



Analysis of Responses

Proposed Changes to the Core Strategy Pre-Submission document Consultation November - December 2012



Prepared by Christchurch Borough Council and
East Dorset District Council

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1	Introduction	2
2	Responses and Analysis of Chapter 1 Introduction	2
3	Responses and Analysis of Chapter 2 A Picture of Christchurch and East Dorset	3
4	Responses and Analysis of Chapter 3 Challenges, Vision and Strategic Objectives	3
5	Responses and Analysis of Chapter 4 The Key Strategy	15
6	Responses and Analysis of Chapter 5 Christchurch and Highcliffe Centres	57
7	Responses and Analysis of Chapter 6 Christchurch New Neighbourhoods	73
8	Responses and Analysis of Chapter 7 Bournemouth Airport & Busniess Park	98
9	Responses and Analysis of Chapter 8 Wimborne and Colehill	110
10	Responses and Analysis of Chapter 9 Corfe Mullen	122
11	Responses and Analysis of Chapter 10 Ferndown & West Parley	124
12	Responses and Analysis of Chapter 11 Verwood Three Legged Cross St Leonards St Ives and West Moors	133
13	Responses and Analysis of Chapter 12 East Dorset Rural Areas	146
14	Responses and Analysis of Chapter 13 Managing the Natural Environment	147
15	Responses and Analysis of Chapter 14 High Quality and Distinctive Environments	180
16	Responses and Analysis of Chapter 15 Meeting Local Needs	184
17	Responses and Analysis of Chapter 16 Prosperous Communities	200
18	Responses and Analysis of SA and HRA Reports	207
19	Responses and Analysis of Infrastructure Delivery Plan	208
20	Responses and Analysis of the Appendices	217

1 Introduction

1.1 This document sets out a summary of the responses made to the Christchurch and East Dorset Schedule of Proposed Changes to the Core Strategy Pre-Submission Document, during the consultation period of 5th November - 21st December 2012. Responses have been made to these summarised comments, however no changes will be made to the Pre-Submission document. All the responses will be sent to the Inspector for the Examination.

2 Responses and Analysis of Chapter 1 Introduction

Paragraph 1.2

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.

Consultation Response

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

Table 2.1

2.1 The comments from key stakeholders and the general public in respect of this Proposed Change have been set out below:

2.2 There were only a couple of responses to the introduction of the document. Two of the responses refer to the amended wording in paragraph 1.2 as they felt it allowed changes to be made after the document has been considered by the Inspector. This however is not the case, the new wording simply highlights that due to changes to the development planning system there will be other documents prepared as part of the Local Plan.

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

3.1The 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.**

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					
0	0	0	0	0	0	0	0	1

Table 3.1

3.2 There was only one written response to this section of the document from Meyrick Estate Management Ltd who stated that they are grateful that the supporting text recognises the role of the rural estates in the local economy and environment.

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

4.1 In addition to the policies listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

4.2 Paragraph 3.1

- 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.

4.3 Paragraph 3.2

4.4 ~~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 the 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.

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. for their intrinsic value and to Improving our special environment and its green infrastructure 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 in our towns and villages, 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. 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.~~

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					
14	25	2	39	33	37	36	35	6

Table 4.1

4.5 The comments from key stakeholders and the general public in respect of the Proposed Changes to the Vision (and including preceding paragraphs 3.1 and 3.2), have been grouped together into various themes and are as follows:

4.6 *Changes to supporting text in Paragraph 3.1*

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

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

4.9 *Changes to the supporting text in Paragraph 3.2*

4.10 Dorset County Council considers that there should be a clear statement as to how the Councils will fulfill their commitments under the Duty to Cooperate as part of the NPPF, and set out how they will work with neighbouring authorities on cross boundary strategic planning issues.

4.11 *Changes to the Core Strategy Vision*

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

4.13 The RSPB, Dorset Wildlife Trust and others commented that, even with amendments proposed, the wording in respect of the natural environment still linked protecting the natural environment with enabling growth. They suggested that the vision should state that environment should be protected for its own sake.

- 4.14 Natural England suggest reference to rivers and priority habitats and species.
- 4.15 The reference in the vision to rural employment being supported is considered worthless given the proposed allocation of a farm in Burton for housing.
- 4.16 The reference to housing delivered in towns and villages should be linked to proportionate evidence and to a local needs assessment.
- 4.17 The reference to the challenges of supporting a significant elderly population should refer to provision of infrastructure.
- 4.18 Two minor grammatical points were also noted.

Officer Response

- 4.19 The text at paragraph 3.1 refers generally to allowing the possibility of reuse of buildings and small employment developments at major villages to enable diversification of the rural economy. It is appropriate to focus this on villages which have a reasonable population whilst avoiding isolated employment development in open countryside.
- 4.20 The farm at Burton forms part of a proposed new housing site where any impact on the farm is outweighed by delivery of housing for the village.
- 4.21 Paragraph 3.2 is simply updating to reflect the new National Planning Policy Framework. The Council's have already undertaken significant joint planning work with adjoining authorities and with Dorset County Council. A statement on this work will be issued as part of the Examination.
- 4.22 In terms of the Vision, the removal of the sentence in the Vision relating to a town centre community facility does not preclude such a facility coming forward, which can be considered under Policy LN6. However it is felt that this particular facility should not be specifically referred to.
- 4.23 The Vision now refers to protecting and enhancing the intrinsic landscape and biodiversity value of the natural environment. However it remains important to make the link between the quality of the natural and built environment, and the benefits this has on economic growth.
- 4.24 References to the evidence supporting housing requirements is set out in detail in Section 4 of the Core Strategy, and it is not considered appropriate to set out this detail here. Similarly, the additional wording in respect of the ageing population already refers to the sort of housing and infrastructure needed to support this population.
- 4.25 The two grammatical errors identified will be corrected.

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** 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.

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					
3	4	1	7	7	8	8	8	0

Table 4.2

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

4.27 Several respondents, including the Dorset Wildlife Trust, RSPB, and the National Trust consider that the alternative wording referring to impact "close to" rather than "on" designated sites is unclear. There should also be reference to direct and indirect impacts and to mitigation being possible through development.

4.28 Natural England however supports the revised wording.

4.29 Other comments received were that the only way to protect the heathlands is by retaining the Green Belt, and that the Objective should also refer to landscape scale ecological networks, and to the protection of priority habitats and species.

Officer Response

4.30 The amended text in respect of impacts "close to" designated sites has been added at the request of Natural England and in order to reflect that most development will occur around these sites. Further wording is considered unnecessary.

4.31 The Objective already refers to protection of the Green belt, and detailed policies within the Core Strategy refer to priority species, habitats and networks.

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 1,000m² 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					
3	0	1	5	3	3	4	6	0

Table 4.3

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

4.33 Friends of the Earth and others raise concern at the decision to reduce the requirement for renewable energy provision in new developments from 15% to 10%, and state that this fails to demonstrate a commitment to carbon reduction and does not reflect the Bournemouth, Dorset and Poole Renewable Energy Strategy.

4.34 There is support for the reference to important ecosystem services, but additional references are sought relating to carbon sequestration, heathland and grassland management, watershed protection and other matters.

Officer Response

4.35 The decision to reduce the target for energy from renewables has been based on the need to maintain viability of new development. Whilst the Renewable Energy Strategy maintains an overall target of 15% of energy to come from renewable sources in Dorset, the target for local sources is 7.5%.

4.36 In terms of additional references, the text on ecosystem services is considered adequate and the additional text suggested is considered too detailed for this objective.

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.

Consultation Response

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

Table 4.4

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

4.38 This objective was largely supported apart from one representation which considered that overall provision of affordable housing was too low.

Officer Response

4.39 The overall levels of affordable housing have not changed from the Pre-Submission document. The support for this change is welcomed.

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.

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					
0	2	1	2	1	3	3	2	1

Table 4.5

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

4.41 There are references to a Christchurch Bypass, to a new highway link to Bournemouth Airport, or to new public transport links to the airport.

4.42 Burton Parish Council objects to removal of specific references to improvement of Stony Lane roundabout and Staple Cross from the Objective.

4.43 Christopher Chope MP considers that changing this strategic objective at the behest of Dorset County Council undermines the role of the Core Strategy which is to set out the improved infrastructure that local people and their Councillors want, not just what DCC will deliver.

Officer Response

4.44 No route or funding has been identified in the Local Transport Plan either for a Christchurch bypass, or for a new link road to Bournemouth Airport. As such, neither represents a proposal that can be included in the Core Strategy.

4.45 The text of Objective 6 has been simplified in respect of the detail of transport proposals, however references to improvements at Stony Lane roundabout and at Staple Cross are retained in Policy KS10.

4.46 It is essential that the Core Strategy is realistic in terms of delivery of key infrastructure. Any transport proposals in the plan are linked to delivery of the Local Transport Plan, and it will be the County Council as transport authority who will deliver these proposals.

5 Responses and Analysis of Chapter 4 The Key Strategy

Green Belt

Policy KS 2

Green Belt

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

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

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

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

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

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
7	2	4	10	4	4	8	9	0

Table 5.1

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 summarised as follows:

5.2 Comments from Nature Conservation Bodies

5.3 RSPB

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

5.5 Nicola Brunt for DWT

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

5.7 Hillary Chittenden, Chairman Environment TAG, East Dorset

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

5.9 Janet Healy, Dorset CPRE

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

Officer Response

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

5.12 General Comments

5.13 Tim Hoskinson, Savills

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

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

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

5.17 Turley Associates

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

5.19 Martin Miller, Terence O'Rourke Ltd.

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

5.21 Woolf Bond Planning

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

5.23 Pro Vision Planning and Design representing Wessex Water

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

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

5.26 Jackson Planning Ltd representing Meyrick Estates

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

5.28 Tanner and Tilley Planning Consultants

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

5.30 Cllr Colin Jamieson (Burton)

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

Officer Response

5.32 The Councils believe that they have allocated sufficient land to meet the development needs of the area for the next 15 years, and that no land currently needs to be 'safeguarded' for future development between the existing urban area and the Green Belt. The Local Authorities consider that the future needs of the area beyond the plan period are currently unknown, and that in particular the local housing market area is wider than the Plan area.

There will be the need for a strategic, cross-boundary, review of the South East Dorset Green Belt to meet the future housing needs of the local housing market area, which may involve land within an adjoining Local Authority being released from the Green Belt for development rather than additional land within the Plan area.

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

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

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

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

Housing Target

Proposed Changes

5.37 Paragraph 4.17 - 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.

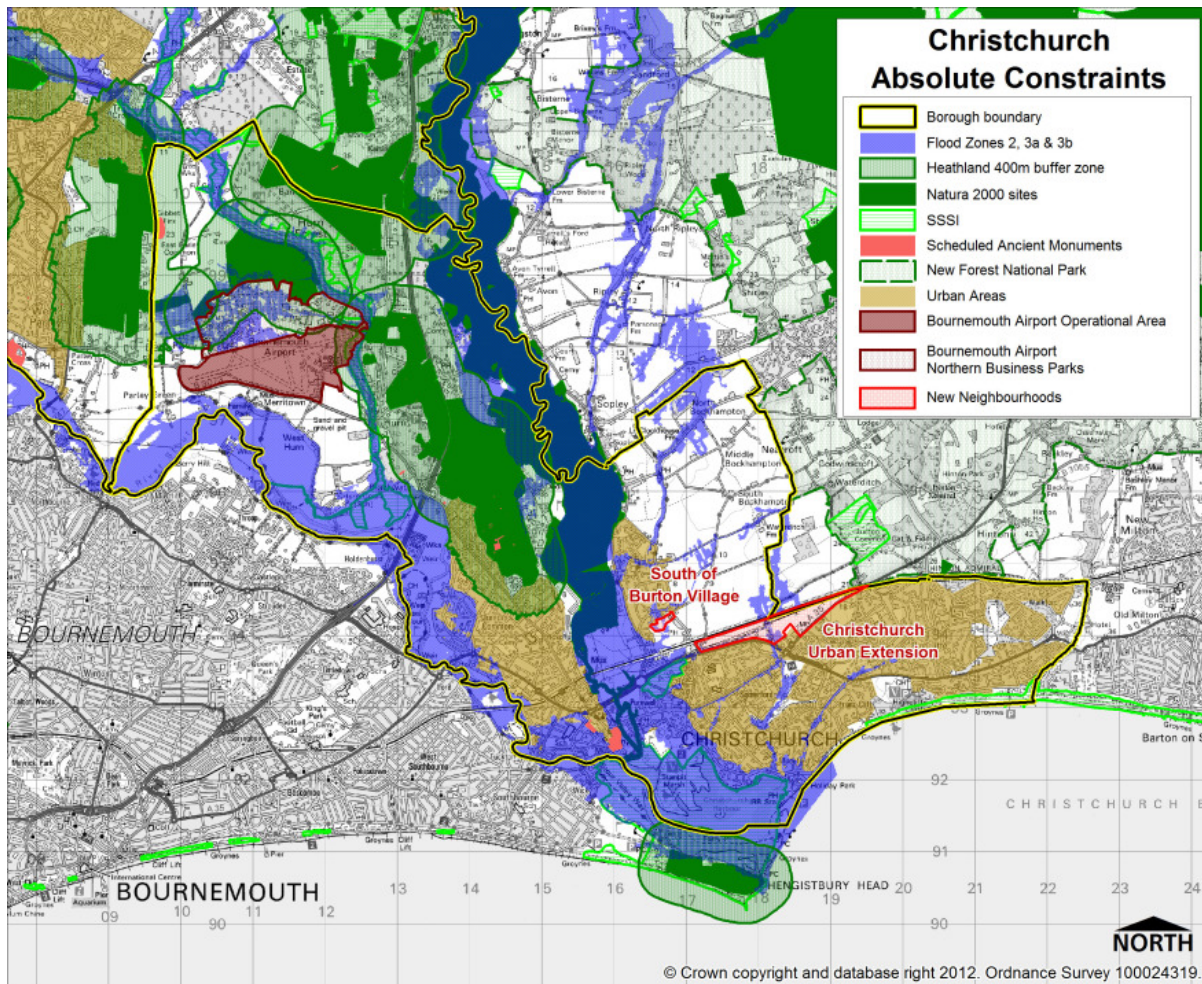
5.38 Paragraph 4.18 - The Bournemouth and Poole Strategic Housing Market Assessment (2012) provides an assessment of need for market and affordable housing. **~~In Christchurch the study identified re is a need for 3,375 new market and affordable homes and for 5,250 in East Dorset between 2013 and 2028. Further evidence has been prepared by Dorset County Council for Bournemouth, Dorset and Poole which provides population and household projections derived from new 2011 census data. Based on this 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.

5.39 Paragraph 4.19 - 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.**~~

5.40 Paragraph 4.20 - ~~**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.**~~

5.41 Map 4.2



Map 4.2 Christchurch Absolute Constraints (PROPOSED CHANGE)

Policy KS 3

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 for the new neighbourhoods, 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 of the Core Strategy.

~~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.~~

Policy KS 4

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					
11	2	2	15	7	12	11	10	2

Table 5.2

5.42 The comments from key stakeholders and the general public in respect of this policy and are summarised as follows:

- The housing requirement is unsound as it is justified by an evidence base that is not available for public scrutiny. It is troubling that the Councils have produced a new evidence base for the objective assessment of the housing need so late in the plan making process.
- The projections should be treated with caution as the 2011 ONS data they are based on has not been fully released and official mid-year estimates have not yet been included in the projection. The migration numbers included in the projections are described as 'experimental'. Also the approach of using past trends to project forward should be considered alongside other indicators of housing need and demand such as as affordability and economic growth targets. A 10% allowance also needs to be made for vacancy rates and second homes.
- Although the difference between the housing requirements in the Pre-Submission document and the proposed changes appears de minimis – (70 dwellings) the objective assessment in the proposed changes is for 7,500 dwellings, and the requirement only goes up to 8,200 once a 10% contingency has been added-on. It is also noted that the figure of 7,500 homes (less the 10% allowance) compares unfavourably with the evidence from the SHMA 2012 which appears to indicate a need for 3,285 homes in Christchurch and 5,040 homes in East Dorset between 2013 and 2028. This would make a total of 8,325 homes. If a 10% contingency is added to the SHMA figure of 8,325 then this would indicate the need for a housing requirement of about 9,157 dwellings (or rounded down to 9,150) over the life of the plan. The Framework requires that the objective assessment of housing need is conducted through the SHMA (paragraph 159). The Dorset County Council document does not satisfy the requirements of the Framework in this regard.
- Several representations suggest that the requirement should be 8,625, based on the SHMA estimates set out in the Pre-Submission document.
- An analysis of the additional homes required to sustain economic growth proposed in the Core Strategy has been excluded. There is also no analysis of unmet housing requirements from adjoining authorities under the Duty to Co-Operate. The housing strategy in the Plan should be developed in recognition of the role that Christchurch and East Dorset play in the wider Strategic Housing Market and Local Enterprise Area.

- The draft Regional Spatial Strategy should be taken into account when identifying a target as it has not yet been revoked.
- The use of a contingency is supported to enable the plan to be able to respond to potential changes in patterns of housing need. It also provides some flexibility which recognises that allocations could provide for more housing than proposed in the Plan.
- The housing target should be reduced to 7,500 and not increased by an arbitrary contingency.
- There is sufficient land with planning permission and identified in the SHLAAs, which means that no changes to the Green Belt are required. The policy should require development on previously developed land to be prioritised.
- The expression of the target is unclear as it is preceded by the word 'about', which means that a 5 year supply cannot be measured. The target should be a minimum
- The Plan should set out a clear housing trajectory.
- Each of the Council areas should have a separate target as the needs of each are different and serve different markets. The target may not be deliverable as it relies on two councils. It could result in the provision of housing being unfairly distributed, so that one of the councils accommodates some of the others requirement.
- Other representations support a single target.
- The predicted delivery rate will not be as high as predicted because the general economy is weak and CIL will make development less viable.
- The SHLAAs overestimate the potential delivery of housing as they allow for development in gardens and a large proportion of the supply is yet to be confirmed as available and therefore achievable in the plan period.
- There is too much reliance on the development of previously developed land with no evidence that this is viable.
- Development at Roeshot Hill will have a long lead in time as the pylons will need to be re-routed. This means that alternative sites need to be identified to ensure a five year supply of housing in Christchurch during the early part of the plan period.
- It is inappropriate for the policy to require a partial review to be undertaken if housing delivery falls significantly below the target. This shows the Plan has not been positively prepared.
- The policy should not insist that the Roeshot Hill Masterplan is to be applied, as this reduces the flexibility to investigate more effective ways to deliver a successful development.

- The housing strategy in the Plan should be developed in recognition of the role that Christchurch and East Dorset play in the wider Strategic Housing Market and Local Enterprise Area.
- The Councils have not tested alternative strategies for how to meet higher targets either by themselves or with the help of adjacent authorities. For instance the SHMA identifies affordable housing needs that are larger than the housing target set out in the Plan and means of meeting this has not been tested. In particular, there needs to be a strategy to boost housing delivery in the first five years of the Plan. The Councils plan to spread delivery evenly throughout the Plan period and this will not meet the backlog of unmet need.
- The housing requirement relating to East Dorset has been informed by the availability of land for housing rather than the needs. The Council has placed too much emphasis on environmental and policy constraint and does not appropriately balance this with social and economic factors.

Officer Response

5.43 The Core Strategy has passed through a series of consultation processes where a range of housing delivery strategies have been investigated. The Plan area is heavily constrained, so opportunities are limited. It is considered inappropriate to increase housing targets beyond household growth requirements as this would cause unacceptable environmental harm and unduly compromise the purposes of the Green Belt. Nevertheless, the affordable housing policies and development proposals will provide an opportunity to significantly increase provision to meet local needs.

5.44 The housing target set out in the Proposed Changes is based on the most recent information provided to the Councils. This updates the Strategic Housing Market Assessment and is the latest of a set of assessments that have been made stretching back to 2005, when the Regional Spatial Strategy was first being prepared. The last iteration of the Regional Spatial Strategy identified a requirement across both authorities for 9,850 dwellings to be provided over the 20 years to 2026, at an average of 493 per year. The Proposed Changes target requires provision averaging 547 per annum. The target therefore shows a clear intent by both Councils to deliver housing to meet local needs.

5.45 The target allows for an element of contingency against predicted schemes not being brought forward. This is a generous allowance bearing in mind that recent history has shown a high rate of completion for schemes receiving planning permission or being identified in plans for housing.

5.46 The use of the word 'about' prior to the target reflects the iterative nature of delivering housing to meet housing requirements. New information as well as new circumstances e.g. economic, can unexpectedly affect the requirement and/or delivery of housing. The word therefore reflects an uncertain future and builds in a degree of flexibility, which historically in Dorset has been articulated as +/-10%. The maths required to identify a five year supply can reflect this range. It is correct for KS3/4 to refer to the need to keep housing delivery under review and, if there is a problem, to undertake a partial review. This again supports the understanding that the delivery of housing is uncertain and shows that the Councils are taking a positive approach to ensure that the needs of the community are met.

5.47 The housing target has been informed by the Strategic Housing Market Assessment (SHMA) prepared on behalf of all the Bournemouth, Dorset and Poole local authorities. This has identified a scale and distribution of housing that is reflected in the Core Strategy, subject to the update provided by DCC. All of the Councils have and continue to work closely in identifying the means in which to meet the housing requirements identified within the SHMA area. This is a complex process relying upon different Core Strategies. Nevertheless, these have progressed to reflect the SHMA and the Christchurch and East Dorset Core Strategy is set within this wider context.

5.48 The Councils have both produced detailed, robust and up to date Strategic Housing Land Availability Assessments. These show that a significant amount of housing can be provided in the urban areas, but this is not sufficient to meet the identified housing requirement. Therefore, there is a need to undertake a review of Green Belt boundaries in order to identify the most sustainable locations for housing outside the urban areas.

5.49 The Councils have agreed to use a single housing target to reflect the joint strategy proposed for the Plan area. This ensures greater certainty of delivery as there are more sites available to ensure a supply of housing. It also reflects a strong commitment to the duty to co-operate between the two Councils. There are examples of other joint core strategies where a similar approach has been used e.g. The Black Country.

5.50 The National Planning Policy Framework does not require Core Strategies to include housing trajectories. Recently we have seen locally that the Purbeck Local Plan Part 1 has shown a trajectory, whereas the Bournemouth Core Strategy has not, and both of these are adopted documents. The housing trajectory for the Plan is contained in the Councils' Annual Monitoring Reports. The Councils are confident that the identification of the new neighbourhoods and urban extension will lead to increased delivery at the beginning of the Plan period ensuring a five year supply of housing is available.

5.51 The Councils are fully aware of the current weak economy. However, the Core Strategy plans for a 15 year period and it is expected that economic circumstances will change over this time. The Core Strategy enables the delivery of housing and the policies in the Core Strategy are flexible enough to reflect economic circumstances.

5.52 The Roeshot Hill Masterplan is a comprehensive document and reflects how the Council considers the site can be best delivered to meet the needs of the Borough, whilst remaining viable. The master plan provides a framework to inform the planning application process and is not intended as a blueprint and as such allows for flexibility. The document does provide flexibility in the way that the site can be delivered, but sets important social, environmental and technical parameters within which this should occur.

Employment Provision

5.53 In addition to the policies listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

5.54 Paragraph 4.26:

5.55 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.

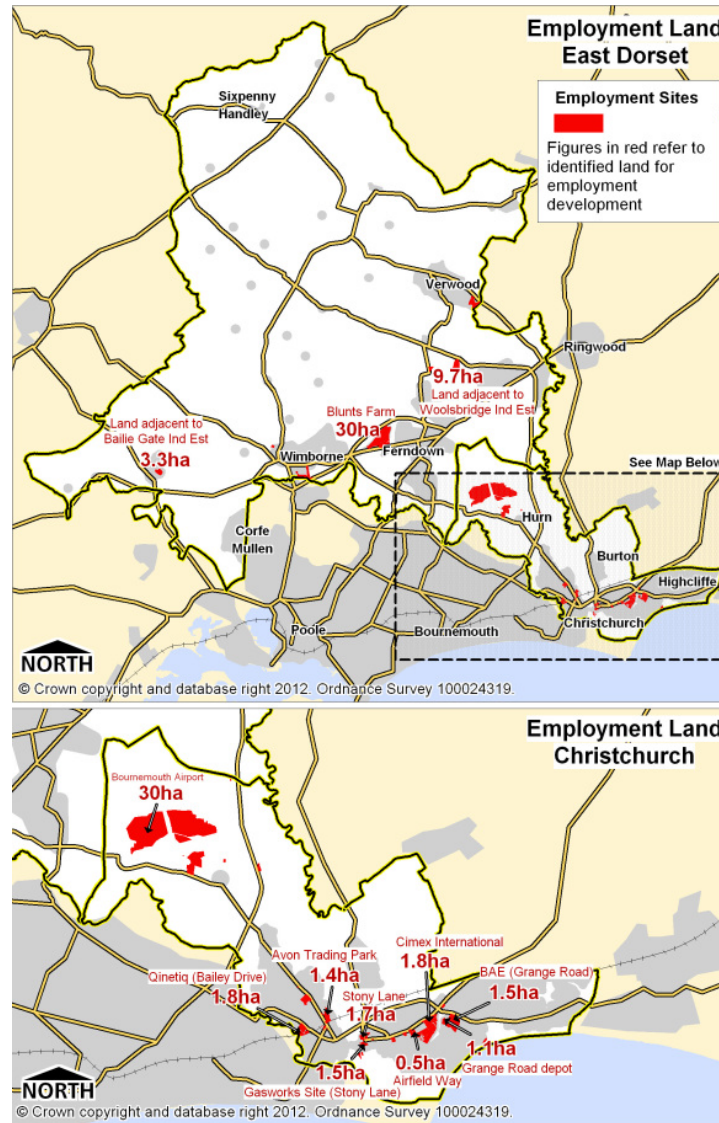
5.56 Paragraph 4.27:

5.57 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 KS 5

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 Strategically Significant City and Town 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.



Map 4.3 Provision of Employment Land (EXISTING)

Consultation Response

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

Table 5.3

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

5.59 Household and Workforce Projections

5.60 Dorset County Council

- Dorset County Council notes the proposed changes to Paras 4.26- 4.27 and Policy KS5 in respect of the change to the area on which the employment land figures are based and has no objection to this change.
- However it is considered that these changes fail to address the County Council’s concern that the linkages between workforce projections and housing provision should be clarified to ensure there is an appropriate balance. The delivery of the proposed amount of employment land alone will place significant demands on local infrastructure – particularly transport. The County Council will wish to continue to work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.
- The County Council re-iterates its concern that background evidence should be updated to explain the linkages between the latest household and workforce projections and policies derived from them, to clarify the relationship and ensure that there is an appropriate balance between them.

5.61 Bournemouth Borough Council:

- Bournemouth Borough Council Support the policy.

Officer Response

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

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

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

Town Centres

Policy KS 6

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, Barrack Road, 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					
1	0	0	1	1	1	1	0	

Table 5.4

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

5.66 *Barrack Road as a 'Local Centre'*

5.67 **Neil White, Quantum**

- The amended text is contrary to the NPPF where it promotes sustainable development. The plan should be positively prepared and consistent with achieving sustainable development. Sustainable development is made up of three dimensions, economic, social and environmental as detailed with the NPPF. By redefining Barrack Road as a Local Centre the Core Strategy fails to acknowledge the objectively assessed potential for Barrack Road to be elevated up the retail policy hierarchy from its existing status. It therefore is not positively prepared especially when considering the Council’s own commissioned evidence base.
- The Plan is un-justified in reverting back to the Local Centre status as the initial Core Strategy Pre-Submission acknowledged the findings within the Council commissioned Joint Retail Assessment 2008 that Barrack Road had potential to sustain a higher retail status (Table 8.3) and that it could be considered to perform the role of a District Centre (Para. 8.16). An updated Joint Assessment in September 2012 has been issued; this is to be read in conjunction with the original assessment (Para.1.5) and does not contradict the original findings contained within the currently adopted Local Plan it confirmed that Barrack Road (Para. 6.62) has the greatest concentration of shops in North Christchurch, this is emphasised by the large retail units located at Christchurch Retail Centre housing many national brands. These shops are not generally associated with Local Centres who generally include a range of small shops of a local nature serving a small catchment area (PPS4 Local Centre Definition).
- The amended text is not Effective as it has been assessed that Barrack Road has potential for a higher retail status. The October 2012 resolution to grant Planning Permission (LPA ref: 8/12/0044) for a 57,000ft2s supermarket highlights that Barrack Road can easily conform to the definition of a District Centre status making it highly deliverable over the plan period. Restricting Barrack Road to the existing status of Local Centre prevents the

potential growth of Barrack Road over the period of the plan and how it is well positioned to improve locally accessible shopping for West Christchurch residents. This is recalcitrant with the NPPF as it goes against the core principles which are to provide sustainable development and encourage growth. The NPPF states “sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.”. Paragraph 23 talks about growth and setting policies over the plan period. The current status of the amended text ignores the assessed findings and limits the potential for acknowledge growth of the Barrack Road Centre. The Plan should be consistent in line with National Policy defining a network and hierarchy of centres that is resilient to anticipated future economic changes.

- The amended text should read as detailed in the previous consultation.

