

Session 4/7 - English Partnerships (452)

Bournemouth & Poole HMA Sub Regional Strategy

Executive Summary

This statement is submitted on behalf of English Partnerships (EP), the national regeneration agency helping the Government to support high quality sustainable growth in England.

EP has 5 core business areas in which we seek to deliver our objectives through:

- Developing our portfolio of strategic sites;
- Acting as the Government's specialist advisor on brownfield land;
- Ensuring that surplus Government land is used to support wider Government objectives, especially the Sustainable Communities Plan;
- Helping to create communities where people can afford to live and want to live;
- Supporting the urban renaissance by improving the quality of our towns and cities.

This paper sets out the response of English Partnerships to the questions regarding the policies and proposals for the Bournemouth and Poole Sub-Regional HMA Strategy. The statement addresses the specific issues raised in the final programme for the EiP.

In summary, EP supports the proposed re-use of land in the Bournemouth and Poole area however, EP seeks reassurance that all previously developed land opportunities within the HMA and surrounding area are fully explored as a priority before Greenfield sites are released. EP's portfolio includes the Government's former nuclear research facility at Winfrith in Dorset which can deliver truly mixed use development and assist with meeting the chronic shortfall of affordable housing in the South East Dorset Sub Region. EP therefore seeks to broaden the boundary of the defined South East Dorset Sub Region to include strategic brown field opportunities such as the Winfrith Technology Centre.

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?*

EP welcomes the contents of Policy SR26 with regards to the focus on the reuse of previously developed land and buildings. However, as stated below EP seeks reassurance that all previously developed land opportunities within the HMA and surrounding area are fully explored as a priority before Greenfield sites are released. EP therefore recommends the inclusion of appropriate wording within Policy SR26 which reiterates the need to prioritise the reuse of previously developed land within the South East Dorset Sub Region and surrounding area before releasing Greenfield sites.

EP has previously in their submissions to the RSS referring to Policies SR26, SR27, S28 and SR29 (South East Dorset Spatial Strategy) criticised the boundaries of the South East Dorset Sub Region as it does not allow for inclusion of sites such as the

Winfrith Technology Centre which is a key facility within the South East Dorset area. EP acquired the Winfrith Technology Centre from the United Kingdom Atomic Energy Authority in May 2004. The Centre has been a key employment and research institution for half a century and presents an unrivalled opportunity to build on an existing infrastructure and investment base. EP is currently seeking to appoint a development partner who will devise and implement a planning strategy and masterplan to create a high quality and sustainable mixed use development to include exploring residential uses and other uses alongside expanded science and technology activities.

As well as submitting comments to the RSS Possible Development Strategies in November 2004 and the Draft RSS in August 2006, EP submitted representations to the South East Dorset Sub Regional Consultation document 'Looking to the Future' in January 2005 which fed into the draft RSS. EP provided detailed reasoning to justify the inclusion of the WTC within the South East Dorset Sub Region. EP sought to demonstrate that the clear scope and need for growth in South East Dorset should be delivered in the form of mixed use neighbourhoods. Winfrith offers the potential for this form of growth - it is an established and growing location for economic development, contains large areas of previously developed land and our investigations show that it has the potential for self containment. It also has excellent links to the rest of the South East Dorset and, with EP as its sponsor, there is clear scope to deliver and demonstrate high quality mixed use neighbourhood scale development and to tackle the problems facing first time buyers, a problem particularly exacerbated within Purbeck District. This reinforces the need for Winfrith to be included within the South East Dorset area.

We note paragraph 4.3.8, which identifies key strategic locations to accommodate economic growth potential within South East Dorset at Bournemouth Airport, the Poole regeneration area, Bournemouth Town Centre, Wessex Fields and the Port of Poole. Given the size, importance and potential of the area, and the clear status, its current condition (with considerable amounts of previously developed land) and its obvious potential, we recommend that the strategic site at Winfrith where there is already a thriving and growing technology centre is included within this list. Given its location (on the western side of the conurbation, and its proximity to passenger rail services) the site is well placed to correct travel to work patterns, provide a sustainable focus for mixed use development and to spread the benefits of growth across the region.

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?

It is recognised that development within the urban area can contribute towards a more sustainable pattern of development and is consistent with a number of national planning and transportation policies. Indeed, paragraph 36 of PPS3 specifically states that the priority for development should be previously developed land.

EP welcomes the contents of Policy SR26 with regards to the focus on the reuse of previously developed land and buildings. However, EP is cautious about the significant reliance on Greenfield urban extensions before the previously developed land within the South East Dorset HMA sub region and surrounding area has been fully exhausted through high density redevelopment. If Greenfield urban extensions are required, EP requests that text is added within Policy SR26 which requires them to be delivered as sustainable communities using a density appropriate to support essential facilities as part of well integrated fine grained mixed use neighbourhoods incorporating homes,

employment and supporting facilities, with high standards of design and access, whilst taking into account environmental considerations.

