

Poole Local Plan Review Development Management Policies



This report summarises the feedback from the consultation on possible policies for determining planning applications.

Number of responses

- A total of 25 responses were received to the consultation.

Views about the possible policies:

- There were 60 comments about the possible policies.
- The policies that attracted the most comments were:
 - Policy DM1: Design (12 comments)
 - Policy DM9: Green Infrastructure and Biodiversity (11 comments)
 - Housing Mix (8 comments)

1. Background

The Council is preparing a new local plan that sets out the amount and location of where new development should take place over the period 2013 to 2033.

To inform this development strategy the Council has undertaken a series of consultation events. The latest consultation on what are referred to as the “*Issues and Options*” took place between 13 June and 8 August 2016.

The consultation was entitled the “*Poole Local Plan Review: Development Management Policies*”. The consultation was run alongside another consultation, called the “*Poole Local Plan Review: Housing and Other Development Sites*”.

2. Consultation Aims

The Council sought views on possible policies that the Council could use to determine planning applications for new development.

The intention is to use the findings to understand if the Council’s currently adopted policies remain fit for purpose and what changes if any are required to ensure the plan is compliant with national planning policy and guidance.

3. Target Groups

Comments were welcome from anyone interested in development. This includes developers, who generally submit planning applications for development and members of the public that often use the policies to comment upon planning applications.

4. Methodology

The consultation included a number of approaches:

- Drop in events around the Borough, where people could come and talk to planning officers;
- Website – the consultation documents were available on the Council’s website. This included an online consultation form; and
- Hard copies of the consultation documents, including consultation forms were available at the Civic Centre and libraries (in addition to online access at these locations)

The consultation asked the following questions:

Q1. Do you agree with the issues identified with developing new development management policies?

Q2. Do you have any comments on the options identified for amending the development management policies?

Q3. Are there any other issues and options that we have not identified but should be considered within the new Local Plan’s development management policies?

5. Consultation Timescales

The consultation ran from 13 June and 8 August 2016 (8 weeks).

6. Communications

This communication included:

- notifying everyone registered to receive updates on the Local Plan Review (1,524 people);
- providing contact details to request printed copies;
- news releases issued to the local and regional media;
- sending a copy of the consultation materials to each Councillor;
- reference to the consultation in all consultation materials that formed part of the “*Poole Local Plan Review: Housing and Other Development Sites*” consultation; and
- erecting planning site notices by each of the possible development sites.

7. Drop In Sessions

The Council arranged 14 drop in events around Poole where people could come and speak to officers. Further details are set out in the consultation report for the “*Poole Local Plan Review: Housing and Other Development Sites*”.

8. Interest in the Consultation

- ❖ Based on the number of responses, far more people were interested in the sites consultation. However people had the opportunity through publication of that consultation to be aware of the Development Management Policies consultation.
- ❖ 1,199 people attended the drop-in sessions.
- ❖ The top ten sources for users accessing the consultation pages online accounted for 4,784 views (e.g. search engines, direct or via other web links)
- ❖ The consultation was front page news in the Bournemouth Echo on 10 June with a two page spread on pages 4 and 5.
- ❖ Throughout the consultation numerous articles were published in papers and online, in different local journals.

9. Responses

- ❖ The consultation attracted a total of 26 responses. 24 organisations, one Councillor and 1 member of the public commented specifically on the Development Management Policies.

10. Findings

The responses are summarised in the table below.

Respondent	Comment
Policy DM1: Design	
Barclays Bank Plc	Support the Council's suggestion that there remains a need to bring forward more detailed guidance on design that relates to Poole's character areas and to ensure the design of development is appropriate to its context. This also compliments Barclays' comments on the proposed housing strategy; to ensure that development comes forward in a way that considers the wider area.
Barratt David Wilson Homes	Agree this policy needs to be amended to be more flexible and less prescriptive.
Gladman Developments	Plan should not be prescriptive on density as each site is different. The plan should be flexible to enable developers to respond positively to site constraints and opportunities to ensure that development appropriate to the location is delivered.
Home Builders	As set out in our previous response to the Issues and Options consultation in March 2015 policy

