape buffers and biodiversity mitigation measures, as well as flood protection, the full 9.7ha of land allocated in Policy VTSW6 will not be available. Therefore the allocation of his clients' land would improve the deliverability and flexibility of the proposed policy VTSW6 by allowing the mitigation measures and landscape buffers to be provided, whilst maintaining the developable area of additional employment land. It is also suggested that the land could form an alternative point of access to the site if the existing access road to the industrial estate proves incapable of any required improvement.

**12.90** This narrow strip of land which fronts Ringwood Road currently acts as a visual and landscape buffer to the existing Woolsbridge Industrial Estate and could serve a similar function to the proposed extension of employment land set out in policy VTSW6. The nature conservation bodies have commented that significant levels of mitigation will be required to ameliorate the impact of the development on the surrounding features of acknowledged environmental importance. These requirements may need a substantial area of land to be provided to achieve this. In order to be able to provide the maximum amount of developable employment land possible on this site, the Council are proposing to amend the site boundaries, shown on Map 11.7, to include the land fronting Ringwood Road proposed above.

### **12.91 Environment**

**12.92** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a "Statement of Common Ground" prior to the Examination in Public. Officers at Natural England do not have an in principle objection to the proposal.

**12.93** Some responses have referred to the risk of flooding on this site. Both Councils have completed Strategic Flood Risk Assessments. No objections have been received to this proposal from the Environment Agency. Flood management, mitigation and defence is covered by Policy ME6 which includes “future proofing” against the effects of climate change and the need for the use of Sustainable Drainage Systems amongst other measures.

**12.94** *Traffic and Transport*

**12.95** The comments of the respondents in this section are noted, but the policy already contains a prerequisite for development that states that 'the agreement of a comprehensive travel plan including the support of regular bus services' is required. Following further comments from DCC officers this requirement has been expanded to add a requirement for cycle and walking links to the site. This requirement will encompass the concerns expressed in respect of this allocation. DCC officers have advised, however, that the proposed extension will require highway improvements which need to be referenced in the policy.

**Proposed Pre-Submission Change**

**12.96** The Council has amended Policy VTSW6 to include an additional 3.1ha of employment land, as set out below:

## Policy VTSW6

### Woolsbridge Employment Allocation, Three Legged Cross.

~~9.7~~**13.1**ha of land at Woolsbridge Industrial Estate is removed from the Green Belt and developed for new employment. This should involve:

- The provision of B1 (office and Light Industry), B2 (General Industry) and B8 (Warehousing and Distribution) employment uses.

#### Prerequisites for development include:

- Approval of a development brief by the Council.
- Agreement of a comprehensive travel plan including support of regular bus services, **cycle and walking links to the Castleman Trailway and Ringwood Road, and necessary highway improvements to the access to the site.**
- Provision of significant landscape buffers alongside the countryside edges of the site. **These buffers will be of adequate size and appropriate nature to safeguard the heathland forming part of the Dorset Heaths in the vicinity of the site.**
- A wildlife strategy to be agreed with the Council that ensures that no harm to the Moors River SSSI **and adjacent Site of Nature Conservation Interest** will derive from the Estate **that ensures that the landscape buffers are secured and managed as part of an ecological network connecting with adjacent land of high biodiversity value.** Particular regard to the water environment, **including flood attenuation and water quality improvements** will be needed and in this respect the use of Sustainable Drainage Systems to mitigate any potential impacts will be expected to form part of this strategy.

**12.97** Map 11.7 Woolsbridge Employment Allocation, Three Legged Cross

**12.98** Plan amended to show additional area of employment land.

**Policy VTSW7****St Leonards Hospital Major Developed Site in the Green Belt**

Land at St Leonards Hospital is identified as a Major Developed Site in the Green Belt, in accordance with the requirements of Annex C to Planning Policy Guidance Note 2.

**Consultation Response**

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

Table 12.7

**12.99** 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:

**12.100 Housing**

- The land should be used solely for 100% low cost housing. There is a great need for young couples to get on the housing ladder.
- If we really need the number of affordable homes projected in the Core Strategy then the Government should be lobbied at high level to put their own policies in action and render this site, which is effectively owned by the Government, attractive to residential developers. (the site has a longstanding planning permission to create a Care Village)
- EDDC should insist on the original plan for St Leonards, a care village to prevent needless erosion of green sites in the area.
- It has proved uninteresting to developers because they cannot make enough money for a care village, and it would seem an ideal location for a large new neighbourhood of housing, close to amenities and a main route.

**12.101 Environment**

- Dorset Wildlife Trust – to achieve sustainable development we consider that, as the nature conservation interests within and adjacent to the site have a strong bearing on appropriate redevelopment, this should be acknowledged in the text. The policy should be extended to give guidance on acceptable development and include pre-requisites for development.
- English Nature – the policy should be expanded to identify the prerequisites that will enable development to meet legislative requirements under the Habitats Directive/Regulations and the NPPF on sustainable development including that in relation to biodiversity.
- ETAG recommend that the proposal should acknowledge the significant biodiversity constraints on and adjacent to the site, including SNCI within the site and the Moors River SSSI and internationally protected heathland adjacent to it.

#### **12.102 Transport**

- The Highways Agency – any proposed development would have to demonstrate a robust case that the operation and safety of the A31 would be maintained. Early engagement with the Highways Agency is recommended to any developer.

### **Officer Response**

#### **12.103 National Planning Policy**

**12.104** The Core Strategy was prepared when national planning guidance was set out in a series of Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). In March 2012 the Government consolidated and concentrated its planning policies into one document, the National Planning Policy Framework (NPPF). Therefore any reference in the Core Strategy to PPGs and PPSs needs to be deleted and the policy updated in accordance with the requirements of the NPPF. Annex C to PPG2 set out a detailed set of criteria to guide the re-development of large, previously developed sites in the Green Belt. This level of detail is absent in the NPPF. In order to confirm the continued status of the site and ensure that the form and scale of development at St Leonards Hospital is appropriate in this Green Belt location, a revised wording will be proposed for Policy VTSW7.

#### **12.105 Housing**

**12.106** Planning permission has been granted by the Council for the re-development of the St Leonards Hospital site for a Care Village and Community and Recreational facilities for 128 dwelling units for the over 55's. This consent expires in 2013, and is subject to a legal agreement which includes a commitment to provide 25% affordable housing, a Nature Conservation Management Framework, provision of community facilities, a contribution towards community transport and a restriction on predatory pets and the age of occupants. The Council is aware that there are negotiations underway between the Homes and Communities Agency (a Government Agency), who own the site, and prospective developers. It is therefore likely that the site will come forward for development within the early part of the Plan period, although the form of that development has yet to be determined as the applicants may wish to submit a further planning application on the site. If an application is submitted it will be subject to the other policies set out in the Core Strategy, in respect of the proportion of affordable housing to be provided (LN3), and matters relating to Managing the Natural Environment (Chapter 13), Creating High Quality and Distinctive Environments (Chapter 14), and Meeting Local Needs (Chapter 15).

#### **12.107 Environment**

**12.108** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the EiP.

**12.109** *Transport*

**12.110** The comments of the Highways Agency are noted and they will be consulted on any subsequent planning application on the site.

### **Proposed Pre-Submission Change**

**12.111** The Policy will be revised to take account of the amendment to national Green Belt policy brought about by the introduction of the National Planning Policy Framework in March 2012.

**12.112** The site lies in a sensitive location in close proximity to features of acknowledged biodiversity importance and a strategy is required to ensure that the re-development of the site mitigates any possible harm to these features.

#### **Policy VTSW7**

##### **St Leonards Hospital Major Developed Site in the Green Belt**

**Land at St Leonards Hospital is identified as a Major Developed Site in the Green Belt, in accordance with the requirements of Annex C to Planning Policy Guidance Note 2.**

##### **St Leonards Hospital Previously Developed Site in the Green Belt**

**Land at St Leonards Hospital is identified as a Previously Developed Site in the Green Belt, in accordance with the provisions of the National Planning Policy Framework.**

##### **Prerequisites for development include:**

- **Approval of a development brief by the Council.**
- **A wildlife strategy to be agreed with the Council that ensures that no harm to the Moors River SSSI, the SNCI on the site and the adjacent internationally protected heathland will derive from the development. Particular regard to the water environment will be needed and in this respect the use of Sustainable Drainage Systems to mitigate any potential impacts will be expected to form part of this strategy.**
- **Agreement of a comprehensive travel plan.**

**Policy VTSW8****Blackfield Farm Green Belt Boundaries, West Moors**

Land at Blackfield Farm will no longer be safeguarded from development and is included in the urban area.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	5	2	15	7	1	9	6	9	3	5	7	10

Table 12.8

**12.113** 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:

**12.114 Care Home**

- The policy which specifically advocates the building of yet another care home in the village is not welcomed and will render the community unbalanced demographically and potentially stagnant.
- There is no evidence of need for an additional care home.
- A care home is not an appropriate form of development off a residential area due to the level of disturbance from such a scheme caused by increase traffic noise day and night, light and noise pollution, road parking congestion, a potential increase in car crime and a regular disruption to the bus routes.
- Incorporate the care home in the care village already approved on St Leonards Hospital site (VTSW7) instead of this site.

- Another care home would not benefit the village at all. It would be for anyone on the country or Europe coming into the village, therefore of little or no use to the village.
- The nearby Military fuel depot would be a significant risk to the elderly residents of the site as they could not be evacuated quickly in the case of an emergency.

#### **12.115 Environment**

- The description of the site fails to identify that it is in two ownerships, and the policy should clarify the position of the Trailway, the impact of the adjacent MoD site, the lack of facilities in the village to cope with additional residents of a care home, and the fact that the site is within 400m of protected heathland.
- The site should not be available for housing or an elderly care home due to an embargo on such development within 400m of heathland, supported by Natural England.
- This is an SSSI, there should be no development within 400m.
- It is a great loss to see green space lost to development when there are brownfield sites available for development.
- Dorset Wildlife Trust – Ecological survey information for this site is not available therefore it is not possible to fully assess the potential environmental impacts of development on this site, therefore there is the need to provide ecological data to justify inclusion of this area in the urban area.
- Natural England – this policy may need to include specific paragraphs about features of biodiversity importance which are to be secured or enhanced.
- ETAG – The site has not been the subject of biological survey. Development will need to take account of the fact that it has been mapped by the RSPB as having heathland restoration potential. There is known biodiversity interest in the publicly accessible area alongside the Castleman Trailway.

#### **12.116 Green Belt**

- G L Hearn, representing the landowners, consider the policy to be sound, but mention should now be made of the NPPF instead of PPG2.
- Goadsby Ltd, representing a landowner in Verwood, proposes that the principle of allowing non- general needs housing development to take place within 400m of protected heathland can be applied elsewhere and suggests that land in Verwood could be removed from the Green Belt to allow for a range of community uses.
- West Moors Parish Council reiterate their previous views that the site should be included in the Green Belt, and not in the urban area. There are concerns that any development of the site would result in increased traffic and that the current road infrastructure surrounding the site is not suitable or sustainable.
- Support the site being included in the Green Belt. The site should not be used for building.
- The land used for the Trailway should be Green Belt, whatever the outcome on the rest of the site.
- The Trailway should be safeguarded as it gives access to open countryside for many people.
- EDDC should buy the land and make it Green Belt.

#### **12.117 Village Facilities**

- Medical facilities in the village are already overstretched and would not appear to be able to support further increases in demand.
- The local sewerage system could not cope with additional development.
- There is an overhead power line in the vicinity, the effects of which can cause adverse effects on people.
- The access to the site is unsuitable for any additional development.

## Officer Response

**12.118** The proposed Policy VTSW8 does not include a requirement for the development of a Care Home on the land. However discussions have taken place with prospective developers of such a use on part of the site and there is the possibility that such a use, or another non-residential development could be acceptable in this location, subject to considerations about the impact of any development on nearby residential properties, access to the site, and the impact on neighbouring nature conservation interests. In light of these discussions there are no very special circumstances to include this land within the Green Belt and it should be formally included within the urban area of West Moors. Any future development proposals will be considered against the prevailing national policy and local policy contained within the Local Plan to ensure it is compatible with its surroundings.

**12.119** 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.

### **12.120** *Gas, electricity and water*

**12.121** Service providers have been contacted throughout the preparation of this document and no concerns have been raised.

### **12.122** *Sewerage*

**12.123** Wessex Water has been contacted throughout the preparation of this document. Their proposals for sewage treatment works are set out in the Infrastructure Development Plan. Any other requirements which result from development will be discussed with developers.

**12.124** A number of responses, including that of Natural England, are concerned with the need for a greater understanding of the biodiversity issues relating to this site. Discussions are underway with Natural England with a view to preparing a “Statement of Common Ground” prior to the Examination in Public, but officers at Natural England have not raised an in principle objection to the land being placed in the urban area.

**12.125** Part of the site is currently occupied by the Castleman Trailway, which is part of a long-distance off-road route from Ringwood in the east to Poole in the south west. This is an important access route to the open countryside which is heavily used by local people, and those from further afield. The land also contains a substantial high pressure water main running along its length which impacts on the development potential of the land. In light of the importance of the Castleman Trailway as a safe access to the surrounding open countryside for leisure use, and its growing importance as an off-road commuter route thereby reducing reliance on motor vehicles, it is considered that this land should be designated as Green Belt as it meets the requirements of the NPPF, in terms of its 'openness' and the fact that it is undevelopable. The policy will be amended accordingly.

## Proposed Pre-Submission Change

### 12.126 Policy VTSW8

**12.127** There shall be no change to the allocation of the land known as Blackfield Farm to within the urban area, but the land which is designated as the Castleman Trailway shall be included in the Green Belt. The land which forms the Castleman Trailway is to be included in the Green Belt as it serves an important leisure and alternative access function and is not suitable for development.

### 12.128 Paragraph 11.44

**12.129** PPG2 has been replaced by the National Planning Policy Framework. Part of the site forms an important function as part of a long-distance railway and is encumbered by a high pressure water pipeline. It is not suitable for development and the land forms a Green Belt function of providing access and opportunities for recreation in accordance with the guidance set out in Paragraph 81 of the NPPF.

**12.130** Amended Text - ....The current Green Belt boundaries are considered to be defensible in terms of the National guidance set out in **Planning Policy Guidance Note 2: Green Belt the National Planning Policy Framework**. The land is therefore to remain excluded from the Green Belt and included within the urban area. **Land to the south of Blackfield Farm forms part of the Castleman Trailway, a long-distance route which passes through the District. Part of this land also contains a high pressure water pipeline. This land forms part of an important leisure and alternative transport function and is not suitable for development. For these reasons the site will be included in the Green Belt.**

### Policy VTSW8

#### Blackfield Farm Green Belt Boundaries, West Moors

Land at Blackfield Farm will no longer be safeguarded from development and is included in the urban area.

**Land which forms the Castleman Trailway to the south of Blackfield Farm will be included in the Green Belt.**

### 12.131 Map 11.9 Blackfield Farm Green Belt Boundaries, West Moors

**12.132** Plan amended to show the land which forms the Castleman Trailway is to be included in the Green Belt.

## 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

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

Table 12.9

**12.133** 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:

### 12.134 *Vision*

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

## Officer Response

**12.135** There was very little response to this policy.

**12.136** 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.

**12.137** 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 Pre-Submission Change

### 12.138 Policy VTSW9

**12.139** 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.

**12.140** Floorspace projections have been included in the policy wording.

**12.141** Traffic movement has been merged into one paragraph to avoid repetition.

**12.142** Delete the wording at the bottom of the Policy VTSW9 text box relating to the Town Centre Boundary.

**12.143** **Paragraph 11.46**

**12.144** Additional Key Facts text to bring in line with the other settlements.

**12.145** **Key Facts**

**12.146** **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%**

**12.147** **Environment**

- **relatively flat, non-pedestrianised and largely linear in structure.**
- **Low crime rate and good safety in the town centre**
- **Pleasant shopping environment**

**12.148** **Strategic Requirements**

- **40 - 50sqm of convenience floorspace**
- **150 - 200sqm comparison floorspace**

**12.149** **West Moors District Centre Primary Shopping Area**

**12.150 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.**

## 13 Responses and Analysis of Chapter 12 East Dorset Rural Areas

### **Policy RA1**

#### **Bailie Gate Employment Allocation, Sturminster Marshall**

3.3 hectares of land at Bailie Gate, Sturminster Marshall should be removed from the Green Belt and developed for new employment.

This should involve:

- The provision of B1 (Office and Light Industry) , B2 (General Industry) and B8 (Warehousing and Distribution) employment uses.

#### **Prerequisites for development would include:**

- Approval of a detailed development brief, subject to public consultation.
- Agreement of a comprehensive travel plan including the support of regular bus services and scope to provide footway/cycleway links towards village facilities.
- Provision of significant landscape buffers alongside the countryside edges of the site.
- A Sustainable Drainage System to mitigate any potential impacts.

**Consultation Response**

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

Table 13.1

**13.1** 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:

**13.2 Housing**

- Mrs Wendy Britton (local land owner) is promoting 7.2ha of land to the south of Bailie Gate for a mix of residential development and open space and community facilities. It is argued that the site is close to local facilities and will provide housing to meet the needs resulting from the proposed expansion of the Industrial Estate proposed in policy RA1.

**13.3 Environment**

- Concern about the impact the proposed development could have on the wildlife which uses the adjoining lakes (Marshall Fishery) and requires confirmation that a co-ordinated and comprehensive pollution prevention plan is in place and that an environmental impact assessment is undertaken before planning permission is granted for the proposal.
- Sturminster Marshall Parish Council – the environmental impact of this expanded industrial estate would need careful consideration, in particular the noise pollution in relation to the village school. There are issues with the disposal of surface water from the site that will need to be addressed before approval or inclusion. A full environmental survey is essential before the next stage of the Core Strategy.
- Marshall Fisheries – object to the industrial estate being extended as it could compromise the Green Belt. Development such as car spray workshops could cause pollution to the lakes, killing fish and not being a pleasant place for fishermen, local golfers, school children, walkers and horse riders to use. Also has concerns about possible noise pollution from the site. This area is prone to flooding, and more buildings will compromise the safety of nearby roads. Questions about the meaning of ‘significant landscape buffers’, where the access will be and what provision there will be for additional drainage from the site.

**13.4 Transport**

- There is no vehicular access directly from the A31 causing traffic congestion and danger to pedestrians near the village shop and primary school. This proposal will increase these factors.
- Sturminster Marshall Parish Council – whilst we would like to think that this would give village residents employment opportunities, we envisage that the additional traffic on our already congested roads could be potentially a hazard. In particular the site is adjacent to the village school.
- Access is by a narrow residential road unsuitable for the type of traffic which would be generated. The roads are used by walkers and horse riders and these users are not compatible with industrial traffic.

### 13.5 *Employment*

- Bailie Gate has many empty units. There is a large area at the front which could provide a shop or skate park which is needed.
- Not justified, no local need – there are many empty units on the site at present.
- Wimborne Civic Society – support 3.3ha of Green Belt land at Bailie Gate to be developed for new employment.

## Officer Response

### 13.6 *Environment*

**13.7** A number of responses have referred to national Green Belt policy and an understanding that seeking to amend existing Green Belt boundaries is illegal and contrary to national policy. This is not the case. Paragraphs 82 – 84 of the National Planning Policy Framework, published by the Government in March 2012, make it clear that Local Planning Authorities can amend existing Green Belt boundaries in exceptional circumstances, through the preparation or review of a Local Plan or when planning for larger scale developments.

**13.8** A Development Brief will need to be agreed with the Council for this site. This will deal with all detailed matters of delivery of the site, such as general layout, significant landscape buffers alongside the countryside edges of the site, and other detailed site requirements.

### 13.9 *Transport*

**13.10** 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.

### 13.11 *Employment*

**13.12** The sites have been selected as sustainable locations close to existing settlements with good access to the road network. We will continue to work with our partner authorities to ensure employment land supply located in Christchurch and East Dorset will contribute in part to meeting the wider strategic requirement across the Bournemouth and Poole Housing Market Area as identified in the 2012 Bournemouth, Dorset and Poole Workspace Study, with financial contributions from the Community Infrastructure Levy.

### **Proposed Pre-Submission Change**

**13.13** Paragraph 12.1 - Key Characteristics of the East Dorset Rural Area

**13.14** Additional text to reflect the role of country landowners and big estates in the rural area.

**13.15** *Landscape Character*

**13.16** The Wiltshire and Cranborne Chase Area of Outstanding Natural Beauty covers a large proportion of the East Dorset rural area. In total it covers over 40% of the District. A significant area adjoining the Area of outstanding Natural Beauty has been designated an Area of Great Landscape Value. **The large rural estates that make up a significant proportion of these areas have played, and continue to play, an important role in shaping the landscape of the area.**

**13.17** No change.

## **Policy RA1**

### **Bailie Gate Employment Allocation, Sturminster Marshall**

3.3 hectares of land at Bailie Gate, Sturminster Marshall should be removed from the Green Belt and developed for new employment.

This should involve:

The provision of B1 (Office and Light Industry) , B2 (General Industry) and B8 (Warehousing and Distribution) employment uses.

Prerequisites for development would include:

- Approval of a detailed development brief, subject to public consultation.
- Agreement of a comprehensive travel plan including the support of regular bus services and scope to provide footway/cycleway links towards village facilities.
- Provision of significant landscape buffers alongside the countryside edges of the site.
- A Sustainable Drainage System to mitigate any potential impacts.

**Policy RA2**

**Furzehill Village Envelope**

The Village Envelope will be amended at Furzehill to include the Council Offices and neighbouring buildings.

Redevelopment of the site for residential, offices, residential institutions, non residential institutions, hotel and/or community uses will be acceptable to support the provision of new Council Offices elsewhere. The following requirements must be met:

- a) Replacement buildings will not exceed the current floorspace of existing buildings and will not exceed their height.
- b) The wooded areas of the site should be retained.
- c) A landscape screen should be provided on the western edge of the site, so that views from the wider countryside, including the Area of Outstanding Natural Beauty are not harmed.
- d) Redevelopment of the site should provide a community hall for the village.
- e) Redevelopment should support the implementation of traffic calming measures through the village.

**Consultation Response**

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

Table 13.2

**13.18** 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:

**13.19 Council Offices**

**13.20** • Object to the proposal to move the Council Offices from Furzehill to the Allendale area of Wimborne as the council already has a modern purpose built building and the partnership with Christchurch BC does not justify a move to the town centre.

**13.21** • Wimborne Civic Society do not support the move of the Council Offices to the town centre or the amendment of the Furzehill village envelope as a consequence.

**13.22 Environment**

**13.23** • Dorset Wildlife trust support the retention of the woodland on site.

**13.24** • The Environment Theme Action Group welcome the recognition of the site's location in the Green Belt, the retention of the woodland and public access to it, and the need for landscape protection for the AONB. They request that any subsequent planning application ensures that the dark skies of the AONB are not affected and that there should be provision for the long term management of the woodland for its contribution to ecological networks.

**Officer Response****13.25 Council Offices**

**13.26** The Council notes the comments on the proposal to relocate their offices to Wimborne (explored in more detail in Pre-Submission Policy WMC2 in Chapter 8 of this Plan) to provide a new Community Centre and new District Council Offices. The Council needs to continue investigating opportunities to provide new public facilities, including the operation of its business. The policy provides the flexibility to respond to proposals that could come forward in the lifetime of the plan.

**13.27** The Council considers that there is no recognised need to provide community facilities within the Furzehill site, and no support was received in respect of the requirement to provide a community hall for the village. There are existing community halls in the nearby settlements of Holt, Colehill and Wimborne. In light of this situation, requirement (d) of Policy RA2, that the redevelopment of the site should provide a community hall for the village, be deleted.

**13.28 Environment**

**13.29** The Council welcomes the nature conservation bodies' support for the environmental protection requirements of the policy. Any re-development of the site would be subject to both national and local policy which will include the impact of the development on the surrounding areas.

**Proposed Pre-Submission Change**

**13.30** Requirement (d) of Policy RA2, that the redevelopment of the site should provide a community hall for the village, be deleted.

## Policy RA2

### Furzehill Village Envelope

The Village Envelope will be amended at Furzehill to include the Council Offices and neighbouring buildings.

Redevelopment of the site for residential, offices, residential institutions, non residential institutions, hotel and/or community uses will be acceptable to support the provision of new Council Offices elsewhere. The following requirements must be met:

- a) Replacement buildings will not exceed the current floorspace of existing buildings and will not exceed their height.
- b) The wooded areas of the site should be retained.
- c) A landscape screen should be provided on the western edge of the site, so that views from the wider countryside, including the Area of Outstanding Natural Beauty are not harmed.
- ~~d) Redevelopment of the site should provide a community hall for the village.~~
- e) Redevelopment should support the implementation of traffic calming measures through the village.

## **14 Responses and Analysis of Chapter 13 Managing the Natural Environment**

## Policy ME 1

### Safeguarding biodiversity and geodiversity

The Core Strategy aims to protect, maintain and enhance the condition of all types of nature conservation sites, habitats and species including:

- Internationally designated sites (SPA, SAC, Ramsar)
- Sites of Special Scientific Interest (SSSI)
- Strategic Nature Areas.
- Sites of Nature Conservation Interest (SNCI)
- Local Nature Reserves.
- Identified priority species and habitats.
- Important geological and geomorphological sites.
- Suitable Alternative Natural Greenspace.

Where development is considered likely to impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, it will need to be demonstrated that the development will not result in adverse impacts. To determine the likelihood of harm occurring, there should be an assessment of effects on any existing habitats, species and/or features of nature conservation importance, and the results of this assessment documented. The method of survey and level of detail will vary according to the size and type of development and whether any priority species and habitats exist on site. The survey should involve consultation and advice from Natural England, the Dorset Wildlife Trust, and Dorset County Council.

Based on this assessment, the following criteria should be addressed when development is proposed:

- Avoidance of existing sensitive habitats and species through careful site selection, development design and phasing of construction and the use of good practice construction techniques.
- Retention of existing habitats and features of interest, and provision of buffer zones around any sensitive areas.
- Enhancement of biodiversity where possible through improving the condition of existing habitats or creation of new ones. Particular attention should be paid to priority habitats referred to in the Dorset Biodiversity Strategy, and the Strategic Nature Areas identified on the Dorset Nature Map.
- Where harm is identified as likely to result, provision of measures to adequately avoid or mitigate that harm should be set out. Development may be refused if adequate mitigation cannot be provided.
- Provision of adequate management of the retained and new features.
- Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline.

