

**DRAFT RSS FOR SOUTH WEST ENGLAND**

**Examination in Public  
April - July 2007**

**Matter 4/7 – Bournemouth and Poole HMA  
Sub-Regional Strategy**

**Statement by Government Office for the  
South West on behalf of H M Government  
Respondent Number: 364**

**March 2007**

**Matter 4/7 - Bournemouth and Poole HMA Sub-Regional Strategy***Panel Questions on Matter*

*Bournemouth and Poole HMA covers Bournemouth, Poole and Christchurch and the wider area including Gillingham, Shaftesbury and Swanage. Other towns in the immediate hinterland comprising the South East Dorset Conurbation include Wimborne Minister, Colehill, Ferndown, Verwood, St. Leonard's West Moors and Wareham.*

*In setting out policies and proposals for the HMA sub-region, does the draft RSS adequately deal with the following questions:*

- a) Is the draft RSS sufficiently clear about the spatial outcomes it is seeking in Bournemouth and Poole in terms of their present and future regional and sub-regional roles and their relationship with the other parts of the HMA?*
- b) Has the scale of additional greenfield development been adequately justified against the likely level of housing requirements and in particular the urban renewal opportunities in the main urban areas?*
- c) Has sufficient consideration been given to the impact of lead-in times for all or any of the development areas on the required annual output for the HMA?*
- d) Have environmental limits arising from matters such as flood risk and the protection of environmental assets been adequately taken into account and in particular do the proposals reflect the need to avoid any impact on the integrity of the important nature conservation areas around the conurbation?*
- e) Have infrastructure considerations been adequately taken into account?*
- f) Do the proposals adequately reflect the need to reduce the need to travel, support the use of public transport and minimise congestion?*
- g) Are the proposed modifications to the Green Belt adequately justified? And*
- h) Does the draft RSS set out adequate guidance on the provision of Green Infrastructure?*

**Executive Summary**

The draft RSS should set out the role and spatial outcomes proposed for Bournemouth and Poole. The draft RSS should explain more precisely how the constituent settlements of the conurbation currently function and how they are intended to function in the future. The draft RSS also does not explain the relationship of settlements outside the conurbation but within the HMA and the degree to which new housing development at these settlements meets local needs or may give rise to greater commuting.

The overall level of growth should reflect the most up to date evidence. The spatial distribution of growth should be reconsidered to achieve greater self containment and reduce the need to travel.

**Government Policy regarding Matter**

PPS1 PPS1 "Delivering Sustainable Development" (Feb 2005)

PPS3 PPS3 "Housing" (Nov 2006)

PPS11 PPS11 "Regional Spatial Strategies" (Sept 2004)

PPS12 PPS12 "Local Development Frameworks" (Sept 2004)

PPG17 PPG17 "Planning for Open Space, Sports and Recreation" (July 2002)

PTHG 13.047 and Statement (supplied) "Providing Homes for a Sustainable Future" (5 Dec 2005)

Letter from Mike Ash (ODPM 7 Dec 2005)

- P1. PPS11 indicates that the RPB must have regard in preparing an RSS revision to the desirability of preparing sub regionally specific policies which the Act refers to as different provision in relation to different parts of the region. PPS 11 also indicates RPBs should, when addressing sub regional issues, be mindful of the need to base a sub regional approach upon functional relationships. Sub regional policies should address a strategic policy deficit which cannot be adequately addressed by general RSS policies or by LDDs on their own.
- P2. PPS3 says that the Government is seeking to deliver a better balance between housing demand and supply in every housing market. RSSs have an important role to play in ensuring an appropriate level of delivery in each region and each sub regional market.
- P3. The Borough of Poole has been identified as a New Growth Point, under the initiative launched by Government in December 2005.
- P4. We believe however that the overall scale of housing growth proposed in the draft RSS appears a) to be insufficient to meet the overall regional needs according to the evidence at the time of its publication and b) ought to be increased to take account of more recently issued population and household projections. We have also made specific comments under Matter 2/4 about the need to achieve a more balanced and sustainable distribution between the location of new homes and jobs, which has implications for the spatial distribution of the overall supply of housing.

