

**Combined Bournemouth Borough Council comments on Boscombe & Pokesdown Neighbourhood Plan Reg 15 Submission Version
2nd November 2018**

Policy / Para in Reg 15 Submission version	Head of Planning Service and other team comments on Reg 15 Submission version
Map 3 Page 10	Transport Planning Team comments Map 3 is incorrect. Palmerston Road public car park needs removing as it has been developed for housing.
Analysis of areas	Heritage comments On several occasions, - particularly "Analysis of the Areas" under the "Heritage assets" headings, there is mixing up of nationally listed and locally listed buildings. Needs checking and amending. For example pages 13,17, 22 and 25. Pages 13 and 25 have been amended in the Reg 15 version, but not 17 and 22.
Page 20	Transport Planning Team comments In Movement paragraph, missed off reference to parking at Overstrand Car Park, which is shown in the Plans
Page 25	Transport Planning Team comments The reference to Pokesdown Station is incorrect. The station is manned Monday - Friday 05:50 - 12:30, Saturday 07:50 - 13:40 and Sunday Closed. The lifts will be working by end of February 2020. This should be amended in line with the reference in page 13 to read "The station is manned part-time with someone in the ticket office."
Page 32	Transport Planning Team comments Map 5 add one way streets from page 11 shaded to match BAP4(7): improved access (light blue).
Page 33	Heritage comments Several proposed locally listed buildings suggested on page 33 but information supplied makes them difficult to identify. Suggest include an appendix with photo, map and description, which should explain why the buildings are important. The same for historic shopfronts. Where a proposed locally listed building is for a street it would be helpful if only the buildings of interest are included. Hampden Lane refers to all buildings.

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BAP1	<p>BAP1: The scale and density of development Planning Policy comments The policy has been re-worded to take into account our previous comments. However the footnote could be made clearer by referring to “buildings of architectural or local heritage value”</p>
BAP2	<p>BAP2: Good design for the 21st Century Head of Planning Service comments We welcome this policy and support your intention to achieve sustainable design including reducing emissions that lead to climate change, recycling and the use of on-site renewable energy. The identification of proposed locally listed buildings is also welcomed</p> <p>Underground bins Litter is highlighted as a key concern highlighted by Boscombe and Pokesdown residents. The Council is keen to see the use of underground bins rolled out in new and existing developments wherever feasible to reduce littering and the visual impact of bins and we would like to see a policy introduced on this. Perhaps this could be incorporated into BAP2 Good Design for the 21st Century.</p>
	<p>Urban Design comments This is an important policy and we support the requirements relating to use of resources, reducing emissions and on-site renewable which would strengthen Core Strategy Policy CS2.</p>
	<p>Planning Policy comments Potentially goes beyond national policy/building regs on renewable energy</p>
BAP3	<p>BAP3: Shopfronts Development Management Comments The policy states that all new shopfronts should include original central and curved entrances, entrances to upper floors etc. It is not clear but seems to suggest that where replacement shopfronts have been installed there would be an expectation for developers to reintroduce these features. This seems rather onerous given that this is not a conservation area and whilst this is desirable, I wonder if this might put potential tenants off due to additional costs.</p> <p>The policy states that in exceptional circumstances roller shutters will be allowed but where these are lattice with Perspex behind. Whilst planning officers currently look for lattice style shutters, I am not aware of any application for roller shutters with Perspex behind. Is this something that is common place? Why only with Perspex behind?</p>

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	<p>There is reference to stall risers and the need to reinstate original stall risers of the same height or to the same height as neighbouring shops – what if the neighbouring shop has a modern shop front with only a minimal stall riser – technically they could mirror that which seems to undermine what they seek to achieve – what if the shops either side have stall risers of varying heights – which one do you take your lead from?</p>
	<p>Community Regeneration comments In principle we support the ethos of retaining and renovating original shop frontages however this needs some further clarification to ensure that what is being protected is ‘quality’ in terms of its original frontage. Whilst we understand that the underlying principle is to protect heritage and community valued shopfronts in areas like Pokesdown, a principle like this could be applied to the whole area and prevent opportunities to develop better frontages (former TJ Hughes Unit etc). perhaps this could be linked more clearly to identified buildings or heritage assets?</p>
<p>BAP4 and BAP5</p>	<p>BAP4: Open Spaces and BAP5: Safe Routes Urban Design comments Re policy on Safe routes (now BAP 5) Please add here (or wherever it fits best): <i>‘cycling contraflows will be introduced in areas where one way streets make cycling difficult’.</i> A number have been introduced recently for example on Borthwick Road and the cycling officer intends to introduce more in Boscombe. The definition of better cycle routes also needs rewording as it is too specific – suggest: <i>‘Cycle routes will be designed to be safe and convenient for all ages and abilities, and will be segregated from traffic where possible’.</i> The monitoring target for this policy, refers to new footpaths which transport officers have advised are unlikely to be built - reference to better pedestrian crossings and cycle routes would therefore be better.</p>
<p>BAP6</p>	<p>BAP6: The number and type of new homes Planning Policy comments Policy amended to refer to a range of 123 – 183 dpa which reflects a proportion, as advised, of the upper end of standard methodology figure. Although ONS 2016 household projections indicated a significantly reduced rate of population growth in Bournemouth, (from 1,458 – 906 dpa), revised PPG out for consultation in Oct 2018 advises to use the 2014 based household projections. Therefore the range would appear to be appropriate.</p>

