The Bournemouth Plan: Core Strategy

Regulation 30(1)(e) Statement

November 2011
1.0 Introduction

1.1 The purpose of this statement is to provide a summary of the main issues raised in the representations submitted on the Bournemouth Plan: Core Strategy Pre-submission Consultation Document [The Bournemouth Plan], published in August 2011. It is prepared under Regulation 30(1)(e) of the Town and Country Planning (Local Development) (England) Regulations 2008, which requires that if representation were made in accordance with regulation 28(2), a local planning authority must provide a statement to the Secretary of State setting out:

i. the total number of representations made; and
ii. a summary of the main issues raised in those representations.

1.2 Copies of all the representations received are available to view at the Town Hall Annexe, St Stephens Road, Bournemouth and online at:

www.bournemouth.gov.uk/CoreStrategy

1.3 The Bournemouth Plan was subject to consultation into the soundness of the plan between 31 August 2011 and 14 October 2011. During this period copies of The Bournemouth Plan were available to view at the Town Hall Annexe and local libraries across the borough. Supporting / background documents were made available on the Council’s website.

2.0 Total Number of Representations Made

2.1 A total of 37 organisations and individuals submitted a representation. Totaling a combined total of 145 comments / representations.

3.0 Summary of Main Issues Raised

3.1 A summary of the main issues raised in individual comments has been produced. Appendix A contains a summary of each representation grouped by Core Strategy section, followed by a combined summary of the main issues raised for each section. The summary for each section is shown below in Table 1 without the individual summary tables included.

<table>
<thead>
<tr>
<th>Table 1: Summary of The Bournemouth Plan: Core Strategy Regulation 28(2) Representations Received</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. SETTING THE SCENE</td>
</tr>
<tr>
<td>• The timeline for the Core Strategy is too short.</td>
</tr>
<tr>
<td>• The introduction fails to identify the key issues.</td>
</tr>
<tr>
<td>2. SPATIAL PLANNING</td>
</tr>
<tr>
<td>Vision and Objectives: Generally supportive of vision and objectives, however added emphasis is needed on housing.</td>
</tr>
<tr>
<td>Strategy: Generally supportive of strategy, however affordable housing and needs of the over 65s needs inclusion.</td>
</tr>
<tr>
<td>3.1 PREPARING FOR CLIMATE CHANGE</td>
</tr>
<tr>
<td>Sustainable Homes and Premises: The impact of this policy on the viability of affordable housing has not been addressed.</td>
</tr>
<tr>
<td>Encouraging the provision of renewable and low carbon energy sources and infrastructure: One representation welcoming the policy.</td>
</tr>
<tr>
<td>Anticipating the effects of flooding and encouraging sustainable drainage: Mixed response, the up front requirement for SUDs information was challenged, while reference to woodland was requested.</td>
</tr>
</tbody>
</table>
### 3.2 A HEALTHY SOCIETY

**A Healthy and Safe Community**  
Natural England welcome the policy with some additions to justification recommended.

### 3.3 DELIVERING SUSTAINABLE COMMUNITIES

**Delivering Sustainable Communities**  
Support for the policy, however it could be less generic.

### 4.1 FOCUS ON BOURNEMOUTH TOWN CENTRE AND DISTRICT CENTRES

**Introduction**  
The basis of definition of the district centres is not adequately explained and concern raised that it is primarily based on retail and does not consider a wider range of community facilities.

**Supporting a Town Centre First Approach**  
The policy needs more flexibility and a threshold on town centre uses elsewhere.

**Future growth in the Lansdowne Employment Area**  
The policy fails to recognise the contribution of non-B uses to the Lansdowne, in particular food and drink uses, larger scale retail and student accommodation. Without a greater degree of flexibility the policy will suppress office space coming forward due to viability and will unnecessarily restrict student accommodation in the Lansdowne.

**Retain and Enhance District Centres**  
General support for the aim of the policy. However, greater clarity required to prevent development being restricted where it may be acceptable. A wider view of the centres with regard to community facilities and their role in the wider context is encouraged.

**Major Convenience Retail Development**  
Concerns raised about preventing retail proposals coming forward, a greater flexibility needs to be considered to allow appropriate proposals.

**Protecting local shopping facilities and services**  
The policy needs to consider encouraging new facilities. Whereas, protecting the ground floor of any employment premises will lead to uncertainty and the protection of inappropriate retail outside of the centres, contrary to the spatial focus of the plan.

**Retaining Community Uses**  
The policy needs to consider encouraging new facilities. The need to demonstrate no demand, rather than significant demand, suggests that the demand from a single person could warrant retaining an existing use.

### 4.2 TRANSPORT

**Key Transport Routes**  
One response supporting the policy

**Delivering Transport Infrastructure**  
There needs to be greater clarity what infrastructure is required and where. Information on the process by which contributions will be sought (CIL) should be considered in the text.

**Green Travel Plan and Transport Assessments**  
One representation received, considered the policy sound.

**Levels of off-street parking in new developments**  
Mixed response from two representors, one raised concerns over a lack of flexibility, while the other requested that tighter measures be introduced, albeit through revisions to national guidance.

**Park and Ride**  
As there is no requirement during the plan period for a park and ride site the last sentence is superfluous.

**Encouraging greener vehicle technologies**  
No representations received

**Increasing opportunities for cycling and walking**  
General support for the policy and preceding text.

### 4.3 HOUSING

**General**  
There is no alternative evidence to justify departure from the RSS housing targets. Furthermore, the plan will only cover 14 years, whereas the NPPF is clear about a 15 year supply. More information on the heathland protection should be added and applied to maps throughout the plan.
<table>
<thead>
<tr>
<th>Topic</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protecting Small Family Dwellinghouses</td>
<td>The policy restricting the loss of small family houses is considered too onerous and based on addressing recent trends rather than a 16 year strategy. Planning for a specific type of housing will harm the delivery of homes; instead it should concentrate on the consideration of the existing mix of an area.</td>
</tr>
<tr>
<td>Encouraging Small family Dwellinghouses</td>
<td>The policy is based on addressing recent trends rather than a 16 year strategy. Planning for a specific type of housing will harm the delivery of homes for which there is more need.</td>
</tr>
<tr>
<td>Housing Distribution Across Bournemouth</td>
<td>Generally supportive of the policy with specific references to environmental / habitat constraints and sustainable transport implications. However, questions were raised regarding the evidence for housing supply behind the policy and the lack of provision of an urban extension into the Green Belt. Level of housing proposed does not accord with PPS3. Too much reliance on windfall and inflexible.</td>
</tr>
<tr>
<td>New Housing Outside the Preferred Locations</td>
<td>While general support for focusing development into the most sustainable locations, limiting the amount of housing elsewhere was not considered appropriate.</td>
</tr>
<tr>
<td>Encouraging Lifetime Homes Standards</td>
<td>General support for the policy, although this approach is not considered sufficient to address the full housing needs of an ageing population.</td>
</tr>
<tr>
<td>Houses of Multiple Occupation</td>
<td>Not considered to be based on a robust evidence base, rather a reaction to localised issues. The 10% threshold does not appear to be derived from a credible evidence base.</td>
</tr>
<tr>
<td>Gypsy and Traveller Sites</td>
<td>The requirement for pitches should be set out to make monitoring and delivery possible. The word detrimental should be amended to unacceptable. Reference should be made to heathland constraints.</td>
</tr>
<tr>
<td>4.4 A THRIVING ECONOMY</td>
<td></td>
</tr>
<tr>
<td>General</td>
<td>A key issue that is not addressed is the potential shortfall of employment land.</td>
</tr>
<tr>
<td>Introduction</td>
<td>There has been no consideration to the allocation of new sites in the Green Belt for non-B1 employment land. Protecting employment land is not the only option.</td>
</tr>
<tr>
<td>Protecting Allocated Employment Sites</td>
<td>Consider the allocation of existing employment sites to be unnecessary. The policy should also encourage other employment generating uses on employment land where certain criteria are met.</td>
</tr>
<tr>
<td>Increase Protection for Sites Outside the Identified Allocations.</td>
<td>The criteria are considered unclear and onerous, there are more pragmatic ways of assessing viability. The policy is also considered to conflict with the objectives of the AAP unless the AAP allocated sites are excluded.</td>
</tr>
<tr>
<td>A Borough Wide Approach to Tourism</td>
<td>Development that would have an unacceptable impact on the A31 trunk road should not be permitted; and the policy should be more positively worded to support the education sector.</td>
</tr>
<tr>
<td>Retaining Tourism and Cultural Facilities</td>
<td>The robust approach advocated in the text should be reflected in the policy.</td>
</tr>
<tr>
<td>4.5 NATURAL ENVIRONMENT, SPORT, RECREATION AND GREEN INFRASTRUCTURE</td>
<td></td>
</tr>
<tr>
<td>Introduction</td>
<td>Reference should be made in 4.5.3 to the IPF and forthcoming Joint Heathlands DPD.</td>
</tr>
<tr>
<td>Green Infrastructure</td>
<td>General support for the policy, however references to woodland and other mechanisms for delivering improvements should be included in the policy. The role of new development should also be recognised.</td>
</tr>
<tr>
<td>Recreation, Play and Sports</td>
<td>General support for the policy, however a suggestion that it is extended to promote the provision of pitches and built sport facilities as identified in other Council strategies and plans.</td>
</tr>
<tr>
<td>Heathland</td>
<td>General support for the policy, however the regulations have been revised and so the reference needs updating. Preceding text would benefit from a caveat that SANGs are untested, require monitoring and are only one of the measures available.</td>
</tr>
<tr>
<td>Nature and Geological Conservation Interests</td>
<td>General support for the policy, a suggestion that the policy could be improved through new woodland where it has been lost as a result of heathland restoration and a reference to protecting native woodland and veteran trees.</td>
</tr>
<tr>
<td>Stour Valley Project</td>
<td>Strong support for the policy. It is suggested that the Council could make</td>
</tr>
<tr>
<td><strong>Green Belt</strong></td>
<td>The RSS included an urban extension and its evidence remains valid. The green belt boundary should be revised to accommodate housing, a country park and employment.</td>
</tr>
<tr>
<td><strong>Pollution</strong></td>
<td>No comments received</td>
</tr>
</tbody>
</table>

