

## **South West Regional Spatial Strategy Revision: Examination in Public**

### **Written Representations (Non Participation) for Matter 4/7: Bournemouth and Poole HMA Sub-regional Strategy**

**Submitted by Goasby Town Planning on behalf of:  
Bournemouth and West Hampshire Water Plc (116);  
Libra Homes (527);  
Capital Developments (Southern) Ltd (528);  
South Coast Land Society, Newsquest Media and Throop Land Trustees (662);  
Seaward Properties Ltd (663)**

**13<sup>th</sup> March 2007**

***1.0 Matter 4/7: 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 Minster, Colehill, Ferndown, Verwood, St Leonards, 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:***

***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?***

1.1 The 4/4 Authorities are making ambitious assumptions about the likely implementation of infill development likely to be found in the urban areas of the HMA. There is a risk that the perceived capacity of urban areas to accommodate residential development will not materialise in a timely fashion as expected by the 4/4 authorities. With limited greenfield sites being allowed for in the draft RSS there will be a danger that the objectives of the RSS and RES will fail to be implemented.

1.2 The Urban Potential Studies (UPS) carried out by the respective local authorities have informed the 4/4 authorities advice to the Assembly on housing capacity of the

HMA. However these UPS are presently being updated in the light of guidance in PPS3. Of particular relevance in PPS3, at paragraph 59, is the requirement that *'allowances for windfalls should not be included in the first 10 years of land supply unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified'*. As highlighted below in response to the question on green belt modifications, and in our original representations, it has been shown that the 4/4 authorities could identify further areas of search for urban extensions, there is no justification for relying so heavily on windfall sites, in the case of Bournemouth reliance on windfall is 100%. The current planned principal source of residential development will continue to be windfall sites. This will result in a continued shortfall of family housing, this problem is being experienced now with the majority of completions being flats. PPS3 requires plans to make provision for mixed communities through the provision of *'a variety of housing, particularly in terms of tenure and price and a mix of different households such as families with children, single person households and older people'*. Such heavy reliance on urban windfall sites will not result in the provision of such a variety of dwellings, in this regard the scale of greenfield allowance is low.

1.3 The draft RSS recognises, in paragraph 4.3.9, that the heavy reliance on sites coming from the existing urban area will lead to the continuation of smaller flat completions and will not provide for the needs of families looking for family dwellings. This situation is now a reality and is resulting in an unbalanced supply of dwelling types. Local Planning Authority annual residential completion figures across the sub region are showing a very high percentage of flats being completed, with a corresponding slow down in house completions. As way of emphasising this point the completion figures for Bournemouth Borough of 2005-2006 for the first time show a net loss in housing. Just 81 houses were completed, however this small growth in housing was cancelled out due to 112 houses being demolished to make way for flat developments, resulting in a net loss of 31 houses (Source: Bournemouth Borough Council AMR 2005-06). During the year 90.5% of completions were flats, this is a significant, and arguably unsustainable trend, there is nothing in the way of draft RSS

policies that will address this trend, present sub-regional policy will not assist in addressing the severe lack of housing completions.

1.4 This will result in socio-economic impacts with families being even more priced out of a very competitive HMA, or unable to source family affordable housing, potentially being forced to leave the sub region, which is resulting in a loss of the working population. Such trends are having an impact on the delivery of RSS and RES objectives. Equally the aims of PPS3 will not be implemented.

1.5 This problem is highlighted in the RSS SSA where gaps in the RSS are identified (see Appendix A to the SSA page 167) it states *'However, the nature of development likely to come forward in the PUA will deliver a high proportion of 1 and 2 bedroom flats. There is growing evidence of a potential over-supply and so it will be important to emphasise the need for a mix and range of dwelling types and sizes, rather than focussing upon the smaller units'*.

1.6 The draft RSS reference in paragraph 4.3.10, where it states *'a more innovative approach to urban form and design could increase the urban contribution'* is unclear. The paragraph should explain what is meant by a more innovative approach. There is a risk that should such an innovative approach be unsuccessful the required numbers of dwellings from the urban area will fail to be delivered, there is a risk such 'innovation' will just continue the trend of over reliance on flat development. This problem of definition is highlighted in the RSS SSA Appendix A page 171.

1.7 As stated above the assumptions made on urban potential across the HMA are ambitious, for example rear garden potential is proving in many circumstances difficult to unlock and deliver, in particular where numerous gardens in various ownerships are highlighted as having potential. The updated Strategic Housing Land Availability Assessments presently underway in the sub region should have more regard to deliverability, existing UPS do not consider this thoroughly enough.

