

1.0 INTRODUCTION

- 1.1 This statement is prepared by Ray Packham BSc (Hons), Dip EP, MIEEnvSc, MRTPI, Associate Director of Turner Holden - White Young Green Planning on behalf of Gleeson Land.
- 1.2 Gleeson Land have interests in the South West and the group has a track record of delivering high quality residential developments and delivering significant quantities brownfield development.

2.0 REPRESENTATIONS AND CHANGES SOUGHT

- 2.1 On behalf of Gleesons, Turner Holden submitted representations on the Draft of RSS which sought changes to **Policy HD1** as follows

Draft RSS	RSS proposals	Household projections adjusted	Proposals
BOURNEMOUTH & POOLE HMA	41,800	48,300	50,000
BOURNEMOUTH (h)	15,600	14,800	15,000
POOLE (h)	10,000	104,00	10,500
CHRISTCHURCH (h)	3,600	4,200	4,000
EAST DORSET	5,400	7,200	8,500
PURBECK	2,100	3,300	3,500
NORTH DORSET	5,100	8,400	8,500

- 2.2 The methodology we adopted is explained at Appendix 1 and we are seeking changes to the RSS to reflect these proposals, including a significant increase in the overall regional allocation to ensure that RSS meets the housing needs of the whole community.

- 2.3 Gleeson Land support the principles of the draft RSS strategy and consider there should be an increase significant increase in allocations to those parts of the HMA where development can be accommodated in a sustainable way.
- 2.4 We objected to **Policy SR26** since the meaning of “balanced growth” in this policy is not clear and provides an excessive degree of latitude in the consideration of development proposals. The reference to the pooling of Section 106 contributions could potentially lead to significant delay in development coming forward and requires to be justified under the criteria of Circular 05/2005.
- 2.5 **Policy SR27** should express a firm commitment to the review of the Green Belt boundary and in **Policy SR29** insufficient provision is made for the future economic potential of the travel to work area and in so doing, under provides for the quantum of housing needed at the conurbation. We have a particular concern that the proposals for East Dorset District, where the constraints to development are less than elsewhere in the conurbation, do not recognise the potential of the area.
- 2.6 In addition, the proposed areas of search, **Inset diagram 4.6**, are excessively prescribed and should be deleted. The locations of these small scale urban extensions are not fully justified in the technical work, the area around the south east of Wimborne is considered in the technical papers to be less constrained and therefore could also be considered as a suitable location. The issues relating to Green Belt and the Heathlands are such that detailed consideration to urban extensions should be given at LDF level rather predetermined through RSS, particularly since the JSA work considers that these are not strategic extensions (para 4.3.12 refers).

3.0 BACKGROUND

- 3.1 The HMA comprises the 5 districts of Bournemouth, Poole, Christchurch, East Dorset, Purbeck and North Dorset. The major focus of development should be on Bournemouth, Poole and Christchurch. However the capacity of the

- conurbation to cope with the additional level of development proposed in RSS is limited and further urban extensions are required.
- 3.2 In 'The Way Ahead' the report noted that many of the South West Region's cities lack the critical mass of population and economic activity to significantly move ahead to realize that the potential that they have (paragraph 2.8 page 14). 'The Way Ahead' notes that Bournemouth and Poole, with a population of 400,000 is the second largest concentration in the region. As such it clearly has the potential to be an economic driver. What is also evident is that the housing proposals in the HMA will fall short of providing the necessary support for the economic potential of the area including the additional working population required to meet the forecast jobs in the Bournemouth and Poole travel to work areas.
- 3.3 The presence of the University which is a growing institution and employment developments associated with Bournemouth International Airport as well as the airport itself suggest growth potential. The growth of Bournemouth Airport is significant over the very short time scale shown in the table below. This is important locally in that Airports have a profound impact of the local economy in the longer term. Together with the University these are two major drivers in the HMA. When coupled with the other local growth sectors the economic prospects are very buoyant.

Bournemouth International Airport – key statistics

(source BIA)

Aircraft Movements	2001	2002	2003	2004
Annual Commercial Movements	7,661	8,664	8,362	12,317
Annual Non-Commercial Movements	72,995	58,024	67,022	68,930
Total Aircraft Movements	80,458	68,556	75,384	81,247
Annual Passenger Statistics				
Total Passengers	276,156	368,204	465,314	494,467
Freight (Tonnes)				
Total Freight/Mail	10,428	10,026	10,338	11,342

Need and demand for housing

- 3.4 The sub national household projections provide a robust indication of future demand for housing in the region and at the Local Authority level. In addition there is unmet demand arising from within the existing population.
- 3.5 The sub regional projections are an indication of what would happen if past trends were projected into the future. In this case our proposals are consistent with the household projections for the HMA as a whole.