Officer Response

5.68 Following consultation on the Pre-Submission Core Strategy the status of Barrack Road centre has been reviewed and it is proposed to maintain its designation as a 'Local Centre'. The 2008 Retail Study forms part of the evidence that has informed the Core Strategy town centre hierarchy. The 2012 Retail Study Update focused specifically on updating retail floorspace projections.

5.69 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'***.

5.70 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.

5.71 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.

5.72 Barrack Road is currently designated as a Local Centre and recent positive growth in trade and activity has been achieved in this context. On this basis, the future vitality and viability of Barrack Road will not be adversely affected through maintaining the current designation and as such is not contrary to the NPPF in terms of achieving sustainable growth.

The Role of Town and District Centres

Policy KS 7

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 1,000 2,500 square metres gross floorspace **within Christchurch, Ferndown or Wimborne and a 500 sqm gross threshold for other parts of the authority's area. This should include assessments 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 **Frontages Cores** are defined.

1. At ground floor level, support will be given within the Primary Shopping **Frontages 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 **Frontages Cores** the same uses will be supported as for Primary Shopping **Frontages 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					
0	0	0	1	1	1	1	0	1

Table 5.5

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

5.74 Retail Study Update

5.75 Christchurch Chamber of Trade

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

Officer Response

5.76 The Core Strategy has been informed by up to date and professionally produced retail studies that have applied nationally established methodology that have used up to date data for establishing projected growth. The Retail Study Update was published in 2012.

5.77 *Impact Assessment Threshold*

5.78 Christchurch Chamber of Trade

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

5.79 David Lowin, White Young Green

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

Officer Response

5.80 Paragraph 26 of the NPPF states that, ***'When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up to date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is not a locally set threshold, the default threshold is 2,500sqm).....'***

5.81 Paragraphs 5.18 and 5.19 of the Retail Study Update (2012) examines the evidence and reasoning for the proposed local threshold. The 2012 Retail Study has advised on a proportionate local threshold for retail impact assessments that is appropriate for local circumstances, established in view of the vitality and viability of Christchurch town centre and based on clear evidence. The proposed Core Strategy impact assessment threshold is based on an assessment of the hierarchy of centres and the retail floorspace projections in the 2012 Retail Study which concludes that retail developments of over 1,000sqm gross should generally be accommodated in Christchurch, Ferndown and Wimborne town centres. The Retail Study concludes that a threshold of 2,500sqm would be inappropriate because this would represent a significant proportion of the overall retail floorspace projections in the area. The Study concludes that development of less than 2,500sqm gross could have a significant adverse impact on the smaller town centres.

5.82 *Non A1 Threshold*

5.83 **Christchurch Chamber of Trade**

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

Officer Response

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

Retail Provision

Policy KS 8

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 ~~8,100~~10,000sqm ~~–11,000sqm~~ net additional comparison floorspace for the period to ~~2031~~~~28~~ and **2,300 sqm net** ~~no requirement for~~ additional convenience floorspace. In East Dorset there is a projected requirement for in the region of ~~5,200~~5,000sqm net **additional comparison** convenience floorspace and ~~4,000~~12,000–13,000 net **additional convenience** comparison floorspace to ~~2031~~~~28~~.

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 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:

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.

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

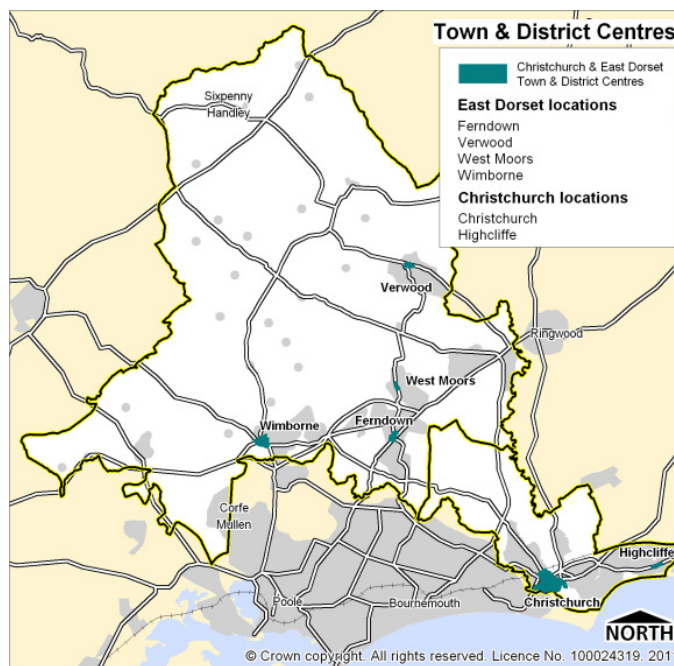
- Comparison Floorspace: 1,150 sqm
- Convenience Floorspace: 700 sqm

West Moors

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

Wimborne Minster:

- Comparison Floorspace: 6,650 sqm



Map 4.4 Future Retail Provision

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					
0	0	0	1	1	1	1	0	0

Table 5.6

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

5.86 *Retail Study Floorspace Projections*

5.87 **Christchurch Chamber of Trade:**

- We do not believe it represents a realistic assessment of either the near or distant future. We are concerned that it has however been used as the basis for updating the Core Strategy without an independent review of its findings and proposals. The figures used have been based on the 'Experian' model which has in recent times not proven to have any great reliability. We do not consider there is any evidence of the need for further retail floor space certainly in the medium term, and as forecasting beyond five years is pure speculation we cannot see the purpose in planning for further growth in the longer term. The report also downplays the importance of the Internet and online shopping. The levels of growth assumed in the report have no basis in fact.
- We disagree with the change to the need for comparison and convenience goods floor space. This new recommendation was based on the 2012 Retails Study Update which has not been given public scrutiny and is not robust. There is no objective justification to plan for additional retail development in and around the town centre. Predictions of future growth have little validity in the current economic situation. The more objective position would be to: Recognise the extent of vacant Retail Property in the town centre Recognise extant permissions for retail development in Wick Lane, Barrack Road, and Somerford.
- We also do not believe that the conditions will encourage the development of the levels of housing necessary to support the assumed increase in population in the Christchurch capture area. On the subject of convenience floor space, the report concludes that there will be a surplus of convenience expenditure in Christchurch of some £19M but neglects that planning permission has already in effect been granted for three new convenience retailers with a capacity of around £45M. We will therefore have a surplus of convenience goods capacity rather than a shortfall and there is therefore no need to plan for further expansion.

Officer Response

5.88 The NPPF requires local planning authorities to assess, ***'the needs for land and floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;'***...

5.89 The Core Strategy has been informed by up to date and professionally produced retail studies that have applied nationally established methodology that have used up to date data for establishing projected growth. The Retail Study is based on ONS population projections and takes into account the level of new housing development planned for in the Core Strategy to determine expenditure capacity.

Transport Strategy

Policy KS 9

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:

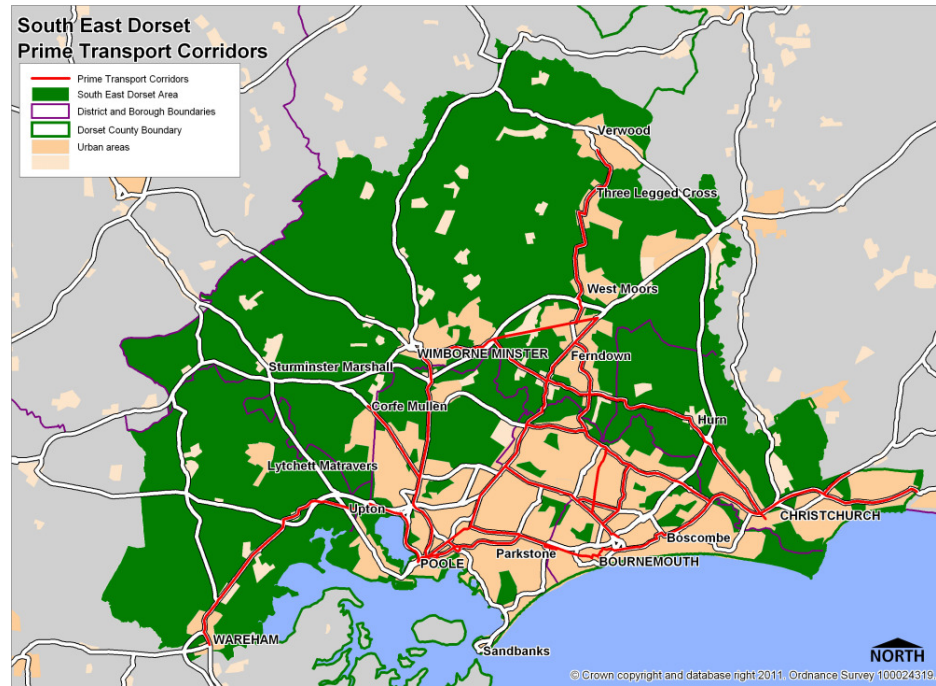
- **A35 Iford Bridge - Fountains roundabout - Stony Lane roundabout - Somerford roundabout - Roeshot Hill - Hampshire boundary.**
- **B3073 Christchurch town centre - Bargates - Fairmile - Blackwater Interchange. (A338 junction)**
- **B3073 Wimborne town centre - Longham mini roundabouts - Parley Cross - 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.



Map 4.5 Prime Transport Corridors

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					
3	0	1	2	1	0	2	0	0

Table 5.7

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

5.91 *Improvements to the A349*

5.92 **Shelia Bourton, Keep Wimborne Green**

- Representations submitted object to the deletion of the A349 Poole through to Wimborne Minster from Policy KS9 on the basis that there is uncertainty whether the Borough of Poole will deliver improvements required. Representations also state that improvements to the A349 road, Poole through to Wimborne should take place before any new housing development takes place and a guarantee should be given by Poole Borough Council that this will be the case.

5.93 **Dorset County Council:**

- The County Council notes the proposal to delete the A349 improvements from the policy since the majority of this route is in Poole so the Borough of Poole will deliver the improvements. Dorset County Council supports the proposed change.

Officer Response

5.94 The majority of the A349 route is in Poole so the improvements along the majority of the route will be delivered by the Borough of Poole. Junction improvements and a Quality Bus Corridor extension are identified for the A349 in the Bournemouth, Poole and Dorset Local Transport Plan 3 (2011 - 2026) which the Borough of Poole has adopted. New housing will make an appropriate contribution to transport improvements required to accommodate development.

Strategic Transport Improvements

Policy KS 10

Strategic transport improvements

~~The Local Transport Plan~~ 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 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 (2014 – 2019)

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

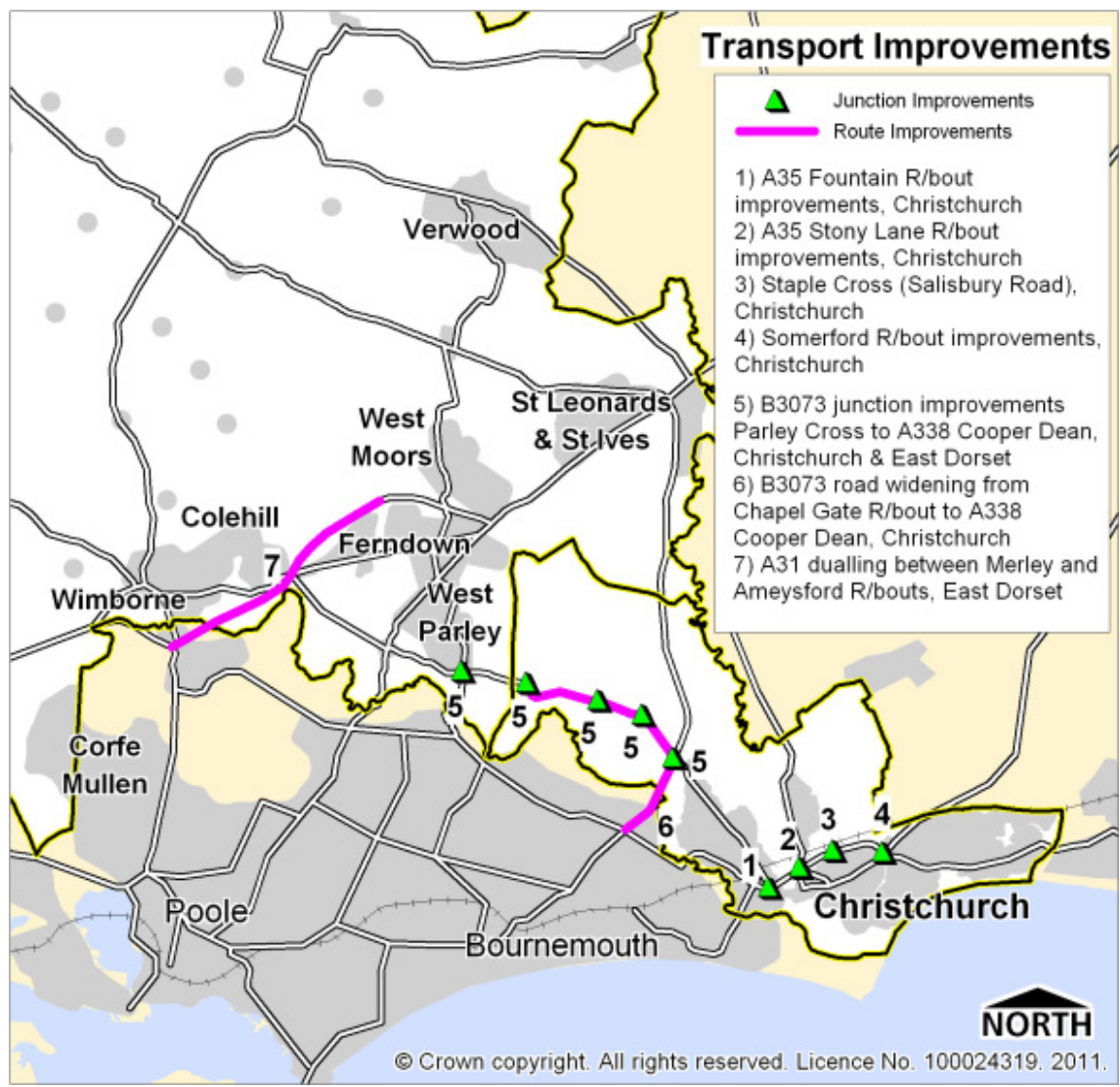
- ~~A35 Fountains roundabout, Stony Lane roundabout, Staple Cross (Salisbury Road), **and potentially** Somerford roundabout junction improvements.~~

~~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:~~

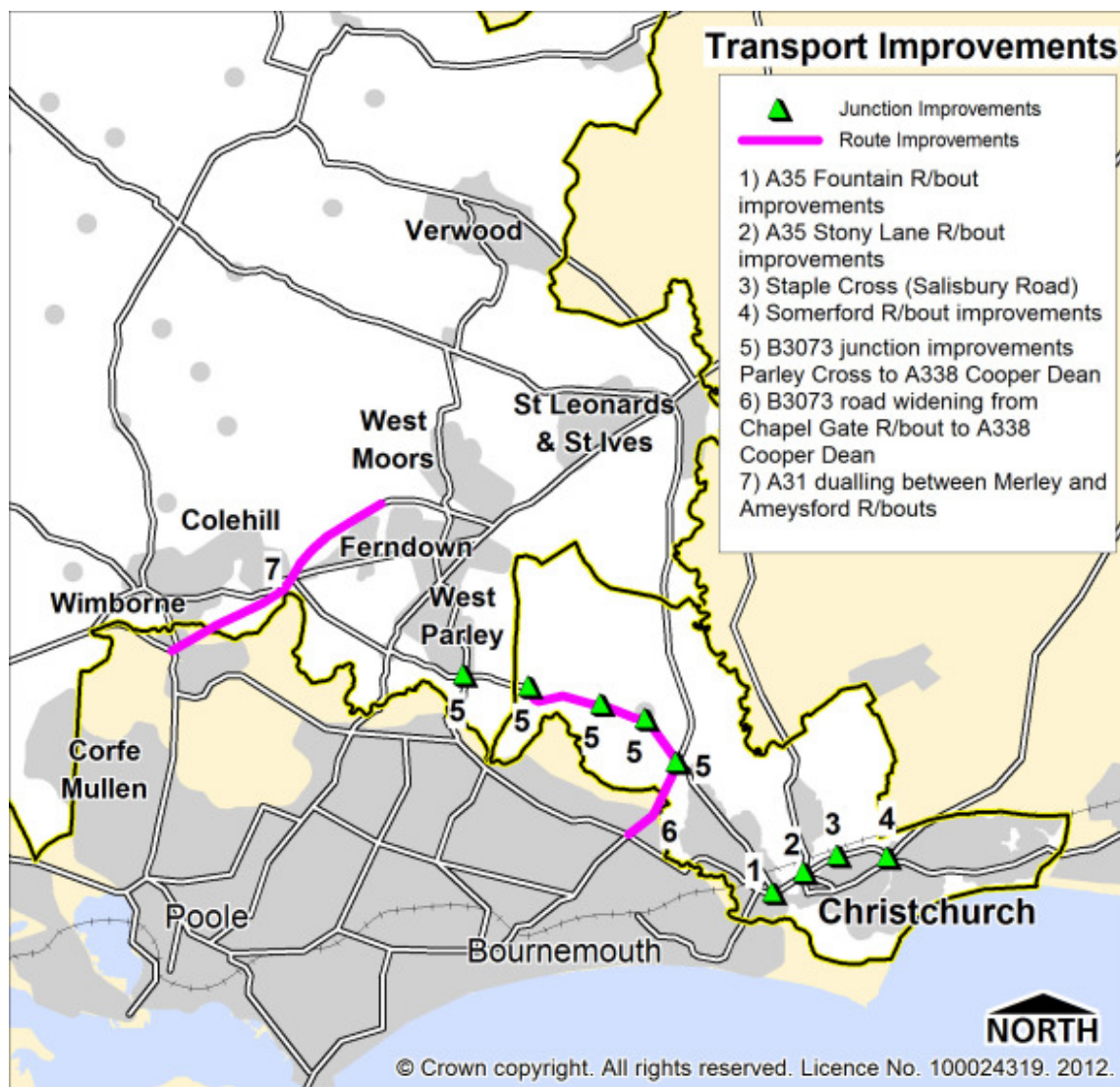
- ~~B3073 junction improvements from Parley Cross **junction improvements and associated development link roads** to A338 Blackwater.~~
- ~~B3073 road widening from Chapel Gate roundabout to Blackwater Junction **improvements** and along the A338 to the Cooper Dean junction.~~
- ~~**B3073 Chapel Gate junction improvements.**~~
- ~~**A31(T) Merley roundabout improvements (Highways Agency Scheme).**~~

Long Term 2023 - 2028 (2020 – 2026)

- ~~**B3073 widening between Chapel Gate to Blackwater junctions.**~~
- ~~A31(T) dualling between Merley - Ameysford **roundabouts** (Highways Agency scheme).~~



Map 4.6 Strategic Transport Improvements (EXISTING)



Map 4.6 Strategic Transport Improvements (PROPOSED CHANGE)

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					
5	1	1	5	3	3	4	1	1

Table 5.8

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

5.96 *Transport Evidence Base*

5.97 Lisa Jackson, Jackson Planning representing Meyrick Estates

- The proposed change to policy KS10 is not justified by evidence as Dorset County Council have not completed sufficient transport modelling to be so specific about where the improvements are needed. If the policy is to include the schemes it needs to be effective and should include those schemes that are missing from the current list, these being Barrack Road/Stour Road, Stour Road/Tuckton Road, Somerford Roundabout. In order to make the plan sound it is suggested that the policy wording be revised to say: ***'Improvements at junctions on the A35 in Christchurch could include but not limited toinserted before 'Stony Lane roundabout'.***

Officer Response

5.98 The proposed change to this part of the policy now refers to the 'potential' for improvements to be required to Somerford Roundabout as opposed to a requirement which was stated in the Pre-Submission version. Therefore, the Proposed Change is less specific than the Pre-Submission draft policy. Evidence to support the need for junction improvements is provided by the South East Dorset Multi Modal Study, the A35 Route Management Study and master planning work undertaken for the North Christchurch Urban Extension. The improvements for the A35 identified in the Core Strategy are considered to be strategic and further improvements along the A35 are identified in the Local Transport Plan 3.

5.99 *A31 Improvements and New Housing Development*

5.100 Sheila Bourton: Keep Wimborne Green

- As funding for the dualling of the A31 has not been agreed neither has the timescale for these improvements, it is our view that no new housing development should take place around Wimborne until funding and timescale is agreed. No new homes should be occupied before improvements to the A31 have been completed, or at least only partial occupation should take place before completion of the works.

Officer Response

5.101 Policy KS10 identifies a timescale for the delivery of improvements to the A31(T) and new housing development will make an appropriate contribution to improvements on the A31(T). The Highways Agency have raised no objection to the delivery of new housing in advance of the dualling of the A31.

5.102 A338 Improvements

5.103 Dorset County Council

- The KS10 policy text needs to make it clearer that the A338 works in the Plan only go up to the County boundary as the Cooper Dean junction is in Bournemouth. Although it is recognised that in reality the whole length will be delivered together. The A338 reconstruction (maintenance) and widening (improvement) should also be split into 2 phases, and will potentially be delivered across the short and medium term timescales identified.

Officer Response

5.104 Comments noted.

5.105 Timing of B3073 Improvements

5.106 Christopher Chope MP

- I object to the deferral of the widening of the B3073 between Chapel Gate and Blackwater.

Officer Response

5.107 This major scheme has been deferred due to a current lack of funding. As it is the junctions which are the main cause of the current traffic congestion, it is those which will be improved first. This is also the most cost effective approach to making the best use of our existing network.

5.108 A35 Improvements

5.109 Christopher Chope MP

- Objects to the deferral and removal of the linkage of improvements to the A35 Fountains roundabout, Stony Lane roundabout and Staple Cross junction to the proposed Christchurch urban extension.

Officer Response

5.110 The improvements for the A35 identified in the Core Strategy are considered to be strategic in nature and therefore all development is likely to be asked to contribute towards their delivery. Timescales for delivery have been adjusted to reflect the predicted continuation of this challenging economic climate. Further improvements along the A35 are also identified in the Local Transport Plan 3.

5.111 *Parley Cross Improvements*

5.112 Bournemouth Borough Council

- 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, see paragraphs 8.61 and 8.62, which promotes the provision of a gyratory. The enhancement scheme may have a significant impact on the flows between Bournemouth and Ferndown. This scheme does not appear to have been referred to at the Preferred Options stage and there are concerns that it will not fully address the predicted traffic problems in the area although it may form part of a phased programme subject to detailed analysis. Currently long delays are evident during the peak periods leading into and out of Bournemouth along A347 New Road. Whilst the enhancement scheme will improve the situation for east-west movements and provide significant relief this should not be at the cost of the north-south movements between Ferndown and Bournemouth.
- As neighbouring Highway Authority the proposed transport scheme has a direct impact on our network due to the high volumes of traffic flowing in and out of the borough along the A347 corridor.

5.113 Without further assurances or detailed analysis confirming appropriate mitigation is provided to the implications on the dominant flows between Ferndown and Bournemouth. We acknowledge that subject to detailed information your proposed enhancement scheme may be a more appropriate solution to the immediate locale than a gyratory; however we would reserve our position subject to the detailed analysis confirming appropriate mitigation of the proposed flows between Ferndown and Bournemouth. The peak period delays that lead into and out of Bournemouth along this corridor which would continue to and may increase the adverse impact on our network unless this enhancement scheme mitigates the proposed development impacts on this strategic junction.

- The Councils need to produce the supporting information that demonstrates the revised enhancement scheme for Parley Cross will not prejudice the flows between Ferndown and Bournemouth.

Officer Response

5.114 The gyratory was suggested as an improvement by DCC engineers in 1998 and developed by transport consultants for the airport development during the early 2000's. This suggested approach was then taken up by the transport consultants developing the SE Dorset Transport Strategy in 2010 before the status of the proposed development at Parley Cross was clear. In light of the evolving plans for the proposed development here, DCC Transport Planners have come to the view that a gyratory in this location would be inappropriate as it would sterilise development land and sever the community of West Parley. A greater package of benefits is now being sought by taking a broader, urban design led approach rather than just progressing a purely highway engineering based scheme. Urban realm enhancements, pedestrian, cycling and public transport improvements can be delivered alongside the development at Parley Cross. Extra road capacity can also be created by encouraging through traffic to use the link roads around the development (which will also serve the development). Preliminary transport modelling work has been undertaken to show this and further detailed work will be undertaken through the planning process with developers. DCC Transport Planners will share the assessment work undertaken with Bournemouth Borough Council Transport Planners as part of their ongoing joint working arrangements.

Transport and Development

Policy KS 11

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 of 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;~~
- ii. contributions to transport modelling work;
- iii. the provision of new and the improvement of existing public transport, pedestrian and cycle routes;
- iv. the provision of travel plans to promote sustainable travel patterns such as park and change, car sharing and car clubs; and
- v. 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:

- provide safe, permeable layouts which provide access for all modes of transport, prioritising direct, attractive routes for walking, cycling and public transport;
- provide safe access onto the existing transport network;
- allow safe movement of development related trips on the immediate network; and
- 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					
1	0	1	0	0	0	0	0	0

Table 5.9

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

5.116 *Developer Contributions*

5.117 *Dorset County Council*

- The County Council notes that the proposal to amended the policy to provide greater clarity for developers on TA requirements and financial contributions towards transport improvements. Dorset County Council supports the proposed change.

Officer Response

5.118 Comments noted.

Presumption in Favour of Sustainable Development

Policy KS 13

Presumption in Favour of Sustainable Development:

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

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

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

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

Consultation Response

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

Table 5.10

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

5.120 *Consistency with NPPF*

5.121 **Jade Ellis, Turley Associates**

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

Officer Response

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

5.123 *Sustainability*

5.124 **Dorset Wildlife Trust**

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

5.125 **Hilary Chittenden, Chairman Environment TAG**

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

5.126 **Lisa Jackson, Jackson Planning representing Meyrick Estates**

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

Officer Response

5.127 Comments are noted.

6 Responses and Analysis of Chapter 5 Christchurch and Highcliffe Centres

6.1 In addition to the policy listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

6.2 Key Facts: Strategic Requirements

6.3 Paragraph 5.4

6.4 There is a need for in the region of ~~7,5008,000~~sqm net of additional comparison retail floorspace to ~~2031 28~~ in Christchurch town centre (Christchurch and East Dorset Retail Update (2012).~~(Joint Retail Study, 2008)~~)

6.5 Retail Provision

6.6 Paragraph 5.10

6.7 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.

Policy CH 1

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 ~~8,000~~7,500sqm (net) of new comparison retail floorspace and 2,300 sqm (Net) 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....~~

...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....

Consultation Response

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

Table 6.1

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

6.9 Retail Floorspace Projections

6.10 Christchurch Chamber of Trade & Commerce

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

6.11 Quantum Group

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

Officer Response

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

6.13 The Retail Study Update provides floorspace projections up to 2031. The Core Strategy plan period is up to 2028, hence the reference to that date in Policy CH1. The projections are a broad requirement rather than a prescriptive figure. As the period up to 2028 covers the majority of the period up to 2031 it is not considered practical to work out a proportionate figure for the shorter period.

Policy CH3 and Map 5.3: Christchurch Primary Shopping Area and Retail Cores.

Policy CH 3

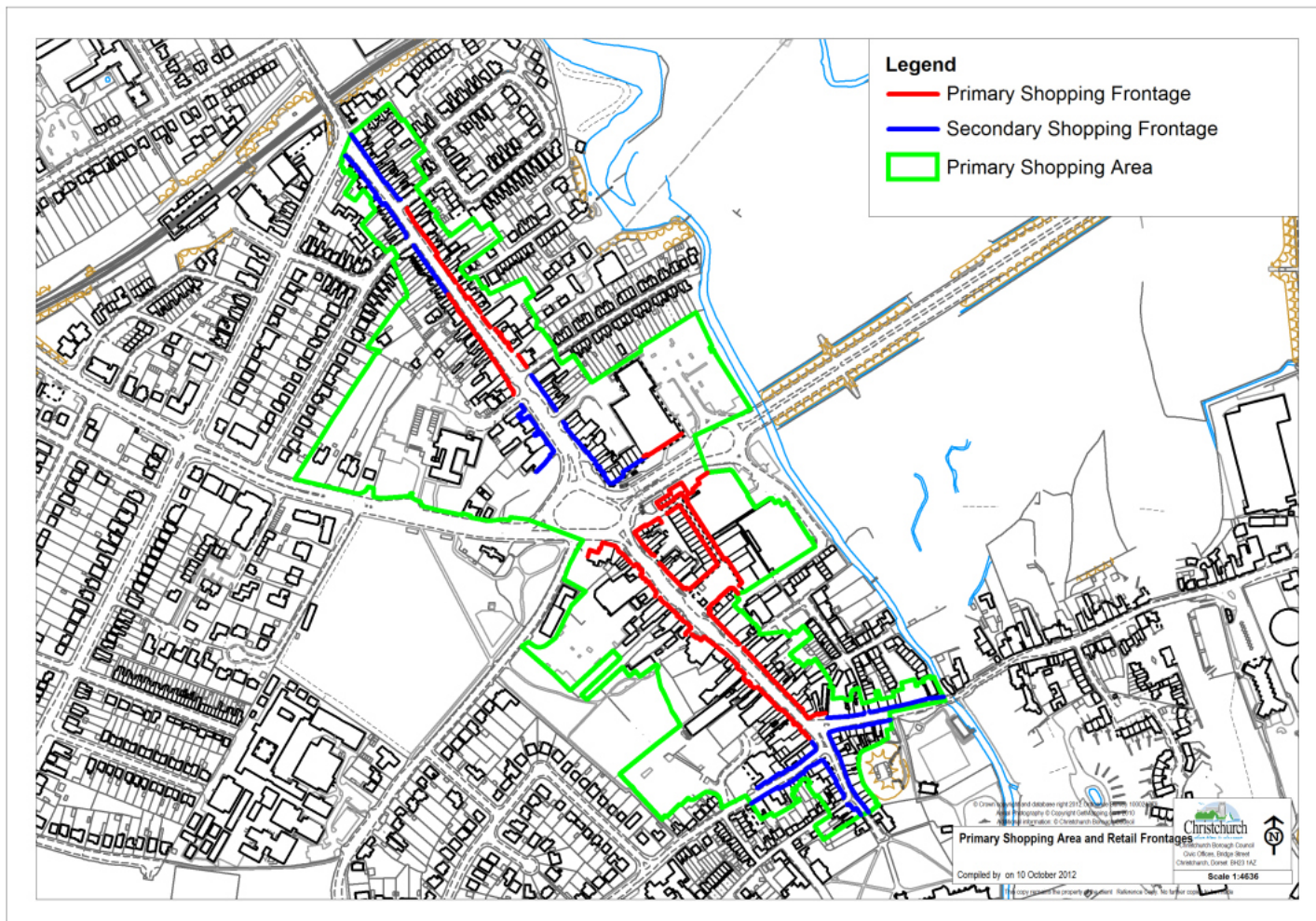
Christchurch Primary Shopping Area and Retail Frontages Cores.