1.8 The scale of development promoted in the HMA has not had regard to the revised ONS household projections of 2003. The work undertaken by the Assembly in February 2007 indicates that under a series of scenarios, where additional housing distribution patterns are tested, a shortfall of dwelling provision between 355 and 606 dwellings per annum across the HMA, or between 7100 and 12,120 over the RSS period, see table 1 below. As expressed in earlier representations on Policy SR29 no mechanism will be in place to allow for further greenfield sites to come forward. The local authorities of the HMA, being led in policy terms by the Draft RSS sub-regional policies, will not be allowed the flexibility to identify a sufficient choice of sustainable residential sites, in particular on greenfield land, through the LDF process.

<b>Table 1: Bournemouth and Poole Housing Market Area - SWRA Summary of CLG 2003 Revised Household Projection by District/Borough (Source: SWRA Feb 07)</b>					
	2006 - 2026 Overall Annual Average Net Dwelling Requirement				
	Draft RSS (Table 4.1)	Scenario 1 5k to all LAs	Scenario 2 5k to SSCTs	Scenario 3 5k to non SSCTs	Scenario 4 Local/Strategic Growth
Bournemouth	680-780	949	1038	780	959
Poole	450-500	608	713	500	573
Christchurch	165-180	219	180	197	170
North Dorset	255	310	255	397	258
Purbeck	105	128	105	163	85
East Dorset	270	316	170	353	236
<b>HMA Total</b>	<b>1925 - 2090</b>	<b>2531</b>	<b>2461</b>	<b>2389</b>	<b>2280</b>

1.9 There is likely to be a continuation of the affordable housing shortfall due to the heavy reliance on windfall sites and an increase in property prices across the HMA. It is generally accepted that the delivery of affordable housing is more efficient on green field sites. Again, such a shortfall in affordable housing will result in the non implementation of the RSS and RES objectives. The problems being experienced with the non-delivery of affordable housing across the South East Dorset Sub-region due to the strategy of constrained growth were clearly expressed by the 4/4 Authorities in a South East Dorset Strategic Planning and Transportation Joint Committee Report of

September 2005. The report assessed affordable dwelling need as identified in local housing needs surveys, projecting the current annual need of 3690 affordable dwellings over the period 2001 to 2026. It was shown that 92,000 affordable dwellings would be required compared to only 40,100 total dwelling provision for the same period. Clearly a significant shortfall in affordable dwellings will be apparent over the RSS period. The extent of green field sites identified in Policy SR29 and the potential for urban intensification across the HMA are inadequate to meet such needs, the Areas of Search should be expanded to allow for the locally determined identification of suitable urban extension in LDDs.

***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?***

2.0 In the earlier representations made for individual clients on Policy SR29 an argument was expressed that the 4/4 Authorities, in promoting their favoured areas of search (or sites as they are on the ground), did not adequately consider the merits of alternative sites. Consequently the sites put forward in the Final First Detailed Proposals (as taken forward in SR29) will result in more significant impacts on environmental resources. The representations set out a clear Sustainability Assessment providing detailed information for the Panel to consider, again the Panels attention is drawn to this evidence.

2.1 The approach adopted in drafting the RSS has failed to have such detailed regard to sustainability issues, the Strategic Sustainability Assessment has not provided decision makers with the level of detail needed to compare the potential impacts of a variety of sites on a like for like basis, hence the work being carried at a late stage, after publication of the draft RSS, on the Habitats Regulations Assessment.

2.2 The Habitats Regulations confirm the precautionary principle in law, the RSS has therefore, when identifying areas of search for development and resisting others, to be

sound in that the proposed growth points are not likely to result in an adverse impact on designated European wildlife sites. The work commissioned by the Assembly, namely the SSA, the Sustainability Implications of the Revised 2003 DCLG Household Projections (LUC January 07) and the Habitats Regulations Assessment of the Draft RSS (LUC December 06) have not adequately assessed such impacts in particular as the broad scale of the work is inappropriate in order to assess likely impacts on Internationally important sites. It appears as if further assessment work is being undertaken at this late stage in identifying areas of search, for the Habitats Regulations Assessment Report paragraph 4.13 states that LUC will be working with others *'to undertake a series of iterative refinements and assessments to 'design out' significant predicted effects on Natura 2000 sites from the draft RSS'*. It is unclear how other alternative sites have been considered, the Panel are urged to consider whether other sites may be less harmful to the Natura 2000 sites, for example where it may be more effective to provide for mitigation. A solution to give confidence in the process will be to allow the LDF process to identify suitable sites. The arguments put forward promoting such an approach are set out in representations to draft RSS Policy SR27, they are not repeated here, but again the Panels attention is drawn to them.