### 4.6 A QUALITY BUILT AND HISTORIC ENVIRONMENT

| **General** | The value of biodiversity in the urban setting should be mentioned. |
| **Designated Heritage Assets** | It was generally felt that the policy does not offer sufficient protection. The wording is considered too subjective and disappointingly reactive in contrast to other initiatives in the plan. The management of heritage assets should also consider the contribution that new development can make. |
| **Local Heritage Assets** | One response that felt the evidence base is too weak and the policy does not offer sufficient protection. The wording is considered disappointingly reactive in contrast to other initiatives in the plan. |
| **Quality Design** | Support for good quality design, however issue taken by one response that the wording is somewhat inflexible requiring enhancement where a good development may only maintain exiting quality. |

### 5.0 THE BOURNEMOUTH PLAN KEY DIAGRAM

With the exception of one representation requesting that the boundary of the green belt is amended on the Key Diagram, the general consensus was that it required more detail, including naming all centres and producing it on an ordnance survey base map.

### 6.0 DELIVERY AND MONITORING

No comments received.

### APPENDIX A: LIST OF REPLACED POLICIES

The wording and layout is considered unclear, resulting in confusion over what the status of each policy is.

### GENERAL COMMENTS

General responses from organisations confirming no specific comments to make. Representation from Dorset County Council considered as a general comment, with no challenges on soundness. Mention of CIL and lack of policy relating to a charging schedule.
The tables below repeat the following format:

<table>
<thead>
<tr>
<th>N</th>
<th>CHAPTER TITLE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Section subtitle</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Representor name</th>
<th>Paragraph or policy number</th>
<th>Representation ID</th>
<th>Support or object to the policy</th>
<th>Test of soundness questioned or Legally Compliant (LC)</th>
<th>Summary of representation</th>
</tr>
</thead>
</table>

Summary: Summary of representations.

The sections are in the same order as the submission document and each contains representations relating to the policy and preceding text where appropriate.
1. SETTING THE SCENE

<table>
<thead>
<tr>
<th>Object</th>
<th>30/Rep4/CS1.1.1</th>
<th>Object 3</th>
<th>The time horizon for the Core Strategy is not sufficiently forward looking to comply with PPS12, which suggests a time horizon of at least 15 years from the date of adoption. Need to identify a requirement to review within 5 years.</th>
</tr>
</thead>
</table>

Summary: The timeline for the Core Strategy is too short.

<table>
<thead>
<tr>
<th>Object</th>
<th>30/Rep5/CS1.1.4</th>
<th>Object 1,2,3,4</th>
<th>The vision should be informed by an analysis of the character of the area and the key issues and challenges facing Bournemouth. The introduction fails to identify these as employment land and housing.</th>
</tr>
</thead>
</table>

Summary: The introduction fails to identify the key issues.

2. SPATIAL PLANNING

Vision and Objectives

|----------------------|-------------------|------------|----------------------------------------|

<table>
<thead>
<tr>
<th>Savills (on behalf of Canford Estates) (30)</th>
<th>V&amp;O 30/Rep3/CSV&amp;O</th>
<th>Object 1,2,</th>
<th>The Vision and Objectives do not place sufficient emphasis on housing provision and the availability of employment land, which are two of the key issues facing the District. Should be amended to reflect this.</th>
</tr>
</thead>
</table>

Terence O'Rourke Ltd (on behalf of Meyrick Estate Management Ltd) (23)

<table>
<thead>
<tr>
<th>V&amp;O 23/Rep5/CSV&amp;O</th>
<th>Support LC</th>
<th>Welcomes the positive and proactive approach. It is important that Bournemouth is seen as a welcoming ‘can do’ place that removes barriers to the future well-being, prosperity and vibrancy of its resident, business and visitor communities.</th>
</tr>
</thead>
</table>

Tetlow King Planning (on behalf of HARPs) (29)

<table>
<thead>
<tr>
<th>V&amp;O 29/Rep9/CSV&amp;O</th>
<th>Object 2,4,</th>
<th>Broadly support the objectives set out, in particular local people having access to a range of housing to meet their needs. Inevitably people will choose to migrate to Bournemouth and the scope of the policy will have to be broadened.</th>
</tr>
</thead>
</table>

Summary: Generally supportive of vision and objectives, however added emphasis is needed on housing and employment land.

Strategy

<table>
<thead>
<tr>
<th>Tetlow King Planning (on behalf of HARPs) (29)</th>
<th>2.2 29/Rep8/CS2.2</th>
<th>Object 1,2,4,</th>
<th>Generally supportive of the aims. Affordable housing should be included as a strategic objective to give the DPD added weight and given the large proportion of over 65s, consider meeting the needs of this group should also be a strategic objective.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Highways Agency (17)</th>
<th>2.2.7 17/Rep11/CS2.2.7</th>
<th>Support LC</th>
<th>Based upon the national policy framework and objectives we support this borough wide strategy.</th>
</tr>
</thead>
</table>

Summary: Generally supportive of strategy, however affordable housing and needs of the over 65s needs inclusion.
## 3.1 PREPARING FOR CLIMATE CHANGE

### Sustainable Homes and Premises

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Reference</th>
<th>Type</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment Agency (36)</td>
<td>CS1</td>
<td>Support</td>
<td>Would wish to see the Council require Code Level 3 rather than just encourage it. Nevertheless considered sound.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>CS1</td>
<td>Support</td>
<td>Natural England welcome the policy and paragraphs.</td>
</tr>
<tr>
<td>Tetlow King Planning (on behalf of HARPs) (29)</td>
<td>CS1</td>
<td>Object</td>
<td>The impact of this policy requirement on the delivery of affordable housing delivery does not appear to have been assessed. The viability toolkit does not include a 10% renewable energy allowance within the build costs.</td>
</tr>
</tbody>
</table>

**Summary:** The impact of this policy on the viability of affordable housing has not been addressed.

### Encouraging the provision of renewable and low carbon energy sources and infrastructure

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Reference</th>
<th>Type</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England (34)</td>
<td>CS2</td>
<td>Support</td>
<td>Natural England welcome the policy.</td>
</tr>
</tbody>
</table>

**Summary:** One representation welcoming the policy.

### Anticipating the effects of flooding and encouraging sustainable drainage

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Reference</th>
<th>Type</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment Agency (36)</td>
<td>CS3</td>
<td>Support</td>
<td>Should be made clear that SUDS will need to be designed to best practice standards. Also, despite not a risk to the borough, specific reference to fluvial and tidal flooding should be included. However, consider the policy to be sound.</td>
</tr>
<tr>
<td>Ken Parke Planning Consultants (18)</td>
<td>CS3</td>
<td>Object</td>
<td>The requirement to provide full details of a SUDS and maintenance plan for all applications will place additional up-front costs to applicants/developers and deter proposals coming forward. It could be addressed as a condition of planning permission.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>CS3</td>
<td>Support</td>
<td>Welcome the policy and paragraphs.</td>
</tr>
<tr>
<td>Woodland Trust (8)</td>
<td>CS3</td>
<td>Support</td>
<td>Would like policy to reference the key role of woodland in water risk management; they should be considered as a sustainable surface water flood management tool as well as providing GI. This should be supported in a Trees &amp; Woodlands SPD/Strategy.</td>
</tr>
</tbody>
</table>

**Summary:** Mixed response, the up front requirement for SUDs information was challenged, while reference to woodland was requested.
### 3.2 A HEALTHY SOCIETY

#### A Healthy and Safe Community

<table>
<thead>
<tr>
<th>Organization</th>
<th>Paragraph</th>
<th>Reference</th>
<th>Support/Opinion</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England</td>
<td>3.2.8</td>
<td>34/Rep21/CS3.2.8</td>
<td>Support LC</td>
<td>3.2.8 should make reference to the benefits in health terms of contact with coast and natural environment.</td>
</tr>
<tr>
<td>Natural England</td>
<td>CS4</td>
<td>34/Rep10/CS4</td>
<td>Support LC</td>
<td>Natural England welcome the policy.</td>
</tr>
</tbody>
</table>

Summary: Natural England welcome the policy and suggest a slight change to 3.2.8.