PPS7 refers to the promotion of sustainable patterns of development in rural areas, through focusing development in and adjoining existing towns and villages, preventing urban sprawl, and discouraging the use of Greenfield land. In their submissions to the Strategy Sessions of the EiP, EP has expressed that there is a relationship and interdependence between rural settlements, and indeed rural settlements and urban areas. It is important that all settlements are economically healthy to sustain region growth, prosperity and sustainability. EP is very keen to express the importance of regenerating rural areas by providing for settlements to accommodate new homes, employment and supporting facilities in very well integrated, fine grained mixed use form. The growth and regeneration in the South West should not just be focused in urban areas, but on an appropriate scale in rural areas. EP believes that the RSS should be taking into consideration the polycentric nature of rural 'sustainable communities' i.e. a sustainable community of linked and interdependent rural settlements across a wider geographical base. In delivering this polycentric growth, EP wishes to stress the importance of major brown field sites / surplus public land in helping to maintain or improve this spatial / functional relationship. EP has therefore submitted statements highlighting these issues to the Strategy Sessions of the EiP.

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?*

EP believes that existing brownfield sites such as the Winfrith Technology Centre are far more likely to deliver the required levels of dwelling numbers within the Plan period, than urban extensions on Greenfield sites which would be subject to significant uncertainty and possible infrastructure constraints. EP questions whether significant consideration has been given to lead in times for Greenfield sites within the HMA, particularly those currently falling within the Greenbelt. EPs' remit as national regeneration body can play an important role in the early delivery of future infrastructure requirements. This may accelerate lead in times for larger developments within the South West.

In their submission to Session 4/14 regarding overall demand, EP questioned the low level of dwelling requirements in Purbeck District as set out within Table 4.1, an increase to a more appropriate level would have a bearing on the required annual output for the HMA. Purbeck District Council is identified with an Overall Annual Average Net Dwelling Requirement of 105 dwellings between 2006 – 2026. The Government's commitment to deliver the sustainable communities agenda means that much greater emphasis needs to be placed on the delivery of new homes to correct current and severe problems with the affordability of housing and to create excellent new development. EP does not consider that the current level of housing growth proposed for Purbeck will be sufficient to address the significant shortfall of affordable housing currently experienced within the District which falls at the heart of one of the most unaffordable housing markets in the Country.

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?

Whilst the restrictions imposed by the European Habitats Directive referred to in Policy SR28 are acknowledged, it is important to recognise that there is a need for a balance between conservation and development.

In testing the development potential of their strategic brown field site at Winfrith which is in close proximity to defined European Habitat area, EP has been made aware of a number of potential mitigation measures, which could enable residential development within the prescribed exclusion zone. Whilst the restrictions imposed by the European Habitats Directive are acknowledged, it is important to recognise that there is a need for a balance between conservation and development. Previously developed sites such as the one at Winfrith should still be considered for residential development to address housing supply and affordability issues, which are as important as environmental issues. Such development could occur sensitively whilst still respecting protected areas. EP is very keen to express the importance of regenerating rural areas by providing for settlements to accommodate new homes, employment and supporting facilities in very well integrated, fine grained mixed use form. The growth and regeneration in the South West should not just be focused in urban areas, but on an appropriate scale in rural areas. Land supply shortages are more intense in rural areas with huge affordability issues and the need to provide local employment opportunities in order to reduce the need to travel.

With regards to the case at Winfrith and other sites in the South West affected by Habitat designations it is important to examine the reasons for a specific designation. For example, the designation at Winfrith relates to heathland bird habitat. The concerns expressed by Natural England relate to the damage that those occupying or associated with new housing can cause and specifically to the actions of pets and children who will roam the heathland without care for the consequences of their action. In this context, two options are available: to avoid risk by limiting occupation of the houses, or by installing management regimes and techniques which minimise the risk of damage.

In fact a number of mitigation methods are provided in the Evidence to support Appropriate Assessment of development plans and projects in South-East Dorset (8th January 2007) by Liley, D., Clarke, R., Tyldesley, D., Underhill-Day, J. & Lowen, J. EP has also been involved in research by the South East England Regional Assembly and partners which identifies additional recreational land that could unlock development close to the Thames Basin Heaths Special Protection Area (SPA). The Assembly-led research has addressed the urgent issue of how much needed new homes can be built without damaging wildlife habitats across Hampshire, Berkshire and Surrey. The study looked at providing alternative recreational land to prevent too many visitors damaging the heathlands. This work is likely to be of key significance for the South West RSS, in particular the Dorset Heathlands Habitat areas.

e) Have infrastructure considerations been adequately taken into account?

Infrastructure planning provision needs to promote and learn how to model fine grained mixed use neighbourhoods incorporating homes, employment and supporting facilities in order to produce a more sustainable pattern of development and reduce the need to travel

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

EP notes the identification (in paragraph 4.3.8) of key strategic locations to accommodate economic growth potential within South East Dorset at Bournemouth Airport, the Poole regeneration area, Bournemouth Town Centre, Wessex Fields and the Port of Poole. However EP is concerned that purely employment based development in these locations may not fully embrace the mixed use principles set out in the Government's Sustainable Communities agenda. Stand alone business parks are not likely to contribute towards the aspirations of integrated sustainable development as set out in PPS1 and PPG13 as they are likely to generate significant trips from outside the settlement in question. By actually mixing land uses within development blocks people are able to undertake their daily activities without generating significant numbers of trips.