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

Please see the proposed change map 5.3 in section 2 of this document.

6.14 Proposed change to Map 5.3

6.15 Amendment of Primary Shopping Area boundary to fully incorporate the Magistrates Court site which will be a key strategic site in delivering the town centre vision.



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

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					
3		3	2	1	2	1	1	0

Table 6.2

6.16 The comments from the stakeholders in respect of this Proposed Change are as follows:-

6.17 Support for inclusion of whole of Magistrates Court Site

6.18 Dorset Development Partnership

- Support the extension of the PSA to include the whole of the Magistrates Court site. Given the clear intention to redevelop this site for a comprehensive retail led mixed use scheme, the inclusion of the whole site will encourage a holistic development solution and allow for the proper planning of the area.

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

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

6.20 Objections to inclusion of whole of Magistrates Court Site

6.21 Quantum Group

- The NPPF Annex 2 Glossary states that a PSA is an area where retail development is concentrated. This generally comprises the primary and those secondary frontages which are adjoining or closely related to the primary shopping frontage. This definition and that of Primary and Secondary Frontages does not include car parks, residential dwellings and nor is retail development concentrated in this particular area. Whilst the Joint Retail

Study seeks to provide justification for this change and recommends the boundary, any justification and the recommendation in this document are not sound as it does not accord with the NPPF definition. The PSA should only be extended once the scale and type of development on this site is known.

6.22 Christchurch Chamber of Trade & Commerce

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

Officer Response

6.23 From the definitions in the NPPF it is clear that the Primary Shopping Area is not the same as Primary Shopping Frontage. A PSA will "generally comprise primary and secondary frontages..." This allows some flexibility and does not appear to prohibit the inclusion of a site which has the potential to deliver a significant proportion of future town centre retail requirements. In view of its central location and future retail potential it would seem logical to draw the PSA boundary around the whole of the Magistrates Court Site rather than run through part of it.

6.24 The Magistrates Court site has been identified as a strategic development site within Policy CH1. At the Special Planning Control committee 23.10.12 at which 2 supermarket applications were considered, Turley Associates submitted a feasibility study which showed a possible development of a foodstore on the Magistrates Court site, a sequentially preferable site. Evidence in the 2012 Retail Study Update which concluded that there would be scope for a large food store in Christchurch in the long term, strengthens the suitability of this site to have a convenience store as part of a mixed use scheme. Information has been provided by Dorset Development Partnerships confirming their intention to develop a planning strategy for the site. They have also supported the inclusion of the Magistrates Court in the PSA (see their comments above). The Council is working with landowners on developing options for this site. Therefore there is justification to extend the primary shopping area to include this site.

6.25 In addition to the policy listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

6.26 Highcliffe District Centre

6.27 Paragraph 5.22: Introduction

6.28 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.**

6.29 Paragraph 5.22: Key Facts: Strategic Requirements

6.30 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)~~

6.31 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)~~

Policy CH 4

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...

Consultation Response

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

Table 6.3

6.32 The comments from the general public in respect of this Proposed Change are as follows:-

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

Officer Response

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

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

Policy CH5 Highcliffe Shopping Cores

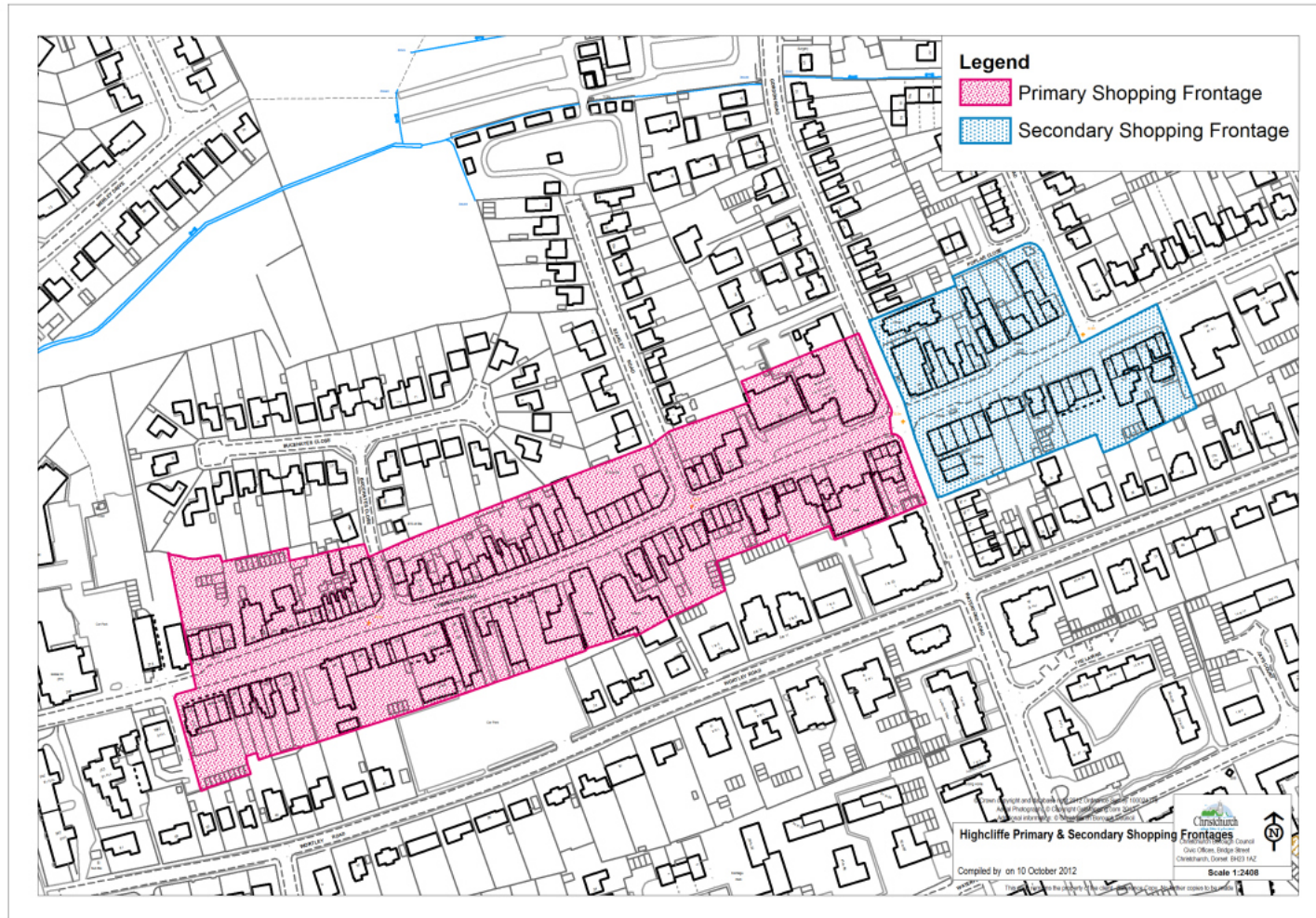
Policy CH 5

Highcliffe Shopping Frontages Cores

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

Please see the proposed change map 5.4 in section 2 of this document.

6.35 Proposed change to Map 5.4



Map 5.4 Highcliffe Shopping Frontages (PROPOSED CHANGE)

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					
0	1		1	0	0	0	0	0

Table 6.4

6.36 The comments from the public in respect of this Proposed Change are as follows:-

- The revised map does not show "frontages". It outlines and shades in the primary and secondary shopping cores. Suggest redraw and show the shopping frontages.

Officer Response

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

6.38 In addition to the policy listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

6.39 Christchurch Shopping Core

6.40 Paragraph 5.31

6.41 The main function of the **Primary Shopping Frontages Cores** 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.**

Policy CH 6

Development in the Primary Shopping Frontages Cores:

Within the Saxon Square and High Street Primary **frontage Gore**, and the primary **frontages 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:...

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					
0	0	0	1	1	1	1	0	0

Table 6.5

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

- (Re Paragraph 5.31) The Retail Update does not form an objective opinion.

Officer Response

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

Policy CH 7

Development in the Secondary Shopping Frontages ~~Gores~~.

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

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

The amenities of the local residents are not adversely affected by noise or disturbance, or by loss of light and privacy.

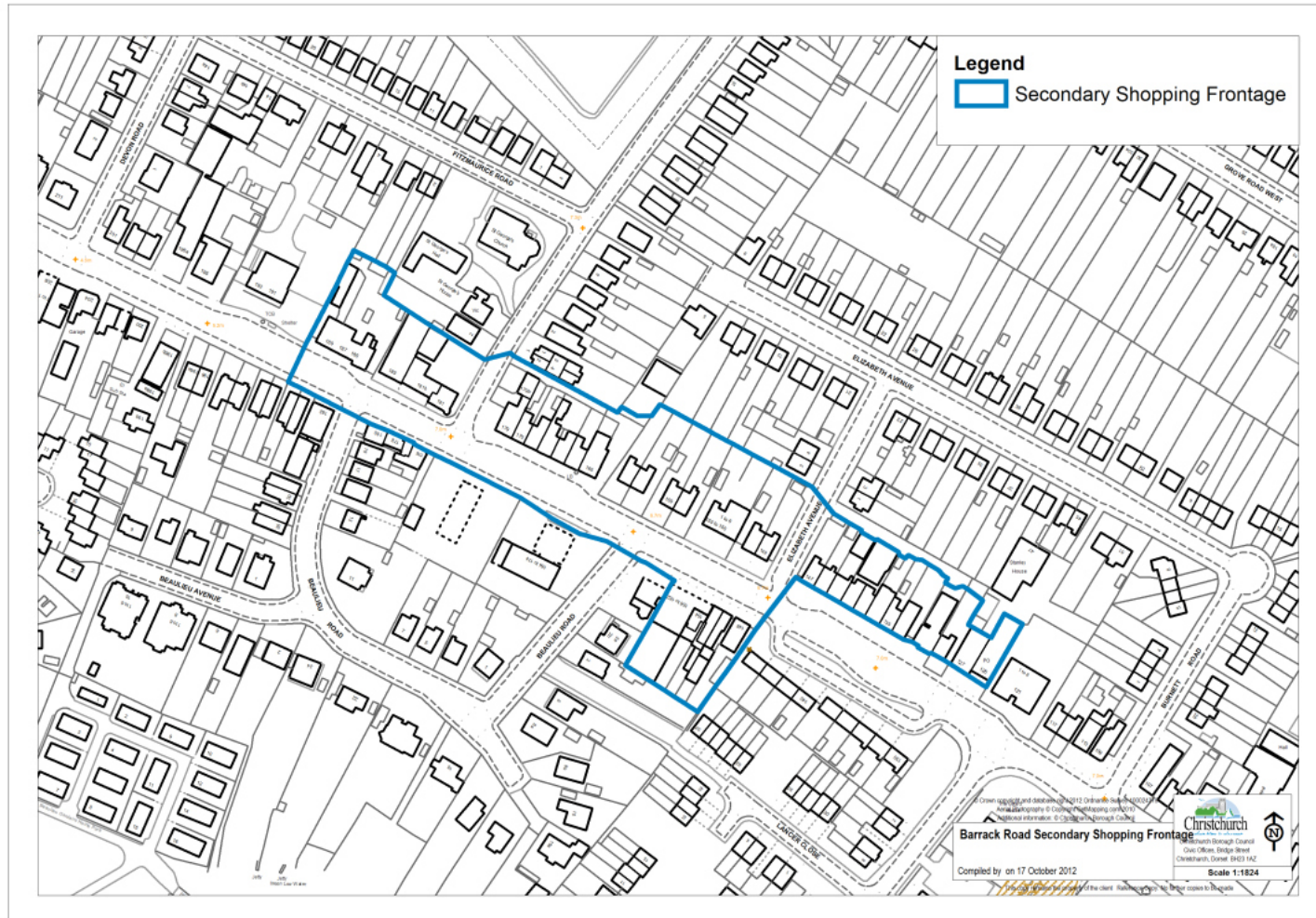
Barrack Road Secondary Shopping Frontage:

Please see the proposed change map 5.5 in section 2 of this document.

Purewell Secondary Shopping Frontage:

Please see the proposed change map 5.6 in section 2 of this document.

6.44 Insert new Map 5.5 to show Barrack Road secondary shopping frontage.



Map 5.5 Barrack Road Secondary Frontage (PROPOSED CHANGE)

Consultation Response

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

Table 6.6

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

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

- The proposed map 5.5 does not show or provide an appropriate boundary for Barrack Road Centre. The Proposal Map seems to ignore the main shopping centre along Barrack Road. It also does not consider the Former QinetiQ Site which recently (23rd October 2012) gained a resolution to grant a planning permission for 57,000ft2 of retail for a new supermarket. Allocating both the existing Retail Park and Former QinetiQ site within the District Centre is sound for the following reasons:
 - (i) There is a longstanding recognition that a District Centre consists of a group of shops which would include a Supermarket or Superstore and non-retail services and community facilities. Such a range of services is necessary in order to adequately serve a local residential area. This reflects the approach taken in the Joint Retail Study evidence base (based on then PPS6) and PPS4. Whilst the NPPF is silent on a definition for a District Centre, the principles remain unchanged in terms of the reasons for identifying a ‘Centre’.
 - (ii) The Centre fronting Barrack Road does not contain either a Supermarket or Superstore and is deficient in this form of retailing. Whilst it contains a range of commercial services and smaller scale top-up food retail (such as the One-Stop store), this aspect of its District Centre function is deficient when compared with the established definitions of a District Centre. The March 2012 Planning Permission for a mixed use scheme including a 371 sq.m retail store at 170-174 Barrack Road does not alter this position.
 - (iii) To perform a District Centre role and ensure the needs of local residents in the Barrack Road / West Christchurch area are met, the Core Strategy should plan positively for the provision of a Supermarket or Superstore in the Barrack Road area. This will then provide a sustainable solution to address the identified outflow of convenience goods expenditure in our Retail Assessment. Such an outflow was identified in the Core

Strategy evidence base (see the household survey of the Joint Retail Study) upon which our Assessment was based. If this cannot be met on an identified existing site within the existing Centre boundary through improvements to existing facilities, following the principles of the sequential approach, the Core Strategy should identify a District Centre boundary that includes adequate provision to address the Centre's deficiency.

- (iv) From our assessment, the most suitable location to accommodate such growth is the Former QinetiQ Site. This was effectively acknowledged in the June & October 2012 Committee resolutions to approve a planning application on this site for a Food Store (LPA Ref: 8/12/0044). This offers the only suitably sized site to accommodate a Food Store of sufficient scale to serve the District Centre / West Christchurch area and already benefits from pedestrian linkage with the Centre. Such linkage can be strengthened via physical improvements which will be delivered as part of the eventual scheme. The provision of a Food Store will then ensure the Centre fulfils its potential for growth reflecting one of the reasons for its identification (see PCSC paragraph 4.35).
- (v) The identification of the site within the District Centre boundary would still complement Christchurch's Town Centre status in the hierarchy as this Centre would still contain additional and wider comparison, convenience and service retail choices to serve the wider CBC area. It is however appropriate to plan for enhanced local convenience provision in a District Centre location in preference to a Town Centre as this will ensure the District Centre fulfils its particular policy role and function. This then allows the Town Centre to increase its role in other forms of retailing (e.g. comparison goods) to ensure it performs effectively in that particular form of retailing. This is particularly appropriate for Christchurch as it seeks to improve its competitiveness and attraction for local residents compared with Bournemouth, Castlepoint and other sub-regional alternatives.
- Suggest that the proposal should read in line that Barrack Road has been acknowledged to be a District Centre and the proposal map should represent this.

Officer Response

6.47 Following consultation on the Pre Submission Core Strategy the status of Barrack Road centre has been reviewed and it is proposed to maintain its designation as a 'Local Centre'. The 2008 Retail Study forms part of the evidence that has informed the Core Strategy town centre hierarchy. The 2012 Retail Study Update focused specifically on updating retail floorspace projections.

6.48 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'***.

6.49 In the case of Barrack Road, on balance we do not feel that this road operates as a 'District Centre'. It has a broad mix of shops but it is not a focus for shopping trips in the same way as Highcliffe, nor could we set out a meaningful vision for the road. Retail frontages along Barrack Road as designated in the current adopted Local Plan (2001) will be retained which will protect its retail function to serve local needs.

6.50 Despite the June and October resolutions to approve a planning application on the former QinetiQ site this does not make a case for including the retail part and QinetiQ site within a boundary and reclassifying it as a District centre as the Barrack Road shopping area does not include a range of non-retail services such as banks, building societies and restaurants as well as local facilities such as a library. The Bailey Bridge retail park contains retail warehouses and does not include a range of non-retail services.

7 Responses and Analysis of Chapter 6 Christchurch New Neighbourhoods

7.1 In addition to the policies listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

7.2 Housing Provision

7.3 Paragraph 6.11

7.4 The Bournemouth and Poole Strategic Housing Market Assessment (2012~~4~~) and Bournemouth, Dorset and Poole Population and Household Projections (2012) identify ~~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 ~~950~~~~933~~ dwellings with densities ranging across the site from ~~26 - 46~~~~20 - 45~~ dwellings per hectare. This has informed the development potential set out in Policy CN1 of 950 ~~850~~.

7.5 Local Centre

7.6 Paragraph 6.18

7.7 The Joint Retail Update (2012) Assessment (2008) 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.

7.8 Suitable Alternative Natural Greenspace (SANG)

7.9 Paragraph 6.27

7.10 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.~~

7.11 Allotment Provision

7.12 Paragraph 6.40

7.13 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 (2012) 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.

7.14 Delivery and Monitoring

7.15 Paragraph 6.54

7.16 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).

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 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 ~~950~~ **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~~ **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 - 46~~ **20 - 45** dph.

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 Roeshot 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~~ 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. **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 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 ~~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:

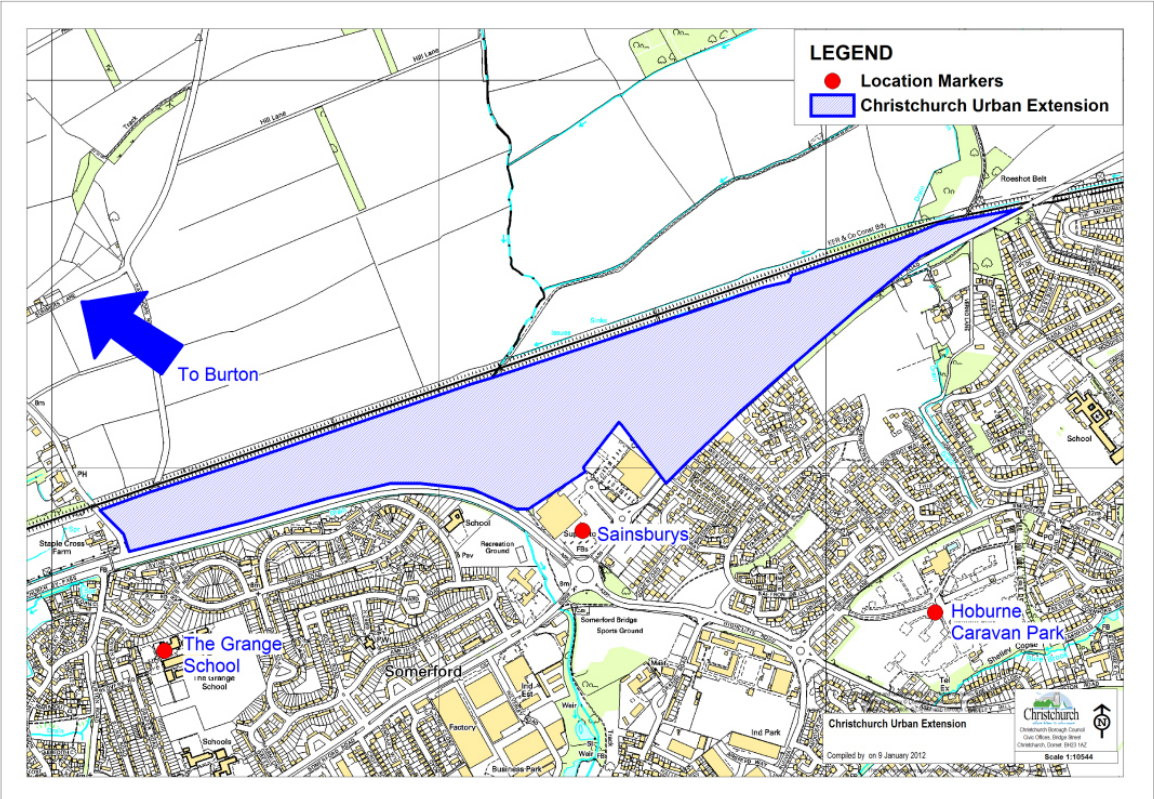
- A pedestrian / cycle link through the urban extension site from the bridleway at Roeshot Hill (north section of Verno Lane) to Hawthorn Road and from Ambury Lane to Old Lyndhurst Road.

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

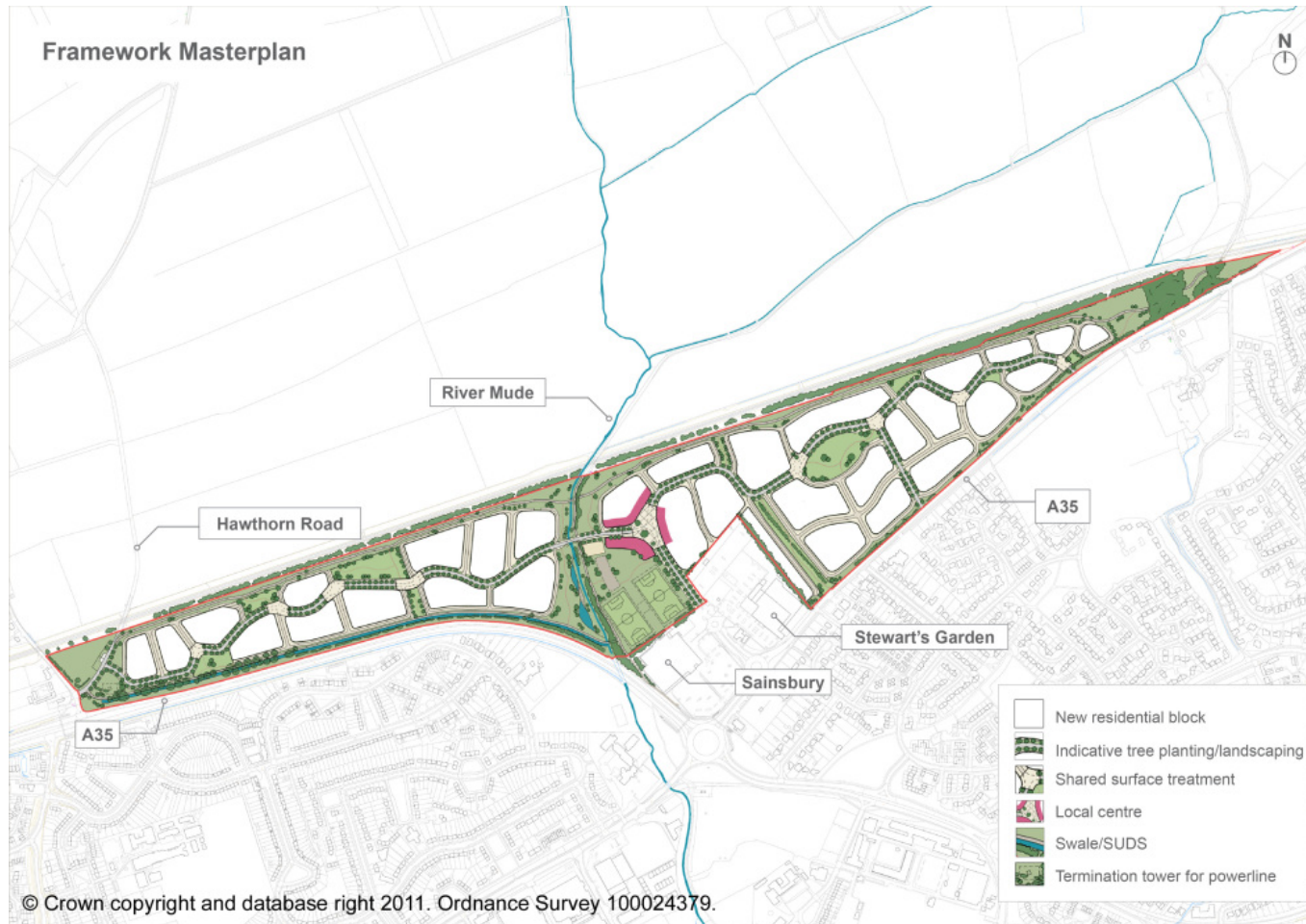
- A35 Lyndhurst Road
- A35 Staple Cross Junction

Contributions towards the following junctions may also be required including:

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



Map 6.1 Christchurch Urban Extension



Map 6.2 Indicative Masterplan Layout

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					
5	9	2	18	11	13	15	9	21

Table 7.1

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

7.18 Increase in Urban Extension Housing Figure

7.19 Woolf Bond Planning, Jeremy Woolf (On behalf of Taylor Wimpey, Bodorgan Properties (CI) Ltd and Sainsbury's PLC)

- As regards the change from 850 to 950 dwellings proposed on the site this is supported. We would request that the Authority confirm that this has been subject to appropriate sustainability testing.

7.20 Goadsby (Peter Atfield)

- This Paragraph of the Core Strategy deals with the anticipated level of development on the proposed urban extension at Roeshot Hill. As set out in the Pre-Submission Core Strategy (PSCS), the potential range of dwellings was between 765 and 933; averaging at 850. This formed the basis of the estimate in Policy CN 1. The dwelling range in the Proposed Changes is now 765 – 950. This gives an average of 848. However, Paragraph 6.11 concludes that Policy CN1 should now accommodate the maximum of 950. This is at the very top of the dwelling range. There is no certainty that this number of dwellings will be delivered. The reference to 950 dwellings is arbitrary; and lacks justification. The housing figure should be amended from 950 dwellings to 860.

7.21 Sheila Bourton, Keep Wimborne Green

- We agree with increasing housing density because this will enable more houses to be built on the areas proposed by our Councils and will serve to reduce even more pressure to release more greenfield sites for development.
- I support the increase to housing density from 20-45 dwellings per hectare to 26-46 dwellings per hectare because by building more dwellings it reduces the need to lose even more greenfield sites to development. This change was also agreed by independent consultants Broadway Malyan.

7.22 Responses were also received stating that the proposed change is not justified, effective or consistent with national policy concerning:

- the A35 is unable to cope with the ingress and exit of additional traffic associated with development and that social infrastructure, including schooling will not support housing development at Roeshot
- Other than supermarkets, local facilities/services are not sufficient for 950 new homes
- In terms of the duty to co-operate has Christchurch Council approached neighbouring authorities to assist in delivering Christchurch's housing requirement
- Increase in housing density and consistency with Core Strategy Vision , ***'of a character and type consistent with the local area.'***
- Has the increase in housing potential been subject to appropriate sustainability testing?

7.23 Cllr Colin Jamieson

- These amended numbers have not been agreed by Christchurch Councillors because they are predicated on housing needs that are out of date.

Officer Response

7.24 Broadway Malyan undertook the Stage 2 master planning on behalf of the Council and have supported a range in housing potential of 765 - 950 as consistent with their master planning work. The increased housing potential at Roeshot Hill is consistent with transport assessments that have been undertaken by Dorset County Council and in respect of the SANGs strategy. The increased housing potential has been subject to Sustainability Appraisal which has tested the sustainable delivery of the Urban Extension.

7.25 The small increase in density from an additional 100 dwellings is consistent with the Stage 2 Master Planning undertaken by Broadway Malyan and the assessment of character impact / relationship of the development to adjoining built areas undertaken through the master planning work.