### 3.3 DELIVERING SUSTAINABLE COMMUNITIES

#### Delivering Sustainable Communities

<table>
<thead>
<tr>
<th>Organization</th>
<th>Paragraph</th>
<th>Reference</th>
<th>Support/Opinion</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>English Heritage South West region</td>
<td>CS5</td>
<td>35/Rep3/CS5</td>
<td>Support LC</td>
<td>The intention to prepare Neighbourhood Plans in each of the 11 districts is welcomed, and in particular the related objective in CS5 of “retaining and enhancing the features that contribute to each place’s heritage, character and local distinctiveness”.</td>
</tr>
<tr>
<td>Highways Agency</td>
<td>CS5</td>
<td>17/Rep10/CS5</td>
<td>Support LC</td>
<td>The Highways Agency strongly supports the emphasis placed within policy CS 5 on supporting a high quality public transport system.</td>
</tr>
<tr>
<td>Natural England</td>
<td>CS5</td>
<td>34/Rep1/CS5</td>
<td>Support LC</td>
<td>Welcome the policy.</td>
</tr>
<tr>
<td>Savills (on behalf of Canford Estates)</td>
<td>CS5</td>
<td>30/Rep9/CS5</td>
<td>Object 1,2,3,4</td>
<td>The community based approach is supported in principle, however the policy is generic rather than place specific and this would benefit from being developed into a spatial strategy, profile and summary for each community.</td>
</tr>
<tr>
<td>Tetlow King Planning (on behalf of HARPs)</td>
<td>CS5</td>
<td>29/Rep6/CS5</td>
<td>Support LC</td>
<td>Welcome the Council’s attempts to provide mixed and balanced communities, which will deliver a range of housing types.</td>
</tr>
<tr>
<td>RSPB Eastern England Office</td>
<td>CS5</td>
<td>20/Rep16/CS5</td>
<td>Support LC</td>
<td>Support this policy.</td>
</tr>
</tbody>
</table>

Summary: Support for the policy, however it could be less generic.
### 4.1 FOCUS ON BOURNEMOUTH TOWN CENTRE AND DISTRICT CENTRES

**Introduction**

<table>
<thead>
<tr>
<th>GL Hearn (on behalf of Castlepoint Ltd Partnership) (7)</th>
<th>4.1.3</th>
<th>7/Rep1/CS4.1.3</th>
<th>Support</th>
<th>LC</th>
<th>Support for the identification of Castlepoint above the other district centres in the hierarchy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Savills (on behalf of Canford Estates) (30)</td>
<td>4.1.3</td>
<td>30/Rep10/CS4.1.3</td>
<td>Object</td>
<td>1,2,3,4</td>
<td>The basis of the district centres is not adequately explained. Concerned that it is primarily based on retail with the provision of an arbitrary 400m buffer. The identification should take into account the broader range of community services/needs.</td>
</tr>
</tbody>
</table>

**Summary:** The basis of definition of the district centres is not adequately explained and concern raised that it is primarily based on retail and does not consider a wider range of community facilities.

#### Supporting a Town Centre First Approach

<table>
<thead>
<tr>
<th>GL Hearn (on behalf of NewRiver Retail Ltd) (11)</th>
<th>CS6</th>
<th>11/Rep2/CS6</th>
<th>Object</th>
<th>1,2,3,4</th>
<th>The principle is sound, however the potential implications for beyond the town centre are unsound. Town centre uses within district centres would be inline with PPS4 and acceptable in principle. It is not appropriate for the policy to restrain this.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highways Agency (17)</td>
<td>CS6</td>
<td>17/Rep9/CS6</td>
<td>Support</td>
<td>LC</td>
<td>The Highways Agency support the focus upon Bournemouth Town Centre as a key area for development, due to its sustainable location.</td>
</tr>
<tr>
<td>Ken Parke Planning Consultants (18)</td>
<td>CS6</td>
<td>18/Rep10/CS6</td>
<td>Object</td>
<td>1,2</td>
<td>As written it will apply to all commercial development and as such will place an onerous burden on the planning system and create uncertainty. The policy should be refined, perhaps referring to scale / thresholds where the sequential tests would apply.</td>
</tr>
<tr>
<td>Martin Robeson Planning Practice (on behalf of Trinity Corporate Finance) (22)</td>
<td>CS6</td>
<td>22/Rep5/CS6</td>
<td>Object</td>
<td>2,4</td>
<td>The policy doesn’t have the required flexibility to deliver the vision and objectives. All the identified uses should be encouraged on all allocated sites unless otherwise stated. It should also recognise the role of re-using/converting existing buildings.</td>
</tr>
</tbody>
</table>

**Summary:** The policy needs more flexibility and a threshold on town centre uses elsewhere.
Future growth in the Lansdowne Employment Area

<table>
<thead>
<tr>
<th>Name of submitter</th>
<th>Reference</th>
<th>Object</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goadsby (on behalf of Forelle Estates Holdings Ltd) (26)</td>
<td>CS7 26/Rep1/CS7</td>
<td>1,2,3,4,</td>
<td>The evidence to support this policy fails to consider non-B Use Classes, it contradicts what is known, is misleading and incorrect. Suppressing non-B1 uses will fail to deliver office space in the Lansdowne due to viability.</td>
</tr>
<tr>
<td>Goadsby (on behalf of London &amp; Henley Group) (27)</td>
<td>CS7 27/Rep1/CS7</td>
<td>1,2,3,4,</td>
<td>The evidence to support this policy fails to consider non-B Use Classes, it contradicts what is known, is misleading and incorrect. Suppressing non-B1 uses will fail to deliver office space in the Lansdowne due to viability.</td>
</tr>
<tr>
<td>Goadsby (on behalf of St Peter's Ltd &amp; Goadsby &amp; Harding (Holdings) Ltd (25)</td>
<td>CS7 25/Rep1/CS7</td>
<td>1,2,3,4,</td>
<td>The evidence to support this policy fails to consider non-B Use Classes. It contradicts what is known, is misleading, contradictory and incorrect. Suppressing non-B1 uses will fail to deliver office space in the Lansdowne due to viability.</td>
</tr>
<tr>
<td>Highways Agency (17)</td>
<td>CS7 17/Rep8/CS7</td>
<td>Support</td>
<td>LC</td>
</tr>
<tr>
<td>Ken Parke Planning Consultants (18)</td>
<td>CS7 18/Rep9/CS7</td>
<td>1,2,</td>
<td>The policy fails to recognise food and drink uses in the Lansdowne and their contribution to the vitality of the area. These are mutually compatible with the employment and student uses and the controlled development of these uses should be encouraged.</td>
</tr>
<tr>
<td>Martin Robeson Planning Practice (on behalf of Trinity Corporate Finance) (22)</td>
<td>CS7 22/Rep4/CS7</td>
<td>2,</td>
<td>It will not be effective in supporting the needs of the education sector. Student accommodation and study facilities should be encouraged on appropriate sites throughout the town centre.</td>
</tr>
<tr>
<td>Peacock and Smith (on behalf of WM Morrison Supermarkets) (32)</td>
<td>CS7 32/Rep2/CS7</td>
<td>3,</td>
<td>The policy should not be prescriptive to the scale of any retail development as PPS4 requires proposals to demonstrate that there will be no significant harm on centres. As the Lansdowne is in the town centre AAP, larger scale retail may be suitable here.</td>
</tr>
<tr>
<td>Terence O'Rourke (21)</td>
<td>CS7 21/Rep2/CS7</td>
<td>1,2,</td>
<td>The Council has not assessed the need for student accommodation in and around the town centre. It is not therefore based on a robust and credible evidence base. The term incidental could unnecessarily restrict student accommodation in the Lansdowne.</td>
</tr>
<tr>
<td>Terence O'Rourke Ltd (on behalf of Meyrick Estate Management Ltd) (23)</td>
<td>CS7 23/Rep3/CS7</td>
<td>1,2,4,</td>
<td>Support the main of the policy and welcome the mixed use approach, but consider that the removal of the requirement for incidental would give more flexibility and enable viable proposals to progress.</td>
</tr>
</tbody>
</table>