In addition, and in recognition of the function of the New Forest National Park, the Core Strategy will carefully consider any adverse impacts on the New Forest as a result of development.

### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
6	3	4	7	3	2	4	1	4	1	7	9	8

Table 14.1

14.1 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:

#### 14.2 Environment

- **Cranborne Chase and West Wiltshire Downs AONB** - We note that Chapter 13 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, un-balances the Core Strategy
- **RSPB** – we would recommend this chapter be titled ‘managing and enhancing the natural environment’ which would better demonstrate the Councils’ environmental commitments made in the Core Vision and strategic objective 1. We support paragraph 13.7. We also support para 13.8 which recognises and supports the role of Suitable Alternative Natural Greenspaces (SANGs) in larger developments as appropriate. We would also suggest the addition of the Dorset Heathlands Interim Planning Framework Supplementary Planning Document and forthcoming Development Plan Document within the ‘Relevant Evidence’ section on page 152. The RSPB support policy ME1, and wish to be included in the ‘monitoring group’ which will consider the delivery of the policy.
- **Transition Town Christchurch** – Para 13.1. This omits the important function of the natural environment in stabilising climate, acting as a carbon store, providing pollinators, cycling water and other natural services upon which human and economic life is dependent. Add to ‘Relevant Evidence’ section the DEFRA Biodiversity Offsetting guidance.

- We welcome the recognition of the areas' special and rare natural environment, and the need to protect it, particularly with respect to the Dorset Heathlands.
- **ETAG** – Paragraph 13.7 fails to recognise the requirement for the Core Strategy to include all three strands of sustainability (social, economic and environmental) and to be proactive in protecting and enhancing the natural, built and historic environment (NPPF para 7-9). Paragraph 13.8 – where impacts are unavoidable, mitigation should be put in place to minimise the harm caused. There should be an overall net increase in biodiversity (NPPF para 9 and 109). Policy ME1 is not compliant with the NPPF in terms of biodiversity gain. The document should add to biodiversity not simply minimise impact: opportunities for increasing biodiversity should be realised. It should be amended to comply with paras 109,113,114, and 117 of the NPPF. ETAG supports the changes proposed by Dorset Wildlife Trust.
- **Keep Wimborne Green** – We note that habitats and species are to be monitored after completion of development, but wonder what can be done if there are found to be adverse affects. Once houses are built, there is no going back – the land cannot be returned to its natural state.
- **Cllr P Timberlake** – considers that the first sentence of policy ME1 needs to be re-worded in order to protect the natural environment, in particular areas with special designations.
- **Woodland Trust** – We would like to see Policy ME1 contain an additional 9th bullet point to make it clear that national policy (para 118 of the NPPF) is being followed with ancient woodland to be protected, maintained and enhanced. East Dorset has a high proportion of ancient woodland compared to the national average (4.76% compared to 2.40%) and it is vital that the Council does all it can to protect this above average resource.
- **Wimborne Civic Society** – We feel that these two policies should provide adequate safeguards for heritage protection and historic buildings.
- **Natural England** – Natural England have raised a number of considerations, however we consider that the incorporation of modifications may best be achieved through discussion with the local planning authorities. The proposed text modifications made by the Dorset Wildlife Trust are supported by Natural England.
- **New Forest National Park Authority** – It is a statutory duty to have regard to the statutory National Park purposes. The Core Strategy should be amended to include a clear, succinct reference to the Section 62(2) of the Environment Act 1995 duty to have regard to the two statutory park purposes to: conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park: and to promote opportunities for the public understanding and enjoyment of the special qualities of the National Park in making decisions that could affect the National Park. This is an important material planning consideration in considering proposals in Christchurch and East Dorset. Other Core Strategies prepared locally have included reference to the duty and in some instances (for example Core Policy 15 of the South Wiltshire Core Strategy adopted Feb 2012) have included a specific policy which only permits development where it does not have a negative impact on the National Park purposes.

### 14.3 Biodiversity

- Please include a reference to ecosystem services in paragraph 13.7. A simple explanation could make reference to the importance of ecosystem services to both humans and flora and fauna in protecting the ability of the ecosystem to regulate healthy soils, clean air and water.
- **Dorset Wildlife Trust** – supports the inclusion of policy safeguarding biodiversity and geodiversity but considers that this policy requires amendment to meet the requirements of the NPPF. Dorset Wildlife Trust provided a detailed list of policy changes required to comply with the NPPF as well as amendments to Map 13.2 Strategic Nature Areas.
- **Jackson Planning Ltd**, on behalf of clients – the impact and pressures of the Dorset Urban Heathlands are to be addressed in the forthcoming Heathland Development Plan Document, however, it must be for the Core Strategy to properly reflect this thinking in terms of SANGs, making use of

less pressured green assets (the coast) and acknowledgement of current patterns of use. Both the coast and the New Forest have significant influence on the urban population of Christchurch and the Core Strategy should acknowledge this and plan for it spatially. The policy should reflect the Dorset Green Infrastructure Strategy. The green infrastructure network must be shown on the key diagram and be supported by narrative text. The policy must also address cross boundary issues in relation to mitigation for potential impact on the New Forest and the requirements for buffering from the urban population.

- **Environment Agency** – This policy implies that conservation and enhancement of biodiversity will only apply to species and habitats that have some kind of official designation attached to them. We would wish to encourage you to make it clear within the policy that all established natural habitats should be protected and enhanced. We would like to see reference to riverine and coastal habitats within this policy. The ‘blue’ corridors within East Dorset and Christchurch are a valuable asset and should be acknowledged as such, with a view to improving and extending them. Improved public access should be encouraged where feasible, which can improve health and welfare, and take pressure off the Dorset heaths. The European Water Framework Directive should be referred to within the policy. This is an important Directive as it specifies a certain level of improvement for rivers within a set time frame.
- **Christchurch Conservation Trust** – it is noted that the Christchurch Local Plan policy ENV15 has been incorporated into Policy ME1, however the policy now contains no mention of wildlife corridors. The Local Plan devotes nearly a page to this subject, which although described as non-designated sites are increasingly seen as vital to nature conservation.

## Officer Response

**14.4** The policy together with those that cover landscape issues in chapter 14 of the Core Strategy are designed to complement each other to ensure all aspects of the landscape are appropriately managed and/or improved.

**14.5** Based on the requirements of the NPPF and the responses received through the consultation including those from Dorset Wildlife Trust, Natural England and Environment Agency, greater clarity is required with:

- Reference to priority habitats and species
- Inclusion of reference to riverine and coastal habitats within the hierarchy of habitats in the first bullet point list.
- Greater emphasis on the overall net increase in biodiversity
- The role of Strategic Nature Areas and how they will be treated in the Core Strategy, including corresponding amendments to the accompanying map.
- The hierarchy of habitats and level of protection afforded commensurate with their status
- Further textual amendments in accordance with the NPPF

**14.6** The policy will be amended to include reference to habitats and species referred to in Section 41 of the Nerc Act 2006, the Dorset Biodiversity Strategy. On this basis there is not a requirement to include an exhaustive list of habitats and species in the policy.

**14.7** To support the revised wording of the policy in respect of all types of nature conservation sites functioning as an ecological network, it is proposed to add an additional map that shows the local designated sites of nature conservation.

14.8 The policy as currently worded considers the potential impacts on the New Forest National Park as a result of development.

### Proposed Pre-Submission Change

14.9 Add text to Paragraph 13.8

14.10 **Priority habitats and species are those species and habitats of principle importance included in the England Biodiversity List published by the Secretary of State under Section 41 of the Natural Environment and Rural Communities Act 2006.**

14.11 Paragraph 13.10

14.12 Protection of habitats and species will be undertaken through the Council's own work programmes, working with partners and the local community, and through implementing the initiatives and proposals within the Dorset Biodiversity Strategy, South East Dorset Green Infrastructure Strategy and the emerging Local Nature Partnerships and Nature Improvement Areas. This will also provide an approach that looks to create an expanded and more connected ecological network giving greater resilience to the natural environment against the pressures from climate change and development. **Strategic Nature Areas, identified on the Dorset Nature Map (Map 13.2), are a positive tool for coordinating activities that secure the retention and enhancement of features of interest as well as activities for the benefit of locally important species.**

## Policy ME 1

### Safeguarding biodiversity and geodiversity

The Core Strategy aims to protect, maintain and enhance the condition of all types of nature conservation sites, habitats and species **within their ecological networks** including:

- Internationally designated sites (SPA, SAC, Ramsar)
- Sites of Special Scientific Interest (SSSI)
- **Strategic Nature Areas**
- Sites of Nature Conservation Interest (SNCI)
- Local Nature Reserves
- **Identified** Priority species and habitats
- Important geological and geomorphological sites
- **Riverine and coastal habitats**
- Suitable Alternative Natural Greenspace

**Within Strategic Nature Areas identified on map 13.2, specific action will be taken towards meeting targets for the maintenance, restoration and recreation of priority habitats and species, and linking habitats to create more coherent ecological networks units that are resilient to climate change.**

Where development is considered likely to impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, it will need to be demonstrated that the development will not result in adverse impacts. To determine the likelihood of harm occurring, there should be an assessment of effects on any existing habitats, species and/or features of nature conservation importance, and the results of this assessment documented. The method of survey and level of detail will vary according to the size and type of development and whether any priority species and habitats exist on site. The survey should involve consultation and advice from Natural England, the Dorset Wildlife Trust, and Dorset County Council.

**In considering the acceptability of proposals, the Council will assess their direct, indirect and cumulative impacts relative to the significance of the features' nature conservation value. National policy will be applied to ensure the level of protection afforded international, national and locally designated sites and species is commensurate with their status.**

**Based on this assessment,** The following criteria should be addressed when development is proposed:

- Avoidance of **harm to** existing **priority sensitive** habitats and species through careful site selection, development design and phasing of construction and the use of good practice construction techniques.

- Retention of existing habitats and features of interest, and provision of buffer zones around any sensitive areas.

Enhancement of biodiversity ~~where possible~~ through improving the condition of existing habitats ~~and achieving~~ or net gains in biodiversity, where possible creation of new ones. Particular attention should be paid to priority habitats and species referred to in Section 41 of the NERC Act 2006 and the Dorset Biodiversity Strategy, and the Strategic Nature Areas identified on the Dorset Nature Map.

- Where harm is identified as likely to result, provision of measures to adequately avoid or adequately mitigate that harm should be set out. Development may be refused if adequate mitigation or, as a last resort compensation cannot be provided.
- Provision of adequate management of the retained and new features.
- Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline.

In addition, and in recognition of the function of the New Forest National Park, the Core Strategy will carefully consider any adverse impacts on the New Forest as a result of development.

## Policy ME 2

### Protection of the Dorset Heathlands

In accordance with the advice from Natural England, no residential development will be permitted within 400m of protected heathland.

Any residential development within 400m and 5km of these areas will provide mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document, including:

- Provision of on-site alternative natural greenspace. (also see Policy ME3 below).
- Contributions to off-site greenspace or recreation projects.
- Contributions to Heathland management projects.

On development proposals of up to 50 dwellings, where adequate mitigation measures cannot be provided on-site as part of the development, a financial contribution to the Councils will be required.

The Dorset Heathlands Joint Development Plan Document will set out the type of development circumstances, a list of projects which will be funded by developer contributions and the calculated contribution amounts as they apply to different types of development. Projects delivered through the Development Plan Document will include Suitable Alternative Natural Greenspace (SANG), heathland access and management, wardening, education, habitat re-creation and other appropriate measures.

### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
6	0	4	8	3	1	3	3	3	2	1	3	6

Table 14.2

**14.13** 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:

#### **14.14 Dorset Heathlands**

- **RSPB** – we support the text presented in paras 13.13 – 13.19 on the Dorset heathlands. We support policy ME2, although would comment that it would be advantageous if policies on Suitable Alternative Natural Greenspaces (SANGs) across SE Dorset authorities are similarly drawn
- **Keep Wimborne Green** – SANGs are untested and we do not know if they will compensate for the proposed loss of Green Belt and rise in local population from development.
- **Mr K Brooks** – I propose the arbitrary 400m limit should now be increased to a more realistic 1km limit and based on a wider and more individual criteria, supported by the local planning authorities being statutorily committed to approving a detailed written assessment of adverse effects before approving any increased residential occupancy.
- **Cllr P Timberlake** – general support for ME2 but query *‘on development proposals of up to 50 dwellings’ – why 50 dwellings?*
- **Woodland Trust** – in order to comply with national and local planning policy (paras 114 and 117 of the NPPF) we would like to see the first mitigation bullet point of the policy amended to read *‘Provision of on-site alternative natural greenspace including native woodland’*.
- **Dorset Wildlife Trust** – supports this policy, subject to continued alignment with the forthcoming Dorset Heathlands Joint Development Plan Document.
- **Natural England** – NE advise that the policy is not sound. It should state *‘protected European and internationally designated heathlands’*. The policy should make it clear that measures are to be delivered in advance of the development and must provide for mitigation in perpetuity. Natural England has not advised that contributions may be made to manage heathlands. This approach is not compatible with the Habitats Regulations for reasons of certainty and the requirement to provide for mitigation in perpetuity. It should be deleted. The policy should reference the advice in the Dorset Heathlands Supplementary Planning Document as well as the Development Plan Document which will set out guidance in the intervening period. The final sentence could be re-worded to indicate *‘visitor management’* and *‘appropriate avoidance measures’*. This policy forms an important part of the avoidance and mitigation measures approach in SE Dorset. Reference should be made in the supporting paras to the role it plays in enabling development in the 400m-5km area and in supporting the specific policy protection for European and international sites which we have advised is needed in policy ME1.
- **Savills, on behalf of clients** – object as the policy does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. The need to provide mitigation to ensure that residential development does not have an adverse impact on the Dorset Heathlands is recognised and supported. However policy ME2 would benefit from greater flexibility in relation to requirements for on-site or off-site mitigation and financial contributions, which should be sought at a level sufficient to address the impact arising from the proposed development. A cross-reference to guidance on SANGs should also be included.
- **ETAG** – supports this policy but we wish to review our position if there are fundamental changes to the evidence and recommendations in the emerging Dorset Heathlands Development Plan Document.
- **Hurn Parish Council** - the policy is incomplete and does not meet the test of soundness. To be effective it needs to include the promotion of ‘robust areas’ for use by the general public as an alternative to heathland. Whilst new neighbourhoods will include SANGs, other smaller urban developments will not, which will increase the pressure on heathlands. The following wording should be included in the last paragraph of the Policy – ‘identifying and encouraging greater access to more robust areas.’

- **Home Builders Federation** - The policy is not sound as it is unjustified. The Councils have not taken the costs of the required mitigation measures into account for their impact on development viability. The NPPF requires plans to be deliverable and this means ensuring that development is not subject to a scale of obligations and policy burdens that jeopardises delivery.
- **Turley Associates, for clients** - the policy is insufficiently flexible to be effective in its current form. A requirement that all developments over 50 units provides an on-site SANG is unrealistic and insufficiently flexible to endure the plan period. It would also potentially undermine the Councils' housing delivery objectives, as provision on site may render some urban sites unviable, thereby putting pressure on the release of greenfield sites instead of urban ones. The 50 unit threshold was removed from the draft Dorset Heathlands Supplementary Planning Document to allow greater flexibility for negotiations on a site by site basis. Referencing the Supplementary Planning Document also avoids the need for the Core Strategy to be revised every time the Supplementary Planning Document is updated.

### Officer Response

**14.15** Natural England support the approach of SANGs provision as an accepted form of mitigation to reduce the recreational pressure on the heathlands. Ongoing monitoring of heathland mitigation projects and SANGs will provide further assessment of their effectiveness.

**14.16** This Policy, which seeks to protect the European and internationally designated heathlands within the Plan area, is generally welcomed by the nature conservation bodies, but there are concerns from some representing the development industry that the policy is too inflexible.

**14.17** Christchurch and East Dorset, along with the rest of South East Dorset, contain significant areas of lowland heathland which are protected by European and international legislation and are given the highest level of protection for their nature conservation importance. The South East Dorset authorities are working together to produce a joint Development Plan Document to ensure that no additional residential development takes place within 400m of European heaths, and that development 400m to 5km from these protected areas mitigates the harm of additional human activity within the vicinity of these sites. Natural England, the Government's advisors on nature conservation matters, has given guidance to all local planning authorities in South East Dorset regarding this matter, and the situation has been recently considered in some detail at the Examination into Purbeck District Council's Core Strategy. The policies proposed within the Christchurch and East Dorset Core Strategy are similar to those recently found sound in the Purbeck Plan.

### Proposed Pre-Submission Change

**14.18** The Policy has been amended to update the position with regards to the Dorset Heathlands Joint Planning Framework document and the need to link the provision of SANGs with the Community Infrastructure Levy.

## Policy ME 2

### Protection of the Dorset Heathlands

In accordance with the advice from Natural England, no residential development will be permitted within 400m of protected **European and internationally designated** heathlands.

Any residential development within 400m and 5km of these areas will provide mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document, **and the Dorset Heathlands Joint Supplementary Planning Document which sets out guidance in the intervening period prior to the adoption of the Development Plan Document**, including:

- Provision of on-site alternative natural greenspace. (**provided in accordance with guidelines set out in Appendix 5**).
- Contributions to off-site greenspace or recreation projects.
- **Contributions to Heathland management projects.**

**Such The avoidance or mitigation measures are to be delivered in advance of the developments being occupied and must provide for mitigation in perpetuity. Suitable Alternative Natural Greenspaces (SANGs) will be secured by way of a legal agreement between the developer and the relevant council. Heathland mitigation measures will be secured through CIL in the majority of cases. The authority will ensure that mitigation measures to avoid harm are given priority as required by this policy.**

On development proposals of **up to approximately** 50 dwellings, where adequate mitigation measures cannot be provided on-site as part of the development, a financial contribution to the Councils will be required.

The Dorset Heathlands Joint Development Plan Document will set out the type of development circumstances, a list of projects which will be funded by developer contributions and the calculated contribution amounts as they apply to different types of development. Projects delivered through the Development Plan Document will include Suitable Alternative Natural Greenspace (SANG), heathland access and **visitor** management, wardening, education, habitat re-creation and other appropriate **avoidance** measures. **The combination of the 400m exclusion zone with the heathland mitigation measures set out above function together as an effective package avoiding the harmful effects of additional residential development on the European and internationally designated heathlands.**

## Policy ME 3

### Suitable Alternative Natural Greenspace

Suitable Alternative Natural Greenspace (SANG) is required to mitigate the impact of developments of over 50 dwellings. The provision of SANG must meet the following standards which have been agreed by Natural England:

- 8 to 16 ha of SANG land or any standard within an adopted Heathlands Development Plan Document shall be provided in perpetuity per 1,000 new occupants through direct provision as an element of the development. The area of SANG must provide the key features set out in this policy to ensure it performs the function of attracting people away from the heaths.
- Where the planning authority is satisfied that direct provision as an element of the development is not reasonable, the planning authority will require contributions towards the provision of SANGs identified through the Heathland Supplementary Planning Document, or a replacement Heathlands Development Plan Document.
- Contributions will be required towards strategic access management and monitoring measures.
- During the phasing of development the effectiveness of SANGs will be monitored and enhancements will be required if the SANGs are not functional according to the criteria set out in this policy.

SANGs must have the features described below without their functionality being compromised by unsuitable size, shape, location, topography or other inherent characteristics and SANGs must be compatible with other planning policy.

For all sites there must be adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car. If the site is intended for local pedestrian use only, then there must be excellent access for people arriving by foot, with a range of access points directly linking housing and the SANG.

- All SANGs with car parks must have a circular walk which starts and finishes at the car park.
- It should be possible to complete a circular walk of 2.3 – 2.5km around the SANG, and for larger SANGs a variety of circular walks.
- Car parks must be easily and safely accessible by car and should be clearly sign posted.
- The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.
- Access points should have signage outlining the layout of the SANG and the routes available to visitors.
- The SANG must have a safe route of access on foot from the nearest car park and / or footpath/s.
- SANGs must be designed so that they are perceived to be safe by users; they must not have trees and scrub covering parts of the walking routes.
- Paths must be easily used and well maintained but most should remain unsurfaced to avoid becoming too urban in feel. A majority of paths should be suitable for use in all weathers.

- SANGs must be perceived as semi natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.
- All SANGs larger than 12ha must aim to provide a variety of habitats for users to experience (e.g. some areas of woodland, scrub, grassland, heathland, wetland, open water).
- Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, flood lighting, sewage treatment works, waste disposal facilities).
- SANGs should be clearly sign-posted or advertised in some way.
- SANGs should have leaflets and or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and to be made available at entrance points to car parks.

The establishment of a SANG should be accompanied by legal agreements to secure the future protection and management of the site.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	1	3	14	3	2	4	6	5	2	3	3	4

Table 14.3

**14.19** 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:

### **14.20** *Suitable Alternative Natural Greenspaces (SANGs)*

- Transition Town Christchurch – The value of SANGs in providing alternative areas for leisure use near new developments is as yet unproven. Moreover, SANGs themselves should have biodiversity measures to increase natural habitats.

- Barton Willmore LLP for clients – we support the inclusion within the policy of a requirement for bespoke SANGs of at least 8ha per 1000 new population, in addition to any other measures that are required to satisfy the Habitats Regulations. However we do not agree that a financial contribution towards Strategic Access Management and Monitoring (SAMM) should be required without a case-by-case examination, in light of the Habitats Regulations, of the efficacy of the SANG and other mitigation measures provided in securing avoidance of likely significant effects on the Special Protection Area (SPA). They provide information on a variety of court cases where the need for SAMMs have been considered and have not been found necessary for specific development proposals.
- Dorset Wildlife Trust – consider that the policy is partially sound and partially unsound. The Dorset Wildlife Trust strongly supports the intentions of this policy to mitigate the impact of developments of over 50 dwellings on the Dorset Heathlands. However we have concerns that this policy is over prescriptive and needs further development, allowing each site to be designed on its own merits and with existing natural features and rights of way incorporated and enhanced. It may be more appropriate to refer to guidance given in the Dorset Heathlands Joint Development Plan Document rather than repeat/create criteria here. DWT set out detailed alternative wording to the policy in their response.
- West Parley Parish Council – This policy is unsound. It is an admirable and well conceived policy necessary for the implementation of residential proposals across the plan area, but it has not however been shown that it is deliverable. Owners of the proposed SANGs will be in a strong position and there can be little confidence that developers will be able to bear the whole burden of infrastructure as well as SANGs. This is an important policy and should be shown to be deliverable before the Core Strategy is adopted. Otherwise there is a clear danger of young families being put in high density housing but the SANGs not materialising – with consequences that are all too well known.
- Terence O'Rourke Ltd, for clients – A joint approach should be adopted by Natural England and the South East Dorset Authorities to ensure the provision of consistent design criteria.
- Wimborne Civic Society – We are in favour of the creation of SANGs.
- Natural England - advise that this policy be re-written so that whilst the scale of developments required to produce SANGs etc is set out the policy refers to the Supplementary Planning Document guidance contained in the Dorset Heathlands Supplementary Planning Document to avoid confusion. Natural England further advise that the policy indicate that the Supplementary Planning Document guidance will be superseded by the Joint Supplementary Planning Document following a further public consultation and democratic approval (as in para 16.23)
- Savills, on behalf of clients – object – the policy does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. The need to provide mitigation for the impact of development on the Dorset Heathlands is recognised and supported, and further SANG guidance is welcomed, however it is important to ensure consistency of approach across the local authorities dealing with the cross-boundary issues that arise in relation to the Dorset Heathlands. As currently drafted, the policy does not provide sufficient flexibility and the relationship with the planned Dorset-wide heathlands Development Plan Document is unclear. Much of the detail included in the policy would be better expressed as guidance rather than policy and would be better as an appendix or supporting text.
- The policy is supported, but should be amended to include the need for SANGs to offer tranquillity and avoid light pollution, as well as the need to develop SANGs on a site by site basis to take advantage of what localised ecology exists and to encourage its development. SANGS with special habitats where dogs off leads will be discouraged must be robust and large enough to ensure that dog walkers do not go elsewhere and can exercise their dogs on another part of the site.
- ETAG – support the policy in part, but consider that it lacks flexibility. The Heathland Supplementary Planning Document is in preparation. Its effectiveness will inform the Development Plan Document. ETAG consider that the criteria for SANGs should be less prescriptive, but take on board

a number of issues such as ensuring that there is sufficient land for the maximum occupation of the dwellings, the SANGs should take account of the wildlife value of the land, the circular walks should not destroy existing habitats, and existing features such as boundary banks, ditches, copses etc should be protected etc. to ensure flexibility and coherence of ecological networks.

- RSPB - we support this policy, but would comment that it would be advantageous of policies on SANG across south east Dorset authorities are similarly drawn
- Home Builders Federation - the policy is unsound as it is unjustified. We have been unable to detect any assessment of the likely impact of this policy on the viability and the deliverability of the plan. It is unclear how the costs of this policy would impact on development viability or whether it is feasible for sites allocated to provide alternative green space.
- Jackson Planning Ltd, on behalf of clients – The impact and pressures of the Dorset Urban Heathlands are to be addressed in the forthcoming Heathland Development Plan Document, however, it must be for the Core Strategy to properly reflect this thinking in terms of SANGs, making use of less pressured green assets (the coast) and acknowledgement of current patterns of use and proposed use through planned build development. Both the coast and the New Forest have significant influence on the urban population of Christchurch and the Core Strategy must acknowledge this and plan for this spatially. The policy must also address cross boundary issues in relation to mitigation for potential impact on the New Forest.
- Turley Associates for clients, Inclusion of the second bullet point is welcomed as it provides flexibility for negotiation on a site by site basis without compromising the overall objective of SPA mitigation. We question the use of specific development thresholds contrary to the draft Dorset Heathlands Supplementary Planning Document. Greater reference to this Supplementary Planning Document will avoid the need to revise the Core Strategy policy if the content of the Supplementary Planning Document changes prior to adoption, or on a rolling basis over the plan period as anticipated. The Council will need to provide compelling evidence if they are to include development thresholds contrary to the joint Councils' own Supplementary Planning Document.