7.26 The impact of this level of development on local facilities has been assessed through the Sustainability Appraisal and is consistent with the overall level of development planned for in the Borough at Pre Submission stage.

7.27 In terms of the Duty to Co-operate it is considered that this level of development can be delivered sustainably without the need for neighbouring authorities to accommodate a proportion of the level of development currently proposed in Christchurch.

7.28 The amended housing figure for the North Christchurch Urban Extension has been agreed by the leaders and lead members of Christchurch and east Dorset Councils. Housing need figures have been informed by up to date assessments including the 2012 Strategic Housing Market Assessment and the 2012 Dorset County Council Household Projections.

7.29 Allotment Provision / Alternative Sites

7.30 A number of responses stated that the proposed changes no longer identify a specific site for the proposed relocation of the Roeshot Hill Allotments (consistent with the 1922 Allotments Act) and additional allotment provision in the form of a 'hub site'. Representations have also stated that uncertainty of alternative allotment provision is inconsistent with the council's Allotment Strategy 2012.

7.31 All reference to the relocation of Roeshot Hill allotments should be deleted and replaced with words to the effect that the site will not be required for housing development at any time within the time frame of the plan.

7.32 A specific area should be identified the provision of allotments and this should be consulted on.

7.33 The provision of allotments should be within reasonable distance of the residential dwellings. The removal of this statement removes the need to provide such a facility in an appropriate setting.

7.34 Roeshot Hill Allotments Association, John Campbell

- The Pre-Submission document identified land to the north of the railway line for the relocation of Roeshot allotments, which was supposed to act as a 'hub' for such recreational activity. We disagree with this aspect of the Christchurch Allotment Strategy and regard reference to a hub as a euphemistic expression for the sanitisation of the urban landscape.
- The one virtue of the original proposal was the certainty that came with the identification of a new site. This proposal is to be deleted, whilst being silent as to the reason. The Council nevertheless persists in its intention to remove the allotments from Roeshot Hill whilst having no credible proposal for relocation consistent with its statutory obligation. We do not think that the Council is justified in submitting a document while a large part of its housing strategy remains speculative.
- These changes bring into focus the Council's consistent failure to consult with this Association. There appears to be a blind determination to pursue a pre-set policy option and in the process destroy a Green Flag award-winning site, purely to maximise commercial gain. As a result we have little confidence in the Council being able to produce a sound principled CN1 policy.

Officer Response

7.35 Alternative sites are currently being considered for the relocation of the Roeshot Hill Allotments and this is the reason that a single specific site was not referred to in the Proposed Changes. The Allotments Association will be engaged in the process of determining appropriate replacement allotment provision. Replacement Allotments will be provided as part of a hub site in accordance with the requirements of the Allotments Act.

7.36 The Roeshot Hill Allotments Association has been engaged on an ongoing basis through the production of the Core Strategy and representatives of the allotments association have sat on the Christchurch Urban Extension Advisory Group.

7.37 SANGs Provision / County Park

7.38 Meyrick Estates

7.39 In addition MEM are pleased that reference to a Country Park east of Burton has been omitted.

7.40 We have been unable to reach final agreement with Natural England on the SANG strategy at Roeshot in time for your consultation deadline. However, we met Nick Squirrell on 17 December and have made progress with the design parameters on the SANG for Roeshot.

7.41 New Forest National Park Authority, Helen Patton

- It is noted that an increase from 850 in the Pre-Submission Document to 950 dwellings is proposed in this document. The housing figure now represents nearly a third of the total housing requirement for Christchurch and highlights the importance of providing the necessary infrastructure to support it. Of particular importance, given the proximity of the site to the New Forest National Park, is the provision of a Suitable Alternative Natural Greenspace (SANG).
- As you are aware, the National Park Authority as set out in its recent response to a request for comments on the Draft SANG Strategy by Jackson Planning, while supporting the general principle of providing attractive, usable greenspace to address the recreational needs of the urban extension, the Authority does have concerns however, over whether the proposed SANGs would achieve their objectives during the periods of large scale mineral extraction also proposed for the area.

7.42 Natural England, Nick Squirrell

- Natural England advice remain the same as at the time of the Core Strategy Pre-Submission.
- Natural England is able to confirm that discussions are ongoing with the landowner and planning authority to bring forward secure proposals for consideration at the EIP. Natural England's view is that at that time a number of concerns relating to the proposal will be resolved through an agreed package of mitigation measures which are compliant with other policies in the Local Plan.

Officer Response

7.43 The Council and the landowner are engaging with Dorset County Council and Hampshire County Council as minerals providers to ensure that a suitable SANG can be provided alongside proposed minerals working in Dorset and Hampshire.

7.44 Biodiversity Enhancements**7.45 Dorset Wildlife Trust**

- Dorset Wildlife Trust support the inclusion of new wording '***Biodiversity enhancements will be provided within this buffer zone***' as a positive approach to improving the environment to compensate for the river being put into a more urban setting.

7.46 Renny Henderson, RSPB

- We support the amendments to this policy including the addition of 'biodiversity enhancements.'

Officer Response

7.47 These comments are noted.

7.48 Affordable Housing Provision & Development Viability

7.49 Responses were received that with the change in policy requirements of affordable housing 'up to 50%' provision of affordable housing could be much lower and result in insufficient affordable housing being delivered.

7.50 Woolf Bond Planning, Jeremy Woolf (On behalf of Taylor Wimpey, Bodorgan Properties (CI) Ltd and Sainsbury's PLC)

- We refer to the above consultation event and respond on behalf of Messrs Taylor Wimpey UK Ltd, Bodorgan Properties (CI) Ltd and Sainsbury's PLC. Our clients have the controlling interest in the land north of Roeshot Hill and wish to ensure that the planning policy framework aimed at securing release of the land is both satisfactory and sufficiently flexible.
- We support the revision to the policy with regard to the percentage of affordable housing required to reflect development viability in recognition of the significant exceptional costs in Policy CN1 including the relocation of the existing allotments and the realignment and undergrounding of the existing overhead power cables. In addition there is a requirement for significant strategic infrastructure to be provided as part of the development including improvements to the wider transport network and the provision of a Suitable Alternative Natural Greenspace (SANG).

Officer Response

7.51 As part of the viability testing undertaken to inform preparation of the the councils' Community Infrastructure Levy the provision of affordable housing was assessed in line with the Core Strategy policy. In the current economic climate it was concluded that 30% affordable housing could be provided alongside other Core Strategy policy requirements, CIL and in view of the abnormal costs associated with the North Christchurch Urban Extension. In this respect the Council will seek to maximise the proportion of affordable housing provided.

7.52 *Overhead Powerlines*

7.53 **Network Development Planner, Scottish and Southern Energy, Mr Graham Paisley**

- I provide below some information on where potential development sites are crossed by existing infrastructure in the form of overhead lines.
- Where overhead lines cross development sites, these will, with the exception of 400kV tower lines, normally be owned and operated by Southern Electric Power Distribution. In order to minimise costs, wherever possible, existing overhead lines can remain in place with uses such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not practicable, or where developers choose to lay out their proposals otherwise, then agreement will be needed as to how these will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits. The existing customer base should not be burdened by any costs arising from new development proposals.
- To ensure certainty of delivery of a development site, any anticipated relocation of existing overhead lines should be formally agreed with Southern Electric Power Distribution prior to submission of a planning application.
- I also wish to draw your attention to recent correspondence which was submitted from Southern Electric Power Distribution to all Planning Authorities regarding existing infrastructure usually in the form of overhead lines.
- "Such overhead lines generally afford supplies to other locations beyond the development, even whole towns or parts of cities in some instances are carried on either steel towers or wood poles. These structures and the overhead conductors they support have been placed in accordance with planning permission in the form of a Section 37 (Electricity Act 1989) consent granted by the Secretary of State. This consent can only be granted following initial consultation with the Local Planning Authority.
- As such Southern Electric Power Distribution believes that in these circumstances, the Planning Authority should impose a condition prohibiting development until such time as the developer has reached agreement with the Distribution Network Operator (DNO)
- a) how the development can be laid out such that the lines can be retained in their current position or;

- b) such that contractual arrangements have been agreed to modify the overhead lines”
- Where existing infrastructure is inadequate to support the increased demands from the new development, the costs of any necessary upstream reinforcement required would normally be apportioned between developer and DNO (Distribution Network Operator) in accordance with the current Statement of Charging Methodology agreed with the industry regulator (OFGEM). Maximum timescales in these instances would not normally exceed around 2 years and should not therefore impede delivery of any proposed housing development.

Officer Response

7.54 This representation from Scottish and Southern Electric is welcomed and will inform the development management process for the North Christchurch Urban Extension.

7.55 In addition to the policies listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes:

~~Burton and East of Marsh Lane New Neighbourhoods~~

Introduction

7.56 Paragraph 6.60

7.57 ~~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.~~

7.58 Paragraph 6.61

7.59 ~~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.~~

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. **Up to** ~~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 International, European and Nationally Designated Habitats ~~Protection of Sensitive Habitats and Species~~

- **Suitable Alternative Natural Greenspace must be provided in accordance with the criteria set out in Policy ME2 and Appendix 5 of the Core Strategy.** ~~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

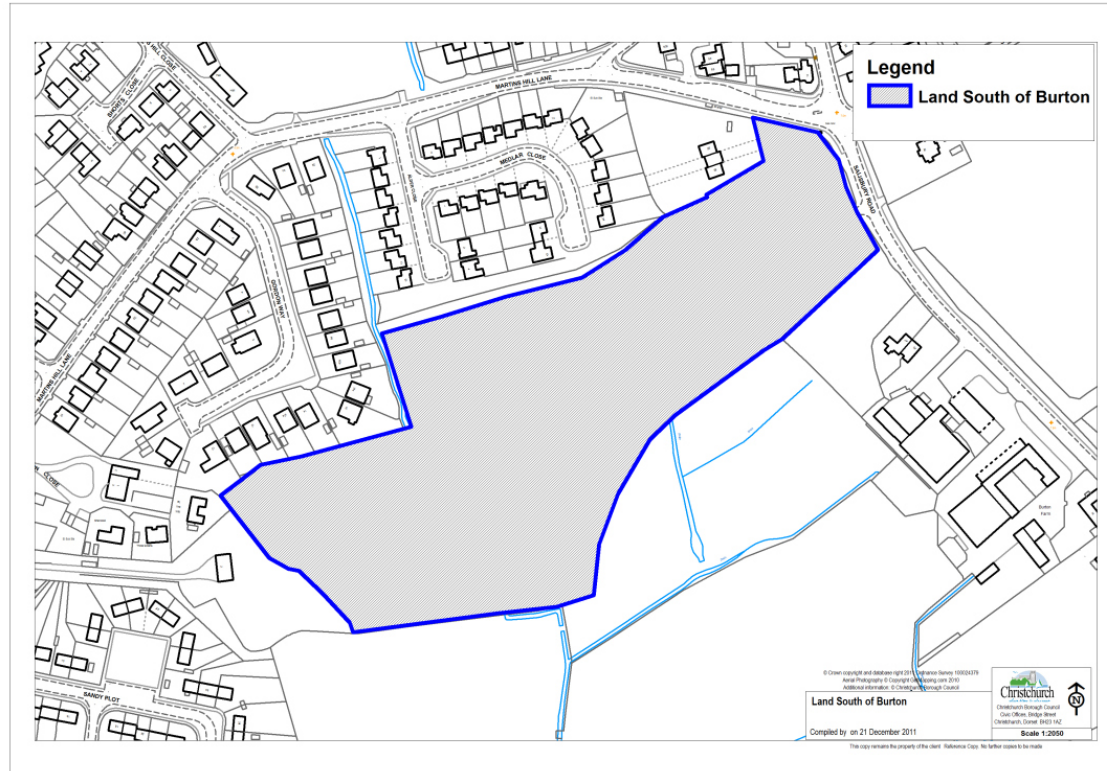
- There is an opportunity for new development to provide funding toward the improvement of community facilities within the village, particularly a village hall. The Council will seek to negotiate a contribution toward such facilities from this development.

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 6.3 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					
7	0	5	2	3	4	4	4	7

Table 7.2

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

7.61 A number of responses were received to Policy CN2 reiterating objections submitted at the Pre-Submission Stage to the proposed development.

7.62 Additional Housing Potential at Roeshot Hill

- Responses were received requesting that the Burton housing allocation be deleted and the housing potential of the North Christchurch Urban Extension increased.

7.63 Environment / SANGs

7.64 Natural England, Nick Squirrel

- Natural England supports the policy text modification made.

7.65 Affordable Housing

- The policy now refers to 'up to 50%' of homes as affordable within the 45 dwelling development intended to meet Burton's needs.

Officer Response

7.66 Additional Housing Potential at Roeshot Hill

7.67 There are no appropriate brownfield sites within Burton village which could provide equivalent housing provision. Locating more housing on the Urban Extension would fail to deliver the Council's objective of providing some housing specifically to meet local needs in Burton itself.

7.68 Environment / SANGs

7.69 This is welcomed.

7.70 Affordable Housing

7.71 As part of the viability testing undertaken to inform preparation of the the councils' Community Infrastructure Levy the provision of affordable housing was assessed in line with the Core Strategy policy. In the current economic climate it was concluded that 30% affordable housing could be provided alongside other Core Strategy policy requirements, and CIL. In this respect the Council will seek to maximise the proportion of affordable housing provided.

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

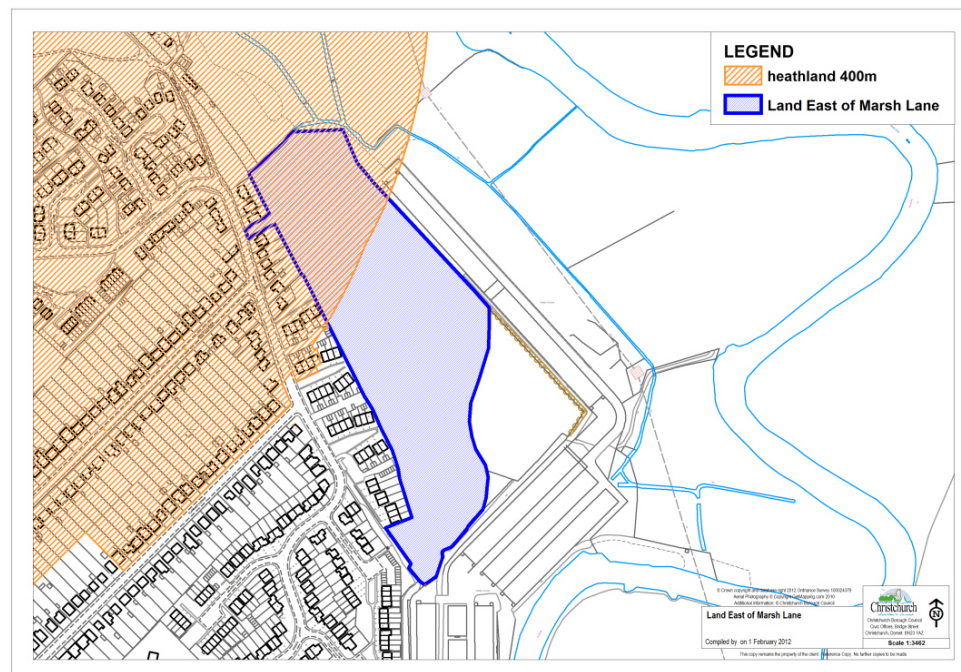
- ~~• Suitable Alternative Natural Greenspace will be provided within the site in accordance with the standards set out in Core Strategy Policy ME3:~~
- ~~• To avoid adverse impacts on off-site areas used by qualifying species of the Avon Valley Special Protection Area and Ramsar Site and Dorset Heathlands 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 6.4 Land east of Marsh Lane (EXISTING - MAP TO DELETE)

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					
10	0	6	3	3	5	4	5	6

Table 7.3

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

7.73 *Deletion of Proposed Housing Allocation*

7.74 **RSPB, Renny Henderson**

- We support the deletion of these paragraphs (6.60 and 6.61)

7.75 **Goadsby, Peter Atfield (on behalf of Sembcorp)**

- The proposed deletion of the Marsh Lane site is not justified. The representations of Natural England on the Pre-Submission Core Strategy (PSCS) outline four areas of concern:

1. Adverse impact on the Town Common SSSI.
2. Adverse impact on the Avon Valley nature conservation designations.
3. The affect on the current grazing regime.
4. Lack of data relating to the biodiversity interest on the site.

7.76 Subsequent discussions with Natural England have focused on the potential development of the site based on a smaller allocation and the provision of a larger and more suitable Sustainable Alternative Natural Green Space. Attached as Appendix 1 to these representations is a response to the representations of Natural England, outlining how the site can be developed incorporating sufficient mitigation measures to protect nearby areas of ecological importance. These concepts are graphically illustrated in Appendix 2. Thereafter, Appendix 3 contains a Phase 1 Biodiversity Survey. This information is considered to address and overcome the objections of Natural England. It is suitable and appropriate to allow for the continued allocation of the site for residential development. It was made available to Natural England in October 2012, albeit their formal response is still outstanding. It is acknowledged that the reduced land take for residential development may result in a slightly smaller allocation. This reflects our earlier representations on the PSCS. The proposed deletion of the Marsh Lane site is not justified. Please refer to our principal representations in respect of Policy CN 3. Retain the text of Paragraph 6.60, subject to a minor amendment to refer to the capacity of the site accommodating up to 90 dwellings. Policy CN3 should be retained, subject to the wording of the policy allowing for the site to be developed for up to 90 dwellings.

7.77 As a consequence of our representations in respect of Policy CN3, Sembcorp object to the Proposed Change by way of the deletion on Map 6.4.

7.78 RSPB, Renny Henderson

- We support the deletion of this policy.

7.79 Natural England

- Natural England supports the modification proposed.

7.80 Dorset Wildlife Trust

7.81 We support the deletion of this allocation as we support Natural England's view that effective mitigation measures cannot be put in place to avoid/mitigate harm to the heathlands and other nearby designations in order to satisfy the Habitats Regulations.

Officer Response

7.82 Christchurch Borough Council, Natural England and Sembcorp have engaged regarding the preparation of a SANGs strategy for Marsh Lane up to October 2012. Natural England has provided a written response following the meeting between these parties on the 22nd October 2012 prior to consultation on the Schedule of Proposed Changes to the Core Strategy Pre Submission Document (November 2012).

7.83 Natural England has expressed clear doubts about the SANGs proposal submitted by Sembcorp for the meeting held on the 22nd October 2012 in respect of its ability to provide effective avoidance/mitigation measures which will prevent recreation / disturbance effects on the European and internationally designated sites. Natural England has referred the quality guidelines for SANGs provision set out in the Dorset Heathlands SPD and stated that the SANGs proposal does not accord with these guidelines.

7.84 In relation to the proposal to reduce the number of dwellings Natural England has stated that reducing the site from 90 dwellings to 45 dwellings would still result in a high number of new residents in close proximity to Town Common and the Avon Valley SPA. Natural England's advice is that a development of c.10 luxury units to the south of the site would appear to be likely to be able to demonstrate no likely significant effect if combined with a SANG. This scale of development would not make a significant contribution to addressing local housing need and would also not be considered a strategic allocation to be included in the Core Strategy. It is not considered that a development of 10 dwellings in this location provides the exceptional circumstances for amending the Green Belt boundary.

7.85 Natural England's position in relation to the deletion of the Marsh Lane allocation is also supported by the RSPB and Dorset Wildlife Trust.

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 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:

Flood risk: (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 **Policy KS 9 and** 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					
3	0	2	2	2	3	3	3	1

Table 8.1

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

8.2 National Park Purposes

8.3 New Forest National Park Authority

- The New Forest National Park Authority is pleased to note and supports the proposed strengthening of wording to this policy. The additional wording reflects the consideration of the National Park purposes within the policy and is in line with the requirements of Section 62 (2) of the Environment Act

1995. Whilst the strengthening of this policy is welcomed, the Authority is however disappointed to note that no amendments for the inclusion of reference to the statutory duty are proposed for the introductory chapters to the documents as requested by the Authority in the comments submitted to the consultation on the Pre-Submission document.

8.4 Natural Environment

8.5 RSPB

- The RSPB support the amendments made to the Vision for Bournemouth Airport made in favour of the New Forest. We object to the revised text relating to the need for development outweighing policy protection of the natural environment. This infers that sole test is planning policy. There is as the Council is aware, a national and international legislative framework for assessing proposals that are likely to harm designated wildlife sites. This is enshrined in the Conservation of Habitats and Species Regulations 2010. We suggest the text needs to be amended to highlight that in addition to plan policy considerations there is a legislative framework that applies. Natural England can advise further as necessary.

8.6 Dorset Wildlife Trust

- Dorset Wildlife Trust support the amended wording under Environmental Designations as this seeks positive improvements in the extent and quality of priority habitats and the populations of priority species and shall conserve ecological network connections. We also support the the need for off site infrastructure to meet the requirements of ME1 (as revised in this alteration), seek to avoid fragmentation of priority habitats, priority species populations and ecological network connections and to provide mitigation or compensation for any harm where it is considered that the need for development outweighs policy protection of the natural environment.

8.7 Natural England

- Natural England support the policy modifications proposed in BA1 and BA3, regarding using Zones to protect the Moors River SSSI.

8.8 Transport & Accessibility

8.9 Bournemouth Borough Council

- The reference to enhanced accessibility to the airport, particularly cycle access, is welcomed however more certainty is sought in the policy wording. It is noted LTP3 is referred to as identifying the other improvements necessary and we would hope that this secures the much needed airport cycle link to north Bournemouth including a bridge over the River Stour. 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.

Officer Response

8.10 With regards to the references to the New Forest National Park and statutory park purposes the inclusion of reference within the policy itself provides substantial weight and therefore it is not necessary to repeat the wording in other chapters of the document.

8.11 The text set out is a vision and the wording was agreed with Natural England and is consistent with the Habitats Regulations. The policy cross refers to all the requirements set out in Policy ME1 and as it is a vision it is not felt that detailed references to international legislative frameworks are required.

8.12 As highlighted above, the text in BA1 is a vision and further detail relating to improving cycle access is set out in Policy KS9 and KS10.

Bournemouth Airport and Business Park Strategic Allocation

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~~ may also be permitted 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.

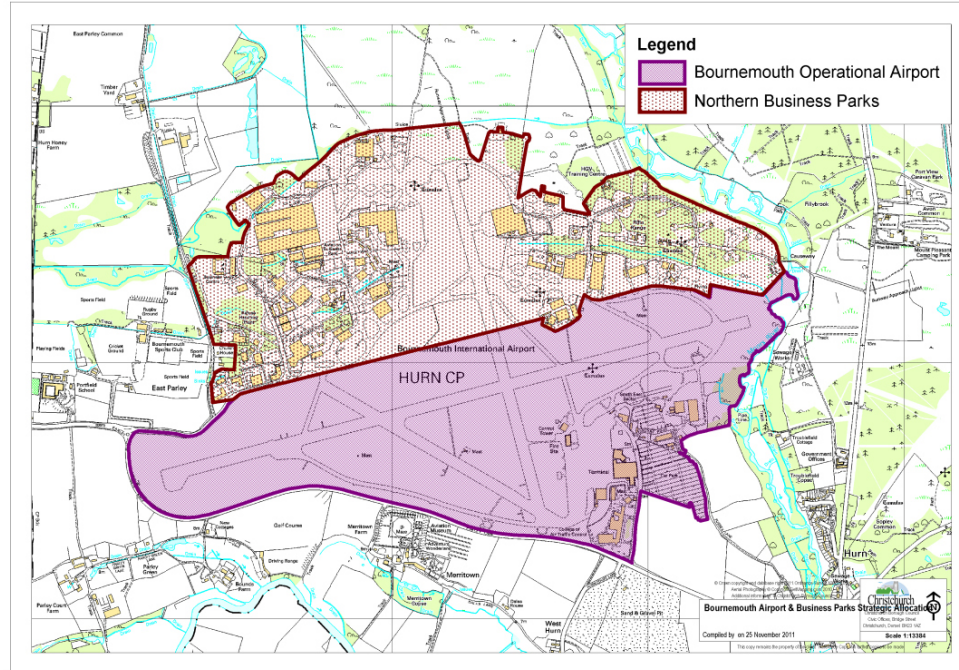
The phasing of future employment development in the airport northern business parks will be in line with the necessary improvements required to the highway network to facilitate development. Over the plan period to 2028 it is envisaged that up to 30ha of new employment development may come forward across 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
- Recycling / environmental industries



Map 7.1 Bournemouth Airport & Business Parks Strategic Allocation

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					
0	0	0	1	1	1	0	0	0

Table 8.2

8.13 Strategy for the Operational Airport

8.14 NATS objects to the phrase '*may*' because the policy wording should be consistent throughout the policy, which earlier states that associated infrastructure will be developed. Also, the word '*may*' creates uncertainty on what the plan aims to effectively deliver. To replace the word '*may*' with the word '*will*'. Also include the words '*and B1 office development*' as an appropriate use to Zone B policy in order to reflect the character of the existing buildings on site.

Officer Response

8.15 As set out in the schedule of proposed changes the reason for the change in the emphasis of the text is because these uses may be appropriate, it is not felt that this creates any uncertainty on what the plan aims to effectively deliver. B1 office development is not consistent with the strategy for the operational airport.

8.16 In addition to the policies listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

8.17 Green Belt

8.18 Paragraph 7.27

8.19 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:

Policy BA 3

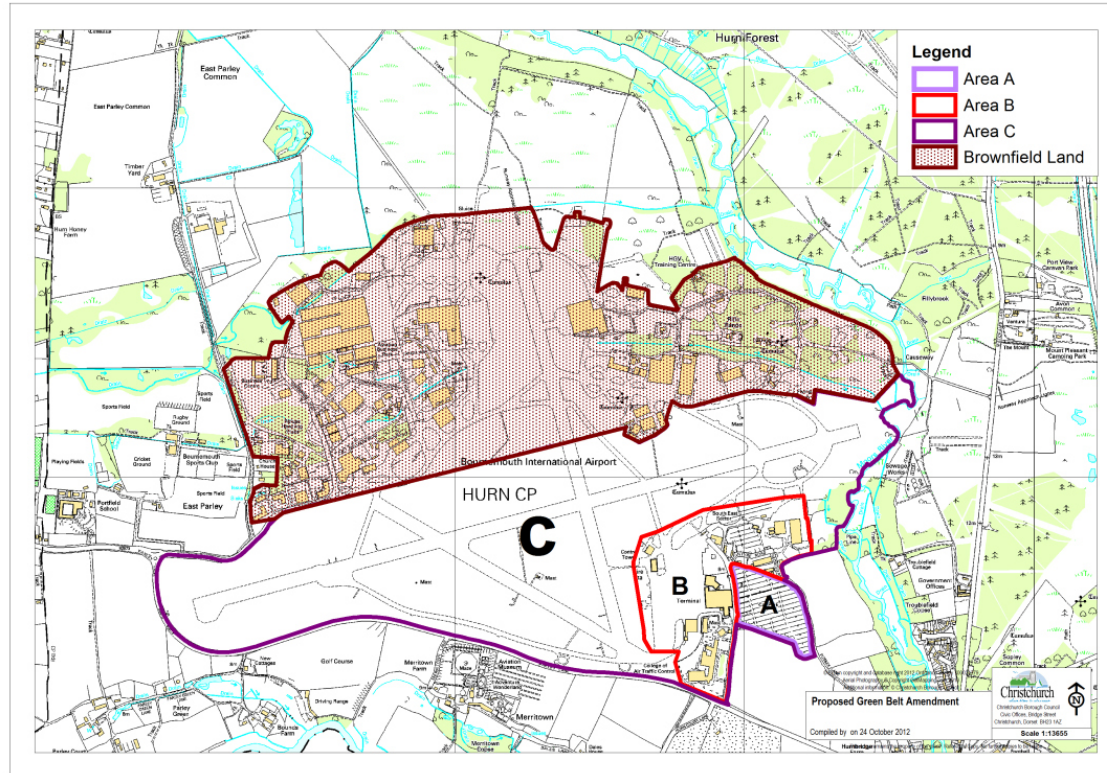
Green Belt at Bournemouth Airport

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.



Map 7.2 Proposed Green Belt Amendment (PROPOSED CHANGE)

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					
3	0	2	2	3	3	2	2	1

Table 8.3

Green Belt / Airport Zoning

8.20 The Malmesbury Estate

- The Malmesbury Estate objects to the proposed changes to the text at paragraph 7.27 and to the reworded policy BA3 relating to the release of Green Belt land to facilitate the growth of airport facilities. This also applies to map 7.2. The Estate contends that the designation of zoning of the Green Belt land proposed for release is unnecessary and contrary to national planning policy. In particular, the Estate strongly objects to the designation of its land opposite the main airport entrance and currently used for airport car parking as zone A where uses will be restricted **"to uses that retain the predominantly open aspect of this area of land, such as car parking"**. The Estate believes that this proposed change is directly in conflict with policy advice to local authorities when defining Green Belt boundaries.
- The Malmesbury Estate has already supported the case that there are exceptional circumstances for amendment to the Green Belt boundary in the vicinity of Bournemouth Airport in order to capitalise on the locations potential for employment and airport related development and as an economic driver for growth. The proposed imposition of restrictions through zoning is entirely contrary to achieving that potential and is in conflict with the broad thrust of advice in the NPPF. The Estate contends that the proposed restriction is misconceived because the land is already used for car parking and consists of extensive hard standings and tall lighting columns that clearly suggest that it is developed brownfield land rather than open land of any merit. When viewed from the B3073 the land is screened only by a low hedge, is readily visible and has lost any qualities that merit protection to retain openness. Similar circumstances also apply to proposed zone B where airport related development is to be permitted, which suggests an inconsistency of approach.
- The removal of the proposed zoning amendments to policy will enable the Plan to be more consistent with national planning policy by not placing unnecessary and unjustified restrictions on potential employment and airport related development, including the proposed park and ride transport hub.