Respondent	Comment
Federation	requires amendment and up-dating either because national policy has changed or new evidence has emerged including the Council's most recent whole plan viability testing which demonstrates development is not viable.
Legal and General	Currently the policy does not include all aspects of design as there are detailed matters dealt with in the Core Strategy. An updated policy approach is an option which should be brought forward. L&G is committed to upgrading and improving the centre and the borough should seek a high level of design for developments. As such, design is an issue which we agree should be promoted through policy. The Borough suggest an option might be to provide furtherer guidance on design through the adoption of an SPD. An SPD should aim to assist applicants in making successful applications not add unnecessary burdens on developers. The Poole Town Centre SPD, was only recently adopted, providing design principles for the town centre and as such a further design SPD which encompasses the town centre would be unnecessary.
Mark Hinsley Arboricultural Consultants Ltd.	<p>Trees and climate change: Trees in Towns II published by the Department for Communities and Local Government in February 2008 recognised Poole as having the highest density of Trees and Shrubs of any Town in England. This is a remarkable statistic when large areas of Poole, prior to development, were open heathland with no trees or shrubs at all. The reason that so many trees were planted in association with the spread, particularly towards the coast, of residential development, was the need to modify the climatic conditions on these new sites to make them habitable by providing shelter from the strong salt laden winds that regularly blow in off the sea. Much of that shelter planting still exists, although many of the residents in those areas are unaware of the benefits it brings and do not understand how different their living environment would be without the micro-climates it creates. An exposed coastal Town like Poole, facing the prospect of high winds from climate change increasing in both strength and frequency, will need to address the issue of the provision of shelterbelts. Such shelterbelts also fit neatly into other environmental improvements such as wildlife corridors and the slowing down of rainfall through the drainage system that helps to reduce urban flash floods, pollution control and other 'green infrastructure' benefits.</p> <p>Another factor of climate change is rising temperatures which, when coupled with the creation through hard reflective surfaces of 'urban heat islands' can result in distress oreven death for certain vulnerable sections of society through raised average temperatures. We could try urban temperature management, through the calculated use of shade trees.</p> <p>Trees and development densities: We only have two outcomes for a tree that is stood where somebody wants to build – the tree either sterilises an area of the site for development purposes and the proposal is refused or the development goes ahead with approval and the tree is felled. There is presently no half-way house.n order to maintain their tree stock in the face of continuing pressure on the land area available, the Borough of Poole, already a National leader in Tree Cover, should take a National lead in tree retention by introducing a third outcome so that, for example; Category A trees still sterilise the site as they do now and Category U trees are still felled; however Category B and C trees may, if site conditions can be demonstrated to be right, be retained with significantly reduced Root Protection Areas on one or two sides provided a comprehensive post development maintenance program is enshrined in the Planning Approval. Such an approach would, in my opinion, allow Poole to make more efficient use of existing development land without sacrificing the current density of tree cover. The advantages that this approach have over simply felling and replanting is that the tree to be retained will always be larger than anything that could reasonably be planted and, as it will always keep at least 50% of its original root system, will always have a better survival chance than a newly planted tree of any significant size.</p>
McCarthy & Stone Retirement Lifestyles Ltd	<p>Building for Life standards are useful, but they tend to be more relevant to larger sites. Many of the initiatives are not possible or difficult to achieve on urban sites and with specialist housing. Support deletion of reference to "Building for Life".</p> <p>Support a review of the approach to public art, due to the challenge of delivering this with the uncertainty of a post referendum economy. A more strategic approach on suitable site allocations</p>