## Officer Response

**14.21** Based on the outcome of the recent Purbeck Core Strategy Examination in Public and the comments received in this consultation, it is recommended that Policy ME3 be deleted and replaced by Appendix 5 which sets out the guidelines for SANGs linked to amended policy ME2. This will ensure it is aligned with the other South East Dorset local authorities that contain National and European protected heathland.

## Proposed Pre-Submission Change

**14.22** Delete the policy and replace with Appendix 5 which set out the SANGs guidelines.

## Policy ME 3

### ~~Suitable Alternative Natural Greenspace~~

~~Suitable Alternative Natural Greenspace (SANG) is required to mitigate the impact of developments of over 50 dwellings. The provision of SANG must meet the following standards which have been agreed by Natural England:~~

- ~~• 8 to 16 ha of SANG land or any standard within an adopted Heathlands Development Plan Document shall be provided in perpetuity per 1,000 new occupants through direct provision as an element of the development. The area of SANG must provide the key features set out in this policy to ensure it performs the function of attracting people away from the heaths.~~
- ~~• Where the planning authority is satisfied that direct provision as an element of the development is not reasonable, the planning authority will require contributions towards the provision of SANGs identified through the Heathland Supplementary Planning Document, or a replacement Heathlands Development Plan Document.~~
- ~~• Contributions will be required towards strategic access management and monitoring measures.~~
- ~~• During the phasing of development the effectiveness of SANGs will be monitored and enhancements will be required if the SANGs are not functional according to the criteria set out in this policy.~~

~~SANGs must have the features described below without their functionality being compromised by unsuitable size, shape, location, topography or other inherent characteristics and SANGs must be compatible with other planning policy.~~

~~For all sites there must be adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car. If the site is intended for local pedestrian use only, then there must be excellent access for people arriving by foot, with a range of access points directly linking housing and the SANG.~~

- ~~• All SANGs with car parks must have a circular walk which starts and finishes at the car park.~~
- ~~• It should be possible to complete a circular walk of 2.3 – 2.5km around the SANG, and for larger SANGs a variety of circular walks.~~
- ~~• Car parks must be easily and safely accessible by car and should be clearly sign posted.~~
- ~~• The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.~~
- ~~• Access points should have signage outlining the layout of the SANG and the routes available to visitors.~~
- ~~• The SANG must have a safe route of access on foot from the nearest car park and / or footpath/s.~~
- ~~• SANGs must be designed so that they are perceived to be safe by users; they must not have trees and scrub covering parts of the walking routes.~~
- ~~• Paths must be easily used and well maintained but most should remain unsurfaced to avoid becoming too urban in feel. A majority of paths should be suitable for use in all weathers.~~

- SANGs must be perceived as semi-natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.
- All SANGs larger than 12ha must aim to provide a variety of habitats for users to experience (e.g. some areas of woodland, scrub, grassland, heathland, wetland, open water).
- Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, flood-lighting, sewage treatment works, waste disposal facilities).
- SANGs should be clearly sign-posted or advertised in some way.
- SANGs should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and to be made available at entrance points to car parks.

The establishment of a SANG should be accompanied by legal agreements to secure the future protection and management of the site:

### **Guidelines for the establishment of Suitable Alternative Natural Greenspace (SANGs)**

#### **Introduction**

**'Suitable Alternative Natural Greenspace' (SANGs) is the name given to green space that is of a quality and type suitable to be used as mitigation for applications likely to affect the Dorset Heathlands European and internationally protected sites. The provision of SANGs is one of a range of mitigation measures, a number of which are detailed in the Dorset Heathlands Planning Framework Supplementary Planning Document, which the south east Dorset Planning Authorities and Natural England consider offer an effective means of avoiding or mitigating harm from a number of urban effects.**

**Its role is to provide alternative green space to divert visitors away from the Dorset Heathlands Special Protection Area (SPA), the two Dorset Heaths Special Areas of Conservation (SACs) and the Dorset Heathlands Ramsar (collectively called the 'Dorset Heathlands' in these guidelines). SANGs are intended to provide mitigation for the likely impact of residential-type developments on the Dorset Heathlands by preventing an increase in visitor pressure. The effectiveness of SANGs as mitigation will depend upon its location and design. These must be such that the SANGs is more attractive to visitors than the Dorset Heathlands.**

**This appendix describes the features that have been found to draw visitors to the Dorset Heathlands, which should be replicated in SANGs. It provides guidelines on:**

- **the type of site which should be identified as SANGs;**
- **measures that can be taken to enhance sites so that they may be used as SANGs.**

These guidelines relate specifically to the means to provide mitigation for development of a residential nature within or close to 5km of the Dorset Heathlands. They do not address nor preclude the other functions of green space (e.g. provision of disabled access). Other functions may be provided within SANGs, as long as they do not conflict with the specific function of mitigating visitor impacts on the Dorset Heathlands.

SANGs may be created from:

- existing open space of SANGs quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public;
- existing open space that is already accessible but could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the Dorset Heathlands;
- land in other uses that could be converted into SANGs.

The identification of SANGs should seek to avoid sites of high nature conservation value, which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANGs, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the local plan.

The character of the Dorset Heathlands and its visitors

The Dorset Heathlands are made up of 42 Sites of Special Scientific Interest, and consist of a mixture of open heathland and mire with some woodland habitats. The topography is varied with some prominent viewpoints. Many sites contain streams, ponds and small lakes. Some have open landscapes with few trees and others have scattered trees and areas of woodland. Most sites are freely accessible to the public, although in some areas access is restricted by army, or other operations.

Surveys have shown that about half of visitors to the Dorset Heathlands arrive by car and about half on foot. Where sites are close to urban development around Poole and Bournemouth, foot access tends to be most common. On rural sites in Purbeck and East Dorset, more visitors come by car. Some 75% of those who visited by car had come from 5.3km of the access point onto the heathlands. A very large proportion of the Dorset Heathland visitors are dog walkers, many of whom visit the particular site regularly (i.e. multiple visits per week) and spend less than an hour there, walking on average about 2.2km.

Guidelines for the quality of SANGs

The quality guidelines have been subdivided into different aspects of site fabric and structure. They have been compiled from a variety of sources but principally from visitor surveys carried out at heathland sites within the Dorset Heathlands and the Thames Basin Heaths.

The guidelines concentrate on the type of SANGs designed principally to cater for heathland dog walkers. Other important heathland mitigation measures, for example facilities designed to attract motor cycle scramblers or BMX users away from heathlands, or facilities for adventurous play for children, are not covered specifically and will need to be considered case by case.

The principle criteria contained in the guidelines have also been put into a checklist format at the end of this appendix.

It is important to note that these guidelines only cover the quality of SANGs provision. There are a number of other matters that will need to be agreed with Natural England and the Council including: provision of in perpetuity management of the SANGs; SANGs capacity; other avoidance and mitigation measures as necessary.

#### Accessibility - reaching the SANGs

Most visitors reach the Dorset Heathlands either by foot or by car and the same will apply for SANGs. Thus SANGs may be intended principally for the use of a local population living within a 400 metre catchment around the site; or they may be designed primarily to attract visitors who arrive by car (they may also have both functions).

SANGs design needs to take into account the anticipated target group of visitors. For example, where large populations are close to the Dorset Heathlands the provision of SANGs may need to be attractive to visitors on foot.

If intended to attract visitors arriving by car, the availability of adequate car parking is essential. Car parks may be provided specifically for a SANGs or a SANGs may make use of existing car parks, but some existing car parks may have features incompatible with SANGs use, such as car park charging. The amount and nature of parking provision should reflect the anticipated numbers and mode of arrival by visitors to the site and the catchment size of the SANGs. It is important that there is easy access between the car park and the SANGs, i.e. this is not impeded by, for example, a road crossing. Thus such SANGs should have a car park with direct access straight on to the SANGs with the ability to take dogs safely from the car park to the SANGs off the lead. Similarly, the nature of foot access between urban development and a SANGs is important and green corridors reaching into the urban area can be an important part of facilitating access to the SANGs.

#### Guidelines:

1. Sites must have adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car.
2. Car parks must be easily and safely accessible, be of an open nature and should be clearly sign posted.
3. There should be easy access between the car park or housing and the SANGs with the facility to take dogs safely from the car park to the SANGs off the lead.

**4. Access points should have signs outlining the layout of the SANGS and the routes available to visitors.**

**Paths, tracks and other SANGs infrastructure**

**SANGs should aim to supply a choice of circular walking routes that provide an attractive alternative to those routes on heathlands in the vicinity (i.e. those heaths that the SANGs is designed to attract visitors away from).**

**Given the average length of walks on heathland, a circular walk of 2.3-2.5km in length is necessary unless there are particular reasons why a shorter walk is considered still appropriate. Where possible, a range of different length walks should be provided; a proportion of visitors walk up to 5km and beyond so walking routes longer than 2.5 km are valuable, either on-site or through the connection of sites along green corridors.**

**Paths do not have to be of any particular width, and both vehicular-sized tracks and narrow paths are acceptable to visitors, although narrow corridors where visitors/dogs may feel constrained should be avoided. The majority of visitors come alone and safety is one of their primary concerns. Paths should be routed so that they are perceived as safe by the visitors, with some routes being through relatively open (visible) terrain (with no trees or scrub, or well spaced mature trees, or wide rides with vegetation back from the path), especially those routes that are 1-3 km long.**

**A substantial number of visitors like to have surfaced but not tarmac paths, particularly where these blend in well with the landscape. This is not necessary for all paths but there should be some visitor-friendly, all weather routes built into the structure of a SANGs, particularly those routes that are 1-3 km long. Boardwalks may help with access across wet areas but excessive use of boardwalks, as may be necessary on sites that are mostly wet or waterlogged such as flood plain and grazing marsh, is likely to detract from the site's natural feel.**

**Other infrastructure specifically designed to make the SANGs attractive to dog walkers may also be desirable but must not detract from a site's relatively wild and natural feel. Measures could include accessible water bodies for dogs to swim/drink; dog bins; fencing near roads/car-parks, etc. to ensure dog safety; clear messages regarding the need to 'pick-up'; and large areas for dogs to be off lead safely.**

**Guidelines:**

**5. Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming too urban in feel. A majority of paths should be suitable for use in all weathers and all year around. Boardwalks may be required in wet sections.**

**6. All SANGs with car parks must have a circular walk that starts and finishes at the car park.**

**7. It should be possible to complete a circular walk of 2.3-2.5km around the SANGs, and for larger SANGs there should be a variety of circular walks.**

**8. SANGs must be designed so that visitors are not deterred by safety concerns.**

**Advertising - making people aware of the SANGs**

**The need for some advertising is self evident. Any advertising should make clear that the site is designed to cater specifically for dog walkers.**

**Guidelines:**

**9. SANGs should be clearly sign-posted and advertised. .**

**10. SANGs should have leaflets and/or websites advertising their location to potential visitors. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.**

**Landscape and Vegetation**

**The open or semi-wooded and undulating nature of most of the Dorset Heathland sites gives them an air of relative wildness, even when there are significant numbers of visitors on site. SANGs must aim to reproduce this quality but do not have to contain heathland or heathy vegetation. Surveys in the Thames Basin heath area show that woodland or a semi-wooded landscape is a key feature that people who use the SPA there appreciate. Deciduous woodland is preferred to coniferous woodland. In these circumstances, a natural looking landscape with plenty of variation including both open and wooded areas is ideal for SANGs. There is clearly a balance to be struck between what is regarded as an exciting landscape and a safe one and so some element of choice between the two is desirable.**

**Hills do not put people off visiting a site, particularly where these are associated with good views, but steep hills are not appreciated. An undulating landscape is preferred to a flat one. Water features, particularly ponds and lakes, act as a focus for visitors for their visit, but are not essential. The long term management of the SANGs habitats should be considered at an early stage. Grazing management is likely to be necessary, particularly for larger SANGs and those with grasslands.**

**A number of factors can detract from the essential natural looking landscape and SANGs that have an urban feel, for example where they are thin and narrow with long boundaries with urban development or roads, are unlikely to be effective.**

**Guidelines:**

**11. SANGs must be perceived as natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.**

**12. SANGs must aim to provide a variety of habitats for visitors to experience (e.g. some of: woodland, scrub, grassland, heathland, wetland, open water).**

**13. Access within the SANGS must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.**

**14. SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, sports grounds, sewage treatment works, waste disposal facilities).**

## **Policy ME 4**

### **Sustainable development standards for new development**

Residential and non residential development including new homes, and the extension of existing homes will be expected to meet national sustainable development standards. Schemes that meet higher standards will be considered more favourably. Developments will be required to incorporate carbon reduction, water and energy efficiency measures and to demonstrate they have explored a range of sustainable and low carbon options. The most appropriate range and type of measures for each development should be informed by the code for Sustainable Homes Design Categories. These will include:

- Water and energy efficiency.
- Orientation and solar gain (natural lighting and heating).
- Use of renewable and low impact materials.
- Minimising waste, pollution and water run-off, incorporating Sustainable Drainage where possible.

Developments involving the conversion or alteration of historic buildings will be expected to demonstrate that they have explored a range of sustainable and low carbon options for construction and energy use and incorporated them into the design where practically possible, provided that this does not harm the character of the building or increase the risk of long-term deterioration to fabric or fittings.

## Consultation Response

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

Table 14.4

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

### 14.24 *Sustainable Development Standards*

- Housing development needs to be built near to amenities to encourage carbon friendly forms of transport such as cycling or on foot.
- Cllr Paul Timberlake – I believe all the measures listed in the bullet points of the policy should be compulsory in order to meet sustainable and energy requirements of the future.
- Transition Town Christchurch – Good, but insulation should be added.
- Savills, on behalf of clients, Object: the policy is not consistent with national policy in that the second sentence is unclear and inconsistent with the guidance on the NPPF, and should be deleted.
- BREEAM - Advises that their website gives examples of the approaches taken by other Local authorities to the introduction of policies to require standards set out in the Code for Sustainable Homes and/or BREEAM.
- Home Builders Federation – We welcome the decision to adhere to the Building Regulations and not to introduce local standards that exceed those set nationally. However it is unclear what is implied by the statement that follows that schemes that meet higher standards will be considered more favourably. This implication is that schemes that meet Building Regulations may be considered less favourably than schemes which achieve higher levels. We are not sure that this would be appropriate.

### 14.25 *Environment*

- ETAG – (with reference to paragraph 13.20) To avoid or mitigate the impact of climate change it is essential that its causes are understood and addressed. Within the Core Strategy consideration has been limited to the use of fossil fuels. ETAG has provided detailed information about the importance of soil carbons and consider that the Core Strategy should consider soil carbon losses due to changes in land management, and suggest

that the following wording is added to the text of ME4: All development proposals should identify and take into account the ecosystem services provided by natural and semi-natural habitats. Where soil carbon losses cannot be avoided, mitigation should seek to ensure minimal soil disturbance and restore permanent semi-natural habitat. While supporting the policy, we are concerned that the wording of bullet point 4 appears to imply that if Sustainable Drainage Systems cannot be incorporated development may be allowed, therefore redraft the policy to ensure no ambiguity on provision of Sustainable Drainage Systems.

- Wimborne Civic Society – We feel that this policy should provide adequate safeguards for heritage protection and historic buildings.
- Environment Agency – We would encourage you to specify which Code for Sustainable Homes category you will require within new residential development. You should at least refer to water use, which is very important in this area where much of the water supply is obtained from rivers, some of which like the Hampshire Avon are protected for their wildlife importance. Specifying a water usage level for new developments will also support policy ME1. Suggest that Core Policy 19 of the adopted South Wiltshire Core Strategy be considered as a model for this revision. There is also no consideration of commercial development. This is covered by the BREEAM standards, and you should consider also being specific about what you expect within commercial developments, in terms of sustainability performance.

## Officer Response

**14.26** No significant objection was received for this policy and it is considered that the policy continues to meet the overall thrust of the NPPF with regards to supporting the move to a low carbon future.

**14.27** Whilst a lack of a specific evidence base for Christchurch and East Dorset precludes a policy that set standards significantly higher than those proposed at the national level, it is considered that the policy encourages those developments that wish to do so. Similarly the issue of soil carbon raised in the responses would also need a similar evidence base - it is also considered that the issue may be better encompassed either in a revised ME1 or in a more detailed development management policy, if and when evidenced.

**14.28** Further reference to preferring the use of Sustainable Drainage Systems is provided in policy ME6, which goes further by requiring all new developments to not result in a net increase in surface water run-off.

## Proposed Pre-Submission Change

**14.29** Based on the consultation responses and changes in national policy, it is considered no change is required to this policy, although references to Planning Policy Statement documents in the preceding paragraphs require removing and replacing with the NPPF.

**14.30** Paragraph 13.22 (second bullet)

**14.31** ~~PPS1 and PPS22~~ **The National Planning Policy Framework** requires local authorities to adopt policies for renewable, low carbon and decentralised energy, and that these should apply to both residential and commercial development. In doing so, this requires local authorities to consider the impact of such policies on development viability.

## Policy ME 4

### Sustainable development standards for new development

Residential and non residential development including new homes, and the extension of existing homes will be expected to meet national sustainable development standards. Schemes that meet higher standards will be considered more favourably. Developments will be required to incorporate carbon reduction, water and energy efficiency measures and to demonstrate they have explored a range of sustainable and low carbon options. The most appropriate range and type of measures for each development should be informed by the code for Sustainable Homes Design Categories. These will include:

- Water and energy efficiency.
- Orientation and solar gain (natural lighting and heating).
- Use of renewable and low impact materials.
- Minimising waste, pollution and water run-off, incorporating Sustainable Drainage where possible.

Developments involving the conversion or alteration of historic buildings will be expected to demonstrate that they have explored a range of sustainable and low carbon options for construction and energy use and incorporated them into the design where practically possible, provided that this does not harm the character of the building or increase the risk of long-term deterioration to fabric or fittings.

**Policy ME 5**

**Renewable energy provision for residential and non-residential developments**

The provision of renewable, decentralised, and low carbon energy will be encouraged in residential development of 10 or more dwellings (or sites of 0.5 hectares or greater), and non residential development of 1,000m<sup>2</sup> gross floorspace (or 1 hectare or greater). This will include new development, and the extension and refurbishment of existing homes or premises.

The expectation will be that 15% of the total energy used in these types of development will be from such energy sources (unless having regard to the type of development involved and its location and design, this is not feasible or viable - in which case the highest levels of this type of energy generation possible will be sought). If applicable national standards call for a higher percentage of such energy, the national standards will be applied.

The Councils will require all schemes or phases with a development to meet a set overall site pre-development target for sustainable energy generation rather than allowing a piecemeal approach. Where new national standards increase the requirement then such standards will be required to be integrated into any further ongoing development on the site.

Within larger developments and new neighbourhoods/urban extensions, the Councils will require the investigation of options for district heating and/or power facilities. Developments may be required to connect to district heating and/or power facilities where appropriate, feasible and viable. Developers will be expected to assess a range of suitable options including district wide and/or micro generation in respect of their sites, with the suitability of the chosen technology being judged on a site-specific basis.

Energy provision should normally be provided on-site, particularly on larger developments, or if not viable, through the Community Infrastructure Levy.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	1	4	10	2	1	3	1	5	1	6	4	0

Table 14.5

**14.32** 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:

**14.33** *Renewable energy provision*

- Synergy Housing – We believe that the emphasis of this policy is flawed. Overall carbon reduction can be achieved by having highly energy efficient buildings rather than purely through the inclusion of renewable energy technologies such as heat pumps etc. Such technology solutions remain relatively expensive and are not always easy to use or understand by dwelling occupants. Suggest that the emphasis of this policy is changed to reflect a dwelling emissions target rather than concentrating on renewable energy technologies. Then there is a choice of whether to reach the target with a ‘fabric first’ approach or including technology solutions (or indeed a combination of the two).
- Tanner and Tilley, on behalf of Pennyfarthing Homes, - it is considered that the Local Authority should clarify the policy and confirm that if the local authorities include energy provision within the Community Infrastructure Levy, where energy provision is to be provided on-site this will be funded through Community Infrastructure Levy rather than the developer being faced with what would otherwise be a ‘double charge’.
- Transition Town Christchurch – add ‘Sustainability should be a material consideration in all planning decisions.’
- DC Planning Ltd, for clients – the Councils’ stance on renewable energy is set in too rigid a framework and to a degree reflects past rather than current thinking. The increasing consensus is that reducing energy consumption by in-built fabric means is more appropriate and effective in the reduction of carbon emissions than bolt on or even integral renewable energy devices. These could effectively just be meeting a % of energy from a wasteful home. The policy should acknowledge that there is ‘another way of doing things’ through enhanced specification for the built fabric.
- Savills, on behalf of clients – the policy is inconsistent with national policy, in that para 95 of the NPPF advises that any local requirements should be consistent with national standards. Recommend the deletion of the second and third paragraphs of ME5.
- We fully support this policy for the provision of small scale localised renewable energy.
- Alliance Planning, for Eco Sustainable Solutions Ltd - It is submitted that the Core Strategy should set out the scale of the requirement derived from national policy to deliver decentralised renewable energy sources that reduce carbon emissions and reliance on traditional sources. There should also be a clear strategy for the development of renewable energy generating capacity that will enable or support the acknowledged need to tackle climate change, including the identification of potential sites and renewable energy sources. We would propose the inclusion of a specific policy stating as follows: ‘The development of low carbon decentralised, renewable energy proposals will be supported including combined heat and power, wind and solar proposals.’ Supporting text should reference the commitment outlined in the NPPF to increase the supply of renewable and low carbon energy. These changes will give substance to the statements pertaining to climate change and ensure that the Core Strategy is positively prepared, justified, effective and consistent with national policy.
- ETAG – support subject to minor changes, in that the proposals should demonstrate that they will achieve a net reduction on carbon emissions, as required in NPPF para 95.
- Turley Associates, for clients - object to the policy on the grounds that the 15% renewable energy target would add a very significant and inappropriate burden to new development. It also does not support current best practice. Strongly request that the council remove the 15% target within policy ME5 and apply Building Regulations as the local standard for energy and carbon reductions. We request that the council amend this wording to include only regulated energy which is in accordance with Government Policy on Zero carbon homes. (Paras 95 and 96 of the NPPF). Finally we request the council apply the recommendations of the Zero Carbon Hub’s research into the development of low and Zero Carbon Homes. This work strongly

recommends that a 'fabric first' approach be adopted which requires homes to focus on energy and carbon reductions through the use of a more insulated fabric prior to the use of renewable technologies.

- Jackson Planning Ltd, for clients – The Core Strategy is not sound as policy ME5 fails to deal with the strategic issues of renewable energy development. Suggest an addition to Policy ME5 (or separate policy): Proposals for renewable energy production and ancillary infrastructure, including distributed generation will be supported in order to reach the Government's target of 15% renewable energy production by 2020. Proposals should demonstrate that they do not have a negative impact on: i adjoining land uses, ii nature conservation designations, iii heritage assets, iv the wider landscape, in particular New Forest National Park, v residential amenity both during construction and operation, vi the road network. (this representation is substantiated by additional evidence submitted with the representation by MEM Ltd).
- Home Builders Federation - It is not appropriate to specify how carbon reduction targets (of Part L of the Building Regulations) are achieved by developers, such as 15% of total energy used to be from on-site or off-site renewable energy as specified in this policy. It is a matter for developers alone how they achieve the Part L requirements and how they achieve this will depend on the specific circumstances of each site. It would assist the industry better if the councils identified through the plan suitable areas for renewable energy plant to be constructed and existing low carbon energy sources and supporting infrastructure (para 97 of the NPPF).

## Officer Response

**14.34** The key concerns raised with this policy were based around viability of development, greater emphasis on the need for a 'fabric first' approach and whether it still fitted with Government's national policies.

**14.35** The figure of 15% was aspirational and did not take sufficient account of viability. The figure of 10% is based on evidence that takes account development viability and it is proposed that this figure is placed in the policy, subject to viability.

**14.36** The fabric first approach is already effectively a requirement of policy ME4 as is the need for greater energy efficiency. If new development is inherently designed for low energy consumption, then this will in turn reduce the amount of energy needed by the 10% requirement.

**14.37** Paragraph 97 of the NPPF looks to local authorities to have in place strategies to promote energy from renewable and low carbon sources which this policy aims to fulfil.

**14.38** The Government's move towards a zero carbon buildings policy, if it comes in 2016 as previously proposed, is likely to result in a similar or greater proportion of on site provision as well as off-site through allowable solutions.

**14.39** In terms of dealing with the more strategic issues relating to renewable energy, it is considered an additional policy is required. This is in line with the requirements set out in the NPPF.

## Proposed Pre-Submission Change

**14.40** To reflect viability and deliverability issues, the % requirement for renewable, decentralised, and low carbon energy is to be amended.

## Policy ME 5

### Renewable energy provision for residential and non-residential developments

The provision of renewable, decentralised, and low carbon energy will be encouraged in residential development of 10 or more dwellings (or sites of 0.5 hectares or greater), and non residential development of 1,000m<sup>2</sup> gross floorspace (or 1 hectare or greater). This will include new development, and the extension and refurbishment of existing homes or premises.

The expectation will be that ~~45%~~**10%** of the total energy used in these types of development will be from such energy sources (unless having regard to the type of development involved and its location and design, this is not feasible or viable - in which case the highest levels of this type of energy generation possible will be sought). If applicable national standards call for a higher percentage of such energy, the national standards will be applied.

The Councils will require all schemes or phases with a development to meet a set overall site pre-development target for sustainable energy generation rather than allowing a piecemeal approach. Where new national standards increase the requirement then such standards will be required to be integrated into any further ongoing development on the site.

Within larger developments and new neighbourhoods/urban extensions, the Councils will require the investigation of options for district heating and/or power facilities. Developments may be required to connect to district heating and/or power facilities where appropriate, feasible and viable. Developers will be expected to assess a range of suitable options including district wide and/or micro generation in respect of their sites, with the suitability of the chosen technology being judged on a site-specific basis.

Energy provision should normally be provided on-site, particularly on larger developments, or if not viable, through the Community Infrastructure Levy.

## Policy ME 6

### Flood management, mitigation, and defence.

When assessing new development, the local authorities will apply the sequential and exception tests set out in PPS25.

All developments (including redevelopments and extensions which require planning permission) within areas at risk of flooding will be required to incorporate appropriate flood resistance and resilience measures as a means of "future proofing" against the effects of climate change. Historic buildings and sites may be exempt from this Policy where measures would harm their character or increase the risk of long-term deterioration to fabric or fittings.