***Is the draft RSS sufficiently clear about the spatial outcomes it is seeking in Bournemouth and Poole in terms of their present and future regional and sub-regional roles and their relationship with the other parts of the HMA?***

1. The draft RSS should do more to define the spatial outcomes it is seeking and how this develops the roles of Bournemouth and Poole.
2. The draft RSS describes the future of Poole in terms of a progressive restructuring of its economy and some spatial outcomes, referring to opportunities such as the central area regeneration. To a degree the draft RSS sets a broad direction for the form and pattern of growth of Poole but should be more specific in the outcomes it seeks that support this direction.
3. The draft RSS appears still less certain with respect to Bournemouth, its role and spatial outcomes. The scope for growth at Bournemouth's key locations for economic growth is not specified. Neither does the draft RSS specify the provision necessary to fulfil Bournemouth's employment, retail, tourism and cultural roles. In addition, proposed rates of housing development do not seem challenging compared to recent rates of

house building. We understand that technical work on the draft RSS identified scope for a northern extension. However this has not formed a proposal although the draft RSS specifically mentions how the difficulties of further expansion of the urban area may affect economic activity.

4. The relationship of significant employment proposals at Bournemouth Airport and Ferndown to the urban areas of Bournemouth and Poole is not articulated. On the surface the proposals appear to undermine the sub area strategy to focus development on urban areas. The draft RSS should be more specific about the intended role of these employment proposals; how they will serve to support economic growth and represent the most sustainable pattern of development.
5. The panel may wish to consider whether Bournemouth and Poole, and in particular Bournemouth's importance as a centre for both housing and employment growth has been given adequately developed.
6. The draft RSS does not explain clearly how the constituent settlements of the conurbation currently function and how they are intended to function in the future. A significant element of housing development is also proposed outside the urban areas of Poole and Bournemouth and it is not clear whether this represents the most sustainable option for accommodating growth.
7. The draft RSS also does not explain the relationship of settlements outside the conurbation but within the HMA and the degree to which new housing development at these settlements meets local needs or may give rise to greater commuting.

***Has the scale of additional greenfield development been adequately justified against the likely level of housing requirements and in particular the urban renewal opportunities in the main urban areas?***

8. The draft RSS does not set out a rationale for the scale of housing development. The need for additional technical work and the expression of housing provision as a range suggests that the evidence base is inadequate. The draft RSS should have more definite proposals including a single figure for each local planning authority.
9. Rates of housing development are expected to be higher in the period up to 2016 and lower thereafter. The draft RSS should consider the implications of apparently slowing the rate growth on the economy and the area's capacity to meet its housing needs.
10. In addition to levels of housing required, the draft RSS refers to the likely mix of housing types, specifically the large number of smaller dwellings, and how these represent an issue for the conurbation's development. The focus for smaller dwellings would seem to be Poole and Bournemouth. Greenfield development at Ferndown, Wimborne Minster and Christchurch is justified on the basis that it will provide a greater choice of housing, complementing urban development, presumably by providing a mix tending toward larger housing types. The draft RSS does not articulate any effects this form of housing delivery is likely to have upon the role and function of each of the conurbation settlements. Instead it is delegated to LDFs to provide sufficient levels of housing to support economic growth as well as secure a range and mix of housing to meet local needs to support mixed and balanced communities.

11. The draft RSS should provide a more detailed strategic context for this work. A significant element of housing demand is anticipated as a result of in-migration and a strategic context should consider this influence alongside the implications for the area of a growing proportion of elderly and retired households. The draft RSS should explain how the broad mix of housing types and its proposed locations will contribute to the role of each of the conurbation settlements.

***Has sufficient consideration been given to the impact of lead-in times for all or any of the development areas on the required annual output for the HMA?***

12. The draft RSS does not appear to have considered the need for managed delivery of proposals. The draft RSS should be sufficiently clear about the scale, broad location and phasing of these extensions to promote timely and co-ordinated delivery.
13. The draft RSS does not set out the likely timing of development of employment sites at Bournemouth Airport and Ferndown and the urban extensions at Wimborne, Christchurch and Ferndown.
14. The draft RSS includes a list of infrastructure requirements (para 4.3.14), but does not set these in any priority. The draft RSS says it might also be incomplete. It is not clear what if any components are necessary to support the development of particular areas and so it is difficult to judge whether there is adequate account given to the lead in times involved in their delivery, creating greater uncertainty over the ability to provide continuity in land supply for development. The draft RSS should identify any key infrastructure necessary to implement strategic proposals. It should also indicate the likely timescales necessary for their delivery.