Respondent	Comment
	would be more beneficial.
Cllr M Pope	I would prefer the policy remains prescriptive. At present there is a tendency to grant applications which in themselves destroy the harmony of existing developments: raising ridge height to accommodate loft development: allowing two storey properties in an essentially single storey (bungalow) urbanisation. I would argue that protecting neighbouring amenity is clearly a fundamental principle of design. We are all aware of 'monstrous carbuncles' which have been allowed at the cost of residential amenity.
Richborough Estates	Welcome that policy wording could be amended to increase flexibility in its application and avoid being too prescriptive in places. It is important that the design assessment tools used by the Council are understood and that any requirement to comply with local or other generic design assessment tools are understood. Advocate the use of a Design Framework approach. This would provide confidence for design quality and consistency as part of the development. Such a Framework can be agreed as part of the outline planning application process with subsequent Design Codes detailing its principles at reserved matters phases of development.
Thorne, S & S	I think it would make sense to have a design policy that brings all aspects into a single policy if they are currently considered separately.
W H White Ltd	It would seem prudent to maintain the criteria on trees within to ensure that trees are considered at the formative stage of any proposal.
Woodland Trust	<p>Would like to see the document reflect similar wording to the Adopted North Somerset Council version in a dedicated 'Trees & Woodland' policy. This should in particular include (a) protection for ancient woodland and ancient trees except in wholly exceptional circumstances and (b) support for woodland creation as part of green infrastructure for all new development. We would also like to see this policy followed up and supported with a Trees & Woodland Supplementary Planning Document (SPD).</p> <p>We would like to see a new 'Public Realm' heading included to deal with urban design, and for street trees to be recognised as a key delivery element of this. Street trees and small woodland copses can play a key role in helping to design a successful public realm element to urban development. For example, the vision and Policy BCAP25 of the Bristol Central Area Plan. We would therefore like to see tree planting and street trees reflected in a new 'Public Realm' heading.</p>
Policy DM2: Heritage Assets	
Gladman Developments	Attaching conditions to outline planning permissions which require detailed archaeological surveys to be undertaken prior to commencement of development is an effective way to secure archaeological assets without delaying the grant of planning permission.
Historic England	Note the Council's confidence in the continued relevance and robustness of the existing development plan heritage policy. We have assumed you have no intention to adjust or revise it as a result.
Policy DM3: Shopping	
Legal and General	<p>It is understood that the Council seek to increase the provision of retail floor space and as such are of the view that policy needs to be reviewed. The Council suggests that there is a need for up to 18,000sqm of non-food retail floor space. We request confirmation of where this figure of 18,000sqm has come from.</p> <p>The consultation document highlights that issues with this policy include recent changes to permitted development rights.</p> <p>As the Dolphin Centre is the primary shopping centre within Poole's Town Centre, policy should seek to ensure that the Dolphin Centre remains within the primary retail frontage.</p> <p>As with Policy DM3A, we would support a similar recognition of the benefit of non-A1 uses in appropriate circumstances within the primary shopping frontage in emerging policy.</p> <p>As part of the revisions to Policy DM3, the current boundary for the 'Primary Shopping Area' should also be reviewed. At present the boundary encompasses a large area of the town centre. As the consultation documents suggest a need for more housing within the town centre, we would suggest that the primary shopping area boundary is redrawn to allow housing sites to come forward, such</p>

Respondent	Comment
	<p>that the two don't overlap or conflict.</p> <p>Recognition should be given in policy to that the fact that significant leisure uses are likely to be best accommodated within the town centre and within the main retail area where they can be accompanied by complementary retail uses (notably food and beverage).</p>
Policy DM4: Coastal Zone	
Bourne Leisure	The vitally important role of the tourism industry should be recognised in an amended policy DM4. The policy should encourage and support appropriate tourist accommodation development within the coastal zone, given the extent of the area and ample opportunities for such development to take place. Requirements for this type of development should align with Policy DM5 with regard to tourist attractions. Suggest the following wording in DM4: <i>"The development of tourist accommodation and visitor facilities within the coastal zone will be encouraged, taking into account visual, environmental, and strategic objectives"</i>
Natural England	To provide greater clarity with planning applications Natural England advise the authority to consider the provision of information relating to the locations where new jetties may be provided, where existing jetties may be refurbished and where no new jetties are acceptable. This would support the position of the authority and the Harbour Commissioners at an early stage in the consideration of small scale applications. Natural England would be pleased to advise on the provision of this policy approach.
Pope, Cllr M	I would not like to see any reduction in the 25 metre zone at Sandbanks.
Thorne, S & S	I would not like to see any reduction in the 25 metre zone at Sandbanks.
Policy DM5: Tourism and the Evening Economy	
Bourne Leisure	Endorses the Council's overall approach to encouraging appropriate tourism development. The specific requirements for development proposals to adhere to listed to for Rockley Park represent a suitable approach to protect the landscape and ecology, whilst not presenting unreasonable demands on development. Notwithstanding this, points 2, 3 and 5 will be addressed in DM9 and therefore do not need to be repeated in such detail in DM5. It is important that DM5 or DM9 include a clear provision whereby development proposals can incorporate mitigation measures for any adverse impacts.
Policy DM6: Accommodation for an Ageing Population	
Gladman Developments	A specific policy is needed for the provision of specialist accommodation for older people. Specialist housing with care for older people that provides choice to adults with varying care needs allowing them to live as independently as possible and differs from traditional sheltered/retirement accommodation. Suggest <i>"The provision of purpose built and/or specialist accommodation for older people in sustainable locations will be supported in Principle Settlements. Schemes should also be considered in other sustainable settlements where there is a proven need. Apartments should be restricted to occupation by only those with care needs, include minimum compulsory care packages, should also include age restrictions and an extensive range of communal facilities. Schemes are expected to be promoted in partnership with an onsite 24/7 care provider to safeguard the delivery of care and support to residents. Such Schemes fall wholly within the auspices of C2 use, meet an otherwise unmet need for specialist accommodation for older people, deliver care and communal facilities and will not therefore be required to contribute towards affordable housing.</i>
Home Builders Federation	As set out in our previous response to the Issues and Options consultation in March 2015 policy requires amendment and up-dating either because national policy has changed or new evidence has emerged including the Council's most recent whole plan viability testing which demonstrates development is not viable.
McCarthy & Stone Retirement Lifestyles Ltd	Welcome the proactive stance in meeting the needs of an aging population. Achieving the lifetime homes standard can be challenging or unfeasible in town/edge of centre locations which are better suited to older person's housing. This is particularly the case with reuse of existing buildings. Therefore flexibility is needed in the application of standards. It is imperative that the application of any enhanced standards which adds additional costs are considered when determining the extent of other planning obligations.
Richborough Estates	The suggestion of a requirement for delivering Lifetime Homes is noted, as an alternative to building new care homes – to make new homes more adaptable to longer-term occupation. Understanding