8.21 Natural England

- Natural England support the policy modifications proposed in BA1 and BA3, regarding using Zones to protect the Moors River SSSI.

8.22 NATS

- NATS support the inclusion of the Hurn Training Centre site within Zone B of the operational airport, subject to the policy enabling the appropriate and viable redevelopment of the site.

- NATS objects to the phrase '**restricted to**' because the list of proposed uses in policy BA2 is not exclusive and so may include other airport related uses and services subject to other Core Strategy policies.
- NATS support the removal of the former Hurn Training Centre site from the Green Belt. In addition to the justification offered by the Local Planning Authority for the site to be included within the boundaries of the operational airport, the land should be excluded from the Green Belt because it does not fulfill the purposes listed in the National Planning Policy Framework, and the Local Plan is the appropriate vehicle to redefine Green Belt boundaries considering the criteria in the NPPF.

Officer Response

8.23 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.

8.24 The zoning approach addresses 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.

8.25 The list of uses referred to in BA2 is in line with the Airport Masterplan and are uses which will meet the operational needs of the Airport. These uses were set out in previous consultations and no change to them has been made in this schedule. The 'exceptional circumstances' for making an amendment to the Green Belt at the Airport relate to meeting the operational needs of the airport and this translates into the uses set out in the zoning policy.

8.26 The list of proposed uses set out in BA2 and related to this policy are consistent with the Airport's master plan and the future operational needs of the Airport and have been established with the involvement of MAG and the Airport Advisory Group. In this respect, the proposed zoning approach is not contrary to the NPPF as it is assisting the growth of uses associated with the operational airport.

9 Responses and Analysis of Chapter 8 Wimborne and Colehill

9.1 New text before Paragraph 8.5

9.2 The Natural Environment

9.3 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.

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	1	2	1	0	2	0	0	0	2	0	0

Table 9.1

9.4 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

9.5 Settlements

9.6 N Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust supports the amended text as an improvement on the original but does not consider this gives clarity on habitats, which is the reason given for the proposed change. The amendment clarifies that the rivers are of ecological value by providing habitat for protected and priority species, which is welcome, but does not clarify that, in the case of the River Allen, the habitat itself is a UK priority habitat, being a chalk stream. The River Allen is important as a Strategic Nature Area and subject to biodiversity enhancement works with a number of partners and we feel that the significance of this river warrants inclusion in the text especially as proposed developments may impact upon this river.
- DWT continue to suggest the following wording: These are not protected in themselves but are important ecological corridors and provide habitat for protected and priority species. The River Allen is a chalk stream which is a UK priority habitat.

9.7 H Chittenden, Environment TAG

- Although the wording is an improvement on the original he has neglected to address the fact that as a chalk stream the River Allen is a priority habitat: it is also a Strategic Nature Area (NPPF117 and 118). This should be reflected in the text.
- As previously advised we recommend that the DWT wording should have been adopted in full viz: Wimborne sits at the confluence of the Rivers Allen and Stour. These are not protected in themselves but are important ecological corridors and provide habitat for protected and priority species. The River Allen is a chalk stream which is a UK priority habitat. The rivers also affect...area.

Officer Response

9.8 These supporting comments and suggested revised wording are noted, however changes have also been made to Policy ME1 in Chapter 13 - Managing the Natural Environment and its supporting paragraphs to emphasis the level of protection afforded to priority habitats and protected species, and that riverine and coastal habitats have been added to the list of nature conservation sites the Core Strategy aims to protect, maintain and enhance. This Policy applies to any development within the Plan area.

Policy WMC 1

Wimborne Minster Town Centre 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....
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.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....

...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	0	3	1	0	1	0	2	0	0	0	0

Table 9.2

9.9 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

9.10 *Accessibility and Car Parking*

9.11 Mr C Undery, Surveyor

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

9.12 Mr C Slocock, Chairman, Wimborne BID Ltd

- In relation to the policies listed where several options have been put forward to increase the number of homes in and around Wimborne, the ‘Infrastructure’ sections of each policy make no mention of the current or future availability of parking in Wimborne Town Centre. The residents and traders of Wimborne already feel that the parking arrangements are inadequate and yet there appears to be no consideration of increasing the number of number of spaces in line with the corresponding increase in residents that would enter the town. There can only be a boost to the local economy if the new residents are able to access the town.

- The Local Authority has a responsibility to support the local economy (Government Directive) and the Mary Portas review also identified car parking as the ‘number one’ issue to a town economy.

Officer Response

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

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

Policy WMC 3

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 **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....

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	0	4	2	0	3	0	3	0	1	0	0

Table 9.3

9.15 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

9.16 *General*

9.17 Mrs S Moran

- Housing density still too high without any justification.

9.18 Mr C Undery, Surveyor

- The imposition on the developer of cost burdens including high proportions of affordable housing, suitable alternative natural green spaces, heathland mitigation, community and transport infrastructure levies etc. will undermine viability, cause developers to reduce purchase offers to landowners to the extent that landowners will decide not to sell, or offers to purchase will fail to reach base price provisions in option agreements.

9.19 Mr C Slocock, Chairman, Wimborne BID Ltd

- In relation to the policies listed where several options have been put forward to increase the number of homes in and around Wimborne, the 'Infrastructure' sections of each policy make no mention of the current or future availability of parking in Wimborne Town Centre. The residents and traders of Wimborne already feel that the parking arrangements are inadequate and yet there appears to be no consideration of increasing the number of number of spaces in line with the corresponding increase in residents that would enter the town. There can only be a boost to the local economy if the new residents are able to access the town.
- The only reference to accessibility in this way is in paragraph 2.93 (WMC4), where it mentions the new homes being close enough for cycling/walking to town. It must be stressed that people seeking to 'shop' may well require their transport to take home their purchases

9.20 Mrs T Valpy

- No consideration of being in the flood plain.

Officer Response

9.21 The policy change only refers to a reduction in the number of houses on the potential development site. This site is close to Wimborne town centre, so it is easily accessible by foot to the facilities and shops in the town.

9.22 The Community Infrastructure Levy (CIL) is a new charge, introduced by Central Government on new development, and will be required for every new home. The CIL draft charging Schedule has a supporting viability study to justify the charge and a list of infrastructure that is required. CIL provides a simpler and more transparent process than the collection of funds and provision for infrastructure under the Section 106 procedures. All local developers, builders and land owners have been made aware of the requirements of CIL.

9.23 The site does not lie within the flood plain. The housing densities are not discussed in this policy, and will be determined through the detailed master planning process of this site.

9.24 No changes proposed.

Policy WMC 7

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	
4	1	0	6	2	0	5	0	4	0	2	2	1

Table 9.4

9.25 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

9.26 *General*

9.27 Mrs S Bourton

- I consider that deleting reference to any possible housing development at Leigh Park to be regrettable. This is because any new affordable housing in this area would be close to Wimborne town centre and would have benefited the residents of Leigh Park and those with a connection to that area.

9.28 Mrs S Bourton, Chair, Keep Wimborne Green

- We consider that deleting any reference to possible housing development at Leigh Park is regrettable because by building even some affordable housing in this area, close to Wimborne town centre would have benefited the residents of Leigh Park and would have added to the affordable housing total overall.

9.29 Mr C Undery, Surveyor

- The imposition on the developer of cost burdens including high proportions of affordable housing, suitable alternative natural green spaces, heathland mitigation, community and transport infrastructure levies etc. will undermine viability, cause developers to reduce purchase offers to landowners to the extent that landowners will decide not to sell, or offers to purchase will fail to reach base price provisions in option agreements. In consequence development will not come forward, landowners will withhold allocated land and housing provision and other benefits will not be achieved.

9.30 Mrs J Healey, Dorset CPRE

- We cannot possibly support the decision to use the entire area to the benefit of the recreational aspirations of the Leigh Park Community. This is not a good decision as some members of the community with children are living in flats/unsuitable accommodation, they could have benefited if just a few family homes were built so they could be re-housed in their own community.

9.31 Mr S Jackson, Wimborne Civic Society

- We continue to support the view that, if Wimborne Rugby Club were to move from Leigh Park, the area released should be developed as a mix of open space, youth club facilities and housing. We therefore do not agree with the decision taken by Wimborne Town Council on 6 November to seek to have Leigh Park declared a Queen Elizabeth II Playing Field in Trust. We consequently are opposed to the deletion of Policy WMC7.3.

9.32 Turley Associates, representing Bellway Homes, promoting land North of Leigh Road, Wimborne

- The Schedule of Proposed Changes suggests an amendment to delete the reference to possible housing development at Leigh Park to reflect the Town Council's Views as landowner. However, the JCS does not provide an alternative option to compensate for this loss.
- We contend that not only should an alternative site be found to compensate for this loss, but that the housing provision proposed at Wimborne/Colehill should deliver more of the objectively assessed housing needs at these settlements.
- An example in our view being the delivery of housing at land north of Leigh Road, Colehill either as an allocation for early release or as a reserve site. A sensitively conceived housing development would not have a material impact on the purposes of including land within the Green Belt.

9.33 Pro Vision Planning and Design, representing Wessex Water, promoting land at Little Canford Depot, Hampreston

- WMC7 Leigh Park Area of Potential Change - The allocation of Little Canford Depot for mixed use redevelopment in place of the unsustainable housing allocations at Marsh Lane, Leigh Park and North-East Verwood would ensure consistency with the NPPF.

Officer Response

9.34 The comments are noted. The change to the Policy wording occurred as a result of Wimborne Town Council's recent decision to retain Leigh Park as open space, rather than a proportion for housing and a proportion for open space.

9.35 The costs of development and CIL charge is discussed above in Policy WMC3.

9.36 We consider sufficient land has been allocated for housing development, and these additional sites are unnecessary, being located in the Green Belt, and not our preferred locations. The Planning Inspector will determine whether further sites are required for housing and if these are deemed suitable.

9.37 **New text before Paragraph 8.33**

9.38 **Green Belt Boundary**

9.39 **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.**

9.40 **Beacroft Foundation school is over capacity already. Dorset County Council 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.**

Consultation Response

9.41 As this paragraph change relates directly to New Policies WMC8 and WMC9, the number of respondents have been counted with the Policy comments below, rather than for this change itself. The comments from key stakeholders and the general public in respect of this Proposed Change have been grouped together into various themes and are as follows:

9.42 ***Green Belt Boundary Changes***

9.43 **G Smith, Dorset County Council**

- It is proposed to insert new text to explain that St Michael’s School and Beaucroft Foundation School will need to expand to accommodate additional demand for middle school places. This will require expansion onto Green Belt land. A new policy, WMC8 will specify that the Green Belt boundary will be amended to meet the school requirements. Dorset County Council supports the proposed changes.

9.44 Mrs S Moran, Local Resident

- Text should be amended to make it clear that adjustment of the Green Belt boundary is just for the school expansion and area will be returned to the green belt if the school size is not increased

Officer Response

9.45 The text explains the Green Belt boundary adjustment is required and justified for the school expansion due to the housing growth. The support is noted. No changes proposed.

Policy WMC (New) 8

Green Belt Boundary at St Michael's School Colehill

The Green Belt boundary is amended to remove land from the Green Belt to enable the satisfactory expansion of the school.

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	0	0	0	0	0	0	0	0	0	2

Table 9.5

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

9.47 Green Belt Boundary Changes

9.48 G Smith, Dorset County Council

- Dorset County Council supports the proposed changes. It is proposed to insert new text to explain that St Michael's School and Beaucroft Foundation School will need to expand to accommodate additional demand for middle school places. This will require expansion onto Green Belt land. A new policy, WMC8 will specify that the Green Belt boundary will be amended to meet the school requirements.

9.49 Colehill Parish Council

- The Parish Council has no comments to make on the boundary changes.

9.50 Wimborne Civic Society

- Assuming that the proposed amendment to the Green Belt is used for an expansion of the School, should this be required and for no other purpose, then we would have no objection to this change. The site concerned should be identified as safeguarded land for an expansion to the School only.

9.51 Mrs S Moran

- Text should be amended to make it clear that adjustment of the Green Belt boundary is just for the school expansion and the area will be returned to the green belt if the school size is not increased.

Officer Response

9.52 Support for the amendment to the Green Belt boundary for satisfactory expansion of the school, is acknowledged from key stakeholders and the community. The justification for changes is explained in paragraph 8.33. No changes proposed.

Policy WMC (New) 9

Green Belt Boundary at Beaucroft Foundation School, Colehill

The Green Belt boundary is amended to remove land from the Green Belt to enable the satisfactory provision of facilities at the school.

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	2

Table 9.6

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

9.54 Green Belt Boundary Changes

9.55 Colehill Parish Council

- The Parish Council has no comments to make on the boundary changes.

9.56 Wimborne Civic Society

- Assuming that the proposed amendment to the Green Belt is used for an expansion of the School, should this be required and for no other purpose, then we would have no objection to this change. The site concerned should be identified as safeguarded land for an expansion to the School only.

9.57 Mrs S Moran

- Text should be amended to make it clear that adjustment of the Green Belt boundary is just for the school expansion and the area will be returned to the green belt if the school size is not increased.

Officer Response

9.58 Support for the amendment to the Green Belt boundary for satisfactory expansion of the school, is acknowledged from key stakeholders and the community. The justification for changes is explained in paragraph 8.33. No changes proposed.

10 Responses and Analysis of Chapter 9 Corfe Mullen

Policy CM 1

Lockyer's School and Land North of Corfe Mullen New Neighbourhood....

....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....**

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	0	1		0	0	1

Table 10.1

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

10.2 Settlements

10.3 Corfe Mullen Parish Council

- We support only the CHANGE to CM1 ref safeguarding the land – though not CM1 itself.

10.4 Tim Hoskinson, Savills, on behalf of Canford Estate and Harry J Palmer

- The proposed change to CM1 is welcomed as it clarifies the status of the proposed new school site in Green Belt terms. However the changes do not address our concerns regarding the timing and delivery of the school relocation, and the need for the policy to include a clear approach to phasing to provide for the early delivery of the land to the north of Wimborne Road.

10.5 Dorset County Council

- The Pre-Submission plan identified the current Lockyers School and land to the north as a site that offers the opportunity to deliver some new housing. It is proposed to include a statement within Policy CM1 to safeguard land in the Green Belt for the expansion of the school only, if this is found to be needed.
- Dorset County Council supports the proposed change.

Officer Response

10.6 The comments in support of the proposed change are welcomed. It is considered that there is no need to introduce a phasing requirement for this relatively small development proposal as there is no indication that the development needs to be carried out in a comprehensive manner. Provided that the overall objectives of the proposal can be achieved, there is no harm in the development of the land owned by the objectors taking place at a different time than the remainder of the site.

11 Responses and Analysis of Chapter 10 Ferndown & West Parley

Policy FWP 1

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.~~

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	0	0	0	0	0	0	0	

Table 11.1

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

11.2 General comments

11.3 Ferndown Town Council

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

Officer Response

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

Policy FWP 3

Holmwood House New Neighbourhood, Ferndown...

....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.~~

Consultation Response

11.5 There were no comments received from key stakeholders and the general public in respect of this Proposed Change.

Policy FWP 4

Coppins New Neighbourhood, Ferndown....

....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.~~

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	0	0	0	0	1		0	0	0

Table 11.2

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

11.7 General comments

11.8 Tim Hoskinson, Savills on behalf of Barratt David Wilson Homes

- The proposed change to confirm that on-site SANG provision is not required, is welcomed.
- As a consequence of this change, the capacity of the site is not justified or effective, and the wording should be revised to 'about 45 homes'.
- The status of Map 10.5 is questioned and the area of residential development should be redrawn to illustrate this change, referencing the concept plans previously submitted.
- The second and third sentences of supporting text at paragraph 10.29 are no longer relevant and should be deleted.

Officer Response

11.9 The support for the amendment regarding SANG provision is welcomed, however this is a small site on the edge of the urban area and to minimise its impact on the surrounding Green Belt, there is no change to the number of proposed housing units proposed.

Policy FWP 6

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 m~~ **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....

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	2	1	0	1	0	2	0	1	0	2

Table 11.3

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

11.11 Convenience Foodstore

11.12 G Sewell, Local Resident

- Unsound. Significant new proposals are included which were not in the original document. We already more than adequately served by a large Tesco Express and diverse shops including the post office and pharmacy.

11.13 Janet Healey, CPRE

- We support the reduction in size of comparison floorspace, as Parley is vulnerable to 'out of town' stores taking over from local convenience stores. However this only goes a very small way in reducing our objections to this site for housing. We would like to take our argument for a reduction in housing on this arable site to its logical conclusion.

11.14 Mr J D Head, Local Resident

- The reasons given for the change in the size of the foodstore was that a mistake was made. As all the drawings etc at the roadshow indicated a large supermarket was to be built this brings into question as to how reliable any of the numbers quoted in this document can be considered to be, and is this large increase in housing justified.

11.15 Hilary Chittenden, Environment TAG

- Rather than using our response to this policy, in reaching a decision the Analysis of Responses has cited part of ETAG's response to FWP3. Although we have been advised that a correction will be made there is no evidence that our views have been taken into consideration in the revision of the Policy.

11.16 Doug Cramond, DC Planning on behalf of Wyatt Homes

- In response to the proposed change in the size of the foodstore, we would be grateful if you would consider the enclosed report by Drivers Jonas Deloitte. The Deloitte report, taking the relevant economic and sustainability figures into account, reaches the conclusion that a store of about 1,500 sq m (net) would bring positive benefits and not undermine the vitality and viability of Ferndown centre. In the circumstances, we trust you will amend the policy wording to reflect this change to 'about 1,500 sq metres'. On this basis we will not pursue the matter through the Examination. Should it remain as presently drafted, we would wish to appear at the Examination to fully explore this matter.

Officer Response

- 11.17** The revised convenience store floorspace figure was derived following the recent update of the Retail Study (September 2012) by NLP. This considered market conditions, catchment and trade leakage from this area. The findings are reflected in this revised figure. The figure in the policy allows for some flexibility as it is prefaced by the word 'about'. The appropriate scale of a store will be determined by the best evidence at the time of a planning application, but the current information suggests that a store should be small.

Policy FWP 7

West of New Road New Neighbourhood, West Parley....

....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 hillfort, and which includes an access strategy for the area.

The land between **the hillfort and the residential development** is to be set out as parkland....

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	4	3	0	2	0	3	0	3	0	2

Table 11.4

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

11.19 Dudsbury Hillfort

11.20 Rohan Torkildsen

- As a nationally significant heritage asset the hillfort and its setting are protected by the Ancient Monuments and Archaeological Areas Act 1979 and the NPPF (2012). The Planning Practice Guide, PPS5 Historic Environment (March 2010) still extant, and The Setting of Heritage Assets, English Heritage, October 2011, are also particularly relevant in this case.
- Scheduled Monuments are considered to be of the highest significance along with World Heritage Sites and similar. There is no specific evidence to demonstrate that an understanding of the significance of the Iron Age hillfort has informed the principal of development in this location, and the Core Strategy and evidence base make only fleeting reference to it.

- The particular characteristics that contribute to the monument's significance must be defined. This understanding must in turn be used to assess whether the significance will be conserved. This expectation was clearly set out in formal English Heritage correspondence to you in May 2008, 26th January 2011, 1st June and 25th June 2012.
- To deliver sustainable development in accordance with the NPPF there is an expectation that such irreplaceable heritage assets are conserved in a manner appropriate to their significance so that they can be enjoyed by future generations.

11.21 West Parley Parish Council

- The Heritage Access Strategy demanded by English Heritage has not yet been discussed by EH or the Parish Council. Many houses have been planned very close to the large area of the monument, which could be used as a children's adventure playground and cannot practicably be closed off. A successful conclusion to this difficult problem cannot be taken for granted. This planned development should not have reached this stage without any formal discussions with EH having been held.

11.22 G Sewell, Local Resident

- We are glad English Heritage are investigating changes near Dudsbury Ancient hillfort. The floodplain's of great importance locally and further down the river.

11.23 Parkland

11.24 Nicola Brunt, Dorset Wildlife Trust

- We note that a 'Statement of Common Ground' is being prepared with Natural England to address the need for a greater understanding of the biodiversity issues.
- We seek a further amendment to incorporate our view that parkland may not be the most appropriate use of the land between the hillfort and residential development, given that we do not know the current biodiversity value of the site.
- We consider the requirement for parkland is too restrictive and an appropriate open space use should be decided once all the necessary information is available, taking into account both the setting of the Scheduled Ancient Monument and the biodiversity of the area.

11.25 Janet Healey, CPRE

- Very disappointing that the area between the hill fort and the proposed residential area has not been enlarged by reducing the proposed number of houses and scrapping the through road.
- Just creating a parkland will serve little purpose.
- Part of the relief road land was under water several times in November 2012.

11.26 Hilary Chittenden, Environment TAG

- Rather than using our detailed and considered response to this Policy, in reaching a decision the Analysis of Responses has cited part of ETAG's response to FWP3. Although we have been advised that a correction will be made to that document there is no evidence that our views have been taken into consideration in the revision of the Policy. Changes have not reflected ETAG's response to the CS regarding layout and design of land between the hillfort and development.

Officer Response

11.27 The Council have commissioned consultants to produce a Heritage Assessment of the impact of the proposed development on the Ancient Monument, in accordance with the guidance from English Heritage. The findings of this study will influence the final relationship of the proposed residential development, the new access road and the area of open space surrounding it with the heritage asset of the Dudsbury hillfort. Nevertheless, work undertaken as part of the Masterplan considers that there is scope to provide housing on this site. The plan associated with this site is indicative and will be informed by more detailed work undertaken as part of a heritage Assessment and in the production of a development brief as required by Proposed Change Policy KS3/4.

12 Responses and Analysis of Chapter 11 Verwood Three Legged Cross St Leonards St Ives and West Moors

Policy VTSW 1

Verwood Town Centre 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....
7. ~~....Residential and Commercial~~ development will take place alongside the projected requirement for retail to provide for a balanced, mixed use environment.
8. In order to improve the vitality of the town centre and improve pedestrian safety around the town, traffic management and calming measures will be provided to reduce pedestrian/vehicular conflict, and sustainable modes of transport will be supported.
9. ~~To minimise congestion and air pollution, the use of sustainable modes of transport will be supported.~~

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

Consultation Response

12.1 There were no comments from key stakeholders and the general public in respect of this Proposed Change.

Policy VTSW 5

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	
6	0	4	3	2	0	3	0	2	0	2	0	1

Table 12.1

12.2 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

12.3 General Comments

12.4 Verwood Town Council

- Support the withdrawal of this site for the reasons stated for the change.

12.5 N Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust support the deletion of this policy from the Core Strategy as the proposed residential development would be likely to cause harm to Ebblake Bog, which forms part of the internationally protected Dorset heaths.

12.6 Mr R Henderson, RSPB

- We support the deletion of this policy.

12.7 Mr & Mrs A J Abernethie, Local Resident

12.8 Excellent change.

12.9 Mr M Newton, Boyer Planning, representing Linden Homes

- Our client is a major national housebuilder and developer with important land interests in the Core Strategy area. Our response therefore focuses on this site and sets out our concern with the removal of the allocation via the schedule of proposed changes. The removal of the site is unsound and contrary to the development plan process and evidence base that led to the identification and allocation of the site in the Pre-Submission draft of the Plan.

12.10 Mrs H Chittenden, Environment TAG

- We support the view of NE that the proposal should be withdrawn as it cannot be demonstrated that there would be no harm to Ebblake Bog as a result of development.

12.11 Mr P Atfield, Goadsbys, representing Seaward Properties

- Seaward Properties support the proposed deletion of the North East Verwood New Neighbourhood. However, this heightens the concern that the strategic housing target will not be met unless there is a replacement allocation elsewhere. As such it is considered that the land owned and controlled by Seaward Properties at Manor Road should be re-allocated for residential development; as set out in the Core Strategy Options for Consideration – and as set out in our representations in respect of Policy VTSW 4 of the Core Strategy Pre-Submission document.

12.12 Mr J Lambert, Pro-Vision Planning and Design, representing Wessex Water

- The allocation of Little Canford Depot for mixed use redevelopment in place of the unsustainable housing allocations at Marsh Lane, Leigh Park and North-East Verwood would ensure consistency with the NPPF.

Officer Response

12.13 The support for the deletion of this policy is noted. However, the site could not be delivered with a SANG at the time of the consultation, and the agents have been actively seeking a solution to this with Natural England. The Inspector will determine whether this site is acceptable and will be required to meet the housing target, as with any others promoted by other planning agents during the Public Examination.

Policy VTSW 6

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....

- Agreement of a comprehensive travel plan including the 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.

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	6	2	0	0	2	0	0	0	1	0	0

Table 12.2

12.14 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

12.15 General Comments

12.16 Mr K Brooks

- The amended text merely crosses out '9.7 hectares to be removed from the Green Belt' and replaces with '13.1 hectares' without explanation or justification. This would virtually double the size of Woolsbridge Ind Estate, which adjoins the floodplains close to the Moors River, rendering the risk of flooding even more difficult to overcome, even using sustainable drainage systems. Even Dorset County Council Highways are admitting 'Highway Improvements are necessary to access the site'. When this Industrial site was approved 30 years ago the plans included an entry / exit road directly to the Azalea roundabout on the A31, but was never constructed. Horton Road is too narrow for large HGV's and wide loads and a direct link to the Azalea roundabout on the A31 should be a pre-requisite for such a substantial development.

12.17 Mr M Hirsh, Intelligent Land

- Ankers and Rawlins have been involved for many years with the development of this estate. Over the past year and a half there has been a continuing negotiation to bring forward more land for development and this is at a well developed stage with Council officers and includes a submitted planning application. It is important to support the local economy and to provide employment land and this proposal meets these requirements and is available. The land's allocation is, therefore, supported.

12.18 N Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust supports the proposed changes to this policy which give increased protection to the nature conservation features adjacent to the site.

12.19 Mr R Henderson, RSPB

- We support the amendments made to this policy.

12.20 Mr and Mrs A J Abernethie

- Excellent.

12.21 Mr N Squirrell, Natural England Dorset and Somerset Team

- Natural England support the policy modifications.

12.22 Mrs H Chittenden on behalf of ETAG

- We support the revision of this policy provided that it can be assured that the wording and subsequent ME policies encompass all our concerns about water pollution and light pollution (please see response to previous consultation).

12.23 Mr J Lambert, Pro-Vision Planning representing Wessex Water

- The Proposed Changes to Policy VTSW6, include the release of 13.1 hectares of land adjacent to Woolsbridge Industrial Estate from the Green Belt. This site is some distance from the closest residential area. It is an unsustainable and unjustified proposal. The approach is inconsistent with the allocation of employment land adjacent to the large village of Sturminster Marshall, which is sustainable and justified.
- A reasonable alternative to the release of Green Belt land adjacent to Woolsbridge Industrial Estate is the retention of the existing employment site at Furzehill. The redevelopment of Little Canford Depot for a mix of housing, employment and green infrastructure, in place of the Furzehill housing allocation, would be more sustainable than the redevelopment of Little Canford Depot solely for employment. Little Canford Depot is a more sustainable location than Furzehill in terms of the site's proximity to the main built up area and access to sustainable transport. The Core Strategy must accord with national policy to be sound. The release of 13.1 hectares of land from the Green Belt adjacent to Woolsbridge Industrial Estate to provide employment is inconsistent with paragraph 17 of the NPPF, as the approach does not favour the reuse of land which has been previously developed.

Officer Response

12.24 The supporting comments are welcomed. The highway improvements referred to only relate to the site access junction with Horton Road itself, and not the suitability of the local highway network to accommodate the traffic generated by the proposal. The Highway Authority have not raised objection to the impact of additional traffic on the existing highway network.

12.25 The existing Woolsbridge Industrial Estate is the second largest employment site in East Dorset and has good transport links to the A31 and markets to the east of the District. It is also within reach of the large centres of population in Verwood, St Leonards and Ringwood. Alternative means of access to the site other than the car are being developed, with improved cycle links to Verwood, St Leonards and Ringwood either carried out or planned. The expansion of this large employment site, with good transport links, is on land which is available and deliverable and is therefore acceptable.

Policy VTSW 7

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 Site of Nature Conservation Interest 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.**

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	2	1	4	2	0	2	0	3	0	2	0	1

Table 12.3

12.26 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

12.27 General Comments

12.28 Mr R Henderson, RSPB

- We generally support the amendments made to this policy. However, whilst we are not familiar with the site, we understand from conservation colleagues that the site itself supports populations of specially protected birds (SPA cited species). These species are not currently adequately protected by the proposed policy.