***Have environmental limits arising from matters such as flood risk and the protection of environmental assets been adequately taken into account and in particular do the proposals reflect the need to avoid any impact on the integrity of the important nature conservation areas around the conurbation.***

15. Our statement on matter 2.4 refers to the use of the term 'environmental limits'.
16. The strategy for the HMA refers to the environmental assets at the conurbation. The importance of sites covered by the Habitats Directive is properly recognised as is the potential for cumulative adverse impacts from growth and urban pressures.
17. The local authorities have introduced a three year 'Interim Planning Framework' to implement mitigation measures to protect designated sites against adverse effect. The draft RSS recognises the need to develop a longer term approach. We understand that the local planning authorities intend to prepare a joint Local Development Document to help ensure the delivery of mitigation measures.

***Have infrastructure considerations been adequately taken into account?***

18. The draft RSS includes a list of infra-structure requirements (para 4.3.14), but does not set these in any priority. The draft RSS says this list may also be also incomplete. The lack of certainty and specificity would seem likely to severely undermine the effectiveness of the spatial strategy.
19. The draft RSS should explain how each element supports the strategy, or whether they are required for particular areas for development, and so therefore present a set of useful priorities. For example, what is the nature of the improvements proposed in the A31 to Poole corridor and what elements of the strategy are supported or underpinned by these measures?
20. It is not clear whether the infrastructure requirements realistically can be delivered in the draft RSS timespan. The draft RSS also does not specify how and by when they need be implemented. It might possibly also consider contingencies if key element of infrastructure fail to be delivered.
21. Urban intensification is a main element of growth and cumulative needs for infrastructure and any specific components are not articulated. It seems to be being presumed that financial contributions from developers may support provision for the range and scale of infrastructure felt necessary to meet future needs. It might be that the draft RSS could offer a clearer context for this approach and possibly the draft RSS has a role setting shared priorities across the conurbation. This might help to support delivery generally and underline the need to deliver specific infrastructure priorities.

***Do the proposals adequately reflect the need to reduce the need to travel, support the use of public transport and minimise congestion?***

22. Locations for urban extensions do not correspond with key strategic locations for job growth and there is no indication that there will be commensurate employment growth to promote a better balance of homes and jobs. Altogether this suggests that these urban extensions will give rise to potentially significant increases in commuting.
23. The draft RSS does not clarify the relationship of the conurbation with outlying towns in the HMA such as Blandford Forum and whether levels of housing growth in these settlements are commensurate with realistic prospects for job growth. A lack of balanced growth may well lead to higher levels of commuting.
24. The draft RSS might also clarify the area's relationship with growth within surrounding areas, and in south west Hampshire in particular, and how the strategy for Dorset HMA addresses any additional commuting this might bring about.

***Are the proposed modifications to the Green Belt adequately justified?***

25. The draft RSS should set out the conclusions from the strategic green belt review and how these have influenced policies and proposals. It is not clear that it is the draft RSS that is proposing changes to the general extent of the green belt. The draft RSS should not delegate responsibility for defining the general extent to LDDs, the role of which is to define detailed boundaries where the general extent of the Green Belt has been altered by the RSS.
26. The draft RSS does not provide a set of 'exceptional circumstances' to alter the general extent of green belt designation at Bournemouth airport. It is also unclear about the extent of the area proposed for exclusion, which should reflect the need for the airport to expand as set out in the Air Transport White Paper. . If the Panel is satisfied that there are exceptional circumstances justifying a change to the general extent of the Green Belt, it should also consider a change sufficient to accommodate the needs of the airport to 2026, in order to avoid the need for incremental change.

***Does the draft RSS set out adequate guidance on the provision of Green Infrastructure?***

27. PPG17 (2002) sets out national policy guidance on planning for open space, sport and recreation. The Annex to PPG17 lists various types of open space<sup>1</sup>.
28. "Green infrastructure" is not a phrase that currently appears in national planning guidance. We understand it to refer to a wide range of natural and man-made landscapes or open areas which have environmental, social and economic value. We are not aware of a definitive list of "green infrastructure" of regional or sub regional significance set out in the draft RSS, although there is useful guidance in para 6.2.17.
29. We welcome the commitment made in Policy G1 and Development Policy D to developing a regional network of Green Infrastructure. However, if Policy G1 is to have regional and sub regional value, it should go further in identifying significant assets that should be protected, enhanced or developed including, where relevant, for SSCTs

---

<sup>1</sup> ***PPG17 Annex says that open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity. It sets out a list of ten types of open spaces.***