Respondent	Comment
	the Council's approach and design criteria for new development will be important in terms of influencing scheme design and the viability of delivery, particularly where additional design requirements need to be incorporated.
Policy DM7: Accessibility and Safety	
Highways England	We agree that the list of highway schemes will need to be reviewed and brought up to date in the final version of the Local Plan. This should reflect schemes already delivered and those no longer being taken forward as well as newly identified schemes. We also welcome the possible approach/option relating to DM7 to remove references to specific highway schemes and replace with a reference that development must not prejudice strategically important highway schemes as identified in the latest relevant publication.
Talbot Village Trust	TVT support the proposal to remove specific transport schemes from policy. It is understood that a comprehensive Wallisdown corridor transport plan is being prepared by both Councils and, until this is confirmed, it would be premature to include reference to schemes in the policy. It is however, also essential that specific transport improvements associated with Talbot Village are not identified as pre-requisites for development. The improvements required along the Wallisdown Corridor result primarily from existing pressures and the predicted growth in movements without development at Talbot Village. New development should not therefore be seen as the means to fund the mitigation for existing problems, as this will invariably make such developments less viable, and potentially unachievable.
Policy DM9: Green Infrastructure and Biodiversity	
Bourne Leisure	No objection to this revised approach to protecting biodiversity. However it is important that a redrafted Policy DM9 recognises that development that might affect existing habitats may be necessary and that it may be acceptable, with suitable mitigation measures that development would not result in overall net harmful impacts. Therefore it is essential that policy is flexible to allow for mitigating adverse impacts where they cannot be avoided to ensure that suitable and sustainable developments are not prevented from coming forward where they include appropriate and achievable mitigation measures. Suggest the following wording: <i>"Development proposals that could result in adverse impacts on Poole's biodiversity assets will be considered according to their merits on a case by case basis and subject to appropriate mitigation or compensation measures which address any negative impacts"</i>
Broadstone Neighbourhood Forum.	Welcome the suggestions and support the proposal to extend the designation of public open space to those smaller areas currently undesignated. The draft Neighbourhood Plan identifies a number of such spaces within Broadstone and is proposing they become local green spaces since they all meet the criteria set out in paras 76-78 in the NPPF (2012) and would also be in line with the new DM9 as proposed.
DCC Ecology	Policies dealing with determination of planning applications should include a requirement to use the Dorset Biodiversity Protocol and the emerging Biodiversity Compensation Framework. These two processes enable planning authorities to fulfil their statutory duty (under National Planning Policy Framework, 2012) to consider impacts on European Protected Species, and to conserve and enhance species and habitats of principle importance (under the NERC Act, 2006). The Protocol and Compensation Framework are endorsed by Natural England and provide the quickest and most cost effective way of fulfilling these obligations. Planning applicants should be encouraged to contact the Dorset Environmental Record Centre (DERC) for environmental information as part of the planning application process. DERC, as the Local Records Centre for Dorset, holds all environmental and ecological data for the county. Ecological information submitted as part of a planning information should ideally be copied to DERC to ensure that our county ecological records are regularly updated.
DLNP	Encourage adoption of the Dorset Biodiversity Protocol and Biodiversity Compensation Framework developed by Dorset County Council. The benefits are speedier planning process, cost to the applicant, meets statutory tests for European Protected Sites(EPS), captures small EPS cases which would go unmitigated, provides a simple checklist, and it is adaptable, auditable and self-funding.
Gladman	Any approach to protecting and enhancing biodiversity should be in line with Section 11 of the