All developments will be required to demonstrate that flood risk does not increase as a result of the development proposed, and that options have been taken to reduce overall flood risk. Post-development surface water run-off must not exceed pre-development levels and options should have been sought to reduce levels of run-off overall. This will primarily be through the use of Sustainable Urban Drainage Systems (SUDS) and a range of flood resistance and resilience measures. Space for such measures should be set aside within larger developments.

The design, construction, operation and maintenance of SUDS must meet national standards. Plans for new drainage systems will need to be approved by Dorset County Council (as SUDS approval body) before construction can start.

Strategic flood defences are identified in the Core Strategy Infrastructure Delivery Plan, and delivery of these schemes will be supported by a range of funding sources including the Community Infrastructure Levy (CIL). Section 106 planning obligations will continue for implementation of site specific flood defence improvements where required. Where development is of a sufficient scale to fund flood alleviation works to make that development safe throughout its design life, works in kind will be considered where appropriate.

For developments within a flood risk area which pass the sequential test, but where risk can not be adequately mitigated on site, a flood management strategy and delivery plan will be required prior to the grant of consent. The strategy will identify the measures required to reduce flood risk and surface water run-off at the site for the duration of its design life, making it safe (including unaided access/egress during flood events) and ensuring that flood risk does not increase elsewhere as a result. The delivery plan will identify the level and source of funding required for such measures and set out a realistic and achievable timetable for implementation. For very large schemes, area wide flood attenuation measures may be required.

## Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
8	0	8	10	2	1	2	1	1	2	2	11	4

Table 14.6

**14.41** 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:

### **14.42 Risk of Flooding**

- Environment Agency (EA) - Please replace any reference to PPS25 with the NPPF. Policy ME6 – please amend the second sentence to read: ‘Where, exceptionally, all development (including redevelopments and extensions which require planning permission) can be permitted within areas at risk of flooding, they will be required to incorporate....’ This reflects the potential result of the Sequential and Exceptions Tests, which all new development proposals within flood zones 2 and 3 are subject to. It is important to make it clear in the policy that development allowed within flood risk areas is the exception rather than the rule. The Options for Consideration document contained policy ME18 – ‘Development within areas at risk of coastal erosion’. We would encourage you to allow this policy to remain as coastal erosion poses a real threat to existing and new communities within Christchurch. The EA also request a consistent approach to the mention of Flood Risk Assessments, surface water management etc within the individual policies in respect of new neighbourhoods throughout the plan.
- ETAG - (para 13.28) there is no mention of surface flooding or the pollution risk it poses particularly at employment sites. (NPPF para 110). (para 13.30 – 13.37 and Policy ME6) support the proposals to ‘future proof’ against the effects of climate change, but are concerned that the ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration (NPPF para 109). Suggest that para 13.33 will need to be amended to be consistent with the NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.
- DCC – as Lead Local Flood Authority, DCC has responsibility to develop a strategy to tackle local flood risks and to ensure that other plans and policies accord with it. It is suggested that the following wording be added to para 13.30: ‘The National Planning Policy Framework (NPPF), when supported by the Christchurch and East Dorset Strategic Flood Risk Assessments (SFRA), Dorset Surface Water Management Plan 2011 and Flood Map for Surface Water (Environment Agency), will inform decisions regarding the suitability of all forms of development within flood zones.’ Para 13.33 and Policy ME6 should be amended by removing reference to ‘Urban’ in ‘Sustainable Urban Drainage Systems’ and SUDS.

- Keep Wimborne Green – the importance of protecting both new and existing properties from flood risk cannot be over emphasised. Particular area at risk is the proposed WMC5 Cranborne Road where run off could seriously affect existing properties south of this new proposed development.
- Cllr P Timberlake - not entirely happy with the parts of ME6 which allow development on flood plains – especially in view of the possible effects of global warming and rising water levels, and if development is allowed, is it better to allow historic buildings to take their chance with nature, rather than take some protective action, even if this does affect the building's integrity to some degree. He suggests not allowing any residential development in flood plains where there is a more than 100 year to one likelihood of flooding taking place.
- Transition Town Christchurch – Good but should include rainwater harvesters to control surface water run-off and protect storm flooding from overwhelming sewers and polluting nearby sea. These also can supplement garden water requirements during times of drought.
- Eastern Area DAPTC – The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainage. It is essential that the District Council recognises their liability to work with the County Council to mitigate the effects of surface water flooding which are now more common than 25 years ago.
- Sixpenny Handley Parish Council – Surface water drainage in Sixpenny Handley is inadequate in that it cannot cope with flash flooding/winterbourne ground water with the result that it impinges on the foul water (sewerage) system and thus be the cause of serious environmental health problems.
- We fully support this policy. It is particularly important in Wimborne as the old town is so susceptible to flash floods in storm conditions.

### Officer Response

**14.43** The policy requires updating with references to the NPPF as well as the comments from the Environment Agency. Alterations to the text are also required to include comments from DCC regarding Sustainable Drainage Systems in Policy ME6 and the text in paragraph 13.30 and 13.33.

**14.44** The issues of coastal erosion and development is now sufficiently covered by the Shoreline Management Plan (SMP) for the area so does not require a specific policy on the matter.

**14.45** The issues of pollution on the natural environment is effectively covered by policy ME1 which is concerned with all adverse impacts on designated sites, habitats or species.

**14.46** Issues of water storage capacity of land and surface water drainage need to be considered at a more detailed stage of the development process along with the work DCC is now required to do as the lead local flood authority, when work towards ensuring there is no net increase in surface water run-off is being addressed.

**14.47** References to rainwater harvesting for use for gardening, etc. is primarily covered by the requirements of policy ME4, but is also an issue likely to be encompassed when site run-off levels are addressed.

### Proposed Pre-Submission Change

**14.48** Paragraph 13.33

**14.49** ~~PPS25~~ **The National Planning Policy Framework** makes specific recommendations that development should be located away from flood zones. It also requires that development within flood zones should be flood resistant (keeping water out) and resilient (to recover quickly following a flood). Development is also recommended to incorporate Sustainable Urban Systems to manage surface water runoff.

## Policy ME 6

### Flood management, mitigation, and defence.

When assessing new development, the local authorities will apply the sequential and exception tests set out in the **National Planning Policy Framework**. ~~PPS25~~:

**Where exceptionally**, all developments (including redevelopments and extensions which require planning permission) **can be permitted** within areas at risk of flooding **they** will be required to incorporate appropriate flood resistance and resilience measures as a means of "future proofing" against the effects of climate change. Historic buildings and sites may be exempt from this Policy where measures would harm their character or increase the risk of long-term deterioration to fabric or fittings.

All developments will be required to demonstrate that flood risk does not increase as a result of the development proposed, and that options have been taken to reduce overall flood risk. Post-development surface water run-off must not exceed pre-development levels and options should have been sought to reduce levels of run-off overall. This will primarily be through the use of Sustainable ~~Urban~~ Drainage Systems (SUDS) and a range of flood resistance and resilience measures. Space for such measures should be set aside within larger developments.

**Policy ME 7**

**Protection of Groundwater**

Groundwater Source Protection Zones will be identified on the proposals map. Where development is proposed in a location likely to affect a Groundwater Source Protection Zone, an assessment of the impact and any mitigation measures proposed must be provided.

This assessment should cover the following:

- The nature of the development, and its anticipated impact on groundwater in terms of contaminants both during construction, and upon completion.
- The need for the development to be in a location affecting Groundwater Source Protection Zones.
- Proximity and impact on licenced and un-licenced water supply.
- Impact on underground aquifers.

The assessment should reflect advice contained in the Environment Agency's document 'Groundwater Protection: Policy & Practice' (GP3).

**Consultation Response**

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

Table 14.7

**14.50** 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:

**14.51** *Protection of Groundwater*

- Keep Wimborne Green – Groundwater Protection Zones should not be compromised and adequate assessments should be made before any development takes place. This is particularly important when this Country is experiencing drought conditions on ever more frequent occasions.
- Cllr P Timberlake – Support Policy ME7.

## Officer Response

**14.52** Based on national policy and the consultation responses, it is recommended that no change is made to this policy.

## Proposed Pre-Submission Change

### Policy ME 7

#### Protection of Groundwater

Groundwater Source Protection Zones will be identified on the proposals map. Where development is proposed in a location likely to affect a Groundwater Source Protection Zone, an assessment of the impact and any mitigation measures proposed must be provided.

This assessment should cover the following:

- The nature of the development, and its anticipated impact on groundwater in terms of contaminants both during construction, and upon completion.
- The need for the development to be in a location affecting Groundwater Source Protection Zones.
- Proximity and impact on licenced and un-licenced water supply.
- Impact on underground aquifers.

The assessment should reflect advice contained in the Environment Agency's document 'Groundwater Protection: Policy & Practice' (GP3).

## New Policy for Sources of Renewable Energy (to follow after current ME5)

**14.53** The National Planning Policy Framework introduces, at paragraph 97, the need for local authorities to have a positive strategy to promote energy from renewable and low carbon sources, and to ensure that their policy addresses the need to minimise the adverse impacts of such development, including cumulative landscape and visual impacts. The new policy below is based on the policy in the Purbeck Core Strategy, which has recently been found 'sound'. Comments received for policy ME5 also supported the inclusion of such a policy.

## Policy ME 8

### Sources of Renewable Energy

The Councils encourage the sustainable use and generation of energy from renewable and low carbon sources where adverse social, environmental and visual impacts have been minimised to an acceptable level.

Proposals for renewable energy apparatus will only be permitted where:

- The technology is suitable for the location and does not cause significant adverse harm to visual amenity from both within the landscape and views into it, and within the Cranborne Chase AONB is in accordance with the current AONB Management Plan;
- It would not have an adverse ecological impact upon the integrity of protected habitats or species unless there is no alternative solution and there are imperative reasons of overriding public interest;
- It would not cause interference to radar, or electronic communications networks, or highway safety;
- It would not cause significant harm to neighbouring amenity by reason of visual impact, noise, vibration, overshadowing, flicker (associated with turbines), or other nuisances and emissions;
- It includes an agreed restoration scheme, any necessary mitigation measures, with measures to ensure the removal of the installations when operations cease;
- Safe access during construction and operation must be provided; and
- It avoids harm to the significance and settings of heritage assets.

Further work will be undertaken to identify suitable areas for renewable and low carbon energy sources

## 15 Responses and Analysis of Chapter 14 High Quality and Distinctive Environments

### Policy HE1

#### Protection of local historic and architectural interest

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

### Consultation Response

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

Table 15.1

**15.1** 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:

#### 15.2 *Historic Environment*

- English Heritage – require additional information included in the supporting text about heritage features under threat, and to include a Delivery and Monitoring section.
- English Heritage – require that the policy be more thorough in addressing Valuing our Historic Environment, in accordance with the requirements of the NPPF. Heritage assets will be conserved and where appropriate enhanced for their historic significance and importance locally, their potential to

contribute towards the local economy etc will be exploited. This will be promoted by ensuring proposals and initiatives are supported that protect and enhance the heritage assets, and promote the sensitive expansion, growth and land use change around settlements and within built up areas, working with local authorities to provide highway improvements and street furniture, sensitive re-use of historic buildings, up to date CA appraisals, use of Article 4 directions, maintain a local list of heritage assets, and use rural design guides.

- The policy should be strengthened in respect of locally listed buildings by the reinstatement of the wording of policy BE 19 of the Christchurch Local Plan.
- The reference in the policy to protection of local listed buildings goes beyond that set out in the NPPF and the policy should be amended to comply with the provisions of national policy.
- The Christchurch Antiquarians – request that HE1 reinstates the policies set out in the Christchurch Local Plan as it felt that the proposed policy may lead to a lessening of protection for the heritage of Christchurch as expressed in its built environment, scheduled ancient monuments and open spaces.
- Wimborne Civic Society welcome the proposal for the local listing of key buildings and structures which have valuable architectural or historic merit and make a positive contribution to local character.
- Dorset Gardens Trust wish to ensure that the policy applies to all types of heritage asset, and not just buildings and structures, and sets out the principles of how a Local List can be achieved within local policy.
- ETAG – support the policy, but would wish to see added a commitment that, where possible, historic landscapes will be restored.
- The policy and reasoned justification should be clearer on what the ‘heritage protection strategy’ is and how development control decisions are to be made against this.
- Christchurch Conservation Trust – expresses concern regarding the combining of existing Local Plan policies in the new Core Strategy policy which fails to specifically include some of these existing policies.

### Officer Response

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

### Proposed Pre-Submission Change

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

## Policy HE1

### Protection of local historic and architectural interest

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

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

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

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

## Policy HE2

### Design of new development

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

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

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

## Consultation Response

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

Table 15.2

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

### **15.6** *Design Issues*

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

## Officer Response

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

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

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

## Proposed Pre-Submission Change

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

## Policy HE2

### Design of new development

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

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

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

**Policy HE3**

**Landscape Quality**

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

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

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

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

**Consultation Response**

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

Table 15.3

**15.11** 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:

### **15.12** *Landscape Quality*

- West Parley Parish Council - This policy is supported.
- Cranborne Chase and West Wiltshire Downs AONB – Wish to see more substantive policies to overcome the vacuum created by the loss of the higher level strategies and policies on which the whole concept of the Core Strategy was predicated. HE3 seems insufficiently robust as it appears that it could be interpreted as relating to proposals within the AONB or only within the setting of the AONB and excluding the AONB itself. The policy should relate to landscape character assessments and historic landscape characterisation and separate statements for development within and outside the AONB.
- The policy should apply to very local landscapes as well as larger scale ones to protect the features residents know and love from harmful developments.
- Turley Associates, for clients, ask that the policy is amended as the use of the words 'protect and seek to enhance' is insufficiently flexible to endure the plan period. For example there may be many instances where the loss of some features are more than compensated for through additional provision on and off a site, which may also generate wider social, economic and environmental benefits as a consequence.

### **15.13** *Environment*

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

## **Officer Response**

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

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

## Proposed Pre-Submission Change

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

### Policy HE3

#### Landscape Quality

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

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

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

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

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

## Policy HE4

### Open Space Provision

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

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

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

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

Table 15.4

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

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

#### **Delivering new and enhanced provision**

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

#### **Location of new provision**

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

#### **Green Infrastructure**

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

## Consultation Response

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

Table 15.5

**15.17** 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:

### **15.18** *Open Space*

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

### **15.19** *Leisure*

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

### **15.20** *Green Infrastructure*

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

### **Officer Response**

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

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

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

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

### **Proposed Pre-Submission Change**

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

## Policy HE4

### Open Space Provision

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

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

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

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

Table 15.6

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

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

#### **Delivering new and enhanced provision**

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

#### **Location of new provision**

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

#### **Green Infrastructure**

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

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

## 16 Responses and Analysis of Chapter 15 Meeting Local Needs

### Policy LN1

Overall, the size and type of new market and affordable dwellings will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. Individual sites will be expected to reflect the needs of the Strategic Housing Market Assessment, subject to site specific circumstances and the character of the local area.

All new housing will be required to be built to meet minimum living space standards for both internal and external areas. The Councils will produce a Supplementary Planning Document which will set out the detailed requirements of this policy. In the meantime the Councils will apply the Homes and Community Agency Housing Quality Indicators in relation to private open space, unit sizes, unit layout and accessibility within the unit.

### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
19	1	3	23	6	14	5	14	5	14	15	3	4

Table 16.1

**16.1** 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:

#### 16.2 *Size and type of new dwellings*

- Sturminster Marshall Parish Council - Any further housing development needs to be of smaller units that are affordable for the younger population of the village.

- Tetlow King on behalf of South West HARP Planning Consortium - Policy should only be applied to sites of more than 20 units as beneath this level there is a danger that the policy could be used to micro manage the housing mix across the two local authority areas. Unless more detail is provided on how the policy might operate in practice the policy may add undue burdens to development and not accord with paragraph 173 of the National Planning Policy Framework (NPPF).
- Goadsby Ltd on behalf of Libra Homes, Seaward Properties Ltd and Sempcorp Bournemouth Water - Support the first part of the policy which accepts that needs identified in the SHMA have to be balanced against site specific circumstances and the character of the area. Paragraph 17 (5th bullet point) of the NPPF confirms that account must be taken of the different roles and character of different areas.
- Pennyfarthing Homes - Support general principle in first paragraph of Policy LN1.

### 16.3 *Living Space Standards*

- Environment TAG East Dorset - Welcome proposals but suggest rewording to read “All new housing will be required to be built to meet at least the minimum...”
- South West HARP Planning Consortium - Welcome introduction of Homes and Communities Agency Housing Quality Indicator Standards and applying them to all new development. However we could sound a note of caution for any standards higher than this being established through a Supplementary Planning Document as this would be contrary to paragraph 173 of the NPPF which states that “Supplementary Planning Documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development”.
- Goadsby on behalf of Libra Homes, Seaward Properties Ltd and Sembcorp Bournemouth Water - Imposition of minimum living space standards is unnecessary and unjust. It will reduce effectiveness of delivery of housing. Individual space standards were abandoned over 30 years ago. Imposes unnecessary burden on developers at a time the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. Suggest delete the second paragraph of Policy LN1.
- Home Builders Federation South West - The insistence on minimum dwelling standards will have significant implications for the viability of schemes. Any standards should be assessed at plan making stage to ensure they do not impair viability and implementation of the plan (paragraph 173 of NPPF). The viability of HQI should be assessed before submitting the plan. The affordable housing viability assessments make no such provision for the costs of HQI.
- Woolf Bond Planning - Second paragraph of policy is open ended, not sufficiently specific and does not provide effective or justified policy. The Mid Sussex standards have been subject to criticism from building industry due to excessive size of dwellings as a result. The inclusion of the policy will add to costs and damage the viability of future residential schemes.

- Turley Associates - Reference to interim application of the Homes and Communities Association indicators should be removed as they have not been informed by local circumstances. This is insufficiently flexible and prescriptive. If space standards are to be imposed at a local level, they should be consulted upon through the Supplementary Planning Document and not prescribed until this has been adopted.
- Minimum unit sizes proposed are contrary to the Council's desire to use land efficiently. The proposed loss and amount of valuable green belt land for new housing development could be reduced by building smaller units without compromising the living standards of new residents.
- Pennyfarthing Homes - Evidence base does not justify the imposition of living space standards.
- DCC - No reference to waste collection or recycling. The Homes and Communities Agency guidelines do not refer to space for storage or collection of waste. Developers should be aware of the space requirements for the recycling and rubbish collection service to be introduced across the county between October 2012 and 2015. Amend first sentence of second paragraph to read "All new housing will be required to be built to meet minimum living space standards for both internal and external areas, including allowance of space for the storage and collection of waste to meet local collection requirement".
- Pennyfarthing Homes - For new open market housing, living space standards should not be prescribed but should be a matter for the developer and their customer.
- Pennyfarthing Homes - The application of the Homes and Communities Agency Housing Quality Indicators to new open market housing is not legally compliant. The NPPF states that design policies should avoid unnecessary prescription or detail. It is considered that the application of space standards will stifle innovation, originality or initiative in the design of new dwellings.
- South West HARP Planning Consortium - Awaiting report back from Sir John Harman Commission on imposition of standards on new housing. Commission expected to report back to Grant Shapps later this year and may make policy on housing standards dated. Proposed policy is unsound as not consistent with national policy in paragraph 173 of NPPF.

## Officer Response

### 16.4 *Size and Type of New Dwellings*

16.5 Evidence in the Strategic Housing Market Assessment supports a policy influencing housing size and mix on all sites. The majority of sites that are likely to come forward within the plan area would be under 20 units. If the policy only applied to sites of over 20 units, this would lessen opportunities to seek an appropriate size and mix of housing. There is flexibility within the policy with the wording "subject to site specific circumstances and the character of the local area."

## 16.6 *Living Space Standards*

**16.7** The NPPF is clear that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings (para 17). Development must have regard to its impact on people's living conditions. This includes factors such as achieving acceptable levels of privacy, and ensuring sufficient internal and external space.

**16.8** Evidence (CABE 2010) identifies that poor living space standards have detrimental impacts on health, well-being, education attainment, family welfare and antisocial behaviour. Consequently policies setting out minimum space standards have been adopted throughout London and elsewhere e.g. Bristol and Mid Sussex. The Mayor of London's Housing Design Standards Evidence Summary July 2010 provides strong evidence of why it is appropriate and realistic to apply living space standards

**16.9** The principle of a policy for living space standards has been supported at previous stages of the Core Strategy, so there is evidence of local support for the introduction of a policy. On this basis it is considered appropriate to base a policy in the Core Strategy on application of the Homes and Community Association Housing Quality Indicators and further consideration be given to bespoke standards in a Supplementary Planning Document if justified by new evidence. The proposed policy only relates to two key aspects within the Indicators which are private open space and unit sizes, layout and internal accessibility (HQL sections 3.2.1 to 3.2.9 and 5.1 to 5.1.13). These are simple to assess and will ensure that residents have sufficient living space for comfortable and healthy living.

**16.10** The policy, supported by the Supplementary Planning Document can provide a clear indication to developers of the factors that the Councils consider important in considering future housing proposals. The policy provides a basis for a methodology to assess issues relating to living space standards, to be set out in more detail in a supporting Supplementary Planning Document. The same approach has been used by Bristol City Council in their Core Strategy.

**16.11** Analysis undertaken by the Councils has shown that a large proportion of planning permissions granted over recent years would have met the proposed standards. However, there were still sufficient to justify concern that dwellings are being built that offer poor living standards.

**16.12** The Three Dragons Viability Report 2010 tested the economic implications of different amounts of planning obligations (£5,000 and £15,000) as well as an affordable housing contribution. It also considered separately the impact on viability of the introduction of Lifetime Homes Standards and Code for Sustainable Homes at code level 4. The assessment therefore provides a broad assessment of viability in the local area which is useful to inform development of affordable housing and space standards policy. Subsequently, viability testing has been applied to the proposed new neighbourhoods and urban extension which have taken into account the proposed standards. These have shown that the schemes remain viable. The Councils have also commissioned work to consider development viability in the context of charging a Community Infrastructure Levy. This will further update the evidence base.

**16.13** The Councils understand that development must be viable for the developer and landowner. The costs associated with the proposed standards will be taken into account when negotiating the viability of schemes and S.106 costs.

**16.14** The Supplementary Planning Document will contain specific details including the requirements relating to waste storage.

### **Proposed Pre-Submission Change**

**16.15** A title has been added to the policy, but no text changes are proposed.

#### **Policy LN1**

##### **The Size and Type of New Dwellings**

Overall, the size and type of new market and affordable dwellings will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. Individual sites will be expected to reflect the needs of the Strategic Housing Market Assessment, subject to site specific circumstances and the character of the local area.

All new housing will be required to be built to meet minimum living space standards for both internal and external areas. The Councils will produce a Supplementary Planning Document which will set out the detailed requirements of this policy. In the meantime the Councils will apply the Homes and Community Agency Housing Quality Indicators in relation to private open space, unit sizes, unit layout and accessibility within the unit.

## Policy LN2

### Layout and Density of New Housing Development

On all sites, the design and layout of new housing development should maximise the density of development to a level which is acceptable for the locality. A minimum density of net 30dph will be encouraged, unless this would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Proposed housing densities will be informed by the Strategic Housing Land Availability Assessment, housing need as set out in the Strategic Housing Market Assessment, the master plan reports for new neighbourhoods and future Annual Monitoring Reports.

Proposals for high density developments will be acceptable in the following types of location where this form of development will not have an adverse impact on the character of the area and where residents have the best access to facilities, services and jobs:

- New greenfield housing sites (density range to be determined by outputs of master planning process).
- Town centres.
- Along the Prime Transport Corridors.
- Areas outside town centres with good access to public transport and essential facilities and services.
- In areas where there is a high level of need for affordable housing or on land already owned by housing associations, or where a housing association is the applicant.

The Councils will carefully consider the design and density of new development in terms of their responsibilities for community safety under Section 17 of the Crime & Disorder Act, and will involve the Police Architectural Liaison Officer in appropriate cases.

### Consultation Response

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

Table 16.2

**16.16** 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:

**16.17** *General comments*

- Environment TAG, East Dorset - Welcome recognition of the need for new development to respect the character of the area.
- Environment TAG, East Dorset - Existing "character areas" do not apply to new neighbourhoods. There would be better acceptance of these large scale developments if local stakeholders were involved in early discussions about design options. Suggest additional words to paragraph 15.10. "Local stakeholders will be involved in the decision making process".

**16.18** *Minimum densities*

- Pennyfarthing Homes - Concerned that as worded new housing development below 30 dwellings per hectare will be the norm rather than the exception. Policy should be strengthened to expect that new housing development will be provided with a minimum density of 30 dwellings per hectare and that only in exceptional circumstances will development be permitted below 30 dwellings per hectare .
- Transition Town Christchurch - Policy should acknowledge that brownfield sites should always be considered before greenfield. Greenfield sites should not be sacrificed as local food production will become increasingly vital.
- Somerford Community Partnership - Object to reference to areas where there is a high level of need for affordable housing/land owned by Housing Associations or where a housing association is the applicant. The need for affordable housing is accepted, but those in need should not be treated as second class citizens. This policy is likely to lead to the creation of high-density ghettos e.g. Scotts Green. Disagree that housing associations should automatically be allowed to develop to a high density, particularly as there is a growing tendency for them to build market homes.
- Woolf Bond Planning on behalf of Taylor Wimpey Ltd - Policy places over-reliance on need for 'master plan reports for new neighbourhoods' to inform housing density. Suggest amendment to read "the indicative master plan reports for new neighbourhoods" to give additional flexibility to schemes as they develop.

**Officer Response**

**16.19** The National Planning Policy Framework (NPPF) advises local planning authorities to set out their own approach to housing density to reflect local circumstances (paragraph 47). Previous changes to national policy removed references to a national minimum density of 30 dwellings per hectare and the requirement for local planning authorities to justify densities below the national minimum (PPS 3 amendments June 2010). The approach as set out in Policy LN2 is considered to be in line with NPPF policy as it encourages rather than requires a minimum density of 30 dwellings per hectare whilst retaining safeguards to ensure that there are no conflicts with local character and distinctiveness of an area.