Summary: The policy fails to recognise the contribution of non-B uses to the Lansdowne, in particular food and drink uses, larger scale retail and student accommodation. Without a greater degree of flexibility the policy will suppress office space coming forward due to viability and will unnecessarily restrict student accommodation in the Lansdowne.
### Retain and Enhance District Centres

<table>
<thead>
<tr>
<th>Supporter</th>
<th>Reference</th>
<th>Status</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>GL Hearn (on behalf of Castlepoint Ltd Partnership) (7)</td>
<td>4.1.23 7/Rep2/CS4.1.23</td>
<td>Support</td>
<td>LC</td>
</tr>
<tr>
<td>GL Hearn (on behalf of Castlepoint Ltd Partnership) (7)</td>
<td>CS8 7/Rep3/CS8</td>
<td>Support</td>
<td>LC</td>
</tr>
<tr>
<td>GL Hearn (on behalf of NewRiver Retail Ltd) (11)</td>
<td>CS8 11/Rep3/CS8</td>
<td>Support</td>
<td>1,2,3,</td>
</tr>
<tr>
<td>Highways Agency (17)</td>
<td>CS8 17/Rep7/CS8</td>
<td>Support</td>
<td>LC</td>
</tr>
<tr>
<td>Ken Parke Planning Consultants (18)</td>
<td>CS8 18/Rep8/CS8</td>
<td>Object</td>
<td>1,2,</td>
</tr>
<tr>
<td>Savills (on behalf of Canford Estates) (30)</td>
<td>CS8 30/Rep7/CS8</td>
<td>Object</td>
<td>1,2,3,4,</td>
</tr>
</tbody>
</table>

**Summary:** General support for the aim of the policy. However, greater clarity required to prevent development being restricted where it may be acceptable. A wider view of the centres with regard to community facilities and their role in the wider context is encouraged.

### Major Convenience Retail Development

<table>
<thead>
<tr>
<th>Supporter</th>
<th>Reference</th>
<th>Status</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>GL Hearn (on behalf of NewRiver Retail Ltd) (11)</td>
<td>CS9 11/Rep1/CS9</td>
<td>Object</td>
<td>1,2,3,</td>
</tr>
<tr>
<td>Peacock and Smith (on behalf of WM Morrison Supermarkets) (32)</td>
<td>CS9 32/Rep1/CS9</td>
<td>Object</td>
<td>3,</td>
</tr>
<tr>
<td>Terence O’Rourke Ltd (on behalf of Meyrick Estate Management Ltd) (23)</td>
<td>CS9 23/Rep2/CS9</td>
<td>Object</td>
<td>1,2,4,</td>
</tr>
</tbody>
</table>

**Summary:** Concerns raised about preventing retail proposals coming forward, a greater flexibility needs to be considered to allow appropriate proposals.
Protecting local shopping facilities and services

| Ken Parke Planning Consultants  
|---|---|---|---|
| CS10 | 18/Rep7/CS10 | Object | 1,2,  
|  |  |  | As written this would relate to the GF of any employment premises. It should be more specific about the types of premises. There is no flexibility in this approach and the analysis of adequate facilities will create uncertainty. Protecting retail outside the centres is contrary to spatial focus of plan.  
|  |  |  |  
| Savills (L&P) Limited (on behalf of Talbot Village Trust) (13) | CS10 | 13/Rep4/CS10 | Object | 2,4,  
|  |  |  | The policies CS10 and CS11 fail to express support for new facilities. CS10 should encourage new local facilities and services, particularly where these contribute to the viability and sustainability of existing local centres (such as Talbot Village CA).  
|  |  |  |  
| Summary: | The policy needs to consider encouraging new facilities. Whereas, protecting the ground floor of any employment premises will lead to uncertainty and the protection of inappropriate retail outside of the centres, contrary to the spatial focus of the plan.  

Retaining Community Uses

| Savills (L&P) Limited (on behalf of Talbot Village Trust) (13) | CS11 | 13/Rep3/CS11 | Object | 2,4,  
|  |  |  | The policies CS10 and CS11 fail to express support for new facilities. Policy CS11 should plan positively for the provision of new facilities outside the identified district centres.  
|  |  |  |  
| Tetlow King Planning (on behalf of HARPs) (29) | CS11 | 29/Rep5/CS11 | Object | 1,2,4,  
|  |  |  | While broadly supportive the need to demonstrate no demand is impossible, as it suggests that if only 1 person wanted to retain a use it would be sufficient to protect it. Suggest rewording to significant demand, with benefits such as aff housing.  
|  |  |  |  
| Summary: | The policy needs to consider encouraging new facilities. The need to demonstrate no demand, rather than significant demand, suggests that the demand from a single person could warrant retaining an existing use.  

---

Page 14 of 27
### 4.2 TRANSPORT

#### Key Transport Routes

<table>
<thead>
<tr>
<th>Organisation</th>
<th>CS</th>
<th>Representation</th>
<th>Support/LC</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highways Agency</td>
<td>CS12</td>
<td>17/Rep6/CS12</td>
<td>Support</td>
<td>4, LC</td>
</tr>
</tbody>
</table>

**Summary:** One response supporting the policy.

#### Delivering Transport Infrastructure

<table>
<thead>
<tr>
<th>Organisation</th>
<th>CS</th>
<th>Representation</th>
<th>Support/LC</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highways Agency</td>
<td>CS13</td>
<td>17/Rep5/CS13</td>
<td>Object 2</td>
<td>Concerned about lack of detail and the fact the council isn’t writing a separate infrastructure DPD. Isn’t clear where the transport infrastructure will be established, we assume this is from the LTP but a clear link needs to be set out in the policy.</td>
</tr>
<tr>
<td>Ken Parke Planning Consultants</td>
<td>CS13</td>
<td>18/Rep6/CS13</td>
<td>Object 1, 2, 3</td>
<td>The Core Strategy should clearly identify the infrastructure required. The LPA cannot rely on SEDTCS as evidence as it is based on higher housing targets. The final point is not compliant with legislation and will diminish the viability of small schemes.</td>
</tr>
<tr>
<td>Natural England</td>
<td>CS13</td>
<td>34/Rep17/CS13</td>
<td>Support</td>
<td>Welcome the policy which seeks to secure good quality walking and cycling infrastructure.</td>
</tr>
<tr>
<td>Terence O’Rourke Ltd (on behalf of Meyrick Estate Management Ltd)</td>
<td>CS13</td>
<td>23/Rep4/CS13</td>
<td>Object 1, 2, 4</td>
<td>Wholly supportive of the principle, but feel there should be greater certainty about the process by which contributions will be sought from developers. Decisions about CIL should be made now and, if appropriate, information included in the text.</td>
</tr>
</tbody>
</table>

**Summary:** There needs to be greater clarity what infrastructure is required and where. Information on the process by which contributions will be sought (CIL) should be considered in the text.

#### Green Travel Plan and Transport Assessments

<table>
<thead>
<tr>
<th>Organisation</th>
<th>CS</th>
<th>Representation</th>
<th>Support/LC</th>
<th>Summary</th>
</tr>
</thead>
</table>

**Summary:** One representation received, considered the policy sound.
Levels of off-street parking in new developments

<table>
<thead>
<tr>
<th>Representor</th>
<th>Date</th>
<th>Reference</th>
<th>Type</th>
<th>Object</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Churches Together (16)</td>
<td>4.2.15</td>
<td>16/Rep2/CS4.2.15</td>
<td>Object</td>
<td>2,</td>
<td>PPG13 allows developers to maximise land use for profit by providing minimal off-street parking. Residents then have to use the public highway, which may have an impact on the community uses of halls. Request PPG13 is revised.</td>
</tr>
<tr>
<td>Churches Together (16)</td>
<td>CS15</td>
<td>16/Rep1/CS15</td>
<td>Object</td>
<td>2,</td>
<td>Unless PPS3 overules PPG13 [Clause 51] then Planning Inspectors assessing planning appeals will still permit developers to minimise/provide no off road parking. It should be made clear that PPS3 has legal priority.</td>
</tr>
<tr>
<td>Martin Robeson Planning Practice (on behalf of Trinity Corporate Finance) (22)</td>
<td>CS15</td>
<td>22/Rep3/CS15</td>
<td>Object</td>
<td>2,4,</td>
<td>The lack of flexibility threatens the deliverability of development, particularly conversions and change of use. It should be flexible to allow for reduced parking in appropriate locations. Updates to parking standards should undergo public consultation.</td>
</tr>
</tbody>
</table>

Summary: Mixed response from two representors, one raised concerns over a lack of flexibility, while the other requested tighter measures be introduced, albeit through revisions to national guidance.