Respondent	Comment
Developments	NPPF, in particular the distinctions between the hierarchy of designated sites” Council should only designate Local Green Space where it meets the special circumstances of para 77 of the NPPF, and not be used as a means of preventing development. Open space provision should be assessed on a case by case basis and could be achieved through a financial payment for offsite facilities, with a mind to the viability and constraints of a particular development site.
Natural England	The authority should consider with Natural England the need for specific policy adjustments in the light of the NPPF guidance and protected species as well as the adoption of the Dorset Biodiversity Protocol and Compensation Framework which are in operation within neighbouring authorities. The authority should carry out a screening exercise for S41 species with the Dorset Environmental Records Centre for sites in App2 and where necessary provide an informative note. The authorities Nature Conservation Officer may be able to advise. For example rare reptiles are known from close to or within site A26.
Cllr M Pope	I see no reason why policies for Public Open Space and Urban Greenspace should not be combined provided this offers the same measure of protection for each. <i>Allotments, Community Gardens/ Orchards and Space for Growing Food</i> - I see no reason why this should only be aspirational. There are a number of plots of public land on the Green Belt which would be much more suitable for this than being concreted over for housing or employment. There is a high demand for this type of facility. Kingston Lacy was able to establish a large area of community gardens with National Lottery funding. Using the Moortown Aerodrome land for community gardens would increase the biodiversity of the area which, I would have thought, would be beneficial to the adjacent Canford Heath SSSI.
Richborough Estates	Note the review of open space standards - such guidance will be important to inform the emerging development proposals for Crupton and Richborough would welcome the opportunity to be involved in that process to inform the scheme design. There is an existing aspiration for allotment provision. Identifying where sites can deliver new allotments, to meet local needs is important. Richborough are seeking to deliver new allotments as part of the development of Crupton. The Crupton development includes the delivery of new SANGs, in conformity with guidance produced by Natural England, with its long-term management also to be secured.
RSPB	Policies PCS28 and PCS29 (which the RSPB had close involvement in drafting) have been critically important policies within the Core Strategy and are well drafted and robust. The new policy will need to be consistent with the legal framework relating to internationally and nationally protected sites, and Natural England’s close involvement in drafting is recommended. We would also expect appropriate reference to green infrastructure, particularly the role and significance of Suitable Alternative Natural Greenspace (SANGs), a central plank of the mitigation mechanism for the potential recreational disturbance associated with residential development (beyond 400m, within 5km of protected heathland). The new plan will also need to make reference to the increasing risk of recreational disturbance to Poole Harbour, where a bespoke mitigation system is also required to address the impacts of residential development leading to increased pressure on the protected site (see also below).
W H White Ltd	Whilst WHW consider that there is scope to amalgamate policies on public open space and urban green space, the subtle distinction should be retained within any detailed wording. WHW consider it helpful to disaggregate renewable energy from this policy. Whilst WHW concur that a distinct policy covering internationally and nationally protected sites would be helpful, the opportunity for biodiversity enhancements should be retained.
Woodland Trust	<u>Ancient Woodland and Ancient Trees</u> It is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to compensate or mitigate for the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. With Poole Council showing a below average ancient woodland resource at 0.19% of land area compared to a UK average of 2.5%, it is critical that this valuable natural resource is absolutely protected in this Local Plan and highlighted appropriately.