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	<p>Urban Design comments I support the policy regarding mix of dwelling sizes.</p> <p>I'm not sure that HMO's should be strongly resisted <i>throughout the neighbourhood plan area</i> given that the south eastern part of the area has very few/ no HMOs. Over concentration of HMOs is only found in the western and northern parts of the neighbourhood plan area.</p> <p>I support the stance that "Car free housing may be acceptable above commercial premises on Christchurch Road on heritage buildings and in highly constrained locations provided that appropriate financial contributions are made towards alternatives such as car clubs, walking and cycling improvements and public transport provision" as rigid application of the Council's adopted parking standards is not practical in such situations.</p>
	<p>Highway Development Control comments Reference car-free housing. To my mind, car free housing does not work unless there are appropriate, (spatially) sufficient and enforceable Traffic Regulation Orders (TROs) in place BEFORE development takes place. Trying to implement TROs after a development has been implemented is very challenging and uses Highways legislation that falls outside the remit of planning law. The NP should agree to implement appropriate TROs before any car-free development as it shows a commitment from local residents, businesses and organisations to be aware of and sign up to measures that would help them achieve the aims of the NP – again, seeking to integrate land use and transport planning. This ought to be explained in the preamble to the Policy.</p> <p>I would recommend that the 'car-free' statement be extended to include the following text 'and most importantly that appropriate TROs are used, such as residents' parking schemes, and that these are implemented in the local area prior to any new residential development. Furthermore, any new development that seeks to be car-free should ensure that the residents of the new development would not ordinarily be permitted to receive a parking permit</p>
	<p>Community Regeneration comments We are in favour of encouraging development that is in favour of family units with two or more bedrooms. This compliments our strategic aims under the Homes for Boscombe Strategy.</p>
BAP7	<p>BAP7: The quality of new homes Head of Planning Service comments Central government guidance requires Local Authorities to establish need, viability and a transition period in order to introduce space standards. It is unclear whether this guidance would also apply to a</p>

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	<p>Neighbourhood Plan but the Council supports the intention. However, the proposed space standards would be in line with Core Strategy policy CS41 which requires developments to ‘provide a high standard of amenity to meet the day to day requirements of future occupants’.</p> <p>Viability work has now been undertaken and a report published. We are waiting for an update to this report.</p>
BAP8	<p>BAP8: Managing our houses in multiple occupation (HMOs) and Bedsits Development Management comments</p> <p>The policy sets out circumstances when HMOs would be permitted but some of these are very subjective and would be difficult to know how to apply when assessing an application and would be likely to lead to appeals if we refused applications – no unacceptable impact on amenities – how do we assess this?; internal and external amenity space, refuse storage, letter boxes, door bells and car and cycle parking to an appropriate standard – what is an appropriate standard for all of these? The Council has existing policies for refuse storage, car and cycle parking. There are no policies for internal and external amenity space, letter boxes or door bells however but we have struggled to win appeals where we have argued for greater outdoor amenity space because we do not have any specific policies.</p> <p>How would we establish whether the proposed HMO would create unacceptable highway problems, when the Local Highway Authority (through the Parking SPD) does not require a high level of parking to be provided for HMOs.</p>
	<p>Transport Planning Team comments</p> <p>Part III is unclear for unacceptable highway problems. Retention of the ‘unacceptable highway problems’ allows for a non-defendable highway refusal. If they had included ‘highway safety or the convenience of road users’ then this would be more defensible but the nature of HMOs and bedsits is unlikely to comprise either.</p>
Para 9.12 – 9.14	<p>Planning Policy comments</p> <p>Reference should be made to the Bournemouth, Christchurch and East Dorset Joint Retail and Leisure Study 2017 prepared by Lichfields and findings relevant to Boscombe summarised.</p>
BAP9	<p>BAP9: Managing our High Street and businesses Development Management comments</p> <p>Royal Arcade - Whilst a viable use that secures the building long term is welcomed, there should also be some reference to the importance of retaining original features and protecting the historic character of this listed building.</p>