Park and Ride

<table>
<thead>
<tr>
<th>Representor</th>
<th>Date</th>
<th>Reference</th>
<th>Type</th>
<th>Object</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Holdenhurst Village Action Group (15)</td>
<td>4.2.19</td>
<td>15/Rep2/CS4.2.19</td>
<td>Object</td>
<td>1,</td>
<td>The Bournemouth Plan &amp; LTP3 expire at the same time and the latter does not identify the requirement for park &amp; ride in the Borough during this period. Therefore, &quot;In the longer term… …viable role for a network of park &amp; ride sites&quot; is superfluous.</td>
</tr>
</tbody>
</table>

Summary: As there is no requirement during the plan period for a park and ride site the last sentence is superfluous.

Encouraging greener vehicle technologies

No representations received

Increasing opportunities for cycling and walking

<table>
<thead>
<tr>
<th>Representor</th>
<th>Date</th>
<th>Reference</th>
<th>Type</th>
<th>Object</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>RSPB Eastern England Office (20)</td>
<td>4.2.27</td>
<td>20/Rep3/CS4.2.27</td>
<td>Support</td>
<td>LC</td>
<td>Support this paragraph and policy which seeks to promote opportunities for cycling and walking</td>
</tr>
<tr>
<td>Highways Agency (17)</td>
<td>CS17</td>
<td>17/Rep3/CS17</td>
<td>Support</td>
<td>LC</td>
<td>Considered sound.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>CS17</td>
<td>34/Rep17/CS17</td>
<td>Support</td>
<td>LC</td>
<td>Welcome the policy and paragraphs which are intended to improve cycling and walking opportunities.</td>
</tr>
</tbody>
</table>

Summary: General support for the policy and preceding text.
## 4.3 HOUSING

### General

<table>
<thead>
<tr>
<th>Organization</th>
<th>Page</th>
<th>Reference</th>
<th>Object</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tetlow King Planning (on behalf of HARPs)</td>
<td>435</td>
<td>29/Rep4/CS4.3</td>
<td>1,2,3,4</td>
<td>The RSS evidence is the most up-to-date and cannot be ignored. Without alternative evidence the plan’s lower target cannot be considered sound. Aside from that, the NPPF is very clear about a 15 year supply of housing but the plan will cover only 14 years.</td>
</tr>
<tr>
<td>RSPB Eastern England Office</td>
<td>Map 6</td>
<td>20/Rep7/CSMap 6</td>
<td>1,2</td>
<td>Insufficient explanation as to what the heathland protection zone is. This applies to other maps throughout the document where it is shown.</td>
</tr>
</tbody>
</table>

Summary: There is no alternative evidence to justify departure from the RSS housing targets. Furthermore, the plan will only cover 14 years, whereas the NPPF is clear about a 15 year supply. More information on the heathland protection should be added and applied to maps throughout the plan.

### Protecting Small Family Dwellinghouses

<table>
<thead>
<tr>
<th>Organization</th>
<th>Page</th>
<th>Reference</th>
<th>Object</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ken Parke Planning Consultants</td>
<td>CS18</td>
<td>18/Rep5/CS18</td>
<td>1,2,3,4</td>
<td>There’s insufficient evidence for a significant need of 3 bed houses. The plan needs to be robust for 16 years and not seek to address recent trends. Promoting a specific type of dwelling will harm the delivery of homes for which there’s more need.</td>
</tr>
<tr>
<td>Tetlow King Planning (on behalf of HARPs)</td>
<td>CS18</td>
<td>29/Rep3/CS18</td>
<td>1,2,4</td>
<td>The blanket ban on redevelopment is too onerous; there may be times when it could bring about the significant delivery of more small housing for the area. We consider that the policy should focus on considering the existing mix of the local area.</td>
</tr>
</tbody>
</table>

Summary: The policy restricting the loss of small family houses is considered too onerous and based on addressing recent trends rather than a 16 year strategy. Planning for a specific type of housing will harm the delivery of homes; instead it should concentrate on the consideration of the existing mix of an area.

### Encouraging Small Family Dwellinghouses

<table>
<thead>
<tr>
<th>Organization</th>
<th>Page</th>
<th>Reference</th>
<th>Object</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ken Parke Planning Consultants</td>
<td>CS19</td>
<td>18/Rep4/CS19</td>
<td>1,2,3,4</td>
<td>There’s not sufficient evidence for a significant need of 3 bed houses. The plan needs to be robust for 16 years and not seek to address recent trends. Promoting a specific type of dwelling will harm the delivery of homes for which there’s more need.</td>
</tr>
</tbody>
</table>

Summary: The policy is based on addressing recent trends rather than a 16 year strategy. Planning for a specific type of housing will harm the delivery of homes for which there is more need.
### Housing Distribution Across Bournemouth

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Date</th>
<th>Reference</th>
<th>Action</th>
<th>Level</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England (34)</td>
<td>4.3.17</td>
<td>34/Rep2/CS4.3.17</td>
<td>Support</td>
<td>LC</td>
<td>Welcome appropriate level of weight to protecting internationally designated heathland sites in the borough.</td>
</tr>
<tr>
<td>RSPB Eastern England Office (20)</td>
<td>4.3.17</td>
<td>20/Rep5/CS4.3.17</td>
<td>Support</td>
<td>LC</td>
<td>Support this which recognises the environmental constraints to housing delivery.</td>
</tr>
<tr>
<td>BNP Paribas Real Estate (on behalf of Royal Mail) (1)</td>
<td>CS20</td>
<td>1/Rep1/CS20</td>
<td>Support</td>
<td>3</td>
<td>Supportive of the policy, but indicates that new uses should be compatible and sensitive to existing business uses.</td>
</tr>
<tr>
<td>Goadsby (on behalf of Throop Land Trustees) (4)</td>
<td>CS20</td>
<td>4/Rep1/CS20</td>
<td>Object</td>
<td>1,2,3,4</td>
<td>Raised questions relating to the evidence behind the policy, suggesting that it does not support this approach. To deliver a mix of housing provision should be made for an urban extension to deliver 2000 new homes in the Green Belt at North Bournemouth.</td>
</tr>
<tr>
<td>Goadsby (on behalf of Mr F Cheeseman) (24)</td>
<td>CS20</td>
<td>24/Rep1/CS20</td>
<td>Object</td>
<td>1,2,3,4</td>
<td>Raised questions relating to the evidence behind the policy, suggesting that it does not support this approach. To deliver a mix of housing provision should be made for an urban extension to deliver 2000 new homes in the Green Belt at North Bournemouth.</td>
</tr>
<tr>
<td>Goadsby (on behalf of Newsquest Media (Southern) Ltd) (5)</td>
<td>CS20</td>
<td>5/Rep2/CS20</td>
<td>Object</td>
<td>1,2,3,4</td>
<td>Raised questions relating to the evidence behind the policy, suggesting that it does not support this approach. To deliver a mix of housing provision should be made for an urban extension to deliver 2000 new homes in the Green Belt at North Bournemouth.</td>
</tr>
<tr>
<td>Highways Agency (17)</td>
<td>CS20</td>
<td>17/Rep2/CS20</td>
<td>Support</td>
<td>LC</td>
<td>The Highways Agency are supportive of this policy and its emphasis on placing urban intensification in areas well served by sustainable transport.</td>
</tr>
<tr>
<td>Savills (on behalf of Canford Estates) (30)</td>
<td>CS20</td>
<td>30/Rep11/CS20</td>
<td>Object</td>
<td>1,2,3,4</td>
<td>Objections to the housing target (less than RSS), reliance on windfall and lack of identified sites. Critical of no development being proposed in the green belt and suggest its boundary is amended to include new allocations, specifically Kinson Manor Farm</td>
</tr>
<tr>
<td>Savills (on behalf of Talbot Village Trust) (13)</td>
<td>CS20</td>
<td>13/Rep7/CS20</td>
<td>Object</td>
<td>1,2,3,4</td>
<td>Objection to the housing target as lower than RSS 16,100 figure. Housing proposed does not accord with PPS3, will result in affordability problems, lack of family housing and too reliant on windfall.</td>
</tr>
</tbody>
</table>

**Summary:** Mixed responses. Generally supportive of the policy with specific references to environmental / habitat constraints and sustainable transport implications. However, questions were raised regarding the evidence for housing supply behind the policy and the lack of provision of an urban extension into the Green Belt. Level of housing proposed does not accord with PPS3. Too much reliance on windfall and inflexible.