Respondent	Comment
	<p>It is also important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees</p> <p><u>Woodland creation in green infrastructure</u></p> <p>Trees and woodland are a key element of natural green space provision for new development and can deliver a wide range of benefits for placemaking for local communities, in both a rural and urban setting. There are benefits for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets). Other benefits of tree planting include Urban heat islands, Air quality and Water management – flooding. Good example policies are CP20 and 21 of the East Hants DC Local Plan: Joint Core Strategy, P14 of the Solihull Local Plan and ES8 of the Stroud District Local Plan</p>
<p>Policies PCS6, PCS8, PCS31, PCS32, PCS33, PCS35 & PCS37</p>	
<p>Home Builders Federation</p>	<p>As set out in our previous response to the Issues and Options consultation in March 2015 policy requires amendment and up-dating either because national policy has changed or new evidence has emerged including the Council's most recent whole plan viability testing which demonstrates development is not viable.</p>
<p>Boatyards and Boat Storage</p>	
<p>Bourne Leisure,</p>	<p>Agree that the former policy should not be reinstated. It was unnecessarily restrictive and potentially prevented opportunities to deliver sustainable development. Support the new approach and requests that a flexible approach is adopted to the treatment of boatyards and storage. The new policy should ensure that new proposals to redevelop boatyards and storage areas are considered individually on a case by case basis. Proposals should be considered in light of the scale of facilities in question and the benefits arising from a new use, or the relocation of storage facilities.</p>
<p>W H White Ltd</p>	<p>WHW concur that it is too early to assess whether new policies are required in respect of Marine Management. In this vein WHW welcome the reinstatement of a policy concerning Boatyards and Boat storage.</p>
<p>Housing Mix</p>	
<p>Barclays Bank Plc</p>	<p>In line with Barclays' support of increasing densities and height in the town centre, any policy should make reference to the flexibility of the application of the housing mix, as larger units are likely to be unrealistic in an increasingly dense town centre.</p>
<p>Barratt David Wilson Homes</p>	<p>Whilst it is understood the Council has identified through the recent SHMA that a mix of housing is required, there is a risk that a policy will be too prescriptive and may deter developers from bringing forward sites. It is therefore suggested that the housing mix is not including within a DM policy and that the market will determine what type of housing is required and in which locations. For example, it is suggested that 20% of development should be 1 bedroom accommodation which is too prescriptive and is not supported by our experience of delivering homes within the local area.</p>
<p>Gladman Developments</p>	<p>Caution against using a prescriptive policy. Policy should be flexible and realistic to take into account the constraints and opportunities of individual development sites and issues of viability.</p>
<p>Legal and General</p>	<p>The policy should be revised to reflect the most recent figures for housing need. The SHMA figures represent a need for 2-3 bedroom dwellings and there is also a need for family sized dwellings (40%). However, it is not appropriate for family dwellings to be located within the town centre and as such, a wider housing policy should take this into consideration and policy should ensure that the provision family dwellings is met on the most appropriate sites. Suggest that to assist with the delivery of housing, the Council should incorporate a density matrix within policy. The use of a density matrix would be an effective method of establishing indicative residential densities for sites and would provide developers with guidance.</p>