**16.20** The Strategic Housing Land Availability Assessments have identified that about 4,800 homes can be built within the urban areas and villages, to be delivered throughout the 15 year life of the Plan. This is not sufficient to meet the identified housing needs of the area. Housing delivery proposed in the Core Strategy therefore relies on development of both brown and green field sites. To ensure that there is a five year housing supply it will be necessary to allow some of the green field sites to be developed near the beginning of the plan period.

**16.21** The Key Strategy chapter sets out policy for the broad location and scale of housing which conforms with the settlement hierarchy set out in Policy KS1. Those settlements which provide the best access to services, facilities and employment are to provide the key focus for development. The Green Belt will be retained and protected, except for strategic release of land to provide new housing.

**16.22** The application of Policy LN2 does not mean that proposals for high density housing will automatically be allowed. Although the policy identifies types of location where proposals for high density developments will be acceptable, there are safeguards within the policy to ensure that new housing respects the local character and distinctiveness of an area. Proposals for new housing will also have to meet the criteria in Policy HE2 which sets out criteria for design of new development and addresses issues including scale, bulk and relationship to nearby properties.

**16.23** It is considered that it is appropriate for the outputs of the master planning process to guide density ranges and this can be refined within Development Briefs (See Policies KS3 and KS4).

### **Proposed Pre-Submission Change**

**16.24** No change.

## Policy LN2

### Layout and Density of New Housing Development

On all sites, the design and layout of new housing development should maximise the density of development to a level which is acceptable for the locality. A minimum density of net 30 dwellings per hectare will be encouraged, unless this would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Proposed housing densities will be informed by the Strategic Housing Land Availability Assessment, housing need as set out in the Strategic Housing Market Assessment, the master plan reports for new neighbourhoods and future Annual Monitoring Reports.

Proposals for high density developments will be acceptable in the following types of location where this form of development will not have an adverse impact on the character of the area and where residents have the best access to facilities, services and jobs:

- New greenfield housing sites (density range to be determined by outputs of master planning process).
- Town centres.
- Along the Prime Transport Corridors.
- Areas outside town centres with good access to public transport and essential facilities and services.
- In areas where there is a high level of need for affordable housing or on land already owned by housing associations, or where a housing association is the applicant.

The Councils will carefully consider the design and density of new development in terms of their responsibilities for community safety under Section 17 of the Crime & Disorder Act, and will involve the Police Architectural Liaison Officer in appropriate cases.

### **Policy LN3**

#### **Provision of Affordable Housing**

In order to maximise the delivery of affordable housing the Councils will require:

All greenfield residential development which results in a net increase of housing is to provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site.

A financial contribution provided by the developer will be acceptable on sites of under 5 units where it is not possible to provide affordable housing units on site.

On sites of 5 or more dwellings provision should be on-site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable.

If an alternative site is not available, a financial contribution in lieu of provision may be accepted.

Financial contributions should be of equivalent value to on-site provision.

Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need and with a local connection.

The mix of units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment. Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.

Any planning application which on financial viability grounds proposes a lower level of affordable housing provision than is required by this policy must be accompanied by clear evidence.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
25	0	0	25	9	13	11	11	10	13	10	13	16

Table 16.3

**16.25** 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:

**16.26 General Comments**

- 50% affordable housing supported on allocated greenfield sites.
- 50% and 40% are ambitious but worth pursuing provided properties are scattered.
- We need more affordable housing – only worth doing CN1 extension if majority affordable.
- Maximise affordable housing to meet need.
- Should be secured in perpetuity.
- Section should include a reference to upholding the total number of affordable homes, even if the percentage is not the same on each site.
- Paragraph 7 – amend to secured in perpetuity for those in housing need and with a local connection.
- Experience of very high targets (South Hams) is not positive.
- Policy targets of 40% and 50% will not be effective in East Dorset.
- Do not understand why mix on-site must reflect the Strategic Housing Market Assessment when neither the Council providing the necessary levels of housing necessary to address affordable housing needs.
- Amend paragraph 11.17 – include a commitment that annual housing completions survey will include a review with meeting local need.
- Addressing duplication in the Housing Register – figures should be published and used in assessing the real need for affordable housing before the Pre-Submission document is submitted.
- Will support while there is a proven need and that affordable housing is allocated to those with Local Connection or work in the area.
- Concern in community that housing will be allocated to people who are not local.....
- Delivery of maximum number of affordable homes/Intermediate for local people is most strongly recommended.

- Housing Need must be for Christchurch residents – families.
- Local need must be prioritised and seen to be working. If no need then overall housing numbers (market and affordable) should be reduced.
- Christchurch has large areas of brownfield sites that could easily be used for housing – housing should blend in and not destroy the greenbelt.
- Should build houses on supermarket sites instead.
- No greenfield wanted should build on brownfield and infill.
- Affordable housing should be allocated on brownfield sites close to town and local amenities.
- Must be other sites, other than greenfield that could be developed.
- Empty properties should be used rather than building on greenbelt and the need for new dwellings.

### 16.27 *An unsound evidence base*

#### 16.28 a) *Percentage of affordable housing (40%) on non-greenfield sites*

- Evidence base questioned that seeks to justify 40% viability
- Three Dragons report prepared in 2008 when minimum was 30 dwellings per hectare and prior to Government guidance that garden land should not be regarded brownfield. Report showed it would be possible to provide 40% affordable housing in higher value areas. Also assumed that within the higher value areas, a density of 30 dwellings per hectare could be achieved. However, may not be achievable in higher value areas of CBC & EDDC, therefore questions the density of development in high value areas would be sufficiently viable to deliver affordable housing.
- Three Dragons evidence also suggests that the percentage of affordable housing should vary according to the different market value areas, rather than a blanket of 40%.
- Will result in all of Planning Applications (to include 40% affordable housing) being accompanied by viability assessments.
- Undermined by flawed assumptions in Three Dragons report over existing use values as majority of residential development comes through existing housing.
- Three Dragons does not set out what is expected as reasonable developer risk and profit. The residual land value stated in case studies does not take account of costs, e.g. stamp duty for the owner to move, capital gains tax, legal fees. In three out of four cases in Christchurch, landowners need to be incentivised to move for development purposes.
- NPPF (paragraph 173) states decisions should provide competitive returns to a willing landowner – therefore the residual land value has to be a good proportion above existing uses value. Assumptions in Three Dragons result in too high a proportion of the residual land value being an affordable housing contribution – such sites will not come forward.
- The Strategic Housing Land Availability Assessment confirms that a very high proportion of Planning Applications in CBC & EDDC are for developments of less than 5. Often within suburban locations. Often have low densities 15 – 30 dwellings per hectare (demonstrated in key facts of HE2). Yet HE2 requires compatible densities – maximum of only 30 dwellings per hectare likely to be tolerated. Therefore conflict between HE2 and Three Dragons.
- Three Dragons report assumes much high densities to deliver 40% affordable housing (case study D questioned – site of that size is rare and at 50 dwellings per hectare likely to fail the test of distinctiveness). With high proportion of detached houses and bungs, probability of 50 dwellings per hectare is highly unlikely

**16.29 b) Development costs and the likely impact on viability**

- Evidence has not taken account of the full range of likely development costs and the impact on viability.
- Does not appear that the Council has taken account of Community Infrastructure Levy, SANG and mitigating impact of the Special Protection Area, and also delivery of zero carbon by 2016, space standards.
- Modelling should assess impact of CSH4 – Part L of Building Regulations constitutes 80% of code costs and will be mandatory from 2013.
- Space standards of LN1 could have serious implications.
- Community Infrastructure Levy and S106 based on a low obligations package. Reports do model £15k but only cite residual land values on schemes at 50 dwellings per hectare at 40% - impact of 50% and 30 dwellings per hectare much worse. On a 30 dwellings per hectare scheme the residual land value would be reduced by a further £450k.
- Unlikely residual land values will incentivise landowners to bring forward land.
- Cost of Zero Carbon post 2016 had potential to add £16k to £23k per dwelling. Viability needs a cushion to ensure costs can be accommodated.
- Three Dragons report does not include evidence of the impact of other S106 contributions on viability, such as heathland, transport contributions and open space. No hierarchy of priorities of the contributions within the Core Strategy. Neither decision maker nor applicant is guided (NPPF requirement).
- Review of the evidence base called-for, removing minimum density requirements removal of gardens from brownfield and that the majority of other sites are unlikely to achieve a minimum density of 30 dwellings per hectare.
- Suggests that the local authorities consider setting % of affordable housing having regards to the different market value areas.
- The Three Dragons evidence indicates 5 value areas in ED. Three policy options were recommended but Council opted for 50% on Greenfield – but Verwood falls in the low value area band (35% to 40%).
- To ensure soundness, sites in Verwood should have targets of 35% to 40% to take account of its Low Value Area.

**16.30 Failure to follow NPPF requirements**

- To accord with NPPF, local plan should include a trajectory for the delivery of affordable housing (Paragraph 12 of NPPF)
- NPPF (paragraph 173) states decisions should provide competitive returns to a willing landowner – therefore the residual land value has to be a good proportion above existing use value. Assumptions in Three Dragons result in too high a proportion of residual land value being an affordable housing contribution – such sites will not come forward.
- NPPF Para 173 requires that scale of development should not be subject to a scale of obligations and policy burden that threaten viability – should still result in competitive returns for landowner and developer.
- Burdensome policy fails to take account of relevant market and economic signals (158 NPPF).
- The NPPF states that policies need to be flexible to changing market conditions – no indication of scope for flex.

**16.31 Removing thresholds and the associated implications for small schemes**

- Policy trigger will hinder new development and frustrate objectives of the Core Strategy. Such a low threshold likely to stymie development – therefore contrary to NPPF objectives to bring forward development.

- The requirement for all schemes to provide a minimum target of affordable housing is too restrictive. Should be a starting point for negotiations
- Concerns that smaller developments will lead to considerable strain on Officer time to negotiate S106 agreements and to go through appeals for small amounts of affordable housing. Rather see resources put into largest schemes delivering highest proportions of affordable homes.
- Triggers for on-site, off-site and commuted sums needs reconsidering to enable smaller developments to come forward.
- One to two units – no affordable housing but Community Infrastructure Levy contribution. Three to six units – off site commuted sum. 6+ S106 affordable housing on-site.
- Reconsideration of the minimum scale of development before an affordable housing requirement is triggered

### **16.32 Insufficient flexibility within the policy**

- NPPF states that policies need to be flexible to changing market conditions – no indication of scope for flexibility.
- Meeting local needs background paper acknowledged that requirements for affordable housing must not conflict with objectives for housing and economic growth.
- Site WMC3 includes exception elements that are in accordance with normal greenfield developments. Flexibility needs to be maintained in the manner of precise percentages of affordable housing.
- Concerned the policy may be over ambitious and has a lack of flexibility to deliver optimal amount of affordable housing.
- If insufficient flexibility is applied to 50% affordable housing this may affect site viability, in turn reducing the overall delivery of residential units including market and affordable.
- Alternative means of affordable housing such as Affordable Rent are likely to play an important role and flexibility is essential.
- Para 177 says that affordable housing requirements should be kept under review. Core Strategy says nothing about what will happen to ensure flexibility should delivery stall due to policy failure. Nothing permitting local planning authority to move to tariff, or alternative if market conditions worsen. Nothing to anticipate the possible inclusion of affordable housing within the community infrastructure levy.
- The percentage of affordable housing should be expressed as minima and not maxima.
- The policy should include reference that any delivery target is subject to viability.
- Supports a flexible policy giving the council a degree of discretion in applying percentages of affordable housing, to take account of site considerations and on-site deliverables, in addition to viability.
- Recommend addition wording “up to 50%” and “where appropriate”, enabling discretion on a site by site basis.
- Greater flexibility on tenure mix should be incorporated to allow for a higher proportion of Affordable Rent and Intermediate Housing.
- Greater flexibility on tenure mix should be incorporated to allow for a greater proportion of intermediate housing.

### **16.33 Failure to address operational requirements and delivery risks**

- Document should set out what mechanisms will be used to test viability submissions.

- As delivery of 40% affordable housing is unlikely, most applications will require “clear evidence” to be submitted. Will be especially pertinent for sites that could have the capacity of 5 units – as stated by Three Dragons and the proposed policy. The Strategic Housing Land Availability Assessment has proved that a high number of smaller sites have historically come through, therefore massive impact.
- No guidance on how evidence will be assessed - Are there benchmarks to be set down assuming the clear evidence means submitting viability assessments? Who will judge assessments? If the Councils bring in external expertise what will the cost be?
- Should this policy be introduced, no clear guidance on how it should be implemented.
- Uncertainty around time and money in entering negotiations – landowners will not have confidence. Too much speculation for developers.
- Bournemouth approach also led/informed by Three Dragons; Policy led to a significantly reduced level of applications. Consequences led to amendment and a tariff for different sizes and locations to create more certainty. No flexibility for the 40% to be lowered and tariff still very high, but does offer a starting point for negotiations. Reference to work between local authorities. No evidence that consultation taken place with Bournemouth regarding the practical operation or policy implications in an area with broadly similar suburban style.
- Question 50% affordable housing as this may not be possible due to other costs (Sustainable Drainage Systems).
- If you make it too hard, developers won't develop.
- Inclusion of at least an outline of the mechanisms to be used to test viability.
- Consider a flexible figure for affordable housing which would reflect the geology and other factors of a particular site.

#### 16.34 *Other Matters*

- To accord with NPPF, local plan should include a trajectory for the delivery of affordable housing (Paragraph 12 of NPPF)
- NPPF (paragraph 173) states decisions should provide competitive returns to a willing landowner – therefore the residual land value has to be a good proportion above existing use value. Assumptions in Three Dragons result in too high a proportion of residual land value being an affordable housing contribution – such sites will not come forward.
- NPPF Para 173 requires that scale of development should not be subject to a scale of obligations and policy burden that threaten viability – should still result in competitive returns for landowner and developer.
- Burdensome policy fails to take account of relevant market and economic signals (158 NPPF).
- Unclear why Council has site specific policies elsewhere in the plan that are not consistent with policy. This policy flexible enough to negotiate lower provisions at the point of submitting a Planning Application.

- There is no reason for different quota's on brown or greenfield sites. To comply with NPPF Local Plans must meet the full need for market and affordable housing, and yet policy LN3 will reduce the delivery of open market housing. Given that all net development will be required to make an affordable housing contribution in the future, the new policy approach must be monitored – it may avoid the need for higher targets on strategic sites and may even reduce the quota requirement overall. Para 50 of the NPPF requires that the size type tenure and range of affordable housing should reflect local demand – demand or need may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to the contrary, a two level quota policy is not justified.
- No evidence provided to support the increase from 40% to 50% affordable housing, or resultant 40% brownfield and 50% greenfield. Evidence not set out in the affordable housing provision of the Three Dragons report.
- Site specific affordable housing percentages should be removed and replaced with reference to policy MN3.
- Amend Policy LN3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites, i.e. the first sentence of the second paragraph of the policy.
- Affordable housing should be set at a target of up to 40%, subject to viability.

### Officer Response

#### 16.35 *General Comments*

**16.36** Many respondents supported the Councils' affordable housing aspirations but were keen to ensure that the resultant housing should be secured for those with a local connection and in perpetuity. Considerable concern was expressed that affordable housing, along with market housing, should not be provided on the Green Belt but on brownfield sites – including the re-use of empty properties that should be targeted before building on the Green Belt. As part of its Housing Strategy, the Council is already actively seeking the reuse of empty homes where possible. Policy LN3 does not seek to prioritise affordable housing provision on either greenfield or brownfield sites, but seeks to ensure that where permissible development opportunities come forward, optimised levels of local housing needs are met for those who cannot afford to rent or buy on the open market.

**16.37** The proposed policy already includes a commitment to ensure that affordable housing will be secured and retained for those in housing need and with a local connection. It is proposed that the Affordable Housing Supplementary Planning document will include detailed definitions of housing need and local connection, ensuring priority as appropriate.

#### 16.38 *An unsound evidence base*

#### 16.39 *Percentage of affordable housing (40%) on non-greenfield sites & Development costs and the likely impact on viability*

#### 16.40 *Related facts*

**16.41** The Three Dragons evidence was published in January 2010. New Build values that informed high level testing were stated as being valid at December 2008.

**16.42** At 30 dwellings per hectare (all houses) & 40% affordable housing & £5,000 per unit for other s106 contributions and without grant (but for social rent and shared-ownership), residual land values in Christchurch then ranged from £1.89m per hectare to £3.30m per hectare. At the same density and percentage of affordable housing, residual land values in East Dorset ranged between £1.54m and £3.86m.

**16.43** *Three Dragons Value Areas – East Dorset*

**16.44** The high value market area in East Dorset included Cranborne, Witchampton, Edmondsham and Whitmore (example 2 bed terrace £310k),

**16.45** East Dorset rural included Stanbridge, Horton Heath, Stapehill and Sixpenny Handley (example 2 bed terrace £260k)

**16.46** Wimborne Minster and St Leonards (example 2 bed terrace £255,000)

**16.47** Southern Settlements include Corfe Mullen, West Moors, Ferndown, Alderholt and West Parley (£220k)

**16.48** Low Value East Dorset includes Verwood North, Verwood and Three Legged Cross (£205k)

**16.49** *Three Dragons Value Areas – Christchurch*

**16.50** Christchurch Rural North - Hurn and Airport (example 2 bed terrace £295k)

**16.51** Christchurch Coastal - Highcliffe, Central Christchurch, West Christchurch and West Mudeford (example 2 bed terrace £240k)

**16.52** Christchurch North - Winkton and Burton and North West Town area (example 2 bedroom terrace £230k)

**16.53** Developers return noted at 15%

**16.54** It is acknowledged that the Three Dragons evidence base is now out of date and it does not adequately reflect changed values in the market place since 2008. And although some calculations were carried out reflecting a higher £15,000 per unit s106 contribution, these were undertaken at 50 dwellings per hectare in Christchurch and 40 dwellings per hectare in East Dorset. Recent research has confirmed that 50 dwellings per hectare would be an unrealistic basis for informing policy setting. Given the likely number of lower density 'housing' and not flatted schemes, even 40 dwellings per hectare may be unsafe. The research basis for the recent Community Infrastructure Levy study has been 30 dwellings per hectare.

**16.55** In light of changes in the market and the wider policy context, it would be inappropriate to solely rely upon the assumptions and evidence that informed the Three Dragons report. Given that the majority of new development is planned for the medium and lower value areas of East Dorset and Christchurch, the Councils' policies should reflect residual land values in these areas – the high value areas, even on an averaged basis, introduced unrealistic distortion.

**16.56** Although some aspects of the Three Dragons report may withstand scaling to reflect the current market, its strengths are diminished by a number of weaknesses that undermine its validity in the current and future context.

**16.57** The Three Dragons report usefully highlights the different historic value areas across East Dorset and Christchurch. These help to justify a policy seeking up to 50% affordable housing on the basis of potential market recovery. However, it is acknowledged that market conditions vary through time and the policy must allow for this as considered below.

**16.58** *Failure to follow NPPF requirements*

**16.59** As proposed in the draft Pre-Submission Core Strategy, the wording of LN3 requiring a “minimum” of 50% affordable housing on greenfield sites and a “minimum” of 40% on brown-field sites does not meet the NPPF requirements of demonstrating flexibility or the scope for negotiations to allow competitive returns to a willing landowner.

**16.60** Although LN3 concludes by stating that evidence will be considered in support of viability arguments, this is confused by the previous ‘minimum’ requirements and the lack of a clear statement confirming that the Policy is sufficiently negotiable. Indeed the concluding paragraph is likely to be viewed as giving away as little as possible, and that the Councils are not willingly embracing the direction contained within the NPPF and the need for flexibility and the need to respond to changing market conditions.

**16.61** The policy needs to be flexible to remain relevant as circumstances change. As a result, policy wording is amended to remove reference to ‘minimum’ requirements. The policy now allows for the Council to negotiate ‘up to’ affordable housing targets. This means that in strong market conditions high proportions could be negotiated and development remains viable. During poor conditions the policy is flexible enough to allow for the provision of lower proportions of affordable housing and still ensure development remains viable.

**16.62** Although the need for flexibility is necessary across the board and for all types of residential developments, the Councils chosen approach to LN3 will have a major bearing on smaller schemes, and schemes on land with higher existing use values than is usually associated with ‘greenfield’ sites. An improved approach is therefore necessary giving greater flexibility, otherwise there is a risk that smaller schemes will not come forward – and in the past, these have made up a significant element of housing delivery for both East Dorset and Christchurch.

**16.63** To comply with the NPPF it will be necessary to demonstrate that a flexible approach has been taken that works for small schemes and on land with higher existing use values; the model will need to offer certainty to land-owners and developers at a very early stage, rather than reactively requiring viability evidence, in the way that might be reasonably associated with large scale developments.

**16.64** Coupled with evidence gathered through the recent Community Infrastructure Levy study, it is therefore recommended that the following changes be implemented to ensure that LN3 is a sufficiently flexible policy that meets the requirements of the NPPF:-

- That policy requirements be amended on the basis of 'up to' 50% affordable housing on greenfield sites and 'up to' 40% on brownfield sites
- That appropriate wording in the Policy allow for a mechanism to be introduced (through an Affordable Housing Supplementary Planning Document) giving a protected margin of return for owners of brownfield sites with higher existing use values, i.e. guaranteeing that a land value return of up to X% of existing use values will be exempt from Policy LN3 requirements. When combined with revisions to thresholds (see below) this step will give advanced certainty for many smaller schemes enabling land-owners and developers to:
  1. Predict if they will be subject to the policy.
  2. If they are subject to the policy, know what they can expect to pay.

#### **16.65 *Removing thresholds and the associated implications for small schemes***

**16.66** The Strategic Housing Market Assessment identifies a very high level of affordable housing need in the area. It is therefore appropriate to seek the provision of as much affordable housing as possible and this requires all schemes to be asked to make a contribution. However, the Councils appreciate that development must be viable for both landowner and developer. The policy therefore allows for the negotiation of provision on the basis of development viability.

**16.67** On sites resulting in a net increase of 1 to 4 dwellings, the Council will accept on-site affordable housing provision in accordance with the policy or a financial contribution in lieu of on-site affordable housing, calculated in accordance with a commuted sum methodology which is to be set out in an Affordable Housing Supplementary Planning Document.

**16.68** On sites resulting in a net increase of 5 to 14 dwellings, the Council will require on-site affordable housing provision in accordance with the policy, however, where this is not possible or at the Council's discretion, a financial contribution in lieu of on-site affordable housing will be acceptable, calculated in accordance with the commuted sum methodology

**16.69** On sites resulting in a net increase of 15 or more dwellings, provision should be on-site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable. If an alternative site is not available, a financial contribution in lieu of on-site affordable housing will be acceptable, calculated in accordance with the commuted sum methodology.

#### **16.70 *Insufficient flexibility within the policy***

**16.71** Objectors recommended that the percentage of affordable housing be expressed as minimum and not maximum – this is to be addressed. The policy wording should make it clear that the policy is flexible and any delivery targets are subject to viability – this is also acknowledged and will be addressed. Reference was also made to greater flexibility around the affordable tenure mix, however, it is considered that the policy wording already allows adequate flexibility, stating that the mix is subject to negotiation and agreement with the Council, subject to meeting Strategic Housing Market Assessment based housing needs.

#### **16.72 *Failure to address operational requirements and delivery risks***

**16.73** The concerns about viability assessment and associated delivery risks are acknowledged and it is accepted that at the point of adopting the Core Strategy, the Councils will need to have considered, consulted upon and adopted an Affordable Housing Supplementary Planning Document setting out the processes and service standards that will apply to Policy implementation, and explicitly around viability testing.

**16.74** It was also strongly voiced that the Councils had not adequately learnt from the neighbouring Bournemouth experience/failure and its impact upon the number of planning applications. However, Bournemouth had since improved their position by setting a tariff system that has introduced more certainty.

**16.75** The responses contained within this document, and the proposed changes to the emerging policy, demonstrate that the Councils are seeking to achieve a deliverable and flexible approach - one that achieves the balance between optimised affordable housing delivery; certainty for those with development interests, and flexibility – as directed by the NPPF – to facilitate housing and economic activity and growth.

## Proposed Pre-Submission Change

## Policy LN3

### Provision of Affordable Housing

In order to maximise the delivery of affordable housing the Councils will require:

All greenfield residential development which results in a net increase of housing is to provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site.

A financial contribution provided by the developer will be acceptable on sites of under 5 units where it is not possible to provide affordable housing units on site.

On sites of 5 or more dwellings provision should be on-site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable.

If an alternative site is not available, a financial contribution in lieu of provision may be accepted.

Financial contributions should be of equivalent value to on-site provision.

Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need and with a local connection.

The mix of units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment. Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.

Any planning application which on financial viability grounds proposes a lower level of affordable housing provision than is required by this policy must be accompanied by clear evidence.

To maximise affordable housing provision, whilst ensuring flexibility and sufficient margins to facilitate housing delivery, the Councils will require all residential developments to meet the following affordable housing requirements:-

Policy Percentage Requirements:

All greenfield residential development which results in a net increase of housing is to provide up to 50% of the residential units as affordable housing in accordance with the Policy Delivery Requirements and Affordable Housing Requirements unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide up to 40% of the residential units as affordable housing in accordance with the Policy Delivery Requirements and Affordable Housing Requirements.

Any Planning Application which on financial viability grounds proposes a lower level of affordable housing than is required by the Policy Percentage Requirements must be accompanied by clear and robust evidence that will be subject to verification.

#### Affordable Housing Requirements

The mix of affordable housing units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment (see Policy LN1). Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.

Conditions or legal obligations will be used to ensure that affordable housing is secured for those in housing need and prioritised for those with a Local Connection.

#### Policy Delivery Requirements:

• On sites resulting in a net increase of 1 to 4 dwellings, the Councils will accept on-site affordable housing provision in accordance with the Policy Percentage Requirements and Affordable Housing Requirements or a financial contribution in lieu of on-site affordable housing, calculated in accordance with the Commuted Sum Methodology.

• On sites resulting in a net increase of 5 to 14 dwellings, the Councils will require on-site affordable housing provision in accordance with the Policy Percentage Requirements and Affordable Housing Requirements, however, where this is not possible or at the Councils' discretion, a financial contribution in lieu of on-site affordable housing will be acceptable, calculated in accordance with the Commuted Sum Methodology

• On sites resulting in a net increase of 15 or more dwellings, provision in accordance with the Policy Percentage Requirements and Affordable Housing Requirements should be on-site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable. If an alternative site is not available, a financial contribution in lieu of on-site affordable housing will be acceptable, calculated in accordance with the Commuted Sum Methodology.