Local evidence of housing need

- 3.6 The situation on affordable housing in the South West varies across the region and the situation in SED is every bit acute as elsewhere.
- 3.7 The locally determined need for housing is inconsistent with the draft RSS provisions such that RSS proposals if adopted will exacerbate the affordability problems of providing housing for local people.

Employment needs

- 3.8 Part of the new employment anticipated in the area will be realised within the economy through business expansion and the growth of existing companies. Notwithstanding this organic growth, there is still a need for additional land to cater for the needs of expanding, relocating or inward moving firms and this is specifically recognised in relation to BIA.
- 3.9 It is accepted, and we consider further below that there are significant environmental considerations that have to be taken into account in the future planning of the sub region. However a serious approach to accommodating necessary development can address these considerations and promote solutions to meeting economic and social objectives as required by PPS1, Sustainable Development.

4.0 PANEL QUESTIONS

- 4.1 ***Question 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?***
- 4.1.1 The spatial outcomes are to maintain the existing broad relationships between Bournemouth, Poole and Christchurch.
- 4.1.2 What is not clear is the relationship between Bournemouth, Poole and Christchurch and the smaller towns inland where it is envisaged that there should be significant growth to accommodate the needs of the sub region. This is mainly in relation to their economic and service roles since it is apparent in RSS that these towns will grow physically but their qualitative functions are not clear.
- 4.1.3 In particular it is envisaged that much of the demographic pressures that exists for Bournemouth and Poole will be accommodated in towns like Wimborne but is Wimborne to act as an economic focus as well? These matters are not explained.

- 4.1.4 Wimborne Minster is one of the key locations for additional new development in the sub region. The first critical issue that needs to be addressed is what is the appropriate level of growth for the South East Dorset and what does that say about relationships between the various settlements.
- 4.1.5 As part of the preparation process of RSS the Regional Assembly asked the Constituent 4/4 and Strategic Authorities to test scenarios of growth. This is documented elsewhere but the conclusions we draw for South East Dorset is that as a result of their initial scoping work the Authorities have not adequately explored the implications of the higher growth scenarios. The Regional Assembly proposed a range of scenarios based on current RSS and the level of growth proposed in the sub region is less than is in the currently Adopted RPG10 despite the evident demographic pressures we have referred to.
- 4.1.5 This has inevitably led to certain presumptions regarding the future accommodation of growth such as for example Wimborne. Not all options have been fully explored particularly an urban extension well related to the Town Centre and to employment areas to the east of the town but maintaining strategic gap with Colehill.
- 4.1.6 More importantly RSS is clear that one of the objectives for South East Dorset is to accommodate sufficient levels of growth and employment to the sub region and therefore not limiting economic growth potential to the area. On the basis of the evidence available and which we have outlined above it is likely that the outcomes of draft policies will be 'economic opportunity lost'.
- 4.1.7 What is also of concern is that the economic potential of settlements such as Wimborne has not been fully explored in the context of the wider economic needs of South East Dorset. Currently there are significant travel to work flows from Wimborne to Bournemouth and Poole and almost equal flow in the opposite direction such that net flows are approaching zero. Given the difficulties of accommodating additional growth within the urban area and the need for urban extensions it is also important that the strategy being promoted for the sub region

makes a specific reference to employment needs and it is a significant omission is that in the identified area of search N,O and P, there is no reference to the need for an employment site.

4.1.7 What is not at all transparent is how the South East Dorset Authorities have come to conclusions that the urban extensions area of search should be where they have been shown on **insert diagram 4.6**. In the absence of through testing of the alternatives and particularly since in our view there is another alternative to the east of Wimborne. We request that this element of the inset diagram be deleted and replaced with a specific reference to the need to test urban extensions through the LDF process. In the context of the very much higher levels of growth which we consider this to be appropriate and fully justified by the latest set of household projections as well as the significant potential that the area offers.

4.1.8 The South East Dorset document SED04 which tests options for growth in the Sub region does not appear to have thoroughly tested the options. The particular area that Gleeson Land will be promoting thorough the Local Development Framework Wimborne South is referred to in page 143 of the options document. It states that

“Wimborne South and the area between Coalhill and Wimborne has no absolute constraints”

There is a Local Nature Reserve but this does not lie within the land which is controlled by Gleesons. Similarly we are aware of the buffer zone around the Sewage Treatment Works. We can see no reason why this particular area should not be included as an appropriate area of search.