Respondent	Comment
Rentplus	The NPPF requires Local Planning Authorities to deliver a wider choice of homes. The mix and unit type proposed should be informed by the Council's SHMA and other documents such as the Housing Register and any Local Housing Needs Surveys, ensuring that the needs of the Borough are met through provisions made in the new Local Plan. It is useful for the Local Plan to set out the general needs of the Borough, rather than relying solely on market forces. The tenure mix should be strongly influenced by an understanding of local need, including aspirations towards home ownership that cannot currently be met due to the poor affordability in Poole.
West Quay Developments (Poole) Ltd	The housing mix policy should ensure that it is not overly prescriptive and should identify that a range of house sizes will be sought, rather than outlining a precise requirement. This is recognised in the SHMA which states in respect to the indicative market housing mix at Paragraph 8.33 that <i>"Although we have quantified this on the basis of the market modelling and our understanding of the current housing market we do not strongly believe that such prescriptive figures should be included in the plan making process and that the „market“ is to some degree a better judge of what is the most appropriate profile of homes to deliver at any point in time. The figures can however be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area"</i> .
Richborough Estates	The proposed development at Cruxton can provides a mix of dwelling types and sizes, with a particular emphasis on family housing, including affordable homes. Whilst the SHMA provides a Borough-wide summary of need, this should not be prescriptive for individual sites. Whether the balance the Local Plan promotes between sites in the town and urban edge sites is as suggested in Option C, or some other ratio, it is very likely town sites with high density will over deliver in terms of flats and small houses, leaving it to urban edge sites to balance out with larger family houses.
W H White Ltd	WHW concur that it would be helpful to introduce a new policy on the range of housing needs, to potential encompass self-build and custom build housing. This could be combined with DM6 to encompass older person's market housing as care homes; as well as student accommodation, private rented sector etc. Contextual information on housing mix across the Borough as a whole is considered helpful. WHW would however be concerned if this translated into a prescriptive policy, which would necessarily be blind to site circumstances and could frustrate delivery.
Housing - Self-Build and Custom Housing	
Gladman Developments	Any such policy should be flexible to allow for negotiation over plots on the basis of viability to ensure no delay in site delivery. The policy should include a mechanism whereby if the self-build plot are not taken up within a given time period the plots revert back to market housing.
Richborough Estates	How any such plots will be delivered and the expectation for these to be included on larger sites is critical. It is important that any such aspirations are subject to full consultation, particularly as this may have implications for viability and delivery of larger sites.
Housing - Affordable Housing	
Rentplus	The Council should consider the impact of the reinstatement of the PPG guidance on affordable housing policy following the legal cases. In the longer term, the reinstated PPG will inevitably reduce the delivery of affordable housing on smaller residential sites. However, the guidance is a material consideration to which decision makers must determine how much weight to give: whilst it ought normally to be considered inappropriate to require affordable housing, local thresholds may be given more weight where supported by up to date evidence. Starter Homes should be considered under the general housing policies, alongside rent to buy housing and other affordable tenures as currently set out under Annex 2 of the NPPF
Flood Risk	
Bourne Leisure	Any future policy drainage should be flexible to reflect the fact that SuDS may not be feasible, nor appropriate for every new development.
Wessex Water	We note that Flood Risk policy is being considered for review around the preparation of Flood Risk Assessments. We request that Wessex Water participate in this review with particular reference to public sewer systems. There are particular areas of policy which may affect new connections, redevelopment sites and levels of service for flood risk protection.
W H White Ltd	WHW would welcome a consistent approach to flood risk mitigation in new development, as we have witnessed a degree of confusion in applying national policy to local circumstance.
Woodland Trust	Trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality

Respondent	Comment
	implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure. Good examples of local plan policy on woodland and flooding are para 5.3.54 of the Herefordshire Local Plan Core Strategy 2011-31, Policy ES4 of the Stroud District Local Plan - We would therefore like to see this document support the use of trees and woodland as a delivery tool to deal with flooding and water quality issues in Poole under the 'Flood Policy' heading.
Green Belt	
Pope, Cllr M	The draft Green Belt Review should also be considered as a development policy
Thorne, S & S	The draft Green Belt Review should also be considered as a development policy
Plan Viability	
Home Builders Federation	The residual land value model is highly sensitive to changes in its inputs therefore an adjustment or an error in any one assumption can have a significant impact on the residual land value. Therefore it is important that the Council understands and tests the influence of all inputs on the residual land value as this determines whether or not land is released for development. It is noted latest viability evidence recommends reductions in both affordable housing provision and the Community Infrastructure Levy (CIL) rates. The HBF is supportive of both these recommendations.
Telecoms	
W H White Ltd	WHW concur with the suggested approach to telecommunications and cultural facilities.
Transport	
Go South Coast	<p>Public transport corridors - would welcome a policy within the Draft Local Plan that sought to not increase on-street parking along these main routes as well as remove parking that proved difficult in terms of public transport operation as well as creating network congestion with the aim to improve journey times. The attractiveness of services and congestion overall on the network. Would welcome early discussions over where these pinch points might be located and how they could be incorporated into the Plan.</p> <p>Would welcome a policy that acknowledges the Wallisdown Road corridor lies between both the Borough of Poole and Bournemouth Borough Council boundaries and therefore there should be standard between both LTAs of the type of infrastructure provision for Public Transport along this corridor for consistency. In addition we would welcome proposals to improve the journey times and congestion along this corridor where new development could bring effective journey time reliability for Public Transport as part of the draft proposals.</p>