12.29 N Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust strongly welcomes the need for 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. We also support the need for Sustainable Drainage Systems.
- However, we consider that the amended text does not ensure avoidance of harm to protected and priority species, including populations of SPA bird species which are likely to be present both on-site and in the surrounding area, including forestry blocks. There is also no requirement for SANG provision should residential development come forward of a scale and type which, without mitigation, could have an adverse impact on the Dorset Heaths SPA, SAC and Ramsar site. This is detailed in Natural England's response to the Pre-Submission Core Strategy.
- Additionally, having been through the planning process several times with regard to this site, Dorset Wildlife Trust do not consider that development is deliverable without some harm to the SNCI priority habitats and species, as the most important habitats (including rare U1 Festuca ovina-Agrostis capillaris-Rumex acetosella grassland) lie close to or within the currently developed area. The site supports 23 Dorset Notable Species within the acid grassland and heath areas.
- Previous negotiations led to a planning obligation attached to a care village proposal for nature conservation mitigation, to include translocation of some areas of the SNCI grassland, management of the SNCI areas within the care village and management of the wider SNCI surrounding the site through scrub and tree removal and heathland restoration. Thus we consider that development would be possible with a mitigation package that would minimise harm to the SNCI and seek biodiversity gains (in line with NPPF 109). We consider this needs to be reflected in the text.

12.30 Mr Les Flay

- Thank you for the opportunity of expressing my views on future policies. Land for example at St Leonards Hospital, agreed for development, without any considerations to road infrastructure. The only way forward in retrospect, is to allow the Grange Estate (EDDC) to return to it proposed development by the County, but to a lesser density, and firmer boundaries strictly adhered to. By this move outgoing traffic from the hospital site, moved into

Boundary Lane, through a small roundabout, onto a flyover across the A31 with filters going both east and west, all paid for by the release of the Grange Estate, to encompass the extra traffic emanating from the new Grange development, also through the Grange distributory road to the A338, coupled with intersections to Hurn Airport.

- St Leonards Hospital development should never have been approved. The hospital has an excellent name, and ought to be encouraged to enlarge into a local cottage hospital, dealing with Ferndown, Ringwood, West Moors and surrounding rural areas, thereby relieving both road congestions, and pressure of Bournemouth and Poole hospitals. (read in conjunction with (para 6)

12.31 Mr and Mrs A J Abernethie

- Great.

12.32 Mr N Squirrell, Natural England, Dorset and Somerset Team

- The policy wording has improved but it is now no-longer consistent with policies ME1 and 3. The Policy needs additional text to set out the requirements for development more comprehensively for applicants.
- A wildlife strategy to be agreed with the Council that ensures that no harm to the Moors River SSSI, the Site of Nature Conservation Interest on the site and the adjacent internationally protected heathland will derive from the development. THE APPLICANT WILL NEED TO SHOW THAT THEY HAVE AVOIDED HARM TO PRIORITY HABITATS AND SPECIES. THE LAYOUT OF THE SITE IS LIKELY TO REQUIRE COMPENSATORY MEASURES WHICH MAY INCLUDE SANG PROVISION WHERE RECREATIONAL PRESSURE IS GENERATED. 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.

12.33 Mrs H Chittenden, Environment TAG

- The changes, as far as they have gone, are welcome but have still not achieved what is necessary. The policy should be more explicit in what is required as prerequisites for development and, as with other development sites within the Core Strategy, should make specific reference to the need for a SANG to be provided.
- Although reference is made to the adjacent internationally protected heathland, there should be recognition of the risk to SPA qualifying bird species whose territories clearly will not be confined to the SPA. As the long term use of the site has yet to be established, considerations similar to those of Policy VTSW6 should apply with respect to buffers, habitat connectivity and protection of the Moors River SSSI.

Officer Response

12.34 The above comments from the nature conservation bodies are noted, however the development of this site will not be considered in accordance with the provisions of the above policy alone. Policies on the protection of priority habitat species and the mitigation of harm, for example through the provision of Suitable Alternative Natural Greenspaces (SANGs) are set out in Chapter 13 - Managing the Natural Environment and apply equally to all development within the Plan. It is therefore not necessary to specifically repeat these matters in the above Policy.

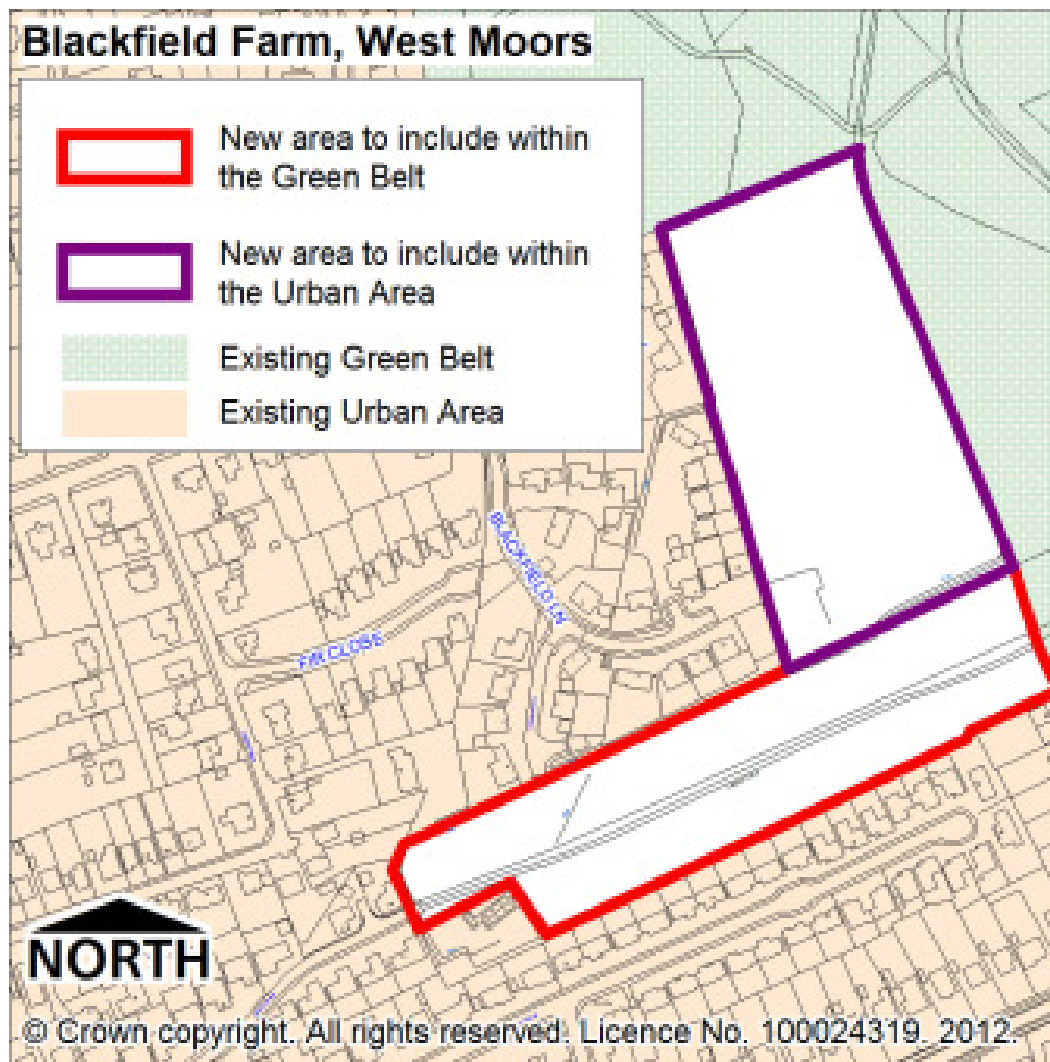
Policy VTSW 8

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.

Map 11.9



Map 11.9 Blackfield Farm Green Belt Boundaries, West Moors (PROPOSED CHANGE)

Consultation Response

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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	2	2	0	0	2	0	1	0	2	0	0

Table 12.4

12.35 The comments from key stakeholders and the general public in respect of this Proposed Change are set out below:

12.36 General Comments

12.37 Mr A Shepley, G L Hearn on behalf of Persimmon Homes

- It is considered that the inclusion of the land south of Blackfield Farm within the Green Belt is not justified or consistent with national policy. This land is not considered to meet any of the five purposes that the Green Belt is supposed to serve, as set out in paragraph 80 of the NPPF. Therefore, this land should be included within the urban area of West Moors along with the land at Blackfield Farm, as contained in the previous iteration of the Core Strategy Pre-Submission document.

12.38 N Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust supports the inclusion of land to the south of Blackfield Farm within the Green Belt as it provides a Green Belt function of providing access and opportunities for recreation.

12.39 Mrs H Chittenden, Environment TAG

- We support inclusion in the Greenbelt of land to the South of Blackfield Farm for reasons detailed in our previous response.

12.40 Mr D Brenchley

- The fact that the land to the south of Blackfield Farm is now being proposed as Greenbelt increases, rather than decreases the need for the whole of the area to be Green belt. The impact upon the local area if Blackfield Farm is allowed to be classified as Urban is completely unjustifiable and would change the nature of the local area and the village for the worse and forever.

Officer Response

12.41 The support for this change is welcomed. The inclusion of the southern portion of the site in the Green Belt meets the requirements of paragraph 81 of the NPPF as it provides an opportunity for access and recreation in the open countryside forming part of the long distance footpath/cycleway through the District and beyond, which gives access to recreational facilities along its length.

12.42 It is considered that there continues to be no justification for the inclusion of the northern part of the land in the Green Belt, as it has development potential, which would be guided by other policies within the Plan and in national guidance, to ensure that any development minimised the impact on the neighbouring properties and surrounding features of nature conservation importance.

13 Responses and Analysis of Chapter 12 East Dorset Rural Areas

Policy RA 2

Furzehill Village Envelope....

...d) ~~Redevelopment of the site should provide a community hall for 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	
0	0	0	0	0	0	0	0	0	0	0	0	0

Table 13.1

13.1 No comments were submitted in respect of this Proposed Change.

14 Responses and Analysis of Chapter 13 Managing the Natural Environment

14.1 Paragraph 13.8 - Relevant evidence.....

14.2 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.

14.3 Mrs Nicola Brunt, Dorset Wildlife Trust

14.4 Dorset Wildlife Trust supports the additional text.

14.5 Mrs Hilary Chittenden

14.6 We welcome the inclusion of the paragraph clarifying the definition of priority habitats and species.

14.7 Paragraph 13.10

14.8 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.

14.9 Mrs Nicola Brunt, Dorset Wildlife Trust

14.10 Dorset Wildlife Trust Supports the additional text which clarifies the role of Strategic Nature Areas.

14.11 Mrs Hilary Chittenden, Environment TAG

14.12 We welcome the changes made.

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.

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					
4	1	3	5	2	2	4	3	0

Table 14.1

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

- Avoidance of Harm to Existing Habitats and conformity with the NPPF**

Ms Nicola Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust strongly supports all the amendments to this policy except the following paragraph amendments to ME1; Dorset Wildlife Trust does not consider that the following paragraph reflects guidance in NPPF (118).

“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.”

NPPF (118) states

- If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. We consider that there is no need for the word ‘adequately’ in front of ‘avoid’ as either harm will be avoided, or it won’t. Also a comma is required after ‘resort’. We also strongly consider that development ‘may’ be refused here weakens ME1, is vague and does not reflect the ‘should’ be refused in NPPF 118. It does not give us confidence that this policy will be applied.

We consider the supported amendments more accurately reflect the types of nature conservation sites, habitats and species which the Core Strategy aims to protect, maintain and enhance within their ecological networks. We also support the changes to the first two amended criteria that should be addressed when development is proposed as these increase clarity and seek biodiversity gains in line with NPPF.

14.14 Mr Nick Squirrel, Natural England

- Natural England supports the modification made to this policy. A minor modification is proposed to one bullet point relating to the assessment criteria:

...Where harm is identified as likely to result, provision of measures to adequately avoid or adequately mitigate the harm should be set out. Development WILL be refused if adequate mitigation or, as a last resort compensation cannot be provided.

This approach is consistent with the NPPF which seeks to move from a net loss of biodiversity to achieving net gains. Natural England supports modifications proposed by Dorset Wildlife Trust.

Mr Renny Henderson, RSPB

- Generally support the amendments made to this policy. However, the amendments in our view are not consistent with paragraph 118 of the NPPF.

14.15 Mrs Hilary Chittenden, Environment TAG

- While welcoming and supporting most of the changes that have been made to this policy there are several issues that have still not been addressed/understood making it unsound as it stands. These exceptions to our support are as follows:
 - i) Under the heading of “criteria to be addressed when development is proposed”
 - Bullet Point 3. The text shows an incorrect change from “adequately avoid or mitigate” to “adequately avoid or adequately mitigate” – the first “adequately” should be deleted for this to make sense. Previous responses by ETAG and DWT made it clear what was needed.
 - Bullet Point 3. There is a world of difference between “Development may be refused” and “Development will be refused”. To ensure certainty we advise the change to “will be refused” is essential.

14.16 The Policy in relation to Ancient Woodland

14.17 Mr Justin Milward, Regional & Local Government Officer, Woodland Trust

- ME1 – Safeguarding biodiversity and geodiversity (p.153)
- We are objecting to the proposed new bullet point text under the paragraph heading ‘The following criteria should be addressed when adequately avoid or mitigate that harm development is proposed’: ‘...net gains in biodiversity, where possible...’ (2nd bullet point).
- ‘Net biodiversity gain’ is not applicable to ancient woodland. It is not possible to minimise the impact of new development on irreplaceable semi natural habitats like ancient woodland or ancient trees. In terms of compensatory measures, it is impossible to replace ancient woodland in Christchurch and East Dorset as this habitat has evolved over centuries and it is not possible to replicate hundreds of years of ecological evolution by planting a new site or attempting to translocation. This does not conform to current national policy.
- Whilst the Dorset Biodiversity Strategy seeks to ‘conserve’ ancient woodland, this is not as strong as promoting absolute protection. Government policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The new National Policy Planning Framework clearly states: “...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss ” (DCLG, March 2012, para 118). This NPPF wording should be considered in conjunction with other national policy on ancient woodland.

Responsibility for Ecological Surveys

Mrs Janet Healey, CPRE

- The wording is fine and the intention to protect both biodiversity and geodiversity is implicit in the text. However, the failing is in the final stages when planning permission is applied for. It is the developer who submits the ecological survey. This of course presents a conflict of interest as the ecologist is paid by the developer. All too often surveys are carried out only once and at the wrong time of year so a true picture is not presented.

Mr Alan Spencer, Local Resident

- Even before development proposals were considered for this Core Strategy the Council should have requested ecological, environmental and bio diverse surveys to be undertaken, made them public and had them examined by its advisors, so that any issues could have been highlighted, and alternative sites been offered in the this phase of the process.

14.18 Strategic Nature Areas

14.19 Ms Nicola Brunt, Dorset Wildlife Trust

- We welcome the additional text on Strategic Nature Areas and the additional paragraph relating to the level of protection afforded to sites of different status and the assessment of impacts relative to a features' nature conservation value. We consider this brings this policy in line with NPPF.

14.20 Nature Maps

14.21 Mrs Hilary Chittenden, Environment TAG

- There is no reference in the text to map 13.5 or any date. It is essential to make clear that the map is a snapshot in time (with date) and that local nature conservation, geological and geomorphological designations are likely to be updated and change during lifetime of Local Plan. We suggest that a reference to the map is inserted after the reference to the Dorset Nature Map on p92 of the Schedule of Proposed Changes.

Officer Response

14.22 Avoidance of Harm to Existing Habitats and conformity with the NPPF

- 14.23** The comments made by stakeholders have been noted. However, the way that the policy is written the criteria relates to the whole hierarchy of habitats and so it cannot be stated categorically that permission will be refused in all circumstances.

14.24 The Policy in relation to Ancient Woodland

14.25 Whilst the detailed comments relating to ancient woodland and veteran trees are noted, it is considered these are adequately protected by extensive national legislation, including the NPPF, paragraph 118.

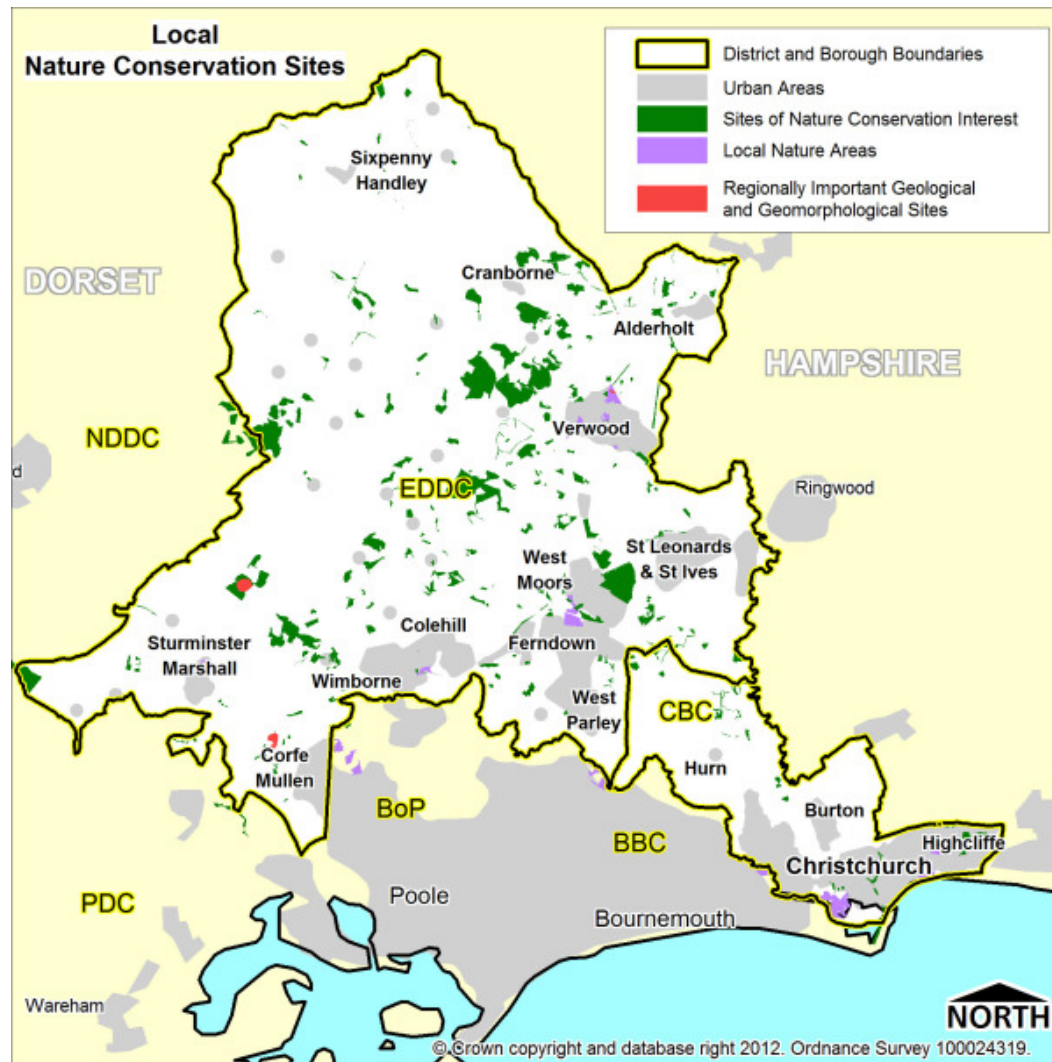
14.26 *Responsibility for Ecological Surveys*

14.27 Natural England advise on the level of information they wish to be submitted to support the proposed development scheme. A Stage 1 Habitat Survey is undertaken as an initial basic requirement. A number of developers undertake, as a matter of course, an Environmental Impact Assessment (EIA) Regulation Screening Option, to assess environmental concerns. Natural England are closely involved in this work, and we look to them for guidance on these matters.

14.28 *Strategic Nature Areas*

14.29 The support is noted.

New Map 13.5

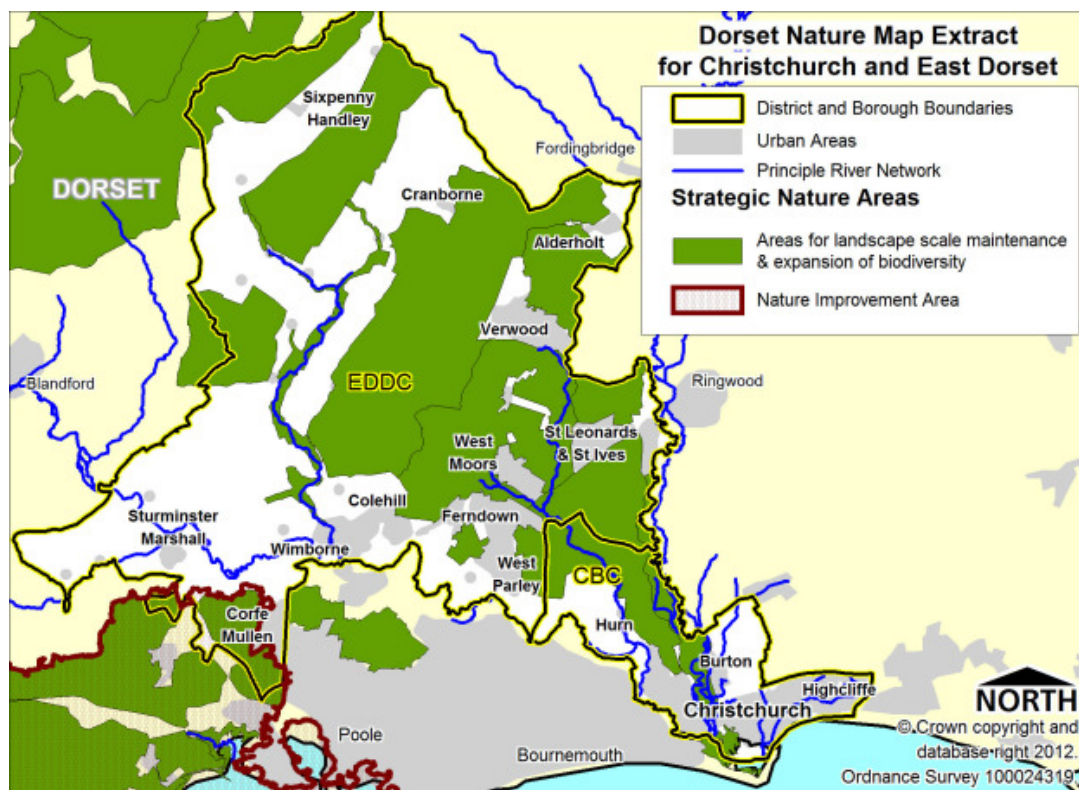


Map 13.5 Local Nature Conservation Sites in Christchurch and East Dorset (PROPOSED CHANGE)

14.30 Mrs Nicola Brunt, Dorset Wildlife Trust

14.31 The inclusion of a map of local nature conservation sites is supported and welcomed. Dorset Wildlife Trust have the following comments on this map: The purple shaded sites are 'Local Nature Reserves' (not areas). We suggest to avoid later confusion that the title is changed to state the date the map was produced and clarify that it is updated annually by Dorset Environmental Records Centre so that as new sites are identified or existing sites deleted this is the information against which planning applications are assessed. Reference to the map is required within Policy ME1.

Map 13.2



Map 13.2 Dorset Nature Map extract for Christchurch and East Dorset (PROPOSED CHANGE)

14.32 Mrs Nicola Brunt, Dorset Wildlife Trust

14.33 Dorset Wildlife Trust supports the amendment to map 13.2 which reflects our comments made on the Pre-Submission Core Strategy.

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.**

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					
12	0	3	15	3	6	15	7	0

Table 14.2

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

14.35 Effectiveness of SANGS

14.36 Mrs Sheila Bourton, Keep Wimborne Green

- We are encouraged that the protection of Dorset Heathlands by way of avoidance or mitigation measures are to be delivered in advance of the occupation of new housing development however, we are concerned that SANGS have yet to be tested as to their ability to attract the public to them and away from internationally protected heathland.

14.37 Ms Lisa Jackson, Jackson Planning Ltd.

- MEM Ltd object to the addition of the phrase that 'SANG will be secured by way of a legal agreement between the developer and the relevant council.' This addition to the policy is not sound and it is not effective as it does not allow for SANG ownership / provision being made by third parties who would be signatory to a legal agreement as part of any planning permission granted where SANG was required to mitigate potential harm from the development.
- MEM object to the phrase "mitigation in perpetuity" as this suggested degree of permanence does not allow for a flexible approach to a 'mobile SANG' which may be used at Roeshot where the temporary use the land for minerals extraction may require alterations to SANG arrangements over time.
- A direct cross reference to policy DH2 from the Dorset Heathland DPD is also needed.

14.38 SANG Provision and CIL

14.39 Ms Lisa Jackson, Jackson Planning Ltd.

- The policy needs to be revised to resolve the issue of potential for double counting of the mitigation for a development being funded both through CIL and s106.

14.40 Mr Tim Hoskinson, Savills

- The revised text states that SANGs will be secured by way of a legal agreement, and that heathland mitigation measures will be secured through CIL in the majority of cases. As currently worded, there is a risk that the larger sites of about 50 or more dwellings which are expected to provide SANGs through a legal agreement would also be required to fund wider heathland mitigation measures through CIL. This would place an unreasonable burden on such sites. The policy wording should therefore be amended to clarify that sites that provide SANGs through legal agreements will not be required to contribute heathland mitigation through CIL.

14.41 Mrs Hilary Chittenden, Environment TAG

- There should be clarity on the circumstances under which heathland mitigation measures will not be secured by CIL.

14.42 Mr Jeremy Woolf, Woolf Bond Planning

- The revisions proposed to policy ME2 suggest heathland mitigation will be delivered either through SANG or through CIL in the majority of cases. There is a risk of double counting in CIL is charged for heathland mitigation for those sites that provide mitigation in the form of SANG. With the above exceptional costs and strategic infrastructure requirements in mind and the potential for double counting, it is considered that the requirement for CIL payments on this site would not be necessary, practicable or appropriate, in effectively delivering the required infrastructure. Further the inevitable confusion and concerns as to double counting that would arise would serve to delay the delivery of the urban extension.

14.43 SANG Phasing

14.44 Miss Lindsay Thompson, Terence O'Rourke Ltd

- The new wording of policy ME2 currently requires SANGs to be in place prior to the occupation of development. On larger schemes in Christchurch and East Dorset, where SANGs will be provided on site, it would be more appropriate and provide greater flexibility to allow SANGs to be phased on the delivery of the new homes. As it stands the current additional wording requires mitigation measures to be in place prior to occupation. This approach is not sound because it is ineffective in that it could unnecessarily restrict the delivery of development, is therefore not in accordance with the NPPF. The policy wording should be amended to provide flexibility and allow a pragmatic approach to be adopted on a site-by-site basis, to enable phasing of the areas of SANGs to be agreed with Natural England and the Council as part of the Section 106 negotiations.

14.45 Mr Peter Tanner, Tanner and Tilley

- The proposed alteration to the wording of the policy to require "...The avoidance or mitigation measures... to be delivered in advance of the development being occupied and must be provided for mitigation in perpetuity...", requires further clarification. As contributions under CIL will be pooled it would be

reasonable for development to be allowed to proceed once the requirements of the CIL Charging Schedule have been met, including allowing for any phased payment that may be included in the CIL Charging Schedule. It would be unreasonable if it is intended that development should not proceed until the mitigation measures have actually been carried out by the Local Authority or Natural England, as this could be some time after the CIL charge has been paid by the developer to the Local Authority. Furthermore, the implementation of mitigation works is likely to be out of the control of the developer. Delay in allowing development to proceed once the CIL Charge has been paid would not be in accordance with the key principles of the NPPF to promote growth and provide for new homes.

14.46 Mitigation

14.47 Mr Tim Hoskinson, Savills

- The amendments to policy ME2 to confirm that developments of approximately 50 dwellings can provide mitigation by means of financial contribution is supported. The policy would benefit from greater flexibility to allow phased provision of mitigation measures alongside development is considered more appropriate.

14.48 Mrs Nicola Brunt, Dorset Wildlife Trust

- We have not yet seen evidence that the combination of the 400m exclusion zone and heathland mitigation measures function together as an effective package avoiding harmful events of additional residential development on the European and internationally designated heathlands. Although this is the aspiration, we cannot be certain of 100% effectiveness without monitoring results. We therefore suggest amendment to reflect this.

14.49 Mrs Hilary Chittenden, Environment TAG

- The effectiveness of the package (referred to at the end of para 5) is, as yet, unproven. The wording is pre-empting the findings of current research. Our agreement to the wording of this will depend on the strength of the evidence and recommendations of the current work by Footprint Ecology. ETAG retains an objection because of lack of evidence at this stage. We advise that it would be better to delete the sentence. The combination of ... heathlands.

14.50 Ms Lisa Jackson, Jackson Planning Ltd

- Policy ME2 has been revised to include a statement with regard to the effectiveness of heathland mitigation measures as a package. This is in part made up from SANGs and in part by the range of other projects funded through the Heathland tariff. The spatial expression of this policy is not shown on the proposals map for the core strategy but is shown on the Draft Heathlands' DPD proposals map. Although the policy cross-refers to the Heathlands DPD this is not sufficient to set the spatial framework for the development of the Borough and it therefore fails to meet the national guidance in NPPF paragraph 154 that requires Local Plans to address the spatial implications of economic, social and environmental change.
- The range of mitigation measures that are referred to should not be placed in an SPD, but examined as part of the Core Strategy or Heathlands DPD. Christchurch and East Dorset Councils are the competent authorities as set out in the Habitat Regulations in deciding whether a proposal will affect a European wildlife site and without any public scrutiny, it cannot be adequately demonstrated that no adverse effects are likely.