4.2 Question 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?

- 4.2.1 It has been long known that peripheral development around Bournemouth and Poole would encroach upon Greenbelt and would have an impact on the Dorset Heathlands. That has long been accepted by the development industry, CPRE, Nature Conservation interests and the Local Authorities that optimum potential needs to be made of development potential within the urban area.
- 4.2.2 It is therefore our view that in order to accommodate significant levels of need arising within the area maximum use be made of the opportunities presented by urban potential but that still leaves a significant requirement for greenfield development elsewhere within the HMA.
- 4.2.3 One of the criteria in SR27 is that adjustments may be made to the inner boundaries of the Greenbelt to accommodate urban extension. We consider that this is an appropriate approach to the accommodation of the development in the JSA area but the commitment needs to be clearer.
- 4.3 *Question 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?***
- 4.3.1 The issue of lead in times at the urban extension has not been fully explored since at paragraph 4.3.12 it is noted that strategic scale urban extensions are inappropriate due to the potential impact to sensitive wildlife and environmental sites.
- 4.3.2 This implies that what is likely to happen in the area is that there will be a series of smaller urban extensions to Wimborne and other settlements which cumulatively will amount to approximately 2,400 dwellings on the basis of the current proposals. As such this would not entail the significant degrees of infrastructure and other investments that are required to deliver strategic urban extensions at the other SSCTs

4.3.3 In the case of the proposal being promoted by Gleeson Land it is our view that the area could accommodate up to about 1500 additional dwellings on the basis of the density assumptions incorporated within RSS or 900 dwellings on the basis of the lower formula in PPG3. It is our view that there would be no fundamental difficulties in delivering this scale of development at Wimborne given the very buoyant nature of the local housing market and the relative lack of restraints to the development of the site itself other than those which are already mentioned in the technical paper prepared for the JSA work.

4.4 *Question 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?*

4.4.1 The presence of the internationally recognized adopted Heathlands will have a significant impact on the capacity of the area to meet levels of growth which are required to maintain a healthy social and economic environment.

4.4.2 We therefore conclude that this is a strategic consideration. The Dorset Heath Lands are both an SAC and contain numerous triple SSSIs

4.4.3 A map from the Natural England website shows the extent of designations in the area. These are scattered throughout the JSA area from the southern side of Poole Harbour adjoining Wareham in the south to just north of Verwood to the north.

4.4.4 Natural England produced a consultation document last year for an Interim Planning Framework for 2006- 2009 which sought to address the way that the Heathlands could be managed to ensure that their integrity was protected but at the same time would not act as an undue restraint upon the development in the locality.

- 4.4.5 We have significant reservations about the details but nevertheless regard it as generally being a positive contribution to try to reconcile development needs in the locality at the same time protecting the significant natural assets. What is clear from the mapping of the Natural Assets in the locality, the development at the location sought by Gleeson Land is approximately 4 kilometres in any direction from a designated SAC and or SPA. In addition Gleesons are seeking to allocate part of the site as significant open space to intercept occasional visits to the Heathland, for example, for dog walking.
- 4.4.6 It is also important to note the following. In the core documents Natural England set out for the South East have been submitted as part of the evidence base.
- 4.4.7 There are significant differences between the Thames Basin and Dorset Heathlands. With its long history of collaborative working, and protection through the policies contained in development plans, South East Dorset is developing a positive approach to ensuring reconciliation between natural assets and needs for development.
- 4.4.8 There are other local considerations in terms of for example the local Nature Reserve and so on, but overwhelmingly it is the Heathlands issue which is the dominant one as far as the strategic accommodation of the development in the sub region is concerned.

4.5 *Question e) Have infrastructure considerations been adequately taken into account?*

- 4.5.1 On infrastructure considerations, as far as we understand, necessary infrastructure is substantially in place to accommodate the level of growth as far as Wimborne is concerned there appears to be no significant constraints on infrastructure on the accommodation of future developments.

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

4.6.1 The LTP contains a number of policies and proposals to encourage more sustainable transport usage

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

4.7.1 PPG2 requires that Green Belts be altered only in exceptional circumstances. We have noted above that the area has significant economic potential which needs to be realised as part of the Regional Economic Strategy. We have also seen over successive Structure Plans that growth at Bournemouth and Poole has generally been within the existing built up area. Therefore peripheral expansion of the smaller towns outside the main conurbation becomes a solution to coping with growth pressures in a sustainable way.

4.7.2 Technical papers supporting the JSA work outline the process which has led to the statements in Policies SR26 and 27. We would support aspects of the process. It has led to the conclusion that there is a need to maintain the role and function of the Green Belt to keep settlements separate and support the open character of the area. It also concluded that modifications to the Green Belt boundary have been justified.