Financial contributions should be of equivalent value to on-site provision calculated in accordance with the Commuted Sum Methodology.

**Where developments are required to provide 10 or more affordable homes, 10% of the affordable housing element should be planned for households requiring specially adapted or supported housing. However, if a requirement for specialised affordable housing (or a viable delivery mechanism) cannot be demonstrated by the Council at the point of submitting a planning application, the quota shall revert to 100% general need affordable housing.**

**Under no circumstances will the financial consequences of including 10% adapted or supported housing result in a greater cost to the development than would arise through an acceptable, viable and proportionate mix of general need affordable housing**

## **Policy LN4**

### **Affordable Housing Exception Sites**

Exceptionally land adjoining the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed in order to provide affordable housing, in perpetuity, provided that:

- The housing comprises 100% affordable housing.
- Secure arrangements are included to ensure that its benefits will be enjoyed by successive as well as initial occupiers.
- The proposed development would provide a mix of housing size and type which meets demonstrated local housing needs as identified in the Strategic Housing Market Assessment.
- The development is small scale and reflects the setting, form and character of the settlement and the surrounding landscape.

This policy will apply to the following settlements:

#### **East Dorset**

- West Moors; St Leonards and St Ives; Three Legged Cross; Alderholt; Cranborne.
- Furzehill; Gaunts Common; Gussage St Michael; Gussage All Saints; Hinton Martell; Holt.
- Horton; Longham; Shapwick; Sixpenny Handley; Sturminster Marshall; Wimborne St Giles.
- Witchampton; Woodlands.

#### **Christchurch**

- Land Adjoining the built up area of Christchurch
- Burton; Winkton

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	9	3	19	12	4	15	2	13	5	11	5	5

Table 16.4

**16.76** 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:

**16.77 General comments**

- Fully support the policy.
- Policy is essential to support rural communities.
- Supports the policy of permitting 100% exception sites in Burton.
- Policy is unsound if Burton is included for exception site policy but Colehill is not. Colehill is comparable to Burton in terms of size and demography, and mix of housing. There is a lack of affordable housing in Colehill. Affordable housing is needed in Colehill to enable young people to live and work in their area who wish to live independently.
- 3 schools in Colehill and affordable housing needed so parents can be within walking distance.
- Why are some areas similar to others left out of Policy? Why not Colehill?
- Should apply to all urban and rural settlements.
- Should be left open to any Parish demonstrating housing need.
- If some settlements permitting market housing can also have exception sites, then so should Corfe Mullen.
- Does not see why affordable housing delivery should be constrained by the uncertainties of market delivery.
- Not sound as the policy is not consistent with NPPF Para 54 – should apply to rural areas and not a restrictive list of settlements.
- Change wording to permit any settlement that can justify housing need through a compliant Housing Needs Survey.
- Policy should be worded to permit exception sites on land adjoining the defined rural and urban settlements...
- Colehill should be in the list of eligible Parishes for exception sites, for the Core Strategy to be sound and legally compliant.

- Should be reworded to include other East Dorset settlements, notably Corfe Mullen.
- Should be reworded to be broadly rural and to remove the list of settlements

#### **16.78 Policy should not be restricted to the land adjoining settlements and should not always be limited to small scale developments**

- Is not always practical
- Policy should permit land adjacent to or in close proximity to [the settlement boundary]
- Delete the first Policy bullet point relating to 100% affordable housing .
- Should not be restricted to small scale – should reflect need. Amply covered in policy, ensuring that the development reflects the setting form and character of the settlement.
- 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 to have their own personal transport.
- Broaden wording to encompass redevelopment of brownfield or other infill sites.
- Delete 'small scale' in the bullet point

#### **16.79 Permitting an element of market housing**

- Very little subsidy now available at the current time and this is likely to continue.
- Should allow some market housing, say 70% affordable housing, 30% market housing. Would be more likely to encourage these sites to come forward and result in a better mix of housing promoting more inclusive mixed communities. Suggested by Para 54 of NPPF.
- To accord with NPPF should allow an element of market housing.
- Policy is unsound as its not justified – Council has not proven how exception sites will be viable without cross subsidy from market housing as permitted by NPPF.
- Change to permit inclusion of market housing to cross subsidise affordable housing provision.
- The housing comprises a minimum of 70% affordable housing (the balance could be made up by open market housing).
- Add “In exceptional circumstances a proportion of market housing may be considered appropriate where it can be demonstrated that the site would be unviable as an exception site that meets the above criteria, without cross subsidy”.
- Should allow market housing where this facilitates affordable housing.

#### **16.80 Other Comments**

- AH under this policy must be shown to benefit people with a strong local association and this restriction will be rigidly enforced.
- No evidence to show how many units exception site policy could deliver to reduce impact on greenbelt and new neighbourhoods.
- Policy is required to encourage landowners to build affordable housing within their estates to make up for housing sold and used as second homes.
- Large estates should be included.

- 100% Affordable housing schemes have potential to create socially excluded enclaves.
- The case for market housing is eroded by the inclusion of an exception site policy that will permit development in rural areas.

### **Officer Response**

**16.81** The need for a consistent settlement strategy for Policy LN4 has resulted in amendments to include Corfe Mullen and Colehill as eligible Parishes in order to allow for as many opportunities as possible.

**16.82** It is acknowledged that occasions may arise where land that is very close to a settlement boundary may be appropriate for consideration as an exception site, however, such sites should always be small in scale.

**16.83** Whilst it is recognised that funding affordable housing on exception sites has become extremely constrained, it is considered that a general policy explicitly permitting market housing on such developments, albeit to cross-subsidise affordable housing, could be counter-productive. However an appropriate policy should not be overly exclusive or prescriptive, including scope for innovation over the life of the Plan, and the flexibility to take individual circumstances into consideration.

**16.84** Exception site policy requires strict controls over provision, management, equalities and ownership to ensure that occupation remains tied to those who are genuinely in housing need and who have local connections. The policy wording includes sufficient scope for innovation and provision through charitable bodies and organisations including Community Land Trusts. Where appropriate such Local Delivery Vehicles may also have close connections to benevolent local landowners, subject to robust constitutional structures ensuring that the greater public interest is served and protected.

**16.85** Details on how the policy is to be implemented will be published within the Affordable Housing Supplementary Planning Document.

## Proposed Pre-Submission Change

### Policy LN4

#### Affordable Housing Exception Sites

Exceptionally land adjoining or very close to the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed to facilitate affordable housing ~~in order to provide affordable housing~~, in perpetuity, provided that:

- ~~The housing comprises 100% affordable housing:~~
- Secure arrangements are included to ensure that affordable housing its benefits will be enjoyed by successive as well as initial occupiers.
- The proposed development would provide a mix of affordable housing size and type which meets demonstrated local housing needs. as identified in the Strategic Housing Market Assessment:
- The development is small scale and reflects the setting, form and character of the settlement and the surrounding landscape.

This policy will apply to the following settlements:

#### East Dorset

- ~~West Moors; St Leonards and St Ives; Three Legged Cross; Alderholt; Cranborne;~~
- ~~Furzehill; Gaunts Common; Gussage St Michael; Gussage All Saints; Hinton Martell; Holt;~~
- ~~Horton; Longham; Shapwick; Sixpenny Handley; Sturminster Marshall; Wimborne St Giles;~~
- ~~Witchampton; Woodlands;~~

Alderholt; Colehill; Corfe Mullen; Cranborne; Furzehill; Gaunts Common; Gussage All Saints; Gussage St Michael; Hinton Martell; Holt; Horton; Longham; Shapwick; Sixpenny Handley; St Leonards and St Ives; Sturminster Marshall; Three Legged Cross; West Moors; Wimborne St Giles; Witchampton; Woodlands

#### Christchurch

Land Adjoining the built up area of Christchurch; Burton; Winkton

## Policy LN5

### Location of Sites for Gypsy and Traveller Sites

The following considerations should be taken into account when determining locations for Gypsy and Traveller sites and Travelling Showpeople sites:

1. Sites should be located to meet the needs of Gypsy & Traveller communities with a preference for close proximity to existing communities to use services and facilities, including schools, shops, medical facilities and public transport;
2. Sites should provide for adequate on-site facilities for parking, storage, play and residential amenity;
3. Sites should allow for adequate levels of privacy and residential amenity for the occupiers;
4. Sites should not have an unacceptable impact on the amenities of adjacent occupiers; and
5. Sites should not result in a detrimental impact on the natural environment.

Proposals for sites for Travelling Showpeople will also need to provide adequate space for residential, maintenance and storage uses and be:-

1. Well related to the public highway network to accommodate the safe passage of large vehicles and pedestrians.
2. Located so as to minimise the impact of on-site business activities on neighbouring properties,
3. Located so as to minimise the visual impact of the uses on the landscape.

## Consultation Response

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

Table 16.5

**16.86** 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:

**16.87** *General comments*

- DCC - Significant differences between the wording, tone and approach of Policy LN5 and the Government policy in the Planning Policy for Traveller Sites” Matters referred to in Policy B (e.g. promotion of peaceful co-existence between site and local community) Policy C (need to ensure that scale of sites in rural or semi-rural areas does not dominate locality) and Policy D (consideration of inclusion of rural exception site policy for traveller sites) have not been addressed in Policy LN5. Suggest re-draft or delete and refer to the NPPF as the source of policy advice.
- Environment TAG (East Dorset) - Considerations achieve an appropriate balance for settled and travelling communities.
- DCC - Paragraph 15.19 - Reference to and links with the work of the Dorset Councils on Gypsies, Travellers and Travelling Show people is welcomed.
- DCC - Key Facts first and second bullet points should read “Dorset County Councils estimate” as estimates quoted are those agreed by all Dorset County Councils at the Dorset Authorities Joint Committee in October 2008.
- DCC - Key Facts Third bullet point should be amended to refer to private sites in each authority. Suggest additional words “but there are some private sites. The January 2012 caravan counts indicate some 4 pitches and Christchurch and 8 pitches in East Dorset have permanent planning permission for private caravans”.
- Paragraph 15.20 - this should be amended to refer to “Planning Policy for Traveller Sites”

**16.88** *AONB’s*

- Cranborne Chase & West Wiltshire Downs AONB - In the light of problems caused by traveller sites to sites and their immediate surroundings as well as damage to the verges of narrow roads and subsequent loss of rural character, Policy LN5 should exclude the AONB.

**Officer Response**

**16.89** The Gypsies and Travellers Planning Policy Statement March 2012 sets out considerations to be included in a criteria based traveller sites policy, much of which are included in Policy LN5. Criteria could be added or existing criteria adapted to reflect issues raised in the Planning Policy Statement. The following amendments and additional criteria should be included to achieve greater conformity with the Planning Policy Statement.

**16.90** *Amend criterion 1 to delete words “medical facilities” and replace with “health services”*

**16.91** Insert new criterion “Sites should be located outside areas of high flood risk (zone 3 flood risk areas).”

**16.92** *Insert new criterion:-*

**16.93** “Development of a site in a rural / semi-rural area should be appropriate to the scale of its surroundings and existing nearby settlement”

**16.94** *Insert new criterion*

**16.95** “Alterations to the Green Belt boundary to accommodate sites will only be considered in exceptional circumstances, to meet a specific identified need. In such circumstances, and as part of the Site Allocations Development Plan Document, sites will be specifically allocated as a Gypsy and Traveller site only.”

**16.96** *Insert new criterion:*

**16.97** *“In sites where mixed uses are proposed, the site and its surrounding context are suitable for mixed residential and business uses and would not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the occupants of the site or neighbouring properties”.*

**16.98** Amend key facts as suggested above.

**16.99** Amend to read “Planning Policy Statement “Planning Policy for Traveller Sites” (March 2012) advises that the Core Strategy should set criteria to guide land supply allocations where there is an identified need.”

**16.100** The NPPF recommends that great weight should be afforded to protecting the landscape quality of the AONB. Policy HE3 has been amended to address this. It is not considered necessary to refer to the AONB in Policy LN5.

## Proposed Pre-Submission Change

**16.101** Paragraph 15.20

**16.102** This is amended to reflect changes in national planning guidance in Planning Policy for Traveller Sites (March 2012) as follows:-

**16.103** **Circular 04/2007 The Planning Policy for Traveller Sites (2012)** advises that the Core Strategy should set out criteria for the local of **travelling showpeopletraveller** sites which will be used to determine planning applications on unallocated sites that may come forward. ~~Annex C of the Circular~~ **Paragraph 11 of the Planning Policy for Traveller Sites** sets out good practice for criteria policies.

**16.104** The policy is amended to more accurately reflect national planning policy guidance in Planning Policy for Traveller Sites (March 2012).

## Policy LN5

### Location of Sites for Gypsy and Traveller Sites

The following considerations should be taken into account when determining locations for Gypsy and Traveller sites and Travelling Showpeople sites:

1. Sites should be located to meet the needs of Gypsy & Traveller communities with a preference for close proximity to existing communities to use services and facilities, including schools, shops, ~~medical facilities~~ **health facilities** and public transport;
2. Sites should provide for adequate on-site facilities for parking, storage, play and residential amenity;
3. Sites should allow for adequate levels of privacy and residential amenity for the occupiers;
4. Sites should not have an unacceptable impact on the amenities of adjacent occupiers;
5. Sites should not result in a detrimental impact on the natural environment.

**6. Sites should be located outside areas of high flood risk (zone 3 flood risk areas);**

**7. Development of a site in a rural / semi-rural area should be appropriate to the scale of its surroundings and existing nearby settlement;**

**8. In sites where mixed uses are proposed, the site and its surrounding context are suitable for mixed residential and business uses and would not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the occupants of the site or neighbouring properties;**

**9. Alterations to the Green Belt boundary to accommodate sites will only be considered in exceptional circumstances, to meet a specific identified need. In such circumstances, and as part of the Site Allocations Development Plan Document, sites will be specifically allocated as a Gypsy and Traveller site only.**

Proposals for sites for Travelling Showpeople will also need to provide adequate space for residential, maintenance and storage uses and be:-

1. Well related to the public highway network to accommodate the safe passage of large vehicles and pedestrians;
2. Located so as to minimise the impact of on-site business activities on neighbouring properties;
3. Located so as to minimise the visual impact of the uses on the landscape.

## **Policy LN6**

### **Community Facilities and Services**

Facilities and services will be provided to support existing and future population growth and changes in the age profile by the following:

New facilities should be concentrated in the settlements of Christchurch, Highcliffe, Burton, Corfe Mullen, Wimborne Minster, Colehill, Ferndown, West Moors, Verwood, Alderholt, Cranborne, Sixpenny Handley, Three Legged Cross and Sturminster Marshall. This is where access can be by public transport, bike and on foot. Some facilities can be provided in smaller settlements in innovative ways such as the provision of health care in the home. Services can also be provided in more innovative ways in suburban areas of Christchurch and East Dorset where access to facilities is more restricted to the car.

The Council will work with partners and service providers to ensure the timely provision of high quality, convenient, local and accessible facilities and services for community and cultural use such as education, health, libraries, facilities for older people / children and young people and community buildings.

Priority will be given to any proposals to allow the multi-use of existing facilities, followed by the expansion of existing, well located facilities to allow for the co-location of facilities and services.

New facilities will be required to serve the needs of the population and new development when the alternatives above are not feasible. Preference will be given to the clustering of services and facilities.

Loss of facilities will be resisted unless it is shown that the facility is no longer needed.

Where appropriate, financial contributions towards the provision of facilities and services will be sought.

**Consultation Response**

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	3	5	12	11	2	11	2	10	4	10	3	3

Table 16.6

**16.105** 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:

**16.106 General Comments**

- The Theatres Trust - Suggest that para 15.23 includes a full description for clarity e.g. – that community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.
- Southern Planning Practice - Ambiguous as community facilities and services are not defined. Policy unsound as not positively prepared and effective. Not clear whether policy relates to privately run facilities such as pubs and local shops or public funded. Suggests that it is publicly funded but not clear.
- Southern Planning Practice - The sentence on resisting the loss of facilities is unsound because there is no clear advice on how the policy requirement will be measured. It is not positively prepared; it is not justified, effective or consistent with national policy.
- Southern Planning Practice -The final sentence is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.
- Insufficient weight given to pressure on infrastructure that increased housing units will cause. Further schools or expansion of schools will add to the burden on traffic.
- Specific reference should be given to community halls needed as meeting places.

- Support concentration of facilities in named settlements as good for sustainability and resilience. Reduces transport needs and allows the critical mass needed for creating vibrant centres.
- Support 4th paragraph as economic and sustainable use of existing facilities.
- Support resisting loss of existing facilities as this will ensure full community participation.
- Transition Towns Christchurch - Good in spirit – follow this in practice.
- No reference to provision of allotments.
- No reference to places of worship. Inconsistent with paragraph 28, 70 and 171 of NPPF which both refer to places of worship as examples of community facilities. Recommend amend wording of core strategy so there is clear recognition given to importance of places of worship in potential new build and change of use of existing properties.
- Labour party (Christchurch Branch) - Inadequate mention of education needs. Does not address the problem of demand for school places arising from the Christchurch Urban Extension.
- Account should be specifically taken of community halls as essential facilities. Government recommendations such as Big Society and Localism Act call for local planning policy to address the needs of volunteer services, local decision making and community activities. Community meeting spaces are essential to this.
- Transition Towns Christchurch - Last bullet point of Key Facts does not mention community halls which are essential to community resilience. The benefits of well run community buildings are listed and include provision of a wide range of health, welfare and leisure activities, education and training activities, community cohesion in providing neutral ground, crime and anti-social behaviour prevention initiatives, economic benefits, environmental improvement for communities, civil renewal, social inclusion and social capital.
- Holt Parish Council - With growing percentage of older people and this trend set to continue, the Core Strategy makes little or no mention of increased provision for their housing or community needs. Little attention is given to creation of additional facilities or centres for people with learning disabilities or mental health problems. •
- Alderholt Parish Council - Concerned about the lack of provision for communities such as Alderholt which in this document is neither considered rural or urban. There is a need in such a large rural community for more financial support to help provide community facilities.

#### **16.107 Rural Facilities**

- Eastern Area DAPTC - There is a confusion of terminology within the document between Rural Services Centres and Key Settlements. It is an essential requirement for farmers, home workers and the service sector for 100% coverage of mobile communications. A policy to support enhanced communications across the rural community is essential.
- Eastern Area DAPTC - Key summary points on social issues in rural areas quoted from Extract from CRC State of the Countryside Report 2010.
- Sixpenny Handley with Pentridge Parish Council - Perception of a casual approach to the concerns of the rural community.
- Sixpenny Handley with Pentridge Parish Council - Sixpenny Handley and Pentridge still retain the basic ingredients of vibrancy. We have to develop in order to meet the needs of Dorset's increasing population and to continue to provide the necessary services to fulfil our role as a Rural Service Centre.

#### 16.108 *Cultural Matters*

- DCC - Core Strategy lacks an overall strategy or policy guidance for cultural provision. No reference is made to the Dorset Cultural Strategy 2009 – 2014. NPPF states that plans should set out strategic priorities for the area including provision of cultural infrastructure and other facilities, allocate sites to meet the scale and type of cultural development required in town centres, promote the retention of cultural buildings to support a strong rural economy, promote healthy communities by planning positively for cultural buildings and guarding against the loss of facilities and take account of the cultural benefits that conservation of the historic environment can bring. More emphasis could be given to the importance of good design and means of ensuring this is achieved.

#### **Officer Response**

**16.109** Para 70 of NPPF gives examples of community facilities as “local shops, meeting places, sports venues, cultural buildings, public houses and places of worship”. This makes it clear that the term extends to privately run facilities as well as publicly funded. It also refers to “other local services” which would cover medical services etc. Policy LN6 refers to “community facilities and services” which conforms to the reference in NPPF. It is considered that continued reference to “community facilities and services” would ensure conformity with terminology in the NPPF. The third paragraph of Policy LN6 gives examples of types of facilities and services. It is considered that this is sufficient as it would be inappropriate to attempt an exhaustive list of examples with the risk of omitting a category.

**16.110** Paragraph 70 of NPPF is clear that policies should plan positively for new community facilities and safeguard existing ones. The intention behind the 6th paragraph of Policy LN6 is consistent with national policy. A similar issue is addressed in Policy PC4 which resists the loss of local shops and community facilities in local centres and villages. In order to provide further clarification, it is proposed to use similar wording in Policy LN6.

**16.111** It is agreed that the last sentence should be deleted and replaced to improve clarity, and the supporting text also needs to be amended to reflect the NPPF.

- 16.112** Policy KS1 sets out the settlement hierarchy based on accessibility to services, facilities and employment. Policy LN6 complements this policy.
- 16.113** 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.
- 16.114** It is recognised that the role of the economy and landscape quality are central to maintaining the character of the rural area. In order to increase the recognition of the rural areas it is proposed to make changes to strengthen references to the rural economy and communities throughout the document and by emphasis in the text.
- 16.115** The importance of cultural provision is referred to in various policies throughout the Core Strategy. The Core Strategy Vision refers to historic towns being vibrant centres of commercial and cultural activity. Within each of the town centre visions, reference is made to the centres being the focus for town centre uses including cultural uses. Policy HE3 refers to the need to protect features of cultural, historical and heritage value. Policy PC5 refers to the development of tourism and culture in the context of wider sub-regional strategy. Reference is made to “Towards 2015 – Shaping Tomorrow”. It is appropriate to add “Dorset Cultural Strategy 2009 – 2014” after this. Please see proposed Pre-Submission changes to Policy PC5.
- 16.116** Dorset County Council as the education provider has been closely involved with the development of the Core Strategy. The authority has indicated where new, or larger replacement schools will be required and these are included in the proposals.
- 16.117** It is considered that reference to “community facilities and services” and the examples given in Policy LN6 which include community buildings is sufficient for the policy, rather than attempt to list every category of facility / service.
- 16.118** The Core Strategy makes reference in paragraph 6.40 that Christchurch BC has prepared a Borough wide allotments strategy (2011) which has identified current and future requirements for allotment provision across the Borough over the plan period and sets out standards to be applied to the provision of new allotments. Policy HE4 sets out open space standards which include provision of allotments.
- 16.119** Para 70 of the NPPF gives examples of community facilities as “local shops, meeting places, sports venues, cultural buildings, public houses and places of worship”. This makes it clear that the term extends to places of worship. Policy LN6 refers to “community facilities and services” throughout the policy which conforms to the reference in NPPF. It is not considered appropriate to list examples of every possible type of community facility although the third paragraph of the policy gives some examples.
- 16.120** The last bullet point of the Key Facts gives examples of cultural facilities. It is not relevant to refer to community halls in this context. There are many benefits of well run community halls, but it is not considered appropriate to list all of these in the Core Strategy.
- 16.121** Regarding provision of housing for older people, a new policy is proposed to address this issue, as discussed below. The key facts after paragraph 15.23 point out that the numbers of elderly is set to increase over the next 15 years, so the issue is raised in relation to providing community services and facilities. The second paragraph of Policy LN6 refers to facilities for older people as an example of provision of community facilities.

**16.122** Alderholt is defined as a Rural Service Centre within the settlement hierarchy in Policy KS1 and the definition of its function, as set out in the policy, acknowledges Alderholt's status as a large rural community. Policy LN6 identifies Alderholt as one of the settlements where new community facilities and services should be concentrated. The aim of the policy is to ensure the needs of current and future communities continue to be provided for. The policy will be delivered in partnership with service providers, other Councils and community groups.

### **Proposed Pre-Submission Change**

**16.123** The last two bullet points of Policy LN6 are amended to address comments on their lack of clarity and detail.

## Policy LN6

### Community Facilities and Services

Facilities and services will be provided to support existing and future population growth and changes in the age profile by the following:

New facilities should be concentrated in the settlements of Christchurch, Highcliffe, Burton, Corfe Mullen, Wimborne Minster, Colehill, Ferndown, West Moors, Verwood, Alderholt, Cranborne, Sixpenny Handley, Three Legged Cross and Sturminster Marshall. This is where access can be by public transport, bike and on foot. Some facilities can be provided in smaller settlements in innovative ways in suburban areas of Christchurch and East Dorset where access to facilities is more restricted to the car.

The Council will work with partners and service providers to ensure the timely provision of high quality, convenient, local and accessible facilities and services for community and cultural use such as education, health, libraries, facilities for older people / children and young people and community buildings.

Priority will be given to any proposals to allow the multi-use of existing facilities, followed by the expansion of existing, well located facilities to allow for the co-location of facilities and services.

New facilities will be required to serve the needs of the population and new development when the alternatives above are not feasible. Preference will be given to the clustering of services and facilities.

**~~Loss of facilities will be resisted unless it is shown that the facility is no longer needed. The loss of existing community facilities and services will be resisted unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of facilities and services for local people.~~**

**~~Where appropriate, financial contributions towards the provision of facilities and services will be sought. Planning obligations may be sought in accordance with the Community Infrastructure Levy Regulations 2010 to obtain financial contributions towards the provision of facilities and services.~~**

**Omission of policy to address housing needs for those requiring specialist housing**

**16.124** The following comments were received on this issue:-

- DCC - Despite the increase in older age groups, no specific proposals to meet their housing or community needs are included in the Core Strategy. Whilst the general approach of DCC is to encourage independent living supported by care in people's own homes, there will still be a need for some new build provision. The Core Strategy should be amended to ensure that it encourages measures (such as lifetime homes and dedicated tenancies for people with mental health or learning disabilities) to help widen the housing choice open to them. Suggest that any new care homes and sheltered housing new builds should have some provision that is equivalent to affordable housing.
- Planning Bureau on behalf of McCarthy and Stone - Object to absence of policy consideration to housing needs for ageing population. Unless this is properly planned for over the next 20 years, there is likely to be a serious shortfall in specialist accommodation for the older population. A specific policy or reference to the needs of the ageing population should be included to identify the wide ranging issues that will be associated. There will be a need to provide a holistic approach to different types of housing and care provision from the public and private sector and across all types of tenure. Evidence suggests that there is a current and growing need for specialised forms of private sector accommodation for older persons such as retirement housing (category II type sheltered housing) and assisted living extra care. Para 50 of the NPPF states that local planning authorities should "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as but not limited to families with children, older people, people with disabilities, service families and people wishing to build their own homes)" The Government sets out its aims and objectives in providing more specialised housing for older people in 'A National Strategy for Housing in an Ageing Society – Lifetime Homes, Lifetime Neighbourhoods'. This emphasises the high priority that the Government will give to future planning policy reform to the challenge of ageing. Appended reports and assessments reinforce the need for local planning authorities to give more appropriate weight to specialist housing and extra care.