14.51 *Policy Support*

14.52 **Mr Renny Henderson, RSPB and Mr Nick Squirrell, Natural England**

- We support the amendments to this policy.

Officer Response

14.53 *Effectiveness of SANGs*

14.54 Evidence now emerging in support of the Joint Heathland DPD is considered sufficiently certain by Natural England to justify the use of SANGs. This is primarily based on monitoring work undertaken on sites where public access has been significantly improved. The use of SANGs is also in combination with the other south east Dorset wide mitigation measures which includes the management of the heathland themselves, improvements of other existing open space and heathland education programmes.

14.55 Regarding the use of the phrase, 'mitigation in perpetuity', this clarifies the fact that it must be in place for the lifetime of the houses it relates to. Whether a SANG is mobile or otherwise is more a matter to be agreed as part of a strategy for a specific site - what must be ensured by this strategy is that it maintains the mitigation for the lifetime of the houses in an agreed form.

14.56 At this stage, the Joint Heathland DPD is at an early stage of preparation and as such, there is a lack of certainty regarding the final content of policies in the DPD.

14.57 *SANG Provision and CIL*

14.58 Approaches to the potential for double counting the cost of heathland mitigation between on-site legal agreements and CIL charges is to be considered through the emerging Christchurch and East Dorset CIL document.

14.59 SANG Phasing

14.60 If a new development is to have a significant phased element to its delivery and is large enough to require its own SANG, then this is a matter for discussion with Natural England as the development application is progressed. The key factor to address though is to ensure there is adequate mitigation in place to cater for the number of houses that will be occupied in each of the phases.

14.61 For small sites that do not require on-site SANGs, then mitigation will be provided through the CIL contribution. This will be pooled towards the delivery of south east Dorset wide mitigation projects. Upon payment of the charge, this will allow the development to commence. In the same that the current Heathland Planning Framework operates, the partner authorities will identify and deliver the projects to mitigate the combined effects of all these smaller scale developments.

14.62 Mitigation

14.63 Please see officer responses above regarding phasing and evidence studies.

14.64 For the spatial expression of the heathland mitigation, as it is part of a wider south east Dorset issue to address it is considered that the Heathland DPD proposals map is the best place for it to be depicted. There is also likely to be additions to the mitigation locations as the document passes through the various stages towards final adoption. The Heathland DPD is also in effect part of the local plan for the District and Borough.

14.65 Additionally, as the new neighbourhood and urban extension sites progress should they be adopted as policy, then the policies map will reflect their extent.

14.66 The range of measures is considered best placed in an SPD, where it can be regularly reviewed to reflect new evidence or target the areas where housing is coming forward at a given point in time within the plan period, to ensure the mitigation effectively relates to new development. However, this approach will be subject to examination as part of the Heathland DPD, which will also contain the overarching details of the types of mitigation that is appropriate and their general location. This approach is similar to that of the link between CIL and the Infrastructure Delivery Plan.

14.67 Policy Support

14.68 The support is noted.

Policy ME 3

Delete policy ME3 and insert following text as Appendix 5:

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).

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					
10	1	6	11	1	5	11	2	0

Table 14.3

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

14.70 Supporting Comments

14.71 Mr Renny Henderson, RSPB, Mrs Gill Smith, Dorset County Council and Mrs Nicola Brunt, Dorset Wildlife Trust

- We support the amendments made to this policy.

14.72 Mr Nick Squirrell, Natural England Dorset and Somerset Team

- Natural England supports the modifications made to this policy. One wording error is detailed below:
- 'Any residential development IN THE AREA BETWEEN (delete within) 400m and 5km of these areas will provided mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document.'
- This is to be consistent with wording in the Dorset Heathlands SPD.
- In accordance with recent progress on the Dorset Heathlands DPD the following minor rewording is proposed:
- 'The Dorset Heathlands (delete Joint) Development Plan Document AND SUPPLEMENTARY PLANNING 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 though 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. THESE MITIGATION MEASURES WILL BE REVIEWED AND REVISED WHERE NECESSARY AND MODIFICATIONS BROUGHT FORWARD FOR CONSULTATION THROUGH THE SPD REFRESH IN ACCORDANCE WITH THE AVAILABLE EVIDENCE.

14.73 Mr Jeremy Woolf, Woolf Bond Planning

- The proposed change to a more flexible policy focusing more on the quality rather than the quantity is supported. As elsewhere the SANG requirement should be varied dependent upon the radius of influence to the SPA.

14.74 Location and Accessibility of SANGs

14.75 Mrs Nicola Brunt, Dorset Wildlife Trust

- The policy should provide guidance on where SANGs should be in relation to the heathland/s they are designed to protect and that land adjacent to or in close proximity to existing heathland may be appropriate as Heathland Support Areas (HSAs). We also suggest that it seems less appropriate to aim to provide heathland on SANGs under guideline 12 than more robust habitats, especially where the preceding text identifies that SANGs do not have to contain heathland or heathy vegetation. With this habitat so vulnerable to disturbance it seems less suitable to encourage it on SANGs that are designed to encourage public access.

14.76 Mrs Lisa Jackson, Jackson Planning

- Bodorgan Environmental Management (BEM) generally supports the substance of change from ME3 to Appendix 5. They believe it is a more effective way to secure quality SANG that meets the needs of new residents, and mitigates any likely harm.
- However, BEM Object to the wording “These must be such that the SANGs is more attractive to visitors than the Dorset Heathlands.” This statement is not justified as the evidence to prove superior attractiveness is potentially subjective and would not be proportionate to the requirements of SANG. This is also inconsistent with the consultations in response to the draft Heathlands DPD which has a lower bar to success. The consultation suggested the DPD should describe SANG as having a similar experience to heathland. It is accepted by Natural England that SANG as a means of mitigation is experimental and untested and confirmed as such in the draft DPD that the long term efficacy of SANG is not yet established. Many of the new SANG in the Thames Basin Heath would not meet this onerous and disproportionate test.
- This is inconsistent with the earlier part of the policy that suggests that SANGs are intended to provide mitigation. The draft Heathland DPD acknowledges as part of the evidence base that there are no major SANGs in South East Dorset; it is not possible to establish how effective they are for mitigation.
- BEM believe the policy needs to be more effective to be found sound and needs to consider the distance/ journey time to the protected heathland and the availability of other existing alternative greenspace as a means of establishing the required efficacy of the SANG.
- The proposed SANG at Roeshot will link to the River Mude improvements and link south to the Coast and potentially could create links to Chewton Common. In the earlier consultation document of the DPD the importance of the wider green infrastructure network was recognised.

14.77 Mrs Hilary Chittenden, Chairman Environment TAG

- While supporting the principle of SANGs, subject to the strength of the evidence yet to be presented by Footprint Ecology, we retain our position that the policy is unsound and ask that the points listed below are read together with our previous comments (response to Core Strategy consultation 2012).
- The guidance should be generic and apply to whole of Dorset. The sites and pressures they have to withstand vary from one heathland area and its urban population to another. As previously noted, design should be bespoke but policy should focus primarily on diverting large numbers of people AWAY from the heaths.
- The policy provides no guidance on where SANGs should be in relation to the heathland or heathlands they are designed to protect. This is a critical oversight. Creating a SANG adjacent to, or in close proximity to, an existing heathland is counterproductive in that it will inevitably increase visitor pressure on that heath. Land adjacent to or in close proximity to existing heathland may be appropriate as Heathland Support Areas (HSAs). These HSAs should be additional to and clearly distinct from SANG, and have the entirely different purpose of encouraging redirection of EXISTING visitor pressure away from the relevant heathland.
- It is essential that new car parking is specifically for SANG use and its provision is not used to restrict the land available for informal recreation. It must not be allowed to become cheap/free out of town parking. Those SANGs designed specifically for New Neighbourhoods should encourage access by walking and cycling and comply with Core Strategy Objective 6.
- Guideline 14 The wording “free from” is too stringent. For example, there are relatively few areas that are free from traffic noise though clearly tranquillity is a key attribute: similarly a derelict farm building would not necessarily render a site unsuitable as a SANG. We recommend that the guidance should be more positive encouraging design that makes SANGs attractive to mitigate effects on heathland. This again underlines the importance of potential sites being judged on their merits.

14.78 Mrs Janet Healey, Dorset CRPE

- SANGs within walking distance of new neighbourhoods should not have parking spaces, access should be by foot only. Otherwise there is a danger that these spaces will be used by visitors to the neighbourhood, or by people visiting the town, they would not benefit those wanting to use the SANG.
- Although it is appreciated that dogs can do much damage on heathlands and therefore it is important to encourage dog walkers away from heathland, SANGS must not be designed purely for dogs. However, if the proportion of dog walkers is likely to be high, then possibly water facilities should be provided in order to protect any natural water features where dogs may inadvertently harm the wildlife.
- We agree that SANGS should never be next to playing fields, they have had such awful problems in Ferndown with dog walkers and playing fields. Proximity should be avoided at all costs. SANGS close to/next to heathlands should also be avoided in case the dogs stray into the heaths.

14.79 Mr Alan Spencer, Local Resident

- The policy has been worded as a catch all for people arriving at SANGs either by Car or on Foot, and as a consequence creates an ambiguity as to the facilities one can expect in a SANG. It also leaves an option for the Developer or Council to provide more car parking spaces in New Neighbourhoods which are situated close to dwellings rather than their aim of providing alternative green space.

- Although the policy does differentiate between SANGs close to Heath land and close to Neighbourhoods, in its present form it contradicts Objective 6 of the Core Strategy which sets out the ideal of encouraging the public to walk or cycle to SANGs rather than use the car.
- It should be obvious that any car parks provided in New Neighbourhood SANGs will become free car parks for visitors to Town Centres and / or be utilised as overflow parking for residential streets, as is the current practice.

14.80 Quality of SANGs

14.81 Mrs Hilary Chittenden, Chairman Environment TAG

- We strongly object to the inclusion of wording that SANGs are to be designed principally for dogs and offer accessible water bodies for dogs to swim.
- The provision of SANG must recognise the needs of the whole community, which includes non dog walkers and children, and the necessity of managing sustainably for example by grazing (as supported below).
- Guideline 12. We question the wisdom of specifically including “heathland” in the variety of habitats. SANGs must aim to develop the natural characteristics of the area.
- Landscape and vegetation para 2. - We welcome recognition of the need for grazing management.

14.82 Development Viability

14.83 Miss Lindsay Thompson, Terence O'Rourke representing Bloor Homes

- The guidelines should be flexible and this is particularly important when providing design guidelines that need to deal with a range of different circumstances. The wording of the quality guidelines appears inflexible in places, through the use of the word 'must'. By definition, a guideline should not be mandatory. Substitution of the word 'must' with 'should ideally' throughout the appendix would reflect the practicalities of provision and provide the flexibility required by developers and decision makers to ensure an appropriate response is made on a site by site basis.
- The appendix mentions visitor surveys from the Dorset Heathlands and the Thames Basin. These surveys should form part of the evidence base to the local plan/core strategy and should be available for consideration. It is not clear how much the guidelines have relied on evidence from the Thames Basin Heaths and how this evidence particularly relates to the Dorset Heathlands.
- If a SANG is intrinsically being designed to mitigate the impact of visitors to the Dorset Heathlands from across the County and beyond, there needs to be an appropriate mechanism in place to either allow flexibility or draw funding from across the County to deliver the SANG. The issue of the requirements need to be tested and should be debated in a basis of a conurbation wide strategy in accordance with the duty to co-operate.

14.84 Ms Jade Ellis, Turley Associates representing Bellway Homes

- Reference to specific circular walk distance necessary within SANGs (page 103) is not sufficiently flexible to satisfy the Effective test of soundness in our view. Nor is there evidence presented to suggest the overall net contribution of a varied supply of SANGS, to meet the varied recreational needs of the population, would not be effective.
- The text should be revised to be less prescriptive and more positive in support of: 1. A proportional approach that reflects an individual developments impact on the SPA (where on site SANG provision is proven necessary); 2. Positively encourage varied SANG provisions off-site that mitigate the level of housing proposed in the JCS.

14.85 Mr Peter Tilley, Tanner and Tilley Planning Consultants

- Whilst we support the deletion of Policy ME3 and the proposal to provide guidance on SANG's in relation to Policy ME2 in Appendix 5, we object to the inclusion in the fourth paragraph to reference to "...the means to provide mitigation for development of a residential nature within or close to 5km of the Dorset Heathlands...". The requirements of Policy ME2 and this guidance should apply to development within 5km of the Dorset Heathlands and there is no justification to apply the requirements to developments beyond this distance.

14.86 Mr Christopher Undery, Surveyor

- See previously submitted Response Form dated 15/06/2012. The imposition on the developer of cost burdens including high proportions of affordable housing, suitable alternative natural green spaces, heathland mitigation, community and transport infrastructure levies etc. will undermine viability, cause developers to reduce purchase offers to landowners to the extent that landowners will decide not to sell, or offers to purchase will fail to reach base price provisions in option agreements. In consequence development will not come forward, landowners will withhold allocated land and housing provision and other benefits will not be achieved.

14.87 Mr Richard Terry, Local Resident

- With limited residential development land identified the burden on developers is to great - the provision of increasing costs - heathland mitigation, transport and many other items. This will lead to reduced offers for land and potentially reducing the supply of land as owners will not sell.

14.88 Trees

14.89 Mr Justin Milward, Regional & Local Government Officer, Woodland Trust

- Under the 'Landscape & Vegetation' heading, we are pleased to see the new reference to native woodland creation, but would like to see it further supported by a 'two for one' tree replacement policy in respect of trees lost as part of heathland restoration (Policy ME2).
- A reading of new policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for this Local Plan.
- Woodland creation is also supported in the Dorset Biodiversity Strategy.

Officer Response

14.90 *Supporting comments*

- We welcome the supporting comments from key stakeholders to the policy changes, and not the revisions recommended by Natural England.

14.91 *Location and Accessibility of SANGS*

- The guidance is quite clear about the location of SANGs, how most people currently access them, and the potential catchment. Each SANG will be designed on the individual circumstances of the location and target visitors. The guidance is sufficiently flexible for details to be agreed on a case by case approach, according to basic agreed principles.
- The suitability of a site as a potential SANG will need to be fully agreed with Natural England at an early stage of discussion, to ensure that sites of high biodiversity are not compromised by the location of the SANG.
- It should be noted that this guidance has been agreed and adopted recently by Purbeck District Council at its Local Plan EiP. The guidance will shortly become adopted across South East Dorset between all stakeholder authorities. The guidance therefore carries considerable weight.

14.92 *Quality of SANGs*

- The suitability of a site as a potential SANG will need to be fully agreed with Natural England at an early stage of discussion, to ensure that sites of high biodiversity are not compromised by the location of the SANG.
- It should be noted that this guidance has been agreed and adopted recently by Purbeck District Council at its Local Plan EiP. The guidance will shortly become adopted across South East Dorset between all stakeholder authorities. The guidance therefore carries considerable weight.

14.93 *Development Viability*

14.94 For larger developments such as the proposed new neighbourhoods, they are required to ensure their impacts are fully mitigated through the provision of SANGs. Whilst there may be the potential for capacity to be added to a SANG through use of additional funds collected via CIL from other developments to enable it to be used to mitigate those other new developments in the vicinity by for example providing improved car parking or green links on to the site, it would be a matter for discussion with Natural England.

14.95 Similarly, discussions on a site-by-site basis are needed with Natural England to agree an approach on a SANG strategy that is both workable and that can fit within the guidelines proposed.

14.96 Work supporting the CIL charging schedules for Christchurch and East Dorset assesses the viability of development based on all the costs developers are likely to face in the District and Borough.

14.97 Trees

- It should be noted that this guidance has been agreed and adopted recently by Purbeck District Council at its Local Plan EiP. The guidance will shortly become adopted across South East Dorset between all stakeholder authorities. The guidance therefore carries considerable weight. It is not considered appropriate to provide detailed Tree policies in the Core Strategy.

Policy ME 5

Renewable energy provision for residential and non-residential developments....

....The expectation will be that ~~15%~~ **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.

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					
3	1	1	1	0	1	0	0	1

Table 14.4

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

Reduction in renewables target

14.99 Angela Pooley, Friends of the Earth

- Reducing the target for renewables from 15% to 10% is contrary to the UK's binding target of achieving a minimum of 15% of all energy coming from renewables. It is also contrary to the policies in the Bournemouth, Dorset & Poole Renewable Energy Strategy to 2020.

14.100 Mr Alan Spencer, Local Resident

- The policy, by reducing its target from 15% to 10%, is ignoring that future innovation can have an impact in reducing the effects of Climate Change. It also gives a message to developers and the public that climate change is not a serious issue. 10% is a soft target; it is quite easily achievable with modern materials and processes.

14.101 Mr Renny Henderson, RSPB

- We object to this amendment. We are unclear as to the justification of the reduction to 10%.

14.102 Mrs Hilary Chittenden, Environment TAG

- As advised in our response to Objective 3, we do not support the reduction of aspirational targets for renewable energy provision. Arguments about viability cannot be sustained when the technology that might be applicable to any site over the Plan period is unknown as is the level of Government incentives. We should be striving to achieve the maximum that is technically possible as required in NPPF 97.

14.103 Mrs Susan Phyllis Christine Chapman

- Target has been altered to 10% rather than 15%. This is not in line with "presumption in favour of sustainable development". Rt Hon Greg Clarke, minister for planning in National Planning Policy Framework.

14.104 Ms Lisa Jackson, Jackson Planning

- The basis of the reduction of the renewable energy target from 15% to 10% is not sound. It is inconsistent with National Energy Policy and the Government's target in National Energy Policy EN-1. It is also inconsistent with NPPF paragraph 93 that emphasises the role planning plays to secure radical reductions in greenhouse emissions and supporting the delivery of renewable and low carbon infrastructure. Paragraph 95 – third bullet point-

requires LPAs to set standards for sustainability consistent with the Government's policy. A reduction of Renewable Energy provision reduction to 10% within the policy is not justified on viability grounds. The very fact that larger proportions of total energy used must be from renewable sources will assist in driving down unit prices.

Officer Response

14.105 The proposed change based on available evidence on viability of development rather than on the Government target of 15% that directly relates to the need for the Country to cut Carbon Dioxide emissions. Whilst no specific target is set out in the NPPF, the policy is worded such that if a higher national standard is set, this would take precedence.

Policy (New) 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

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					
6	0	0	8	3	4	6	5	1

Table 14.5

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

14.107 Support

14.108 Mr Renny Henderson, Conservation Officer, Royal Society for the Protection of Birds

- We generally support the aims of this new policy.

14.109 Mr Joshua Lambert, Pro-Vision Planning representing Wessex Water

- The Estate supports policy ME8 as the policy is consistent with Paragraph 97 of the NPPF

14.110 Mrs Lisa Jackson, Jackson Planning representing Meyrick Estates

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

14.111 Conflict with Policy ME1

14.112 Mr Renny Henderson, Conservation Officer, RSPB

- We suggest the addition of text which highlights the need for schemes to be comprehensively assessed and to avoid or mitigate for potential harm, in accordance with Policy ME1.

14.113 Mrs Nicola Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust consider that ME8 could conflict with ME1 with the paragraph permitting development where “ It would not have an adverse ecological impact upon the integrity of protected habitats and species unless there is no alternative solution and there are imperative reasons of overriding public interest”.
- We consider that there should also be reference to priority habitats and species and continue to be a requirement to mitigate or compensate for any harm to the natural environment where such schemes are approved.

14.114 Mrs Hilary Chittenden, Chairman, Environment TAG

- While accepting that policies throughout the Core Strategy are mutually dependent there could be risk of this policy conflicting with biodiversity policy, ME1.

14.115 Renewable Technology

14.116 Angela Pooley, Co-ordinator East Dorset Friends of the Earth

- The wording for this policy is unjustifiably negative and suggests a lack of commitment to renewable technology, in particular, wind.

14.117 Mrs Sheila Bourton

- With regard to renewable energy apparatus, how does the Council measure "it will not cause significant harm to a neighbouring amenity by reason of... ."? What is meant by "significant"? There must surely be a demonstrative formula to measure perceived harm.

14.118 Mrs Sheila Bourton, Chairman, Keep Wimborne Green

- How does the Council measure "significant harm to a neighbouring amenity...."? What is meant by "significant"?

14.119 Mr Elliot Marx, Local Resident

- 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.
- The judgement of at what point impacts have been minimised to 'acceptable' levels is open to challenge as the New Policy ME8 proposed here will not result in the needed amount of renewable energy being generated.
- Loss of visual amenity should not be a deciding factor in granting permission for installation of wind turbines or any other renewable energy installation. The need for new renewable energy generation is too urgent to compromise development in this way

Officer Response

- 14.120** The supporting comments are welcomed.

14.121 *Policy ME1*

14.122 ME1 applies to all development, including renewable energy, so whilst not specifically referred to, a development site would need to comply with this policy.

14.123 *Renewable Technology*

14.124 It is considered the policy meets the requirements of the NPPF. It will however, continue to be developed as further work will be undertaken to identify suitable areas for renewable and low carbon energy sources during the plan period. This is stated in the policy itself allowing flexibility to meet changes in technology advancement. With regard to the term 'significant', this will be judged on a case by case basis, but has been accepted by Planning Inspectors as being an appropriate form of wording in this policy.

Paragraph 13.33 -

14.125 **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 Drainage Systems to manage surface water runoff.**

14.126 Ms Gill Smith, DCC

- Dorset County Council supports these proposed changes.

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.

Consultation Response

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

Table 14.6

14.127 The comments from key stakeholders and the general public in respect of this Proposed Change are as follows:

14.128 *Supporting comments*

14.129 Gill Smith, Dorset County Council

- Dorset County Council supports these proposed changes.

14.130 Mrs Trish Jamieson, Clerk, Burton Parish Council

- Supports the strengthening of the restrictions on building in areas likely to flood.
- Notes that this policy as strengthened will protect Burton Village from development in unsatisfactory areas.

14.131 Mrs Hilary Chittenden, Chairman Environment TAG

- The revised wording needs slight correction so that it makes sense. Where exceptionally any developmentRemove the word 'all'.

Officer Response

14.132 The supporting comments are welcomed. The comments regarding the use of the word 'all' are noted, but it is not considered necessary to make the change suggested in this instance.

15 Responses and Analysis of Chapter 14 High Quality and Distinctive Environments

Policy HE 1

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.

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	4	1	0	1	0	3	0	1	0	4

Table 15.1

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

15.2 General Comments

15.3 Rohan Torkildsen, English Heritage

- Policy HE1 is unclear, repetitive, incomplete, and inconsistent with the NPPF.
- The title is misleading. The third paragraph is grammatically confusing. Other text is criticised.
- The Policy is silent on a few areas I would have expected to be included, as a result I would suggest it is redrafted to accord with the NPPF.
- Suggestions for developing DPDs are given.

15.4 Mr M Hirsh, Intelligent Land

- The Policy omits the reference to criteria for the use of Heritage Assets for residential purposes and fails to describe the context of viability as being 'optimal', there is also no reference to enabling development.
- It fails to meet the position set out at paragraph 55 bullet point 2 of the NPPF, which places it in conflict with 'saved' policy CSIDE2 of the EDLP.

15.5 Burton Parish Council

- Supports the new wording. Point out that Burton is a Conservation Area and that Burton Farm was identified as an irreplaceable resource

15.6 Additional Comments:

- The proposed changes to Policy HE1 are very much better than the original. However there is still a discrepancy between the description of the heritage assets to be protected in paragraph 1 of the amended text, and the fourth paragraph (starting Article 4..). The first paragraph is more all embracing than the fourth paragraph, which refers only to key buildings and structures. The text should be more consistent.
- The additional statement refers to heritage assets being an irreplaceable resource. I would imagine that Burton Farm would come under the category of Heritage.
- Why are Conservation and Special Character Area Appraisals to be updated?
- Is this being changed to accommodate new development?
- Christchurch has a rich archaeological heritage which is virtually ignored throughout the Core Strategy and proposed changes to it. Current Structure Plan and Local Plan policies are combined into a bland Policy HE1 and are inadequate.
- Burton Farm clearly has heritage importance. Such a statement can be interpreted in many ways and appears to be so designed as to leave open the possibility of redeveloping the old barns and possibly the farm itself.
- It appears that the Council are altering the Conservation Area Appraisal to meet the changes made by this development rather than the other way round. I object to this bending of the rules.

Officer Response

15.7 The amended text has taken on board the previous comments given by English Heritage, so these new comments are somewhat surprising. The advice in the NPPF has been followed, and this supersedes previous advice. The Core Strategy takes a strategic approach and replaces the Structure Plan and Local Plans. It is not proposed to change the policy as it meets the requirements of the NPPF.

15.8 Burton Farm is recognised as a heritage asset, and the policy has not been drafted to allow new development. Appraisals need to be updated periodically and it was always intended the Character Statements would be updated during the life of the Plan.

Policy HE 2

Design of new development

....Relationship to nearby properties, including minimising general disturbance to amenity....

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.

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	3	1	0	0	0	2	0	0	0	0

Table 15.2

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

15.10 *General comments*

15.11 **G Smith, Dorset County Council**

- Dorset County Council supports these proposed changes to para 1.26-1.27 and Policy HE2.

15.12 **Keep Wimborne Green**

- We agree this is very important. Who decides what level of disturbance is acceptable? How will it be policed?

15.13 Sheila Bourton, Local Resident

- I agree that it is very important to minimize general disturbance to existing properties, I am concerned as to how this will be measured and policed? What level of disturbance is acceptable?

15.14 Hilary Chittenden, Environment TAG

- Analysis para 9.58 commits to including light pollution but has not done so. It is not covered by “amenity”. The changes have not addressed ETAG concerns.

Officer Response

15.15 The design of new development will be monitored through the development management process and through the discharge of conditions.

15.16 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. As previously discussed, 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 HE2 in this respect.

16 Responses and Analysis of Chapter 15 Meeting Local Needs

The size and type of new dwellings

Consultation Response

16.1 There were no comments in respect of this Proposed Change.

Officer Response

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.

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					
10	0	3	10	5	11	9	10	3

Table 16.1

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

16.3 1/ Unqualified support for the policy and revisions

16.4 2/. That revisions address concerns over the use of the housing target as a starting point for negotiations, but other representations have not been addressed.

Officer Response

16.5 The respondent has not explicitly introduced objections to the proposed changes.

16.6 3/. Permitting a financial contribution in lieu of on site affordable housing

16.7 Regrets seeing provision for sites resulting in a net increase of 15 or more dwellings.

Officer Response

16.8 The proposed changes have not introduced a new possibility to accept a financial contribution for sites of 15 or more but have modified the previous approach from 2 categories (below 5; or above 5 dwellings); to three categories (1 to 4 dwellings, 5 to 14 dwellings and 15 or more dwellings). The three category approach introduces greater flexibility. On 1 to 4 dwelling developments the developer can default to an off-site contribution; on 5 to 14 dwelling developments, the expectation is on-site provision, but at its discretion the Council can accept an off-site contribution. On larger 15+ developments, the expectation is on site provision, unless it is not possible to provide affordable housing on site.

16.9 4/. Requiring AH where new developments result in net loss of dwellings

16.10 That wording should be adjusted to prevent developers avoiding affordable housing when reducing the number of units on a site (example cited in Wimborne).

Officer Response

16.11 The respondent has not objected to a proposed change.

16.12 5a/. Unsound evidence base

16.13 That up to 50% affordable housing is not justified by the evidence base on grounds of viability and threatens overall delivery of housing.

16.14 That the CIL evidence shows that provision in excess of 30% to 35% will render sites non-viable.

16.15 That the evidence base has not taken all development costs into account, or the overall viability of the plan.

16.16 Questions evidence base for 40% on brownfield sites. Does not accord with 3 Dragon findings, i.e. only viable at 40% in higher value areas, and at 30 dph or above (therefore not viable in lower value areas of CBC & EDDC, and on low density schemes).

16.17 That the Policy should not be up to 50% across the board on greenfield sites, but reflect the value areas and recommendations of the 3 Dragon evidence base, including lower value sites in Verwood having a target of 35%.

Officer Response

16.18 In the 3 Dragon reports for both Christchurch and East Dorset (Findings and Policy Options), options included 50% affordable housing in higher value areas and 40% across the remaining areas.

16.19 The recent CIL viability research has confirmed that even under the current highly constrained market conditions, all residential development opportunities schemes across Christchurch and East Dorset (including brownfield and greenfield, large and small sites, and high value and low value areas) would be viable, at a minimum baseline of 30% affordable housing (of which 70% would be for Affordable Rent) and with a CIL contribution at £100 per square metre. In the Consultants opinion, many developments, especially greenfield sites, would still be viable with significantly more than 30% affordable housing. By stating 'up to' 40% or 50% affordable housing, and including explicit commitments surrounding flexibility, deliverability and 'sufficient margins' to facilitate housing delivery, certainty is given that the Council's affordable housing policy will not undermine deliverability or viability, where robust and verified evidence is provided.

16.20 It is recognised that proposed policy LN3 will need to be supported with detailed operational procedures, setting out how balances around 'flexibility and sufficient margins to facilitate housing delivery' will be applied in practise. These will be formally adopted, with prior public consultation, in the proposed Housing and Affordable Housing Supplementary Planning Document.