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	<p>Urban Design comments Support the diversification of uses on the High street excluding residential at ground level. Sovereign Centre - Recommend adding '<i>Any redevelopment of the Sovereign Centre should relate sympathetically to the Royal Arcade. Good pedestrian permeability should be maintained with entrances on all sides</i>'.</p>
Preceding paras to BAP10	<p>Highway Development Control comments This addresses Site Allocations. I consider that the preamble to the Policy should set out the need for a robust car parking assessment for both the existing and future requirements for public car parking in the local area. This would ensure that adequate levels of car parking are available to sustain the viability and vitality of both the (varied) existing and proposed development uses in the NP area.</p>
BAP 10 and Table 12	<p>BAP10: Site Allocations and Table 12: Site Allocations Head of Planning Service and Planning Policy comment There is only detailed policy wording for SA2, SA4, SA5 and SA6. Other sites rely on Table 12 information. All the identified sites ideally need a site allocation policy (even if brief) to enable them to carry weight in the decision-making process.</p>
BAP10	<p>BAP10: Site Allocations SA2: Hawkwood car par Head of Planning Service comments</p> <p>It is questioned from the housing perspective whether the proposed site allocation represents the best use of space as the car park is a valuable site that could provide many more homes and help bring vibrancy and economic activity to the centre of Boscombe. We recognise the need for family housing but in such a central location we feel that there is a case to suggest that this might be delivered through larger flats with access to outdoor space. It is considered that a higher density medium rise development might be more appropriate and realistic in this context. SA2 should make reference to the potential of the site for residential development.</p> <p>From a transport perspective, we must highlight that retained Policy 8.22 of the Bournemouth District Wide Local Plan states that 'Where redevelopment would affect public car parking spaces (whether publicly or privately owned), any spaces lost should be replaced either: i) on site; ii) in the vicinity; or iii) by the provision of alternative transport measures.'</p>

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	<p>Whilst not examined in detail given the narrow dimensions and tree constraints of the site it is questionable whether it would be suitable for a viable multi storey car park.</p> <p>If the allocation is to be pursued, given the need for new housing referred to above, development involving the loss of parking spaces at Hawkwood Road might be appropriate but we would ideally wish to be sure that an up to date parking study demonstrates that the parking to be lost is actually surplus to requirements. The methodology of the parking study would need to be agreed in advance with the Local Highway Authority. This requirement should ideally be included in the policy wording.</p> <p>Consideration should also be given to the desirability of protecting mature trees on the site boundary. Recommend adding '<i>Any redevelopment should not adversely affect matures trees on the site boundaries</i>'.</p>
	<p>SA3: Ashley Road Coal Yard, North Road Transport Planning Team comment SA3 need to retain access and rear rail platform space for future halt, I note there is a lack of footway along North Road which will need to be delivered by this site.</p>
	<p>SA4: Royal Victoria Hospital, Shelley Road, Phase 2 Urban Design comments Recommend adding: <i>'Any redevelopment should create a positive frontage and access to the adjacent public green space'</i> Could there also be scope to accommodate community gardens in the green space?</p>
	<p>SA5: Gladstone Road West (Centenary Way) Urban Design comments Support the allocation. As you know urban design, housing, regeneration and highway staff have been looking at the scope for development here. As well as providing housing the project has the potential to create a much more appealing approach to the heart of Boscombe and improve safety and convenience for pedestrians and cyclists. Please add: <i>'..and provide safe and convenient pedestrian crossings'</i></p>
	<p>SA6: Sovereign Centre and car park Head of Planning Service comments Policies SA6 and BAP8 overlap and need to be consistent.</p>