### New Housing Outside the Preferred Locations

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Date</th>
<th>Reference</th>
<th>Action</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tetlow King Planning (on behalf of HARPs) (29)</td>
<td>CS21</td>
<td>29/Rep2/CS21</td>
<td>Object</td>
<td>1,2,4</td>
</tr>
</tbody>
</table>

**Summary:** While general support for focusing development into the most sustainable locations, limiting the amount of housing elsewhere was not considered appropriate.
## Encouraging Lifetime Homes Standards

<table>
<thead>
<tr>
<th>Author</th>
<th>Reference</th>
<th>Type</th>
<th>Submissions</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Savills (L&amp;P) Limited (on behalf of Talbot Village Trust)</td>
<td>CS22</td>
<td>Support</td>
<td>LC</td>
<td>The aim is supported, however a flexible approach is required to respond to the range of proposals that will come forward over the plan period. The proposed approach that encourages rather than requires is therefore supported.</td>
</tr>
<tr>
<td>Tetlow King Planning (on behalf of HARPs)</td>
<td>CS22</td>
<td>Object</td>
<td>1,2,4</td>
<td>Welcome the move towards increasing the number of new Lifetime Homes, but this will not sufficiently address the needs of all the ageing population. The Council needs to look at providing the full range of care and accommodation needs of older people.</td>
</tr>
</tbody>
</table>

**Summary:** General support for the policy, although this approach is not considered sufficient to address the full housing needs of an ageing population.

## Houses of Multiple Occupation

<table>
<thead>
<tr>
<th>Author</th>
<th>Reference</th>
<th>Type</th>
<th>Submissions</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ken Parke Planning Consultants</td>
<td>CS23</td>
<td>Object</td>
<td>1,2,4</td>
<td>Seems to be based upon a perception of an issue rather than evidence base. It's a poorly conceived reaction to localised issues, with a 10% threshold derived from a pressure group. This is procedurally unworkable and will reduce low cost housing.</td>
</tr>
<tr>
<td>Residential Landlords Association</td>
<td>CS23</td>
<td>Object</td>
<td>1</td>
<td>The 10% threshold and purpose of the policy do not appear to be based on credible evidence and will be difficult to apply. Raised concerns such as the impact on rents and supply of housing and the legality of the approach.</td>
</tr>
<tr>
<td>Terence O'Rourke</td>
<td>CS23</td>
<td>Object</td>
<td>1</td>
<td>Restricting the number of HMOs in defined areas will have an adverse impact on the university. No assessment of student housing need has been undertaken by the Council; the decision to restrict HMOs is not based on a robust and credible evidence base.</td>
</tr>
</tbody>
</table>

**Summary:** Not considered to be based on a robust evidence base, rather a reaction to localised issues. The 10% threshold does not appear to be derived from a credible evidence base.

## Gypsy and Traveller Sites

<table>
<thead>
<tr>
<th>Author</th>
<th>Reference</th>
<th>Type</th>
<th>Submissions</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Federation of Gypsy Liaison Groups</td>
<td>CS24</td>
<td>Object</td>
<td>1,2,3,4</td>
<td>The figure for the Gypsy and Traveller pitch requirements should be set out to make monitoring and delivery possible; the Site Allocations DPD would be the delivery vehicle. Minor policy amendment to replace the words &quot;detrimental&quot; with &quot;unacceptable&quot;.</td>
</tr>
<tr>
<td>Natural England</td>
<td>CS24</td>
<td>Object</td>
<td>2</td>
<td>The policy should make reference to the heathland protection zones. Whilst this does not prevent proposals coming forward, it does signal a firm constraint which proposers should be aware of.</td>
</tr>
</tbody>
</table>

**Summary:** The requirement for pitches should be set out to make monitoring and delivery possible. The word detrimental should be amended to unacceptable. Reference should be made to heathland constraints.
### 4.4 A THRIVING ECONOMY

#### General

<table>
<thead>
<tr>
<th>Object</th>
<th>4.4</th>
<th>30/Rep8/CS4.4</th>
<th>1,2,3,4,</th>
<th>A key issue that is not addressed is the potential shortfall of employment land in the conurbation. There is a need for an adequate provision of types and sizes of sites cross boundary, particularly in North Canford.</th>
</tr>
</thead>
</table>

**Summary:** A key issue that is not addressed is the potential shortfall of employment land.

#### Introduction

<table>
<thead>
<tr>
<th>Object</th>
<th>4.4.6</th>
<th>4/Rep2/CS4.4.6</th>
<th>1,2,3,4,</th>
<th>Protecting existing employment land is not the only option. There's been no consideration given to the allocation of new sites. To plan positively for non-B1a growth, some commercial land should be allocated in the green belt at North Bournemouth for commercial use.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Object</th>
<th>4.4.6</th>
<th>5/Rep1/CS4.4.6</th>
<th>1,2,3,4,</th>
<th>Protecting existing employment land is not the only option. There's been no consideration given to the allocation of new sites. To plan positively for non-B1a growth, some commercial land should be allocated in the green belt at North Bournemouth for commercial use.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Object</th>
<th>4.4.6</th>
<th>24/Rep2/CS4.4.6</th>
<th>1,2,3,4,</th>
<th>Protecting existing employment land is not the only option. There's been no consideration given to the allocation of new sites. To plan positively for non-B1a growth, some commercial land should be allocated in the green belt at North Bournemouth for commercial use.</th>
</tr>
</thead>
</table>

**Summary:** There’s been no consideration to the allocation of new sites in the Green Belt for non-B1 employment land. Protecting employment land is not the only option.

#### Protecting Allocated Employment Sites

<table>
<thead>
<tr>
<th>Object</th>
<th>CS25</th>
<th>1/Rep2/CS25</th>
<th>1,</th>
<th>Consider the allocation of existing employment sites for employment to be unnecessary. Would want the Royal Mail Delivery Office removed from the employment land allocation.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Object</th>
<th>CS25</th>
<th>12/Rep1/CS25</th>
<th>3,4,</th>
<th>Generally supportive, but consider that it does not plan positively for non-B uses. It should encourage sui-generis and other employment generating uses on employment land where certain criteria are met.</th>
</tr>
</thead>
</table>

**Summary:** Consider the allocation of existing employment sites to be unnecessary. The policy should also encourage other employment generating uses on employment land where certain criteria are met.
### Increase Protection for Sites Outside the Identified Allocations.

<table>
<thead>
<tr>
<th>Source</th>
<th>Reference</th>
<th>Type</th>
<th>Support/LC</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>BNP Paribas Real Estate (on behalf of Royal Mail) (1)</td>
<td>CS26</td>
<td>Support</td>
<td>LC</td>
<td>It is considered that the policy is broadly in accordance with national policy by protecting employment land with a degree of flexibility.</td>
</tr>
<tr>
<td>Ken Parke Planning Consultants (18)</td>
<td>CS26</td>
<td>Object</td>
<td>1,2</td>
<td>The requirement of the policy is unnecessary and onerous. There are more pragmatic ways of assessing and demonstrating viability. The necessity to market a property for 12 months can be deleted without undermining the policy.</td>
</tr>
<tr>
<td>Martin Robeson Planning Practice (on behalf of Trinity Corporate Finance) (22)</td>
<td>CS26</td>
<td>Object</td>
<td>1,2</td>
<td>The policy is not appropriately justified by evidence and conflicts with the objectives of the AAP. The allocated sites in the AAP should be excluded. The criteria is too subjective whereas the principal policy test should be clearer and more objective.</td>
</tr>
</tbody>
</table>

**Summary:** The criteria are considered unclear and onerous, there are more pragmatic ways of assessing viability. The policy is also considered to conflict with the objectives of the AAP unless the AAP allocated sites are excluded.

### A Borough Wide Approach to Tourism

<table>
<thead>
<tr>
<th>Source</th>
<th>Reference</th>
<th>Type</th>
<th>Support/LC</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highways Agency (17)</td>
<td>CS27</td>
<td>Object</td>
<td>2,</td>
<td>The Highways Agency would object to developments considered to have an unacceptable impact on the A31 trunk road therefore feel this needs to be referred to in the policy.</td>
</tr>
<tr>
<td>Martin Robeson Planning Practice (on behalf of Trinity Corporate Finance) (22)</td>
<td>CS27</td>
<td>Support</td>
<td>LC</td>
<td>Broadly support the policy, but considers it should be more positively worded to encourage accommodation that specifically supports the education sector.</td>
</tr>
</tbody>
</table>

**Summary:** Development that would have an unacceptable impact on the A31 trunk road should not be permitted; and the policy should be more positively worded to support the education sector.