16.21 With exceptional levels of housing need and some of the worst affordability/income ratios outside London, both Councils intend to maximise the scope to secure affordable housing to address both social and economic imperatives for the long-term benefit of the local area. As proposed the policies will be flexible, enabling growth and housing delivery in the short-term, but equally ensuring that affordable housing provision is optimised and future proof over the life of the Core Strategy.

16.22 5b/. Viability

16.23 That the proposed changes fail to address the difference between viability and deliverability – it will be critical for landowners and developers to achieve competitive returns, especially if 70% Affordable Rent proportion.

16.24 Viability won't necessarily improve with increased house prices, as development costs will rise.

16.25 That the policy does not make it sufficiently clear that affordable housing requirements will be subject to viability assessment.

16.26 Considers that 40% brownfield policy requirement will result in viability assessments for all brownfield schemes seeking to reduce affordable housing.

Officer Response

16.27 The first sentence of the newly amended LN3 text states that the Policy intends to maximise affordable housing provision, whilst ensuring flexibility and sufficient margins to facilitate housing delivery. The Policy wording states 'up to' 40% or 50% affordable housing, explicitly acknowledging the scope to deliver less. The text also confirms that any proposals for a lower level of affordable housing, must be accompanied by clear and robust evidence that will be subject to verification.

16.28 The text also confirms that the mix of affordable housing will be subject to negotiation but rightly and reasonably, counter proposals will be required to reflect identified housing needs in the latest SHMA. The scope for negotiation is also confirmed through the expectations that ‘normally’ the [affordable housing] tenure split should allow for 30% intermediate housing.

16.29 It is acknowledged that the proportions of affordable housing and the tenure mix of the affordable housing itself, could both be factors affecting viability. If it is demonstrated that either or both elements prevent viable and deliverable housing development, then scope is included within the policy to reduce the percentage of affordable housing, or to negotiate alternative tenure mix proportions – subject to meeting needs identified in the SHMA.

16.30 The policy principles are sufficiently flexible to address changing market and/or development cost circumstances, as long as expert evidence is submitted and is subsequently verified as part of the pre-planning and planning application process.

16.31 Unless the Housing and Affordable Housing Supplementary Planning Document makes provision for any exceptional tests or exceptional circumstances, any planning applicant seeking to provide less than 40% affordable housing on brownfield sites, will be expected to submit supporting viability evidence for verification. Carrying out such an assessment should form part and parcel of any prudent development business plan, and should not be viewed as an onerous requirement. However it is acknowledged that timescales for verification may be a critical factor in business planning, and the Councils will set out procedural service targets within the Housing and Affordable Housing Supplementary Planning Document.

16.32 5c/. Flexibility

16.33 By insisting that affordable housing provision must reflect identified housing need, the scope for negotiation is undermined – should state ‘ideally’.

16.34 Requiring affordable housing contributions on very small sites will hinder small developments coming forward and is inconsistent with NPPF.

16.35 No indication that policy is flexible as required by NPPF.

Officer Response

16.36 The revised wording of Policy LN3 confirms that the requirement will be applied flexibly, recognising the need for ‘sufficient margins to facilitate housing delivery’, permitting negotiation and reductions in percentages of affordable housing, or adjustments to tenure mix, where these are justified and proven.

16.37 However the Policy must result in the meeting of identified housing needs, as set out in the latest SHMA (and as updated in the future). But at the current levels of unmet housing need across Christchurch and East Dorset, and with the diversity of housing need – for both Affordable Rented and Intermediate Affordable Housing – wide scope exists to negotiate the type and tenure mix of affordable housing.

16.38 Notwithstanding this scope for negotiation, evidence supports the justified prioritisation of affordable rented (or socially rented) housing in Christchurch and East Dorset where this is viable, as defined within the definition of affordable housing as set out in Annex 2: (Glossary) of the NPPF.

16.39 Unless the Housing and Affordable Housing Supplementary Planning Document makes provision for any exceptional tests or exceptional circumstances, all category C3 residential planning applications, large or small, showing a net increase in dwellings will be subject to the policy requirements of LN3. But as explicitly confirmed within the Policy, if supporting expert evidence is provided (and verified) demonstrating that sufficient margins can only be achieved through a reduced level of affordable housing (either onsite or offsite financial contribution), then the adjustments will be made.

16.40 As previously noted, carrying out such an assessment should form part and parcel of any prudent development business plan, and should not be viewed as an onerous requirement.

Affordable Housing Exception Sites

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...

....East Dorset

- West Moors; St Leonards and St Ives; Colehill, Corfe Mullen, Three Legged Cross; Alderholt; Cranborne....

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					
28	0	24	6	2	4	4	3	2

Table 16.2

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

16.42 1/. Changes to the list of eligible settlements

16.43 The additional inclusion of Colehill Parish as eligible for exception sites.

16.44 The additional inclusion of Corfe Mullen as eligible for exception sites.

16.45 Generally increasing the settlement scope for exception site policy.

Officer Response

16.46 It should be noted that of 25 respondents, 23 expressed support in favour of including Colehill Parish within the eligible list of Parishes, creating a potential future supply of housing to meet local need.

16.47 The revised list of eligible Parishes was extended to include Colehill and Corfe Mullen to increase the scope for the maximum use of exception policy in settlements both within the rural areas, but also where boundaries adjoin rural areas. A step that was made possible through the less prescriptive definition of rural settlements within the NPPF, but that also reflected the level of public objection to the former draft Core Strategy (in the case of Colehill) and to achieve consistency (by including Corfe Mullen).

16.48 2/. Broadening scope for exception sites to ‘very close’ to development boundaries

16.49 Respondent welcomed this revision but further detail required to define ‘very close’.

16.50 3/. Changes reducing explicit restrictions to 100% Affordable Housing (thereby creating scope for some market housing)

16.51 Ambiguous concerns at revised policy wording.

16.52 Welcomes the revised policy wording.

16.53 That the Policy does not go far enough to permit market housing.

Officer response

16.54 At the present time the Council does not intend to positively word Policy LN4 to permit market housing as a part of exception site policy, considering that doing so would undermine the prospect of achieving 100% affordable housing exception sites, as have been provided across East Dorset in the distant and recent past.

16.55 However, it was also recognised that previously proposed policy wording - that would have explicitly prevented any scope for cross-subsidy within such schemes - should be removed, to permit long-term flexibility within the policy and the possibility of cross-subsidy on a highly controlled basis, as suggested within the NPPF.

16.56 In addition to the policies listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.

Gypsies, Travellers and Travelling Showpeople

16.57 Paragraph 15.20

16.58 ~~Circular 04/2007~~ **The Planning Policy for Traveller Sites (2012)** advises that the Core Strategy should set out criteria for the location of travelling showpeople 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 practise for criteria policies.

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.

Consultation Response

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

Table 16.3

16.59 The comments from a key stakeholder in respect of this Proposed Changed are as follows:

16.60 Dorset County Council support the proposed changes to reflect changes in government policy.

Officer Response

16.61 Support noted.

Community facilities and services....

~~**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.**~~

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					
3	0	0	3	1	2	1	1	0

Table 16.4

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

16.63 Lack of definition of community facilities and services

16.64 Hall and Woodhouse consider the policy to be ambiguous as community facilities and services are not defined as they are in Policy PC4. Not clear whether policy relates to privately run facilities such as pubs and local shops or more specifically to facilities which are generally funded. Policy wording and the Infrastructure Delivery Plan suggests that the policy is directed to facilities that are generally publicly funded, but this is not clear.

Officer Response

16.65 It is still considered that continued reference to "community facilities and services" is in conformity with the terminology in paragraph 70 of the NPPF which makes it clear that the term extends to privately run facilities as well as publicly funded.

16.66 Loss of facilities: unclear

16.67 Hall and Woodhouse consider the proposed addition of the requirement to show that the "loss would not result in a substantial decline in the range and quality of facilities and services for local people" is not defined as to how this will be measured. Also the two parts of the policy may conflict - a facility may no longer be viable but its loss would remove the only facility of its kind from the community. The policy should focus on ensuring that a facility or service has been adequately marketed to prove whether it remains viable.

Officer Response

16.68 Issues on how to measure decline of quality and range of facilities and assessing viability are normally considered at pre-application discussion or planning application stage. There is potential to include further detail in a policy within the Development Management DPD.

16.69 References to financial contributions

16.70 Dorset County Council consider the wording confusing as it does not set out the difference between planning obligations and CIL and how the two relate to each other. Implies that planning obligations may be sought under CIL regulations, which is incorrect. Suggest that Core Strategy should include a new policy and supporting text in the Key Strategy.

16.71 Hall & Woodhouse consider the reference too vague and that the circumstances and basis in which contributions should be sought need to be detailed.

16.72 Druitt Hall

16.73 The first sentence re loss of existing community facilities is contrary to CBC's plans to demolish Druitt Hall.

Officer Response

16.74 CIL will be the primary means of securing developer contributions to address the impacts of development on infrastructure. The use of Section 106 obligations where appropriate can complement CIL. The CIL Regulations 2010 define the circumstances where each can be used. Thus it is correct to refer to planning obligations being sought in accordance with the CIL Regulations 2010."

16.75 It is not considered necessary to include a new policy in the Core Strategy regarding CIL. The Infrastructure Delivery Plan sets out the intention that each Council intends to become a CIL charging authority and sets out the priorities. Where relevant, Core Strategy policies contain references to CIL.

16.76 It is not considered necessary to detail the circumstances and basis in which contributions should be sought as this is contained within the CIL Regulations.

16.77 The demolition of Druitt Hall does not preclude the building of a new community hall. A smaller hall could be accommodated on land already owned by the Council. It is understood that the Community Partnership have expressed their continued aspiration to provide a new hall for the Town Centre but have yet to submit a planning application for a smaller hall.

New Policy LN7

Housing and Accommodation Proposals for Vulnerable People

Category C2 health and care related development proposals

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 to demonstrate that any impacts upon, or risks 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 development proposals 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 development 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 will require the prior approval of both the Council and Dorset County Council.

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					
3	0	2	2	2	3	2	3	0

Table 16.5

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

16.79 1/. Welcomed

16.80 Without qualification (including Dorset County Council, the statutory body with responsibility for older and vulnerable people).

16.81 Welcomed but more robust enabling policy required.

16.82 Welcome the inclusion of the policy, but wish to see a more robust enabling policy presuming the positive determination of such housing. Especially so, given the demographic of the population and that the NPPF guidance requires the assessment of the group as part of SHMAs. The Council is also urged to review Housing in Later Life: Planning Ahead for Specialist Housing for Older People (on the HousingLIN website).

16.83 2/. The introduction of Lifetime Home standard requirements

16.84 That the proposed introduction of Lifetime Homes standards for larger scale developments and neighbourhood schemes is unsound, unjustified and contrary to national policy. That the cost of Lifetime Home Standards (two average costs quoted – one circa £3,000 per dwelling and one £1,525 per dwelling) have not been factored into viability assessments as a development cost (as required by the NPPF).

Officer Response

16.85 The aim to “encourage the provision of homes which incorporate flexible and sustainable design principles, including the Lifetime Homes Standards” is not explicitly connected to new policy LN7, but is made as a general statement to be associated with all residential development proposals. In the interests of delivering more sustainable communities, and enabling lifetime flexibility, the Council will encourage the Lifetime Homes Standard and other sustainable design principles that contribute to affordable warmth.

17 Responses and Analysis of Chapter 16 Prosperous Communities

Policy PC 1

Christchurch and East Dorset employment land hierarchy:

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

...The following sites 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:....

....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.**

Consultation Response

17.1 There were no comments received in respect of this Proposed Change.

The Rural Economy

17.2 Paragraph 16.16

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

Policy PC 3

The Rural Economy

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

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

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

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

- Are consistent in scale and environmental impact with their rural location avoiding adverse impacts on ~~the Cranborne Chase and West Wiltshire Downs AONB~~, sensitive habitats, Areas of Great Landscape Value and landscapes identified through landscape character assessments and the openness of the Green Belt.

- **Conserve the landscape quality and scenic beauty of the Cranborne Chase and West Wiltshire Downs AONB, and comply with the provisions of the AONB Management Plan.**
- Do not harm amenity and enjoyment of the countryside through the impact of noise and traffic generation.
- That minimise additional trips on the highway network and are accessible by sustainable modes other than the car.

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

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

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

Consultation Response

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

Table 17.1

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

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

17.6 Sixpenny Handley with Pentridge Parish Council

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

Officer Response

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

17.8 *Housing Development in the Countryside*

17.9 The Charborough Estate

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

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

17.11 Southern Planning Practice

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

Officer Response

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

Policy PC 6

Electronic Communications Networks

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

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

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

Consultation Response

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

Table 17.2

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

17.14 *Locational Criteria*

17.15 Sheila Bourton, Keep Wimborne Green

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

17.16 *Structural Capacity*

17.17 Mono Consultants Limited

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

17.18 New policy wording suggested:

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

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

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

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

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

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

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

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

Officer Response

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

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

18 Responses and Analysis of SA and HRA Reports

Sustainability Appraisal

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	1

Table 18.1

18.1 Jackson Planning

18.2 Grateful that the SA has been updated to cover the alternative site/solution at Burton, as it is believed this is a viable alternative and the SA will assist the Inspector at Examination.

Officer Response

18.3 Comments Noted.

Habitats Regulations 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	
2	0	2	0	0	0	0	0	0	0	0	0	0

Table 18.2

18.4 RSPB

18.5 We support the comments made in paragraph 3.24. These relate to uncertainties over the effects of policies KS9 and KS10.

18.6 We support the comments made in paragraph 3.25. These relate to the aspirations of Christchurch Borough Council for a by-pass (as mentioned on the Vision). We would add that any such proposal is likely to need project level assessment including a Habitats Regulations Assessment (HRA). This will include a consideration of alternatives and considerations of over-riding public interest, as is briefly described in paragraph 3.19.

Officer Response

18.7 Comments noted.

19 Responses and Analysis of Infrastructure Delivery Plan

Infrastructure Delivery Plan Comments

19.1 The comments received are set out below by theme. The number of comments received are are listed in the table below.

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	5	2	0	5	0	4	0	4	0	5

Table 19.1

Heathland Mitigation

19.2 Para 2.88:European legislation requires infrastructure to mitigate the impact of development on Dorset Heathlands SPA and Dorset Heaths Special Area of Conservation (SAC). Development can lead to detrimental impacts on heathland if not mitigated through a range of measures that may include amongst other things the provision of areas of Suitable Alternative Natural Greenspace (SANGs), access and visitor management, wardening, and education measures. Six South-East Dorset authorities have long been involved in a joint approach across the area to mitigate the impact on heathlands by housing development through an Interim Planning Framework (IPF). This has now been replaced by the Dorset Heathlands Planning Framework SPD 2012 -2-12. The same authorities are now bringing forward a South East Dorset wide DPD which will set out the cross-boundary planning approach to mitigating the impact from development on heathland. This DPD will provide further evidence of the projects required to mitigate adverse effects arising from development which will link in with the table in the IDP and will be funded by CIL in future. Development in Christchurch and East Dorset cannot be granted planning permission until the relevant Council is satisfied that that its impact on the protected heathlands can be reasonably mitigated through the delivery of an identified schedule of mitigation projects and works identified by the Heathland Executive. In the case of large scale development proposals, a bespoke mitigation package including the delivery of SANGs may be appropriate.

19.3 Para 2.89:To ensure that development can proceed in the Borough and District, the Councils will ensure that the appropriate proportion of CIL monies collected from development will be directed towards delivering the Dorset Heathlands SPA and Ramsar and Dorset Heaths SAC mitigation projects identified in the IDP table as a priority.

Consultation Response

19.4 The comments from key stakeholders and the general public in respect of this Proposed Change have been grouped together:

19.5 Natural England

- Natural England support paragraphs 2.87, 2.88, 2.89 and the hierarchy set out in 2.94. These set out an approach to the mitigation/avoidance of adverse effects on European and Internationally protected sites which is consistent with the requirements of the Habitats Regulations 2012 and Government policy set out in the NPPF with regard to the protection of these sites.

19.6 RSPB

- The RSPB object to paragraph 2.88, requesting some changes to the text to make it clear that in the case of large scale proposals a mitigation package is likely to be required. The organisation also states that the word "avoidance" should be included in the fifth sentence within the hierarchy of addressing potential effects on designated sites.
- The RSPB object to paragraph 2.89 stating that the current drafting of the paragraph does not make it clear that the Council gives absolute priority to CIL funds for mitigation for designated heathlands. They believe it is inferred but not unambiguous.

Officer Response

19.7 The Councils have not yet set out a draft Regulation 123 list which is required under the CIL Regulations, setting out which projects will be delivered by CIL and which by s106. Until this has been written, changes to the wording are not proposed.

19.8 This paragraph of the IDP is a short statement of information on the effect of development on heathlands and how SANGs are required to mitigate the effects of development. It is not a summary of the Heathlands Planning Framework SPD which provides full information on avoidance and mitigation. A change is not proposed.

19.9 The table in the IDP lists heathland mitigation as the first priority. Consideration could be given to amending the paragraph wording but it is felt the table makes the priority setting clear.

19.10 Natural England's comments are noted and welcomed and give support to the view that the amendments suggested by the RSPB are not required.

Transport

<u>A338 resurfacing (maintenance scheme from A31 junction-A3060 Cooper Dean) and widening to 3 lanes (Blackwater to A3060 Cooper Dean).</u>	<u>£30M</u>			<u>In order for this scheme to proceed, funds will need to be used from the "Local Major Transport Scheme Funding" devolved from Government to Bournemouth, Dorset and Poole. This must be approved by members.</u>	<u>2015-2019</u>	-
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Table 19.2

Consultation Response

19.11 Dorset County Council (DCC) have suggested a change is required to reflect the fact that the widening of this road is likely to take place after 2020. It should also be made clear that while the description of the road is correct, it is only the length from the DCC boundary with Bournemouth Borough Council that is within their control and the IDP should be reword to reflect this.

Officer Response

19.12 This is not a comment on a change but a request from DCC to update the IDP to take into consideration changing circumstances with regard to the time scale.

Flood Management, mitigation and defence

19.13 Strategic Flood Risk Assessments have been carried out for both areas. Extensive areas of risk have been identified within Christchurch and as a result improvements to flood defences have been identified in the emerging Christchurch Bay and Coastal Erosion Strategy and these are included in the Schedule of Projects. Further information on how flood risk will be managed for strategic sites will be set out in the Site Allocations Development Plan Document and Floodrisk Supplementary Planning Document. DCC now have a role in this issue as the Lead Local Authority and the SUDS approving authority.

Consultation Response

19.14 DCC has pointed out that they are not yet the SUDS approving body and have requested an amendment to the sentence.

Officer Response

19.15 DCC suggest amending the wording to read as follows: Dorset County Council now has a role in this issue as the Lead Local authority and once Schedule 3 of the Flood and Water Management Act is implemented, as the SUDS approving body authority. It is suggested the change is made.

Education

19.16 DCC is the education authority for the Borough and District and has a statutory duty to plan for and provide sufficient school places for children and young people.

19.17 The increased population which will arise as a result of development will require some expansion of education within both authorities' areas. DCC as the education provider has been closely involved in the planning process and has supplied information on the requirements which will be generated by the development rates in the Core Strategy.

19.18 In Christchurch, it is not anticipated that there will be a requirement for a new school. The DCC strategy will be to extend and expand existing schools rather than build new schools. It is anticipated that there will a requirement to extend Highcliffe St Marks, Somerford Primary and Mudeford Infant/Junior schools.

19.19 In Wimborne, a replacement first school is proposed on the site north of Wimborne, Cranborne Road New Neighbourhood. This school would not only cater for the children living on the proposed development to the east and west of Cranborne Road but for the existing pupils at Wimborne First School. The existing Wimborne First School would be closed. A site for a first school is also shown at the south of Leigh Road New Neighbourhood.

19.20 DCC recognise that Lockyers School building needs replacement. However, there are currently no funds to do this. DCC is still considering what type of school would replace the middle school, this is dependant on the outcome of any changes at Corfe Hills School which has become an Academy School. It is unknown as to whether the school will retain its three tier function or if it will widen its age group intake to become part of the two tier system. DCC are keen to replace the Middle School on the recreation site across the road from the existing site. Any design for a school would need to be flexible to allow for the school to be a middle school or a Primary School depending on any decisions at Corfe Hills. Henbury First School could be extended to become a primary school.

19.21 There is some capacity in Ferndown and West Parley schools to cater new development. However, a one form entry first school is required. This could be provided by expanding the existing Parley First School which is the County's preferred solution, although a new stand-alone site could be possible.

19.22 A new upper school is proposed for Verwood, on DCC owned land adjacent to Emmanuel Middle School.

Education						
CBC-Refurbishment and expansion of Somerford Primary School	£2.1m			DCC/Developer contributions		<u>3 Essential Strategic Infrastructure</u>
CBC-Highcliffe St Marks Extension to School from 60 intake to 90.	£1.2m £1.3m			DCC/ <u>Developer contributions</u>		<u>3 Essential Strategic Infrastructure</u>
CBC-Mudeford Infants and Junior Schools- combine onto one site and expand	£4.5m £5.5m			DCC/ <u>Developer contributions</u>	Late in plan period	<u>3 Essential Strategic Infrastructure</u>

Education						
CBC-Secondary school upgrade for three schools-combined amount	£7.8m £11.6m			DCC / <u>Developer contributions</u>		<u>3 Essential Strategic Infrastructure</u>

Table 19.3

Consultation Response

19.23 The comments from key stakeholders and the general public in respect of this Proposed Change have been grouped together:

Education

19.24 Dorset County Council

- DCC Education are concerned that they have not taken into consideration development which will come forward within the urban areas of Christchurch and East Dorset. As a result, additional information is required within the paragraphs on Education and within the tables.
- In addition to the items already identified in the IDP, additional requirements have been identified arising through increasing pressure from birth rates and the need to accommodate population outside the specific allocated sites.
- Christchurch: Amend Para 2.44 and Schedule of Projects for Christchurch
- Due to increasing pressure from birth rates Dorset County Council wish to propose a further change to para 2.44 of the IDP to add Burton Primary School to the list of schools in Christchurch that will need to be expanded.
- Add to the Schedule under Christchurch Education: CBC Burton Primary School expansion to 2FE; Est Cost £1.5 million; Delivery agency – DCC/Developer contributions.
- East Dorset. Wimborne: Amend Para 2.46 and Schedule of Projects for East Dorset:
- In addition to the specific site allocations, an additional 210 places in the Wimborne area should be delivered as an extension to one of the schools, funded through developer contributions and DCC.
- Add to the Schedule under East Dorset Education: additional 210 places delivered as an extension to one of the schools; Est cost £1.8million; Delivery agency Developer Contributions and DCC.

- East Dorset: Ferndown: Amend Para 2.47 and Schedule of Projects for East Dorset
- In addition to the provision at Parley First School, additional accommodation will be required to meet the needs arising due to growth in the Ferndown area. Ferndown First School could rise to 90 in the existing buildings with a small allocation to refurbish and bring these spaces on line.
- Add to the Schedule under East Dorset Education: refurbishment of Ferndown First School; Est cost £200,000; Delivery agency – Developer contributions.
- East Dorset. Verwood. Amend Para 2.48 and Schedule of Projects for East Dorset
- In addition to the allocated sites, an additional 934 units will require just over 1FE within the Verwood area.
- Add to the Schedule under East Dorset Education: an additional 1FE; Est cost £1.8 million; Delivery agency - Developer Contributions and DCC.

19.25 Mrs J Healy, Dorset CPRE

- Support for replacement school on WMC5. Previously believed this would be an additional school and did not realise Wimborne First School would be relocated to this site.

19.26 Mr J D Head, Local Resident

- The requirement for a new first school at West Parley has suddenly appeared in the IDP. No information has been given to the Parish Council on this nor appears to be available. This requirement has not been included in the Core Strategy and residents have been denied a chance to comment. The strategy is therefore unsound.

Officer Response

19.27 In order to be able to deliver the number of school places which are required as a result of the increasing birth rate and the level of housing to be provided within Christchurch and East Dorset, Officers recommend that the proposed alterations above are made to the paragraphs and tables of the IDP.

19.28 The comment on the school by Mr Head is part of a larger comment on other facilities. The requirement for a school was included in the Draft Infrastructure Delivery Plan which was out to consultation in April 2012. This part of the comment is therefore not duly made.

Libraries

19.29 Whilst there have been cuts to the library service, the County is actively pursuing an extension to the library in Christchurch town centre. There is the potential to provide additional community uses within the scheme. Work on the extension will begin in the spring of 2013.

Consultation Response

19.30 Dorset County Council

19.31 DCC point out that the change referring to the extension of the library in Christchurch is incorrect. The extension will be completed in Spring 2013.

Officer Response

19.32 Amend wording: The extension to the library in Christchurch is underway with a completion date of Spring 2013.

Waste

19.33 Dorset Waste Partnership are investigating options and a business case for a single depot in Christchurch and East Dorset to replace existing depots at Grange Road, Christchurch and Haviland Road, Ferndown.

Consultation Response

19.34 The comments from key stakeholders and the general public in respect of this Proposed Change have been grouped together:

19.35 Mr R J Leaper, Local Resident

19.36 Mr Leaper stated that he was under the impression that the Council believed its new waste collection service was a success and questions this need.

19.37 Mr J D Head, Local Resident

19.38 Mr Head commented that the proposed waste transfer depot has suddenly appeared in the document and no information has been given to the parish council and residents. They have not been given a chance to comment.

19.39 Mr W P Rees, Local Resident

19.40 The single most outrageous flaw is the underhand manipulation and obfuscation of major new proposals which particularly affect West Parley. These new proposals have been quietly detailed in the Infrastructure Delivery Plan (IDP) but have not been properly described in the Pre-Submission Core Strategy and most certainly have not been subject to proper public scrutiny. The contemptuous attitude of EDDC to the wishes of the local population, coupled with the underhand major changes quietly detailed in the Infrastructure Delivery Plan render the Pre-Submission Core Strategy wholly unsound.

19.41 West Parley Parish Council

19.42 The Parish Council raise the concern that this major construction, with traffic impacts on an overloaded transport network, would have a considerable planning impact on West parley yet is not mentioned in the Core Strategy. The proposal has appeared in the IDP with no justification and no discussion with the parish council.

Officer Response

19.43 The change set out above, sets out the case that the County Council as waste authority, wishes to replace two existing depots with one central depot but there is no indication given as to where the depot will be located. The waste collection service, no matter how successful, requires facilities to serve the collection service. The information on this requirement was given by DCC as part of a request for information from service providers. Traffic impacts would be assessed as part of a planning application.

Fire and Rescue

19.44 Dorset Fire and Rescue may require a fire and rescue station to be built at West Parley.

Consultation Response

19.45 The comments from key stakeholders and the general public in respect of this Proposed Change have been grouped together:

19.46 Mr R J Leaper, Local Resident

19.47 Another fire station is a waste, we are surrounded by fire stations already.

19.48 Mr J D Head, Local Resident

19.49 Mr Head commented that the proposed fire station has suddenly appeared in the document and no information has been given to the parish council and residents. They have not been given a chance to comment.

19.50 Mr W P Rees, Local Resident

19.51 The single most outrageous flaw is the underhand manipulation and obfuscation of major new proposals which particularly affect West Parley. These new proposals have been quietly detailed in the Infrastructure Delivery Plan (IDP) but have not been properly described in the Pre-Submission Core Strategy and most certainly have not been subject to proper public scrutiny. The contemptuous attitude of EDDC to the wishes of the local population, coupled with the underhand major changes quietly detailed in the Infrastructure Delivery Plan render the Pre-Submission Core Strategy wholly unsound.

19.52 West Parley Parish Council

19.53 The Parish Council raise the concern that this major construction, with traffic impacts on an overloaded transport network, would have a considerable planning impact on West Parley yet is not mentioned in the Core Strategy. The proposal has appeared in the IDP with no justification and no discussion with the parish council.

Officer Response

19.54 The request to include this wording in the IDP came from the Fire Service after consideration of the proposed development of the area and an assessment of the existing service.

20 Responses and Analysis of the Appendices

Consultation Response

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 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 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.

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.**



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	1	0	2	0	1	0	0

Table 20.1

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

20.2 Appendix 1 Open Space Provision

20.3 Lindsey Thompson, Terence O'Rourke representing Bloor Homes

- The policy offers no flexibility on the provision of open space facilities and the ongoing maintenance.
- There should be recognition this is the Councils preferred approach. However, developers should be able to put forward alternative approaches for the delivery and maintenance of open space and play facilities on a particular, such as a management company on a SANG.

20.4 Jade Ellis, Turley Associates representing Bellway Homes

- Inflexible policy on a site by site basis.
- The level and need of open space will vary on a site by site basis, depending on existing capacity and needs in the area. The sums involved will vary accordingly and should not be fixed index linked sums.
- Gives no opportunity for the use of a management company by residents in the future.

Officer Response

20.5 The policy has been carefully worded to meet the requirements of the Partnership's needs. This is to ensure open space provision is laid out, delivered and maintained in accordance with our expectations in the future, based on local needs for each settlement. In this case, it is essential the provision of open space is delivered and managed in this way, rather than by ad hoc private management companies. Where a site will be required to

deliver open space, it is important for officers to discuss potential needs, proposals and standards with the developer at the earliest opportunity in the planning process, to ensure the site meets local needs based on the Open Space Sport and Recreation Survey (2007) and any subsequent updates to this.