### Officer Response

**16.125** The NPPF indicates in para 50 that local planning authorities should plan for a mix of housing to meet the needs of different groups in the community including older people and people with disabilities. Long term strategies for services and accommodation for older and vulnerable people are led by Dorset County Council. The Councils work closely with DCC to assist vulnerable people who are in immediate housing need. High level evidence on housing need for older and vulnerable groups can be found in the Housing Need and Demand Survey 2008 (Appendix 1) and Strategic Housing Market Assessment 2008 (Appendix 2). Both Christchurch and East Dorset have very high levels of older and vulnerable people and those proportions of the population (especially the frail elderly) are going to increase over the next 20 years. Due to the local demographic context it is likely that the number of applications for private care homes and extra care schemes will continue.

**16.126** Due to the significance of this issue, a meeting has been held with DCC to discuss evidence and the development of a policy related to care homes, housing for older people and those with special needs. It was agreed that the Core Strategy should ensure that:-

- New development proposals for extra-care housing and care homes (market or affordable) should take into account the impacts on health and social care services and be supported by robust evidence of local need;
- Development proposals should fit within the wider strategic framework for the Dorset County Council area and the East Dorset and Christchurch Housing Strategy;

- Proposals for extra-care accommodation to be sold or let on the open market should be required to make an affordable housing contribution in accordance with Policy LN3;
- The Councils should support and encourage Lifetime Homes;
- A proportion of affordable homes on larger scale housing developments should be provided for those with special or supported housing needs.

### **Proposed Pre-Submission Change**

#### **16.127 New Paragraph preceding New Policy LN7**

**16.128** The following paragraph is proposed to provide new text to introduce the new policy to take into account the housing and accommodation needs of older and vulnerable people.

#### **16.129 General principles for all residential development proposals**

**16.130 To achieve sustainable and inclusive communities, larger scale developments and new neighbourhoods should make provision for older and vulnerable people in both the market and affordable housing sectors.**

**16.131 By requiring appropriate and adaptable housing, good layout and design, such schemes should create opportunities for older and vulnerable people to live securely, independently and inclusively within communities. Across all types and tenures the Council will therefore encourage the provision of homes which incorporate flexible and sustainable design principles, including the 'Lifetime Homes' standards and those that contribute to achieving affordable warmth.**

**16.132 Mutual and co-housing models will be supported where a group of households with supported or specialised housing requirements, meet their own needs collectively, procuring and managing their own housing.**

**16.133** The following policy is proposed to address representations received concerning the omission of a policy to address housing needs for older people and those requiring specialist housing:-

**New Policy LN7**

**Housing and accommodation for vulnerable people**

**Care homes and category C2 accommodation**

**New social, care or health related development proposals, or major extensions to existing developments, within the C2 use classification will not be subject to Policy LN3 however they will be required demonstrate that any impacts upon, or risk to, the strategic aims and objectives of Dorset County Council and NHS Dorset health and social care services have been taken into account and mitigated against.**

**Non C2 residential developments for older and vulnerable people**

**All other residential development proposals for older and vulnerable people, including sheltered housing, assisted-living and extra-care accommodation, must meet the requirements of policy LN3.**

**Subject to viability, open market proposals to provide housing for older or vulnerable people will be required to meet policy LN3 through a commuted sum contribution, calculated in accordance with the approved methodology.**

**Specialist housing proposals for older or vulnerable people that seek to address the policy requirements of LN3 through on-site affordable housing will be considered, however, the details of any such proposals and associated delivery mechanisms must have the prior approval of the Council and Dorset County Council.**

## 17 Responses and Analysis of Chapter 16 Prosperous Communities

## Policy PC1

### Christchurch and East Dorset Employment Land Hierarchy

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

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

### Strategic Higher Quality Sites

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

### Other Higher Quality Sites

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

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

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

**The following sites have been identified for upgrading:**

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

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

**Consultation Response**

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

Table 17.1

**17.1** 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:

**17.2 General Comments**

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

**17.3 Coverage of Policy**

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

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

## Officer Response

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

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

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

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

### **17.8 East Dorset Sites:**

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

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

### Proposed Pre-Submission Change

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

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

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

## Policy PC1

### Christchurch and East Dorset employment land hierarchy

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

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

#### Strategic Higher Quality Sites:

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

#### Other Higher Quality Sites:

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

- Hughes Business Centre

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

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

**The following sites have been identified for upgrading:**

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

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

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

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

### Policy PC2

#### Alternative uses for employment land where justified by market evidence

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

### Consultation Response

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

Table 17.2

**17.14** 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:

**17.15 General Comments**

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

**17.16 Coverage of Policies**

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

**Officer Response**

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

**Pre-Submission Policy**

**17.18** Paragraph 16.15 Change:

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

**17.20 Reason:**

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

**17.22** No change to the Pre Submission Policy.

**Policy PC2****Alternative uses for employment land where justified by market evidence**

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

## Policy PC3

### The Rural Economy

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

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

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

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

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

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

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

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

### Consultation Response

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

Table 17.3

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

#### 17.24 General Comments

- Dorset Association of Parish and Town Councils (DAPTC) - Improved mobile phone reception and broadband are required in the rural area.
- DAPTC - Policies must encourage small business units and home working and must recognise their existence. Improved communications will help and cost of travelling encourage this.
- DAPTC - No mention of the role of rural estates in the economy of the rural area.
- DAPTC - Lack of partnership working reduces the role of market towns as a focus.
- DAPTC - Confusion of terminology between Rural Service Centres and Key Settlements.

- DAPTC - Rural roads must be maintained. They are not recognised in the strategy or policies.
- Sixpenny Handley with Pentridge Parish Council - Surface water flooding is more common than 25 years ago - DCC co-operation is required to mitigate the effects.
- Sixpenny Handley with Pentridge Parish Council - Increased elderly population due to the retired moving in. Not contributing economically, but offer volunteering skills. The elderly should be able to remain in the rural community with the necessary care package.
- Sixpenny Handley with Pentridge Parish Council - Major land owners should be encouraged to build new housing in villages and hamlets suitable for people on lower incomes, such as craft workers and the technically skilled.
- Sixpenny Handley with Pentridge Parish Council - New affordable housing is essential.

### 17.25 Coverage of Policy

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

### 17.26 Re-use of buildings

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

### 17.27 AONB

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

## Officer Response

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

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

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

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

**Proposed Pre-Submission Change**

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

## Policy PC3

### The Rural Economy

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

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

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

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

- Are consistent in scale and environmental impact with their rural location avoiding adverse impacts on ~~the Cranborne Chase and West Wiltshire Downs AONB,~~ sensitive habitats, Areas of Great Landscape Value and landscapes identified through landscape character assessments and the openness of the Green Belt.

- **Conserve the landscape quality and the scenic beauty of the Cranborne Chase and West Wiltshire Downs AONB, and comply with the provisions of the AONB Management Plan.**
- Do not harm amenity and enjoyment of the countryside through the impact of noise and traffic generation.
- That minimise additional trips on the highway network and are accessible by sustainable modes other than the car.

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

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

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

## **Policy PC4**

### **Shops and community facilities in local centres and villages**

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

The loss of existing retail premises, leisure and other local facilities will be resisted unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of services for local people.

## Consultation Response

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

Table 17.4

**17.33** 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:

### 17.34 *General Comments*

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

### 17.35 *Coverage of Policy*

- Southern Planning Practice on behalf of Hall and Woodhouse - Objection to the policy requirement to demonstrate that the loss would not result in substantial decline in the range and quality of services for local people. The principal reason why local facilities and services close is because they are not supported and used by local people and cannot therefore be continued as a viable business. These are almost exclusively private businesses that have no public subsidy or alternative funding mechanisms - as a result if the business folds through lack of support and is therefore no longer viable, there can be no economic or social justification for seeking to keep the facilities. The policy would likely result in the premises being left vacant,

boarded up and derelict making no positive contribution to the local economy and community. This would conflict with the core principles set out under the NPPF.

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

## Officer Response

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

## Proposed Pre-Submission Change

**17.37** No change to Policy PC4.

### Policy PC4

#### Shops and community facilities in local centres and villages

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

The loss of existing retail premises, leisure and other local facilities will be resisted unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of services for local people.

## Policy PC5

### Tourism

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

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

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

### Consultation Response

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

Table 17.5

**17.38** 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:

**17.39 General Comments**

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

**17.40 Coverage of Policy**

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

**Officer Response**

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

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

## Proposed Pre-Submission Change

### Policy PC5

#### Tourism

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

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

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

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

## New Policy

### Electronic Communications Networks

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

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

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

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## 18 Responses and Analysis of Chapter 17 Omissions to the Plan

### Omissions

#### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
18	3	1	28	19	6	15	12	15	12	14	14	29

Table 18.1

**18.1** 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:

**18.2 *New Policies Required***

**18.3** Policy on Presumption in Favour of Sustainable Development - the Core Strategy is not sound as it does not contain a policy on sustainable development as required by the NPPF. Policy wording suggested.

**18.4** Policy on Older People’s Accommodation-The Core Strategy should contain a policy on this due to the number of older people living in the area. The provision of accommodation for older people would free up larger houses allowing more efficient use of the housing stock.

**18.5** Policy on Strategic Allotment Sites-Required for Christchurch to deal with Roeshot Hill replacement allotments. Inappropriate to include replacements within CN1 and to provide sites outside the Borough.

**18.6** Policy requiring Sprinklers in New Development - Dorset Fire and Rescue believe it is essential that new housing stock is provided with domestic sprinkler systems. As community safety is a key Government requirement of local authorities this policy would ensure that a safe and sustainable community is achieved.

**18.7** Policy requiring Fire Hydrants and Mains to be provided as part of development - Dorset Fire and Rescue require developers to provide fire hydrants and adequately sized mains to enable their use.

**18.8** Policy requiring the provision for the potential setting up of a 'Free School'.

**18.9** Policy requiring the provision of future cemetery space.

**18.10** Policy setting out the Council's stance on the Community Infrastructure Levy.

#### **18.11** *Previous Policies*

**18.12** As this document incorporates the previous Local Plan for Christchurch, all previous policies which have been retained must be included in the document, not in an Appendix.

#### **18.13** *Viability*

**18.14** The evidence base is incomplete as there is no viability study for Christchurch. The East Dorset study is out of date. It includes a grant level for affordable housing which no longer exists, affordable rent is not included, it assumes Code for Sustainable homes Level 3 not 4 and makes an assumption about CIL which is not reflected on nearby authorities. The document would not be considered to be sound.

#### **18.15** *Alternative Sites*

#### **18.16** *Christchurch*

**18.17** Bournemouth airport-Policies BA1 and BA2 take a short term view and fail to include undeveloped land. Land shown on the objector's map should be removed from the Green Belt to meet employment needs, airport related development needs and park and ride needs.

**18.18** Land south of Burton village - Amend Policy CN2 to allocate additional land for further 45 dwellings. The current proposal does not meet housing need. Capacity of site is greater than shown.

**18.19** Land south of Fairview Drive-Amend Green Belt boundary and allocate land for residential development and public access to river. Land does not fulfil any of the purposes of including land in the Green Belt and therefore should be removed.

#### **18.20** *Wimborne and Colehill*

**18.21** Wimborne Road, Colehill - allocate land for residential development and allotments. To be prepared positively, the Core Strategy must take account of the Localism agenda and take into consideration locally generated development which provides for local needs and facilities. This proposal is supported by the Parish Council and the Colehill Allotments Group.

**18.22** St Michael's School, Colehill - the proposed allocations of residential land will increase demand for middle school education. Allenbourn School is constrained and expansion restricted. Expansion of St Michael's will require a significant amount of new infrastructure such as classrooms, specialist rooms, studio spaces, toilets and circulation space. Satisfactory expansion of the school would require an amendment to the Green Belt boundary to accommodate this growth.

**18.23** Beaucroft Foundation School, Colehill - The school is over capacity already. DCC wish to expand Post 16 facilities to enable students to be able to stay at the school. Additional facilities are required to provide for this facility and the numbers of students. Re-drawing of the Green Belt is required to enable the facilities to be provided.

**18.24** Victoria Hospital, Wimborne - Allocated site on WMC3 is insufficient. Expansion will require 0.8ha. Larger area needed to provide services for proposed population expansion. Demand for out-patient care will grow. GP commissioning group committed to using services.

**18.25** Stour Valley and Moondale proposals (Note: these sites fall into several parishes but have been discussed within this section due to the relationship with the rugby and football club proposals.)-Council's approach using the out of date areas of search is flawed and therefore the plan is not sound. The plan does not contain the most appropriate and justified strategy. Insufficient housing requirements are shown in the Core Strategy and therefore the plan is unsound. It is not good planning to have the replacement rugby and football clubs adjacent to new housing. The sites listed provide a more satisfactory resolution to this problem. Alternative sites and alternatives to the proposed allocations are listed below:

**18.26** 1) Alternative to WMC6 - housing south of Parmiter Drive, employment land and football pitch.

**18.27** 2) Alternative to WMC3 - residential development of 140 units and 0.4ha for expansion of Victoria Hospital. Replacement allotments. New cycle/footbridge

**18.28** 3) Land north of A31, south of Wimborne Road West-residential development with associated Stour Valley Country Park, neighbourhood facilities, and services south of Canford Bottom Roundabout. Cycling and walking facilities.

**18.29** 4) Land north of Fryers Copse and east of Willow Drive- residential development, care home and allotments.

**18.30** 5) Land east of Ham Lane, Little Canford. Manor Farm site. (see also Ferndown)-rugby club and associated facilities.

**18.31** 6) Hilltop Nursery (See also Ferndown) - land for residential development and SANG.

**18.32** North of By The Way, Leigh Road - Allocate land for residential development and neighbourhood centre. Site would benefit Wimborne and Colehill. Has good links and access. Is screened and will have less visual impact than allocated sites. Development is infilling and containment rather than coalescence.

**18.33** Leigh Farm, north and south of disused railway line - Allocate 7.5ha for residential development. Comprises poor quality grazing land unlike other sites. Not visually intrusive. Would not create coalescence. Less environmentally sensitive than other sites.

**18.34** St Margaret's Hill-Allocate land for cemetery use. Additional housing will need for cemetery space. Bournemouth and Poole are running out of space and using Wimborne. A split site for the cemetery would not work. The site could be used as allotments until required.

**18.35** Stone Park- Allocate land for 70 dwellings. Although within land at Stone Park Estate, this site adjoins the existing urban area of Wimborne and could be developed with minimal impact on landscape or heritage. The allotments at Cuthbury and the football club are within the historic landscape and development is proposed here.

### **18.36 Corfe Mullen**

**18.37** Land east and west of Haywards Lane (17ha).- No justification and evidence base for need for housing in Corfe Mullen and no indication of proportion of housing need allocated at CM1. No justification for extent of land release from Green Belt. Contrary to NPPF. Concern that CM1 cannot be delivered, especially school site. Proposals should be finalised and consulted on with the alternative sites. Alternative site is available, suitable and deliverable. About 200 dwellings proposed. Would integrate with urban area and is accessible to the existing urban area and proposed country park.

**18.38** Land south-west of Blandford Road (1ha) - Local Plan Policy CM3 allowed development in this area and the policy should be continued. The land should be considered as an alternative to the proposed local centre as it is more central with existing facilities and would complement the proposed allocation at CM1. The proposal would also provide residential development faster than CM1 therefore meeting NPPF requirements.

**18.39** Land between Pardy's Hill and Blandford Road - Master planning exercise sought to determine the capacity of a number of areas of search and does not constitute positive planning. A wider range of sites should have been examined at an earlier stage and suitable sites would have emerged which do not suffer from the constraints of CM1. The Core Strategy is not sound as it is not positively prepared, is not the most appropriate strategy and therefore not justified, causes loss of facilities such as allotments and recreation ground, and it is unlikely, given the scale of development, that the school can be replaced. Land should be allocated as a reserve site.

### **18.40 Ferndown**

**18.41** Stourbank Park - Allocate land for employment with some residential in conjunction with adjoining Wessex Water Depot. Improvements at Canford Bottom roundabout offer potential for development in the surrounding area. Site is no more remote than that proposed at Holmwood Park, FWP6 is difficult to contain and could lead to more development to the east, FWP7 looks hard to achieve due to cost of new road and has visual impact as well as impacting on the Hillfort. Core Strategy is unsound on the basis of this omission.

**18.42** Stapehill Abbey - Core strategy does not provide a policy to positively resolve the future of the Abbey in accordance with the NPPF. A full range of housing and insufficient numbers are at variance with the NPPF. Allocate land for 55 units including conversion of buildings, and for offices, educational or leisure uses. Additional land should be allocated at a density of 3 dwellings per hectare, 10 affordable houses, an on-site SANG and allotments.

**18.43** Land east of Ferndown Industrial estate - allocate land for employment purposes. Overall target for land should be higher. As land at Bournemouth Airport cannot be easily delivered, greater flexibility is required with additional sites allocated. Land here is well located to attract investment and allow expansion of local industries.

- 18.44** Hilltop Nursery (See also Wimborne) - allocate land for residential development and SANG.
- 18.45** Land east of Ham Lane, Little Canford Manor Farm site (see also Wimborne) - allocate land for rugby club and associated facilities.
- 18.46** Little Canford Depot-Allocate land for residential development - 50 to 100 units, employment development, fishing lakes and amenity land. This mixed use site has to be re-developed within the plan period and compares well with other sites. Core Strategy is unsound as does not represent the best option, given the alternatives. Brown field sites should be considered before green field. Amend KS1 to include redevelopment of land, Amend KS2 to release brownfield sites in Green Belt, Amend KS4 to include a greater level of housing supply in accordance with evidence, amend PC1 to include a more flexible approach to sites, Amend PC2 to allow mixed schemes on employment sites. Documentation includes a Sustainability Appraisal.
- 18.47** Holmwood House-Allocate land adjacent to FWP3 for residential development. The true level of development required to meet housing need has not been recognised. The plan is unsound as it does not secure a sufficient supply.
- 18.48** 122 Ringwood Road, Longham - Allocate land for residential development, 15 to 20 units. There is insufficient capacity within the village to provide land for development to support the services within the village. This site is available for the “limited development” referred to in the policy.
- 18.49** West Parley - Dorset Fire and Rescue-May require land shown for community development for a Fire and Rescue station.
- 18.50 Verwood**
- 18.51** Land adjoining Greenacres, Firs Glen Road and at junction of St Michael’s Road and Howe Lane-allocate land for residential development.
- 18.52** Land at Noon Hill Road, Verwood-amend Green Belt boundary and allocate land for a care home and range of medical uses and allotments.
- 18.53** Land at Manor Road-remove allocation of VTSW4 and allocate land at Manor Road for residential development and SANG. No landscape designations and low quality agricultural land. Not prominent in the landscape. Vehicular access available. Sustainable location. Potential to improve links to schools with pedestrian and cycle routes.
- 18.54** Land at Ringwood Road, Three Legged Cross, adjacent to VTSW6-Allocate land for employment use. As part of the allocation is considered to be undeliverable due to the SSSI nearby and potential effect on the Moors River SSSI, additional land should be allocated.
- 18.55 St Leonards**
- 18.56** Matchams, Hurn Road-the Core Strategy should contain a policy which incorporates alternative land uses which would be appropriate at this site.
- 18.57 Alderholt**

**18.58** Land at Blackwater Close-allocate land for 75 bungalows for 65 to 80 age group. Would provide for this age range which is omitted from the Core Strategy and free up family housing.

**18.59 Sturminster Marshall**

**18.60** Land at Arch Ground, Station Road-allocate 3.7ha for residential development and 3.5ha for public open space with recreational and community facilities.

**Officer Response**

**18.61** Policy on Presumption in Favour of Sustainable Development - this is included as Policy KS13

**18.62** Policy on Older People's Accommodation-Policy LN7 has now been introduced on housing for vulnerable people.

**18.63** Policy on Strategic Allotment Sites. The Councils are preparing an allotment strategy.

**18.64** Policy requiring Sprinklers in New Development - This is covered by other legislation.

**18.65** Policy requiring Fire Hydrants and Mains to be provided as part of development -This is covered by other legislation.

**18.66** Policy requiring the provision for the potential setting up of a 'Free School'. This is dealt with by other legislation.

**18.67** Policy requiring the provision of future cemetery space. Consideration has been given to the need for additional cemetery space but it is not considered that a separate policy is required.

**18.68** Policy setting out the Council's stance on the Community Infrastructure Levy. Policies now contain references to CIL.

**18.69** As this document incorporates the previous Local Plan for Christchurch, all previous policies which have been retained must be included in the document, not in an Appendix. It is considered that an appendix covers this issue.

**18.70** Viability studies have been prepared for the urban extension and new neighbourhoods, as well as to justify affordable housing policies. Further work is being undertaken in relation to the Community Infrastructure Levy and affordable housing, which will also provide important information on this matter.

**18.71 Christchurch**

**18.72** Manchester Airport's have not identified this area of land as required for the operational airport or for employment development. Sufficient development can come forward at the North West business park to meet projected employment land requirements over the plan period (identified in the Bournemouth, Dorset and Poole Workspace study (2012) without the need to consider this proposed site within the Green Belt. On this basis there are no exceptional circumstances to permit development in the Green Belt in this location.

**18.73** The Core Strategy Policies KS3 and KS4 will be superseded by a single housing target for both districts which meets the combined housing requirement identified in the Dorset County Council household projections (2012) which also allows for a 5% buffer to be applied to the 5 year land supply in accordance with the NPPF. A development of 90 dwellings to the south of Burton is considered inappropriate in relation to Burton's status as a village within the settlement hierarchy and a development of this size may not maintain a strategic gap between the village and the railway line. On this basis there is no need to provide a development in addition of 45 dwellings.

**18.74** Land south of Fairview Drive is a small non strategic site. There is no justification to remove this site from the Green Belt.

**18.75** *Wimborne and Colehill*

**18.76** The greenfield sites allocated in the Core Strategy have been identified through a rigorous process which is set out in the Key Strategy Background Paper and the Masterplan Reports. This process involved the selection of settlements and a sieve mapping exercise to identify which areas were not subject to the absolute constraints of proximity to the heathlands and flood plains. This resulted in six areas of search which have been subject to detailed Masterplanning exercises and to the selection of the sites which are included in the Pre-Submission Core Strategy.

**18.77** The Council is satisfied that using its evidence studies and research, it has allocated sufficient sites to meet the need which has been established and therefore to meet the tests of soundness. Therefore, additional sites are not required.

**18.78** Wimborne Road, Colehill -The Council does not consider that this site falls within the area identified through the Masterplanning process. No change.

**18.79** Stour Valley and Moondale proposals:

- **Alternative to WMC6:** housing south of Parmiter Drive, employment land and football pitch. This is a variation on the Council's proposals in the Pre-Submission Core Strategy. A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other detailed site requirements. The requirement for this can be found in replacement Policy KS3 and KS4. As such, the allocation of the site is unaffected. No change.
- **Alternative to WMC3:** residential development of 140 units and 0.4ha for expansion of Victoria Hospital. Replacement allotments. New cycle/footbridge. A Development Brief will need to be agreed with the Council for all new neighbourhoods. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, and other detailed site requirements. The requirement for this can be found in replacement Policy KS3 and KS4.

As such the allocation of the site is unaffected. The proposal would result in a lower housing figure, which, on its own, would not be sufficient to meet the local need. No change.

- **Land north of A31, south of Wimborne Road West:** residential development with associated Stour Valley Country Park, neighbourhood facilities, and services south of Canford Bottom Roundabout. Cycling and walking facilities. Whilst access may be achievable it is considered that the number of dwellings may be restricted by the provision of a single vehicular access and the view of the highways agency would be required. A site for residential development in this location is poorly located to the services provided by the town centre of Wimborne than the sites identified in the Core Strategy. Development here would result in a car dependent new neighbourhood. The accesses to the suggested Country Park would not support the high level of traffic which a full scale Country Park would generate. If trip generation were kept low as would be the case with the SANGs north of Wimborne, the access may be acceptable. A full scale Country Park would attract increased traffic across and along the A31. A proposal for highway services adjacent to Canford Bottom Roundabout would need to be referred to the Highways Agency. It is felt that this proposal would be unacceptable to the Agency. No change.
- **Land north of Fryers Copse and east of Willow Drive:** residential development, care home and allotments. The Council does not consider that this site falls within the area identified through the Masterplanning process, as suitable for strategic housing allocations. No change.
- **Land east of Ham Lane, Little Canford. Manor Farm site rugby club and associated facilities:** Development of the site would cause significant harm to the Green Belt. The site is considered to be too remote to be a sustainable use of the land for this purpose. The proposed site is close to the A31 and there is likely to be an impact on this trunk road. The view of the Highways Agency would be required. Whilst there could be a solution to the vehicular access to the site and the potential to link to improved cycling facilities at Canford Bottom Roundabout, the site is in a less accessible location than that proposed in the Core Strategy. No change.
- **Hilltop Nursery land for residential development and SANG:** This land is within 400m of heathland where development for residential use is not permitted due to the effects on the heathland. No change.

**18.80 North of By The Way, Leigh Road:** This area is considered to form a "key Green Belt gap" between settlements and therefore is important. The Masterplanning work explains why this area has not been selected for development. No change.

**18.81 Leigh Farm, north and south of disused railway line:** This area is considered to form a "key Green Belt gap" between settlements and therefore is important. The Masterplanning work explains why this area has not been selected for development. No change.

**18.82 Stone Park- Allocate land for 70 dwellings:** The Masterplanning work explains why this area has not been selected for development. No change.

**18.83 Victoria Hospital, Wimborne:** This representation has been made by the Friends of the Hospital. No representation to support this has been received from the hospital or the Primary Care Trust. As the allocation in WMC3 was made following discussions with the PCT, no change is proposed.

**18.84 St Michael's School, Colehill:** The Council accepts that an amendment to the Green Belt boundary will be required in order to allow the school to expand to meet the expansion which will be required as a result of the development which is proposed for Wimborne and Colehill. Amend the plan.