4.7.3 Sustainable urban extensions at Wimborne and other settlements will almost inevitably require encroachment into the Green Belt and therefore these extensions have to be assessed and planned to ensure that the role and function of the GB is maintained as far as possible and that urban expansion is managed to ensure that the best sustainable outcomes are achieved. This essentially, as PPG2 addresses, is a function of Local Plans (LDFs) and it is only at the detailed level that the merits of specific locations can be fully assessed as well as the implications for GB, and as importantly, their relationships to the Heathlands.

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

4.8.1 The nature of GI is explained in the draft RSS. Such infrastructure should be subsumed in the Master Planning exercise required for large sites which should have regard to the character of the area including 'connectivity' to local environmental assets.

5.0 CONCLUSIONS

5.1 I conclude that the level of development provided at the HMA in the draft RSS is inadequate to meet the needs of the area both for market and affordable housing. There are no sufficiently robust planning reasons to inhibit development in the HMA and accordingly we request that RSS is amended as we have requested.

APPENDIX 1

TURNER HOLDEN – WHITE YOUNG GREEN REGIONAL HOUSING REQUIREMENTS

METHODOLOGY

1.0 INTRODUCTION

- 1.1 Turner Holden – White Young Green submitted proposals for a substantial increase in the overall housing requirement for the region and for each district and SSCT. This note outlines the methodology used for these proposals.

2.0 THE APPROACH THE BASE DATA

- 2.1 In 2006 the DCLG published revised household projections for England and Wales and for the regions. These showed a significant projected increase in the rate of household growth compared with the previous 'definitive' 1996 based household projections. Subsequently the sub regional, district level projections were published

http://www.communities.gov.uk/pub/65/TableFSubRegionalHouseholdProjectionsEngland2003based_id1165065.xls

- 2.2 While these projections have limitations (see explanatory note on DCLG web site) they are the officially published and provide readily and publicly available growth scenarios for each district.
- 2.3 These projections therefore form the basis of the proposals submitted.
- 2.4 A preliminary analysis was undertaken in April 2006 comparing the draft RSS proposals and the emerging DCLG household projections and it was evident that the SWRA proposals fell substantially short of the latest projections at regional level and that there were some significant sub regional disparities.

- 2.5 The next stage was to devise a methodology to 'translate' the household projections into a 'base housing requirement'. At a policy level, the Government has published its view of the most likely scenarios for household growth. Therefore any alternative housing proposals should if possible be based on the official published data. Accordingly we considered that testing alternative migration, labour force and headship formation scenarios would not produce a significantly more robust and acceptable outcome than could be achieved by using the Governments own projections.
- 2.6 Therefore the main statistical adjustment to be applied to the household projections, (as to all demographic models), in order to identify the baseline housing requirement, is to allow for changes in vacant, second and holiday homes within the district level housing stock expressed as an adjustment to projected household change.
- 2.7 Census Table CAS48 provides data on vacant, second and holiday homes at 2001. The rate of second and holiday homes was applied to the growth in projected households over the Plan period 2006 to 2026, held as a constant proportion. The derived data was rounded to the nearest 100 to produce the base proposals.
- 2.8 We took the view that the change in the rate of vacant homes between the two censuses 1991 and 2001 had fallen significantly for most Local Planning Authorities. While most Local Planning Authorities have an Empty Homes Strategy in place we considered that the scope to further decrease the number and rate of vacant housing and thereby increase housing supply from this source is limited. On second homes the evidence suggests that this has increased in recent years but we have made no allowance for this change which would produce a higher net housing requirement.

3.0 ADJUSTMENTS

3.1 The initial data provided a base on which to then make adjustments for the final proposals based on a number of factors.

3.2 The adjustments were based on:

- Sub regional studies undertaken by the respective Local Planning Authorities and others;
- The Roger Tym and Partners report on settlement functions;
- Other published data on economic, demographic and social trends;
- Policy
- The Draft RSS settlement strategy; and
- Our knowledge of the Region.

4.0 CONCLUSIONS

4.1 We conclude as follows.

- The overall regional requirement in draft RSS falls far short of what is required to meet regional housing need.
- Second proposals have to ensure a sustainable pattern of development across the region.
- Third the proposals have to be capable of being implemented.

Finally we consider that Development Policies B and C in draft RSS are unduly restrictive and do not represent a sustainable strategy for rural communities. In addition in relation to Development Policy A we proposed a two tier policy and the addition of a number of towns to the lower tier.