### Retaining Tourism and Cultural Facilities

<table>
<thead>
<tr>
<th>Source</th>
<th>Reference</th>
<th>Type</th>
<th>Support/LC</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Theatres Trust (37)</td>
<td>CS28</td>
<td>Support</td>
<td>LC</td>
<td>The robust approach advocated in the text should be reflected in the policy.</td>
</tr>
</tbody>
</table>

**Summary:** The robust approach advocated in the text should be reflected in the policy.
## 4.5 NATURAL ENVIRONMENT, SPORT, RECREATION AND GREEN INFRASTRUCTURE

### Introduction

<table>
<thead>
<tr>
<th>Organization</th>
<th>Section</th>
<th>Reference</th>
<th>Support Level</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>RSPB Eastern England Office (20)</td>
<td>4.5.3</td>
<td>20/Rep2/CS4.5.3</td>
<td>Support 1,2,</td>
<td>Omits key policy from description in 4.5.3. Need to add in IPF and forthcoming heathlands DPD.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>4.5.3</td>
<td>34/Rep12/CS4.5.3</td>
<td>Support LC</td>
<td>The Council should consider inserting a reference to the IPF and forthcoming Joint Heathlands DPD/SPD.</td>
</tr>
</tbody>
</table>

Summary: Reference should be made in 4.5.3 to the IPF and forthcoming Joint Heathlands DPD.

### Green Infrastructure

<table>
<thead>
<tr>
<th>Organization</th>
<th>Section</th>
<th>Reference</th>
<th>Support Level</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Savills (L&amp;P) Limited (on behalf of Talbot Village Trust) (13)</td>
<td>CS29</td>
<td>13/Rep1/CS29</td>
<td>Support 2,</td>
<td>The aim is fully supported, however, reference to the mechanisms for delivering such improvements should be included in the policy. The role of new development contributing, either on-site or through financial contributions, to GI should be recognised.</td>
</tr>
<tr>
<td>Woodland Trust (8)</td>
<td>CS29</td>
<td>8/Rep3/CS29</td>
<td>Support 3,</td>
<td>Pleased to see the wide range of benefits that GI provides, but suggest that there is an additional point referencing native woodland as an ideal tool for delivering these benefits.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>CS29</td>
<td>34/Rep3/CS29</td>
<td>Support LC</td>
<td>Welcome this policy that supports GI.</td>
</tr>
</tbody>
</table>

Summary: General support for the policy, however references to woodland and other mechanisms for delivering improvements should be included in the policy. The role of new development should also be recognised.

### Recreation, Play and Sports

<table>
<thead>
<tr>
<th>Organization</th>
<th>Section</th>
<th>Reference</th>
<th>Support Level</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England (34)</td>
<td>CS30</td>
<td>34/Rep8/CS30</td>
<td>Support LC</td>
<td>Welcome this policy that supports GI.</td>
</tr>
<tr>
<td>Sport England (2)</td>
<td>CS30</td>
<td>2/Rep1/CS30</td>
<td>Object 4,</td>
<td>Consider that the policy should be extended (or an additional policy added) to positively promote the provision of new and / or improved playing pitches and built sports facilities, as identified in other Council strategies and action plans.</td>
</tr>
</tbody>
</table>

Summary: General support for the policy, however a suggestion that it is extended to promote the provision of pitches and built sport facilities as identified in other Council strategies and plans.
### Heathland

<table>
<thead>
<tr>
<th>Organization</th>
<th>CS</th>
<th>Rep/CS</th>
<th>Support</th>
<th>LC</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England (34)</td>
<td>4.5.9</td>
<td>34/Rep20/CS4.5.9</td>
<td>Support</td>
<td>2,</td>
<td>It would be appropriate to record that Christchurch Harbour SSSI is the estuary servicing internationally designated sites along the River Avon which are particularly important for migratory fish such as salmon as well as birds.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>4.5.10</td>
<td>34/Rep4/CS4.5.10</td>
<td>Support</td>
<td>3,</td>
<td>Welcomes the paragraph, but the Habitats Regulations have been revised in 2010 so the reference needs updating.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>4.5.12</td>
<td>34/Rep15/CS4.5.12</td>
<td>Support</td>
<td>LC</td>
<td>The policy places weight on SANGs but this is only one of the measures available. It would be considered appropriate to reword to mention &quot;measures currently delivered through the Urban Heathland Partnership&quot;.</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>CS31</td>
<td>34/Rep13/CS31</td>
<td>Support</td>
<td>LC</td>
<td>Support the policy.</td>
</tr>
<tr>
<td>RSPB Eastern England Office</td>
<td>4.5.10</td>
<td>20/Rep4/CS4.5.10</td>
<td>Object</td>
<td>1,2,</td>
<td>Wrong regulations quoted, should be the Conservation of Habitats and Species Regulations 2010.</td>
</tr>
<tr>
<td>RSPB Eastern England Office</td>
<td>4.5.12</td>
<td>20/Rep1,12/CS4.5.12 and CS31</td>
<td>Support</td>
<td>LC</td>
<td>Support the policy. Support this text which highlights importance of IPF and forthcoming DPD. Would benefit from additional caveat on SANGs as untested and requiring monitoring/evaluation that they deliver mitigation for recreational pressure on European wildlife sites.</td>
</tr>
</tbody>
</table>

**Summary:** General support for the policy, however the regulations have been revised and so the reference needs updating. Preceding text would benefit from a caveat that SANGs are untested, require monitoring and are only one of the measures available.

### Nature and Geological Conservation Interests

<table>
<thead>
<tr>
<th>Organization</th>
<th>CS</th>
<th>Rep/CS</th>
<th>Support</th>
<th>LC</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England (34)</td>
<td>CS32</td>
<td>34/Rep5/CS32</td>
<td>Support</td>
<td>LC</td>
<td>Welcome and support the policy.</td>
</tr>
<tr>
<td>Woodland Trust (8)</td>
<td>CS32</td>
<td>8/Rep1/CS32</td>
<td>Support</td>
<td>3,</td>
<td>Pleased to see the references to maintaining and enhancing woodland, but feel that the policy could be improved by containing a commitment to new woodland habitat where it has been lost as a result of heathland restoration. Would like to see reference to protecting native woodland and veteran trees.</td>
</tr>
</tbody>
</table>

**Summary:** General support for the policy, a suggestion that the policy could be improved through new woodland where it has been lost as a result of heathland restoration and a reference to protecting native woodland and veteran trees.
### Stour Valley Project

<table>
<thead>
<tr>
<th>Source</th>
<th>Reference</th>
<th>Action</th>
<th>Support</th>
<th>LC</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England (34)</td>
<td>CS33</td>
<td>Support</td>
<td>LC</td>
<td></td>
<td>Strongly support the policy and supporting paragraphs which provide excellent justification. The Council should consider reference to the function of this area as a strategic SANG.</td>
</tr>
<tr>
<td>Savills (on behalf of Canford Estates) (30)</td>
<td>CS33</td>
<td>Object</td>
<td>1,2,3,4</td>
<td></td>
<td>The identification of the Stour Valley as a sub-regionally significant recreation and habitat resource is fully supported. However, the policy needs to be supported by an appropriate delivery mechanism, such as Kinson Manor Farm.</td>
</tr>
<tr>
<td>RSPB Eastern England Office (20)</td>
<td>CS33</td>
<td>Support</td>
<td>LC</td>
<td></td>
<td>Support this policy.</td>
</tr>
</tbody>
</table>

Summary: Strong support for the policy. It is suggested that the Council could make reference to the function of this area as a SANG. The policy does need to be supported by an appropriate delivery mechanism, such as housing development on Kinson Manor Farm.

### Green Belt

<table>
<thead>
<tr>
<th>Source</th>
<th>Reference</th>
<th>Action</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cassell, R (31)</td>
<td>CS34</td>
<td>Object</td>
<td>1,2,3,4,</td>
</tr>
<tr>
<td>Savills (on behalf of Canford Estates) (30)</td>
<td>CS34</td>
<td>Object</td>
<td>1,2,3,4,</td>
</tr>
</tbody>
</table>

Summary: The RSS included an urban extension and its evidence remains valid. The green belt boundary should be revised to accommodate housing, a country park and employment.