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	<p>Transport officers have raised concern regarding to the loss of parking, as above. Policy wording should require a robust parking study demonstrating surplus capacity if any parking is to be lost -</p> <ul style="list-style-type: none"> • methodology to be agreed in advance with the Local Highway Authority • any redevelopment to relate sympathetically to the listed Royal Arcade • good pedestrian permeability with entrances from all sides. <p>The policy now refers to a “robust parking study and impact appraisal to assess parking requirements”. This is unclear as it appears to relate to the parking requirements of the development only and not the wider area.</p> <p>Urban Design comments Sovereign Centre - Recommend adding ‘<i>Any redevelopment of the Sovereign Centre should relate sympathetically to the Royal Arcade. Good pedestrian permeability should be maintained with entrances on all sides.</i></p>
	<p>SA8: Opposite Hawkwood Road car park, r/o KFC, Primark and adj to Primark and SA9: 617 – 623 Christchurch Road and car park behind Sainsbury’s on Hawkwood Road Transport Planning Team comments Transport officers have again raised concern to the loss of parking, as above. Policy wording should require a robust parking study demonstrating surplus capacity if any parking is to be lost - methodology to be agreed in advance with the Local Highway Authority.</p>
	<p>SA12: Boscombe bus station Head of Planning Service comments Any reconfiguration of the bus station would need to demonstrate that the provision for buses will be maintained or improved. This should ideally be added to the policy wording.</p> <p>We have serious reservations regarding the provision of open space on the site of the bus station when accounting for the value of Council owned land. We are also concerned that this would be a poor location for this use, given the traffic noise and pollution, the lack of pedestrian crossings and the existing unattractive frontage of the Sovereign Centre.</p> <p>To achieve best value for this land and create a positive built frontage to a reconfigured bus hub it is suggested that this site would be more suitable for commercial or leisure use on the ground floor, a better</p>

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	<p>entrance to the Sovereign centre and residential use above.</p> <p>We do however appreciate the importance of community gardens and wonder if there might be scope for alternative locations to be considered possibly at Shelley Gardens, next to SA4 or the triangle of wooded land adjacent 61 St Clements Road.</p>
Table 13	<p>Table 13: Implementation and monitoring the Neighbourhood Plan Head of Planning Service comments There are numerous references to the Boscombe Regeneration Partnership and Bournemouth Borough Council being responsible for delivery. This may not be realistic given the uncertainty around the future of the Council. Grant funding is also significantly reducing and all the large grant making organisation (Big lottery, Heritage lottery etc.) are reviewing their funding streams.</p>
	<p>BAP5: Safe Routes Highway Development Control comments Monitoring targets - I consider that 100m of new footpaths cycle lanes seems low and I am not sure how this was determined. Is there any evidence to support 100m?</p>
	<p>BAP6: The number and type of new homes Highway Development Control comments Undertake an assessment of parking controls in the area prior to any development to ensure the implementation of appropriate TROs to enable car-free housing development if such car-free housing is being promoted.</p>
	<p>BAP10: Site Allocations SA2: Hawkwood Road car park redevelopment Highway Development Control comments I consider that Before and After parking survey and assessments should be undertaken, which includes relevant on-street and off-street public car parking in the local area.</p>
	<p>BAP10: Site Allocations SA6: Sovereign Centre Highway Development Control comments I consider that the monitoring should ensure that car parking survey and assessments, as mentioned earlier, should be undertaken prior to any development.</p>

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	<p>BAP11: Priority Improvement projects Transport Planning Team comments Add extra text to indicator of achievement to read “prepare costed plan for proposed cycle lanes and safe routes including a programme of cycle contraflows on one way streets in accordance with the BAP proposal map.”</p> <p>Highway Development Control comments I consider that the monitoring target of 100m of new footpaths cycle lanes seems low and I am not sure how this was determined. Is there any evidence to support 100m?</p>
	<p>Other issues Urban Design comments Community Gardens/ Land Adjacent to 61 St Clement Road An alternative location for a new community garden which was discussed during the call for sites could be the triangle of land by the rail line adjacent to 61 St Clement Road which has been used for fly tipping and is covered by a Tree Protection Order. The tree officer’s initial view was that there might be space for a building at the wider end of the site - suggest allocating it for 1 to 2 dwellings and/ or a community woodland. The site is likely to remain a problem area unless it has a purpose.</p>
	<p>Cycle Officer comments Want to see two-way cycling throughout Boscombe and indeed across the town wherever possible. We would also like to see exemptions to turning bans and street closures for cyclists. Some form of filtered permeability, or traffic cells, would be a better approach to tackle rat running than the current arrangement of one way streets and turning bans</p>
<p>Basic Conditions Statement page 118</p>	<p>Appendix Basic Conditions Statement Page 118 Highways Development Control comments No reference to CS14 Delivering Transport Infrastructure. The NP seeks to provide much new development and it may be necessary for new development to fund appropriate transport mitigation measures.</p>