**18.85 Beaucroft Foundation School, Colehill:** The Council accepts that additional facilities are required at this school, in part to deal with its expanded role to cater for existing students and in part to cater for the expansion which will be required as a result of the development which is proposed for Wimborne and Colehill. As the expansion of the school is required and cannot reasonably be provided elsewhere it is considered that there are exceptional circumstances which justify a change to the Green Belt boundaries. Amend the plan.

**18.86 St Margaret's Hill - Allocate land for cemetery use:** The Council understands that there is sufficient land available at the cemetery for a considerable number of years. Whilst the view has been raised that Bournemouth and Poole are running out of space for burials, this has not been communicated to the Council by these authorities who have recently announced the possibility of a site for a joint cemetery. Burial sites are appropriate in the Green Belt and other sites, not associated with the cemetery, could come forward in future. As the expansion of the school is required and cannot reasonably be provided elsewhere it is considered that there are exceptional circumstances which justify a change to the Green Belt boundaries. No change.

**18.87 Corfe Mullen**

**18.88 Land east and west of Haywards Lane (17ha):** The Masterplanning work explains why this area has not been selected for development. No change.

**18.89 Land south-west of Blandford Road (1ha):** The Masterplanning work explains why this area has not been selected for development. No change.

**18.90 Land between Pardy's Hill and Blandford Road:** The Masterplanning work explains why this area has not been selected for development. No change.

**18.91 Ferndown**

**18.92 Stourbank Park:** The Council does not consider that this site falls with the area identified through the Masterplanning process as a sustainable location, as it is separated from Wimborne, the closest settlement, by the A31. No change.

**18.93 Stapehill Abbey:** This site is not within the areas of search which have been considered suitable locations for development, as it does not relate closely to an urban area with key services and facilities. It is therefore not an area which is in line with the Key Strategy. As a brownfield site in the Green Belt, the Council will consider any proposals for development under the policies in the Core Strategy and those in the National Planning Policy Framework. No change.

**18.94 Hilltop Nursery:** (See Wimborne) No change.

**18.95 Land east of Ham Lane, Little Canford Manor Farm site:** (see Wimborne) No change.

**18.96 Land east of Ferndown Industrial estate:** The Council considers that a more than sufficient allocation of employment land has been made. Furthermore, the proposed site is close to European designated wet heathlands and the Council is concerned that development on this site would impact on the hydrology of the area with implications for Slop Bog. No change.

**18.97 Little Canford Depot:** Allocate land for residential development - 50 to 100 units, employment development, fishing lakes and amenity land. This mixed use site has to be re-developed within the plan period and compares well with other sites. The Council does not consider that this site falls within the area identified through the Masterplanning process as a sustainable location, as it is separated from Wimborne, the closest settlement, by the A31. No change.

**18.98 Holmwood House: Allocate land adjacent to FWP3 for residential development:** The Council considers that it has allocated sufficient land to meet housing need and has chosen those sites through the Masterplanning process- see above. The allocation of this site would close the important Green Belt gap between Ferndown and Longham. No change.

**18.99 122 Ringwood Road, Longham:** Allocate land for residential development, 15 to 20 units. The Masterplanning work explains why this area has not been selected for development. No change.

**18.100 West Parley-Dorset Fire and Rescue-May require land shown for community development for a Fire and Rescue station:** Please see Policy FWP6. A Development Brief is required for this site and will cover this potential requirement.

**18.101 Verwood**

**18.102 Land adjoining Greenacres, Firs Glen Road and at junction of St Michael's Road and Howe Lane-allocate land for residential development:** There are no exceptional circumstances to release this small area of land and allocate it for development. No change.

**18.103 Land at Noon Hill Road, Verwood - amend Green Belt boundary and allocate land for a care home and range of medical uses and allotments:** There is no identified need for the range of medical facilities suggested for this site that cannot be provided within the urban areas.. The land is also close to SPA heathland and as acid grassland is considered unsuitable for allotments. No change.

**18.104 Land at Manor Road-remove allocation of VTSW4 and allocate land at Manor Road for residential development and SANG:** No landscape designations and low quality agricultural land. Not prominent in the landscape. Vehicular access available. Sustainable location. Potential to improve links to schools with pedestrian and cycle routes. At the current time there is uncertainty as to whether the SANG to mitigate impacts n nearby heathlands is deliverable. No change.

**18.105 Land at Ringwood Road, Three Legged Cross, adjacent to VTSW6 - Allocate land for employment use:** As part of the allocation is considered to be undeliverable due to the SSSI nearby and potential effect on the Moors River SSSI, additional land should be allocated to provide greater opportunity for employment provision and mitigation of wildlife impacts. See response to VTSW6.

**18.106 St Leonards**

**18.107 Matchams, Hurn Road the Core Strategy should contain a policy which incorporates alternative land uses which would be appropriate at this site:** It is not considered necessary to provide a policy outlining alternative uses for this site which is in the Green Belt and remote from any settlement. The site also contains important heathland and has poor access to the urban areas. The Council would consider any proposals on this site in accordance with the policies in the Core Strategy and in the National Planning Policy Framework. No change.

**18.108 Alderholt**

**18.109 Land at Blackwater Close - allocate land for 75 bungalows for 65 to 80 age group:** Although Alderholt is categorised as a Rural Service Centre in Policy KS1 it has very limited services and facilities. The scale of development is therefore considered too large, and restricting age occupancy could leave vulnerable people in a remote location. A smaller proposal could be considered in the Site Allocations Development Plan Document. No change.

**18.110 Sturminster Marshall**

**18.111 Land at Arch Ground, Station Road-allocate 3.7ha for residential development and 3.5ha for public open space with recreational and community facilities:** Sturminster Marshall is shown as a Rural Service Centre in Policy KS1 where large scale development would not be considered appropriate. The Council has not allocated strategic sites within these settlements due to their poor access to services and facilities. No change.

### Proposed Pre-Submission Change

**18.112** St Michael's School, Colehill -The Council accepts that an amendment to the Green Belt boundary will be required in order to allow the school to expand to meet the expansion which will be required as a result of the development which is proposed for Wimborne and Colehill. Amend the plan.

**18.113** Beaucroft Foundation School, Colehill - The Council accepts that additional facilities are required at this school, in part to deal with its expanded role to cater for existing students and in part to cater for the expansion which will be required as a result of the development which is proposed for Wimborne and Colehill. Amend the plan.

**New Policy**

**St Michael's School, Colehill - Amend Green Belt boundary**

**Beaucroft Foundation School, Colehill - Amend Green Belt boundary.**

## 19 Responses and Analysis of Chapter 17 SA and HRA Reports

### Sustainability Appraisal/Equalities Impact Assessment/Health Impact Assessment

#### Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
0	0	3	20	2	16	2	11	2	10	1	18	23

Table 19.1

**19.1** 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:

#### **19.2 General**

- SA was not available for consultation and therefore the Core Strategy is unsound.

#### **19.3 Vision and Strategic Objectives**

**19.4** East Dorset Environment Theme Action Group (ETAG)

#### **19.5 Objective 1**

- Sustainability Appraisal (SA) Objective 1-concern that there have been no biological surveys to inform site selection or future management. Risk of a number of losses of potential habitat restoration and risks to habitats. Score is considered to be unknown or possibly negative.
- SA Objective 2- concern that Green Belt is the only resource which has been considered. Development will take place on greenfield sites.
- SA Objective 3- Risk of pollution on employment sites. Light pollution and tranquillity not considered adequately in scoring.
- SA Objective 7-Considered that there is risk to some high quality habitat. Design and management of SANGs can provide opportunity for habitat restoration.

- SA Objective 12-considered that proposed employment sites pose a threat to the Moors River and to opportunities for heathland restoration. Scoring is marginal between unknown and negative.
- Cumulative effects and summary-Scores positively on only 4 of the SA Objectives. No assessment of how Core Strategy will contribute to ecological networks or balance of ecosystem over District. Maybe some wins though SANGs but absence of surveys creates too many unknowns.

### 19.6 Objective 3

- SA Objective 1- Should identify biodiversity interest on proposed sites to ensure this Strategic Objective is addressed. It is considered that transport and development will impact on this objective.

### 19.7 Objective 4

- SA Objective 1-Consider that policies for employment sites largely preclude habitat expansion and enhancement. Negative score should be shown. Cumulative effect and summary should state that loss should be mitigated or where not possible, off-site compensation should take place.

### 19.8 Objective 5

- SA Objective 1-Concern that there will be some habitat losses and others will be put at risk. In the absence of survey, these cannot be quantified. Not all will be mitigated through SANGs. Scoring should be unknown although without adequate design and management of the SANGs, scoring could be negative.

### 19.9 Objective 6

- ME1 may reduce the impact of some of the routes proposed. It will not ensure “no adverse effect on biodiversity”. Score is negative not 0.

### 19.10 Key Strategy

#### 19.11 KS5

- SA1SA1-NOx emissions are harmful as well as carbon emissions. Opportunity to enhance and expand habitats will be lost to development. Score is negative not 0.

#### 19.12 KS10

- SA Objective 1-Score should be negative. Direct habitat loss and connectivity are at risk as a result of B3073 improvements and A31 dualling.
- SA Objective 3-Greenhouse gas emissions will increase as a result of:

1. Embodied energy in road construction

2. Moving points of congestion
  3. New roads increase light pollution
- Mitigation will not be provided by monitoring traffic flows

#### 19.13 *Wimborne and Colehill*

##### 19.14 **WMC2**

- SA Objective 1-Score positively if opportunity is taken to restore biodiversity and setting of River Allen corridor.

##### 19.15 **WMC3**

- SA Objective 1-Scoring depends on widening the riverside area and recognising existing and potential biodiversity interest and linkages to SANG which is yet to be identified.

##### 19.16 **WMC5**

- SA Objective 1-Until surveys have been carried out, biodiversity losses cannot be assessed. Potential for habitat linkages and enhancements are unknown. Impact on River Allen unknown.
- SA Objective 3-Development on this steep slope is at odds with minimising pollution. It will be essential that pollutants do not reach the River Allen.
- SA Objective 4-Loss of permanent grassland will contribute to greenhouse gas emissions. Loss of ecosystem function will reduce the water holding capacity of the land. Score should be unknown, not positive.

#### 19.17 *Ferndown and West Parley*

##### 19.18 **FWP3 and Map 10.4**

- SA Objective 1-In the absence of a survey, impact is unknown. Policy should identify linkages to be able to meet Objective.

##### 19.19 **FWP7**

- SA Objective 1-The site may well be a significant area of Biodiversity Action Plan acid grassland which if properly managed could make a substantial contribution to habitat enhancement and connectivity.
- SA Objective 3-the Policy and SA should address light pollution.

##### 19.20 *Verwood*

**19.21 VTSW3**

- This policy includes land at Coopers Lane South within the urban area. This policy should be reassessed as it has not taken into consideration the following points:
  1. The land lies within 400m of heathland
  2. The land is covered by a blanket Tree Preservation Order
  3. There is significant biodiversity (though not formally surveyed) with woodland edge flora, bats and birds including nightjars.
  4. Risk of light pollution
  5. Against the NPPF, para 123
  6. The proposal scores negatively against SA Objective 1 as it would put at risk Biodiversity Action Plan habitat and species.
  7. The proposal scores negatively against SA Objective SA11 as it would destroy local distinctiveness by impacting on tranquillity and on the adjacent heathland.

**19.22 VTSW6**

- SA Objective 1- No evidence the policy will meet the Objective. High risk of water borne pollution and light pollution on the Moors Valley SSSI, Sites of Nature Conservation Interest and heathland. Designating sites does not meet this Objective. There are opportunities for habitat enhancement of heathland and wet woodland. These would be lost to development. The site has not been the subject of a biological survey and has been mapped by RSPB as having heathland restoration potential. Negative score.
- SA Objective 3- Risk of polluting river systems remains. Scoring possibly negative.
- SA Objective 4- Vehicle movements will depend on the users on the site. Meaningful travel to work plan may not be achievable.
- SA Objective 5-Travel to work plans may limit greenhouse gas emissions. Plans for cycleways will contribute to meeting Objective.

**19.23 VTSW7**

- SA Objective 1-Proposals for development would impact on the Sites of Nature Conservation Interest. Any loss should be compensated to provide net biodiversity gain.
- SA Objective 3-Risk of light pollution to heathland and aquatic ecosystems.

**19.24 *Creating Prosperous Communities*****19.25 PC1**

- SA Objective 1-New employment sites will be at the expense of significant loss of biodiversity and habitat restoration potential. Impact on water courses and light pollution. Scoring therefore negative.
- SA Objective 3-Detailed examination of drainage will be required to meet this Objective. Need to ensure all water passes through pollution control systems. Unless this is in place, scoring will be negative.

**19.26 ME1**

- SA Objective 1- The emphasis is on protecting habitats and protected species rather than enhancing and expanding biodiversity. The score is therefore negative.

**Officer Response**

**19.27** The Councils have made it clear that the SA was available for consultation throughout the same consultation period as the Pre-Submission Core Strategy.

**19.28** It should be recognised that the Core Strategy is a high level document and legislation requires the SA to be carried out at a corresponding level. Some of the issues raised will be dealt with at the Development Brief and planning application stages. These will be subject to detailed environmental assessment. Further information on biodiversity and habitats will be required at that stage. Many of the comments refer to this detailed level of biodiversity surveys and analysis, design, layout and subsequent SA, and Environmental Impact Assessment and Appropriate Assessment. These comments and suggested amendments are therefore not appropriate at this stage. This statement is also applicable to any road improvements where off-line improvements are required. In many cases, the improvements may be within the existing carriageway.

The Councils and Natural England have agreed that a "Statement of Common Ground" will be agreed between the two bodies prior to the Examination in Public to cover all matters relating to biodiversity.

**19.29** Some amendments have been made to policies such as the introduction of a criteria on light pollution which may cover some of the comments raised. These have been assessed as to update the SA.

**19.30** Detailed comments made on Policy VTSW3 are considered as part of the Verwood chapter.

**Proposed Pre-Submission Change**

**19.31** No change is proposed to the SA.

## 20 Responses and Analysis of Chapter 17 Infrastructure Delivery Plan

**Infrastructure Delivery Plan**

### Consultation Response

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

Table 20.1

**20.1** 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:

#### **20.2 Cultural Facilities**

- DCC -
  1. The Infrastructure Delivery Plan is supported but lacks reference to cultural facilities. Amend table under para 1.10 to include reference to cultural facilities. No project is submitted but evidence base should be expanded to investigate cultural needs.
  2. Update para 2.50 to include starting date of Christchurch library extension of spring 2013.

#### **20.3 Flooding**

- DCC - make reference to DCC as Lead Local Authority and future Sustainable Drainage System Approving Body (SAB).

#### **20.4 Waste**

- DCC - Include information on Dorset waste partnership investigating options and a business case for a single depot in Christchurch and East Dorset to replace depots at Grange Road, Christchurch and Haviland Road, Ferndown.

### 20.5 Fire and Rescue

- Dorset Fire and Rescue -
  1. New development leads to an increase in traffic volumes. This leads to an increase in incidents and demands on Fire and Rescue. Residential properties also pose a risk to fire related incidents as do employment buildings. New schemes place additional demands on Fire and Rescue in terms of additional capital investment, new facilities and funding for additional fire fighters, officers and support staff.
  2. No capital funding is available and therefore Fire and Rescue is reliant on contributions from development to deliver requirements. There is a need to, amongst other things, acquire land and build new stations, extend existing stations, provide vehicles, provide advice and equipment and increase staffing levels.
  3. DCLG states that the Community Infrastructure Levy can be used for "...police stations and other community safety facilities." Dorset Fire and Rescue will liaise with police and ambulance services to ensure a co-ordinated approach.
  4. A new Fire and Rescue Station may be required at West Parley.

### 20.6 Police

- Dorset Police -
- Growth and new development will impose additional pressure on the infrastructure base of Dorset Police which is critical to the delivery of effective policing.
- The Police Service does not receive any dedicated funding for capital projects.
- Increases in population require additional police officers or that existing officers work more efficiently.
- DCLG states that CIL can be used for "...police stations and other community safety facilities." Infrastructure is defined by Dorset Police as "property and non-property infrastructure necessary to maintain an adequate police force. Non property includes staff set up costs and staff revenue funding, capital and revenue costs of vehicles and the capital costs of equipment and IT necessary for remote working or to provide remote monitoring.
- Property infrastructure costs include the capital costs of construction, including fit-out costs and adaptations. The impact of growth indicates that money will be required for front line officers, including PCSOs and vehicles, kitted out, trained and funded for the first three years.

### 20.7 Sewage and Water

- Wessex Water - Capacity improvements of receiving networks for the larger greenfield sites are required. Developers will need to contribute to these costs.

## Officer Response

- 20.8** Agree need to refer to cultural facilities.
- 20.9** Agree need to update the information on Christchurch library.
- 20.10** Need to refer to DCC role on flooding - The Council already makes reference to the County Council as the Sustainable Drainage Systems Approving Body in Policy ME6 and is adding information to this policy to clarify the policy.
- 20.11** Agree need to include information on Dorset waste partnership investigating options and a business case for a single depot in Christchurch and East Dorset to replace depots at Grange Road, Christchurch and Haviland Road, Ferndown. This information will be included.
- 20.12** Agree need to include information on possible requirement for a fire and rescue station at West Parley. This information will be included and is referred to in Policy FWP6.
- 20.13** Whilst Dorset Police have indicated that the proposed developments will increase their need for officers and equipment, these are not considered to be infrastructure and there is no indication that they require any new buildings. No change.

## Proposed Pre-Submission Change

- 20.14** Cultural facilities.- No project is submitted but evidence base should be expanded to investigate cultural needs.
- 20.15** Facilities - Update para 2.50 to include starting date of Christchurch library extension of spring 2013.
- 20.16** Flooding - The Council already makes reference to the County Council as the SUDS approving authority in Policy ME6 and is adding information to this policy.
- 20.17** Waste - Include information on Dorset waste partnership investigating options and a business case for a single depot in Christchurch and East Dorset to replace depots at Grange Road, Christchurch and Haviland Road, Ferndown.
- 20.18** Fire and Rescue - Include information on Dorset Fire and Rescue possible requirement for a fire and rescue station at West Parley

**Infrastructure Delivery Plan**

Amend table under para 1.10 to include reference to cultural facilities. No project is submitted but evidence base should be expanded to investigate cultural needs.

Facilities - Update para 2.50 to include starting date of Christchurch library extension of spring 2013.

Flooding - The Council already makes reference to the County Council as the SUDS approving authority in Policy ME6 and is adding information to this policy.

Waste - Include information on Dorset Waste Partnership investigating options and a business case for a single depot in Christchurch and East Dorset to replace depots at Grange Road, Christchurch and Haviland Road, Ferndown.

Fire and Rescue - Include information on Dorset Fire and Rescue possible requirement for a fire and rescue station at West Parley

## 21 Responses and Analysis of the Appendices

## Appendix 1

### Open Space Provision

Children's play provision should be to the following standards:

On sites of 50 dwellings or more one or more Local Equipped Area for Play (LEAP) designed for use by accompanied children of early school age (approximately 4 to 8 years) so that at least one is within 5 minutes walk (400m walking distance) of all new housing on the site, using routes which do not cross any roads above the level of local distributor roads. Each LEAP should include:

- at least 5 types of play equipment and surfacing complying with the relevant British Standards;
- a 400 sqm activity zone; and
- a buffer zone between the edge of the activity zone and the boundary of any residential property of a minimum of 20m depth (which could include footpaths and planted areas);
- seating for accompanying adults;
- fencing and entrances to exclude dogs and to separate the activity area from areas used by motor vehicles.

On sites of 150 dwellings or more, in addition to the provision of adequate LEAPs, one or more Neighbourhood Equipped Area for Play (NEAP), designed for use mainly by unaccompanied and unsupervised children aged between 8 and 14, with opportunities for play by some slightly younger children, older children and those with special needs, so that at least one is within 1000 metres walking distance (maximum 600m straight line distance) of all new housing on the site, using routes which do not cross any roads above the level of local distributor roads. Each NEAP should include an activity zone of at least 1000 sqm, including:

- at least 8 types of play equipment and surfacing complying with the relevant British Standards;
- a kickabout area;
- opportunities for wheeled play;
- seating for accompanying adults;
- a buffer zone between the edge of the activity zone and the boundary of any residential property of a minimum of 30m depth (which could include footpaths and planted areas);
- fencing and entrances to exclude dogs and to separate the activity area from areas used by motor vehicles.

In many cases a large site, which may be considered as a single unit in planning terms, is subdivided between developers because of market and financial considerations. In such cases, the site will be treated as one for the purposes of considering the proper provision of play space. Provision will need to be planned between the separate developers to a comprehensive overall plan.

It will usually be the case that any individual housing site will be too small to provide play spaces at all the levels of the hierarchy set out above. In some instances there will be existing play and open space provision nearby which already meets these standards as far as the housing site is concerned in terms of quality of the facilities and walking distance. In these circumstances there will be no need for provision on site.

### Consultation Response

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

Table 21.1

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

#### 21.2 Allotments

- The document includes no mention of the provision of allotments.
- Ferndown Town Council have a legal requirement to provide allotments and the waiting list for plots has now grown to nearly 100 people with zero provision in the town apart from a privately owned site at Longham (which does not contribute to the Town Council's provision). The Town Council are working with the Allotment Association to come up with a solution to this all too common problem but allotment provision needs to be included in the plan to make sure that it is not overlooked and to ensure that open space provision requirements made on developers do not stop at a play area here or there.

**Officer Response**

**21.3** This policy refers to the provision of open space for children's play areas. The two responses were from the same individual concerning the provision of allotments in Ferndown. The provision of allotments could be funded through the Infrastructure Delivery Plan, which identifies individual projects which the Community Infrastructure Levy (CIL) will fund. A scheme for allotments in Ferndown could be funded in this way, once a site has been identified or provided. At this stage, a site has not been identified, although it is possible, the new neighbourhoods at Holmwood House or Coppins Nursery could provide allotments within the open space associated with these sites.

**21.4** Appendix 1 is based on restricted and outdated play area criteria, which does not accurately reflect the current and future needs for the Partnership area. The Inspace Open Space, Sport and Recreation Report (2007) identified the provision in Local Needs Areas across the District and the policy needs to reflect the qualitative and quantitative future needs of these areas. The policy has been updated with support from the Head of Leisure and Open Spaces, and developers will need to work closely with the Councils to deliver the required provision.

**Proposed Pre-Submission Change**

## Appendix 1

### Open Space Provision

Children's play provision should be to the following standards:

1. On sites of 50 dwellings or more **a site for open space should be provided subject to the following:**

- **To be of a suitable size and location for the specific site;**
- **To be pre-prepared, in terms of drainage , clearance, fencing and contamination and ready for use;**
- **Full details of the open space requirements for the locality to be agreed with the Head of Leisure and Open Spaces of the relevant Council**
- **To be accompanied by a capital payment of £50,000\* towards the site layout and provision.**
- **To be accompanied by a £50,000\* maintenance fund toward the ongoing care and maintenance of the site\*\*.**

2. On sites of 150 dwellings or more **a site for open space should be provided subject to the following:**

- **To be of a suitable size and location for the specific site;**
- **To be pre-prepared, in terms of drainage , clearance, fencing and contamination and ready for use;**
- **Full details of the open space requirements for the locality to be agreed with the Head of Leisure and Open Spaces of the relevant Council**
- **To be accompanied by a capital payment of £100,000\* towards the site layout and provision.**
- **To be accompanied by a £100,000\* maintenance fund toward the ongoing care and maintenance of the site\*\*.**

~~**one or more Local Equipped Area for Play (LEAP) designed for use by accompanied children of early school age (approximately 4 to 8 years) so that at least one is within 5 minutes walk (400m walking distance) of all new housing on the site, using routes which do not cross any roads above the level of local distributor roads. Each LEAP should include:**~~

- ~~• **at least 5 types of play equipment and surfacing complying with the relevant British Standards;**~~
- ~~• **a 400 sqm activity zone; and**~~
- ~~• **a buffer zone between the edge of the activity zone and the boundary of any residential property of a minimum of 20m depth (which could include footpaths and planted areas);**~~
- ~~• **seating for accompanying adults;**~~
- ~~• **fencing and entrances to exclude dogs and to separate the activity area from areas used by motor vehicles.**~~

~~On sites of 150 dwellings or more, in addition to the provision of adequate LEAPs, one or more Neighbourhood Equipped Area for Play (NEAP), designed for use mainly by unaccompanied and unsupervised children aged between 8 and 14, with opportunities for play by some slightly younger children, older children and those with special needs, so that at least one is within 1000 metres walking distance (maximum 600m straight line distance) of all new housing on the site, using routes which do not cross any roads above the level of local distributor roads. Each NEAP should include an activity zone of at least 1000 sqm, including:~~

- ~~• at least 8 types of play equipment and surfacing complying with the relevant British Standards;~~
- ~~• a kickabout area;~~
- ~~• opportunities for wheeled play;~~
- ~~• seating for accompanying adults;~~
- ~~• a buffer zone between the edge of the activity zone and the boundary of any residential property of a minimum of 30m depth (which could include footpaths and planted areas);~~
- ~~• fencing and entrances to exclude dogs and to separate the activity area from areas used by motor vehicles.~~

In many cases a large site, which may be considered as a single unit in planning terms, is subdivided between developers because of market and financial considerations. In such cases, the site will be treated as one for the purposes of considering the proper provision of play space. Provision will need to be planned between the separate developers to a comprehensive overall plan and fully agreed by the Head of Leisure and Open Spaces of the relevant Council.

~~It will usually be the case that any individual housing site will be too small to provide play spaces at all the levels of the hierarchy set out above. In some instances there will be existing play and open space provision nearby which already meets these standards as far as the housing site is concerned in terms of quality of the facilities and walking distance. In these circumstances there will be no need for provision on-site.~~

~~\* The capital payment and maintenance fund will be index linked to provide current values of the costs of delivery.~~

~~\*\* The maintenance fund will be ring fenced for the delivery of open space maintenance across the Partnership area during the Plan period.~~

## 21.5 Appendix 3 East Dorset: Status of Saved Local and Structure Plan Policies

### 21.6 Policy ME1

21.7 Amend SNCI's and SSSI's to remove the apostrophes to SNCIs and SSSIs.

### 21.8 Policy ME7

21.9 Amend text: 'Structure Plan - development which harms surface or underground water resources **should not** be permitted.'