### Pollution

No comments received
4.6 A QUALITY BUILT AND HISTORIC ENVIRONMENT

General

<table>
<thead>
<tr>
<th>RSPB Eastern England Office (20)</th>
<th>4.6.2</th>
<th>20/Rep8/CS4.6.2</th>
<th>Object 1,2,3,</th>
<th>Need to mention the value of biodiversity in the urban setting for health, well being and environmental reasons.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Summary: The value of biodiversity in the urban setting should be mentioned.</td>
</tr>
</tbody>
</table>

Designated Heritage Assets

<table>
<thead>
<tr>
<th>Savills (L&amp;P) Limited (on behalf of Talbot Village Trust) (13)</th>
<th>4.6.5</th>
<th>13/Rep5/CS4.6.5</th>
<th>Support 2,3,4,</th>
<th>The overall aim of protection is supported. It would benefit from a positive, proactive approach to the management of heritage assets. Vitality and viability are important considerations and new development can make a positive contribution to these assets.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chappell, S (14)</td>
<td>CS36</td>
<td>14/Rep1/CS36</td>
<td>Object 2,3,4,</td>
<td>Introduces a more subjective approach to decision making with regard to applications in Conservation Areas (CAs). There is a danger that development in CAs will not be adequately controlled. Policy needs to be more robust and not rely on a future DPD.</td>
</tr>
<tr>
<td>English Heritage South West region (35)</td>
<td>CS36</td>
<td>35/Rep1/CS36</td>
<td>Object 1,2,4,</td>
<td>The evidence base is not adequate (e.g. there is no evidence on condition of heritage assets). The resulting proposed approach is disappointingly reactive, exemplified by the DM style policies and in contrast to other initiatives in the plan.</td>
</tr>
<tr>
<td>Savills (L&amp;P) Limited (on behalf of Talbot Village Trust) (13)</td>
<td>CS36</td>
<td>13/Rep6/CS36</td>
<td>Support 2,3,4,</td>
<td>The overall aim of protection is supported. It’d benefit from a positive, proactive approach to the management of heritage assets. Vitality and viability are important considerations and new development can make a positive contribution to these assets.</td>
</tr>
<tr>
<td>Talbot and Branksome Woods Residents’ Association (9)</td>
<td>CS36</td>
<td>9/Rep1/CS36</td>
<td>Object 1,2,4,</td>
<td>The policy does not appear to adequately protect Conservation Areas from harmful development, where existing policy 4.4 gives greater protection. This policy will rely too heavily on subjective judgement. Much greater detail is needed.</td>
</tr>
</tbody>
</table>

Summary: It was generally felt that the policy does not offer sufficient protection. The wording is considered too subjective and disappointingly reactive in contrast to other initiatives in the plan. The management of heritage assets should also consider the contribution that new development can make.

Local Heritage Assets

| English Heritage South West region (35)                      | CS37  | 35/Rep2/CS37    | Object 1,2,4, | The evidence base is not adequate (e.g. there is no evidence on condition of heritage assets). The resulting proposed approach is disappointingly reactive, exemplified by the DM style policies and in contrast to other initiatives in the plan. |

Summary: One response that felt the evidence base is too weak and the policy does not offer sufficient protection. The wording is considered disappointingly reactive in contrast to other initiatives in the plan.
### Quality Design

<table>
<thead>
<tr>
<th>Commenting Organisation</th>
<th>CS Ref</th>
<th>Correspondence Ref</th>
<th>Position</th>
<th>Support/Objection</th>
<th>Supporting/Letting Council</th>
</tr>
</thead>
<tbody>
<tr>
<td>RSPB Eastern England Office (20)</td>
<td>4.6.12</td>
<td>20/Rep6/CS4.6.12</td>
<td>Support</td>
<td>LC</td>
<td>Support this paragraph which recognises the potential for development to deliver enhancements for biodiversity.</td>
</tr>
<tr>
<td>English Heritage South West region (35)</td>
<td>CS38</td>
<td>35/Rep4/CS38</td>
<td>Support</td>
<td>LC</td>
<td>The high quality urban design agenda is welcomed, but suggest the Borough Council consider the formation of a design panel to help assist a consistent exemplary approach across the Bournemouth/Poole/Christchurch conurbation?</td>
</tr>
<tr>
<td>Natural England (34)</td>
<td>CS38</td>
<td>34/Rep19/CS38</td>
<td>Support</td>
<td>LC</td>
<td>Natural England considers biodiversity and habitat enhancements to be sound and appropriate.</td>
</tr>
<tr>
<td>Terence O'Rourke Ltd (on behalf of Meyrick Estate Management Ltd) (23)</td>
<td>CS38</td>
<td>23/Rep1/CS38</td>
<td>Objection</td>
<td>2,</td>
<td>Welcomes the priority to promote high design quality and takes issue only with the inflexible wording of this policy. Requiring development to enhance an area can unfairly prejudice good development that maintains the existing qualities.</td>
</tr>
<tr>
<td>RSPB Eastern England Office (20)</td>
<td>CS38</td>
<td>20/Rep15/CS38</td>
<td>Support</td>
<td>LC</td>
<td>Support this policy.</td>
</tr>
</tbody>
</table>

**Summary:** Support for good quality design, however issue taken by one response that the wording is somewhat inflexible requiring enhancement where a good development may only maintain exiting quality.

### 5.0 THE BOURNEMOUTH PLAN KEY DIAGRAM

<table>
<thead>
<tr>
<th>Commenting Organisation</th>
<th>CS Ref</th>
<th>Correspondence Ref</th>
<th>Position</th>
<th>Objection</th>
<th>Supporting/Letting Council</th>
</tr>
</thead>
<tbody>
<tr>
<td>GL Hearn (on behalf of Castlepoint Ltd Partnership) (7)</td>
<td>KD</td>
<td>7/Rep2/CSKD</td>
<td>Object</td>
<td>2,</td>
<td>The key diagram to the core strategy has omitted to name a number of the designated district centres; these should be referred to specifically on the Key Diagram.</td>
</tr>
<tr>
<td>Ken Parke Planning Consultants (18)</td>
<td>KD</td>
<td>18/Rep2/CSKD</td>
<td>Object</td>
<td>2,</td>
<td>The boundaries of the town and district centres are not identifiable, the key diagram should be based on an Ordnance Survey map.</td>
</tr>
<tr>
<td>Savills (on behalf of Canford Estates) (30)</td>
<td>KD</td>
<td>30/Rep1/CSKD</td>
<td>Object</td>
<td>1,2,3,4,</td>
<td>The focus of growth indicated will not meet the housing or community needs of Bournemouth. The Key Diagram should be revised to reflect the opportunity for the provision of a new country park and housing at Kinson Manor Farm.</td>
</tr>
</tbody>
</table>

**Summary:** With the exception of one representation requesting that the boundary of the green belt is amended on the Key Diagram, the general consensus was that it required more detail, including naming all centres and producing it on an ordnance survey base map.

### 6.0 DELIVERY AND MONITORING

No comments received.
## APPENDIX A: LIST OF REPLACED POLICIES

<table>
<thead>
<tr>
<th>Holdenhurst Village Action Group (15)</th>
<th>AppA 15/Rep1/CSAppA</th>
<th>Object 3,4,</th>
<th>Confusion over the status of removed / replaced polices from Local Plan: 8.6, 8.7, 8.21. Unclear whether they are still valid or cancelled once the Core Strategy is adopted.</th>
</tr>
</thead>
<tbody>
<tr>
<td>O’Luby, A&amp;R (10)</td>
<td>AppA 10/Rep1/CSAppA</td>
<td>Object 1,</td>
<td>Wording used relating to description of saved, cancelled and removed policies is confusing, unclear and cannot be justified.</td>
</tr>
</tbody>
</table>

**Summary:** The wording and layout is considered unclear, resulting in confusion over what the status of each policy is.

## GENERAL COMMENTS

<table>
<thead>
<tr>
<th>Dorset County Council (28)</th>
<th>GEN 28/Rep1/CSGEN</th>
<th>Support LC</th>
<th>It is considered that there are no issues which Dorset District Council would wish to challenge on grounds of soundness. (General comments made).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tetlow King Planning (on behalf of HARPs) (29)</td>
<td>GEN 29/Rep10/CSGEN</td>
<td>Support LC</td>
<td>There is no mention of CIL. We consider it extremely likely that after 2014 Bournemouth will be forced to adopt CIL. It is therefore essential that the Council set out a strategic policy with which the CIL charging schedule will need to accord.</td>
</tr>
<tr>
<td>The Coal Authority (3)</td>
<td>GEN 3/Rep1/CSGEN</td>
<td>Support LC</td>
<td>Confirmed that they have no specific comments to make on the document at this stage.</td>
</tr>
<tr>
<td>Transdev Yellow Buses (19)</td>
<td>GEN 19/Rep1/CSGEN</td>
<td>Support LC</td>
<td>Having reviewed the above documents for ‘soundness’, no major comments to add.</td>
</tr>
</tbody>
</table>

**Summary:** General responses from organisations confirming no specific comments to make. Representation from Dorset County Council considered as a general comment, with no challenges on soundness. Mention of CIL and lack of policy relating to a charging schedule.