EP believes that it would be very unfortunate if the RSS simply lurched to push just stand alone business parks to address this imbalance, only then to lurch in the next plan period to build huge housing estates, which will then in turn generate the need for more employment space, no doubt to be provided by a lurch again to stand alone business park in the following plan period. The RSS has to break this vicious circle, and provide for homes and jobs and other facilities to grow in parallel to deliver a long-term, sustainable pattern of growth.

In light of the above, EP requests additional wording to Policy SR26 to specifically state that sustainable growth will not come from stand alone business parks, housing estates etc which fuel the need to travel, but there is a need to promote integrated fine grained mixed use development to create sustainable communities and reduce the need to travel in accordance with government guidance as set out in PPS1, PPS3 and PPG13.

g) Are the proposed modifications to the Green Belt adequately justified?

The aim should be to focus development towards previously developed land. The use of additional land released from the Green Belt, is acceptable where it is necessary to support the aim of sustainable growth, which reduces the need to travel. As explained above however, EP does not support the significant reliance on Greenfield urban extensions before the previously developed land within the South East Dorset HMA sub region and surrounding area has been fully exhausted through high density redevelopment.

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

Green infrastructure (GI) has been identified within an early draft of the RSS Sustainability Appraisal as one of a number of areas of policy weakness. The South West Regional Assembly (SWRA) acknowledged this weakness and recognise GI as an important component in ensuring development provides positive benefits for the region.

In recognition of the SA's conclusion, the SWRA and English Nature jointly commissioned a further study. This resulted in a supporting paper entitled 'Draft Discussion Paper on Green Infrastructure (Aug 2005) on the role of the draft RSS in delivering GI.

One of the purposes of the discussion paper was to “identify GI components and implementation measures appropriate to different spatial scales”. The paper confirmed “a fundamental problem with securing GI in the past, which had been as a result of lack of strategic context (and money) the consequences of which has sometimes been a piecemeal approach that does not deliver adequate benefits”.

The study considered the overall approach of the draft RSS in respect of urban concentration/extension and identified that careful management will be required to ensure that development contributes to, rather than detracts from the quality of life in urban areas. One of its conclusions is the need for “*guidance on Mechanisms for Delivery and Management, including Phasing and a requirement for Local Authorities to prepare GI Plans*”.

Draft RSS Development Policies D and F provide the strategic context of GI, the latter recognising the importance of planning for GI within the masterplanning process. English Partnerships are in full support of this policy and recognise the widespread benefits of GI in creating sustainable communities.

In addition, Policy GI 1 defines green infrastructure in non-specific terms and states “*networks of Green Infrastructure (GI) will be required to enhance quality of life in the region and support the successful accommodation of change*”. The preamble to Policy GI 1 includes the definition of GI emerging from the SWRA/EN study. However it fails to provide or identify any further guidance on implementation or in relation to standards of provision expected to be achieved and which were specifically referred to in the study.

Clearly implementation is dependant on existing supply and/or deficit throughout the region. Hence a one-size-fits-all approach is considered inappropriate. The SWRA/EN Study recommended the need for developing further regional guidance on GI provision to give strength to the effect of Policy GI 1. EP suggests guidance that could be underpinned by two existing pieces of work. Firstly, English Nature’s (now Natural England) publication ‘*Providing Accessible Natural Greenspace in Towns and Cities: A Practical Guide to Assessing the Resource and Implementing Local Standards for Provision*’ and associated toolkit which sets out quantitative standards. And second, an adaptation of the TCPA’s hierarchy approach for the development of Green Infrastructure Networks, setting out indicative scales of provision for various categories of GI.

Suggested Policy Amendments

- EP recommends the inclusion of appropriate wording within Policy SR26 which reiterates the need to prioritise the reuse of previously developed land within the South East Dorset Sub Region and surrounding area before releasing Greenfield sites.
- EP has previously in their submissions to the RSS referring to Policies SR26, SR27, S28 and SR29: South East Dorset Spatial Strategy criticised the boundaries of the South East Dorset Sub Region as it does not allow for inclusion of strategic previously developed sites such as the Winfrith Technology Centre.

- Inclusion of Winfrith Technology Centre within paragraph 4.3.8, which identifies key strategic locations to accommodate economic growth potential within South East Dorset.
- EP requests additional wording to Policy SR26 to specifically state that sustainable growth will not come from stand alone business parks, housing estates etc which fuel the need to travel, but there is a need to promote fine grained mixed use neighbourhoods incorporating homes, employment and supporting facilities which reduces the need to travel in accordance with government guidance as set out in PPS1, PPS3 and PPG13.
- EP does not consider that the current level of housing growth proposed for Purbeck will be sufficient to address the significant shortfall of affordable housing currently experienced within the District.
- Whilst the restrictions imposed by the European Habitats Directive (referred to in Policy SR28) are acknowledged, it is important to recognise that there is a need for a balance between conservation and development. The policy text should be worded accordingly.