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

3.0 The detailed representations submitted on behalf of clients have shown that the incursions into the green belt by way of urban extensions proposed in the draft RSS have not been adequately justified. The Panels attention is drawn to detailed representations made on Policy SR27.

3.1 In summary the approach adopted in identifying the 'Areas of Search' is unsound for it is inconsistent with national planning guidance contained in PPS11, with the approach recommended by the East of England RSS Panel and with the approach adopted in the South East England RSS. Representations already made to Policy SR29 have appraised in detail the evidence in the South East Dorset Strategy background paper SED04 and the Regional Buchanan green belt review. The appraisal illustrates how inconsistent the findings of the RSS evidence are, and shows that the release of

alternative urban extensions would cause less harm to the integrity of the green belt than should the presently identified sites be developed.

3.2 A general policy should be included to ensure a green belt review takes place through the LDF process, rather than at the regional level. The RSS should also delete the areas of search as presently identified (see objections to Policy SR29) and either broaden these areas of search to indicate a much wider area of search within which a realistic number of alternative sites will be present, or, the RSS should make reference to appropriate settlements where urban extensions will be allowed, the precise boundaries of urban extensions being determined through the LDF process.

3.3 Supplementary evidence regarding Policy SR29 put forward a case that the proposed modifications to the green belt have not been adequately justified. The representations made the case that the sites put forward by the 4/4 authorities, and subsequently taken forward in the draft RSS, did not have full regard to the likely impacts. The representations showed clearly that my client's sites have fewer impacts on the green belt.

3.4 Green belt incursions planned for had regard to a sieve mapping exercise (see Core Document SED04) again these findings are challenged in representations and, as advised, are not repeated here. The ARUP RSS Urban Extension Evidence Base Review February 2007 has not dealt adequately with the review of 4/4 work, our review has been more thorough. The ARUP review lacks critical analysis, it has failed to recognise that particular sites have been dismissed without due appraisal by the 4/4 authorities. The report findings are of debatable value because of the limited time taken to prepare and the broad based nature of the work, it adds little to the debate. It is understood the study did not have regard to our evidence. Such an approach would be more suited to locally confined green belt assessments where a more detailed evidence base can be developed to inform LDD preparation.

***h) Does the draft RSS set out adequate guidance on the provision of green infrastructure?***

4.0 The draft RSS fails to recognise that a number of potential urban extensions that have already been unreasonably dismissed have good potential to deliver substantial areas of green infrastructure. In this regard the draft RSS does not set out adequate guidance on green infrastructure. Representations put forward for various clients highlighted the potential to deliver parcels of land as way of green infrastructure, the Panels attention is again drawn to these representations.

4.1 The siting of urban extensions will have consequences for the most appropriate siting of green infrastructure. My clients have, through representations on the draft RSS, highlighted the potential of land to provide for Suitable Alternative Natural Green Space (SANGS) thereby offering realistic, attractive and substantial areas of open space that will have a positive impact in diverting pressure away from the internationally important Heathlands of South East Dorset. Such provision on the edge of the urban area, in locations where pressure can be redirected from the heathland, will not be replicated elsewhere as limited opportunities exist.

4.2 The most efficient and effective way of providing for additional green infrastructure will be through the provision of SANGS as part of a wider development concept, the draft RSS and recently adopted (non-statutory) Dorset Heathlands Interim Planning Framework (IPF) have failed to acknowledge this. As it stands it appears as if the Annexe 3 'Projects to divert users from heaths' in the IPF are purely a shopping list of existing, or aspirational projects from the local authority parks departments and countryside services. There is no evidence put forward that these are the most appropriate or effective mitigation measures. Other avenues for mitigation should also be explored, or at the least not dismissed at this stage in the IPF and RSS process. The IPF background paper at paragraph 8.3 acknowledges that there should be a '*spatial relationship between the proposed open space and the likely location of new housing*'. This approach is supported, but again it is difficult to see how in practice this will be implemented outside the strategic framework set by the RSS and LDF. It is imperative

that a strong linkage between the emerging RSS, LDF and the IPF is made in order that other mitigation as part of development proposals can be explored.

4.3 In carrying out an appropriate assessment, under the Habitats Regulations, all alternatives should be considered, as it stands the alternative possibilities for the provision of SANGS is not being considered, therefore the IPF and RSS are flawed.

4.4 The IPF at paragraph 8.14 recognises that the provision of SANGS, although planned for, its delivery and implementation *'is more difficult to guarantee'*. This assumption again is dismissing the potential of residential urban extensions bringing forward such a provision. The provision of SANGs will be essential in relieving pressure on the heaths, this is recognised in paragraph 4.7 of the background paper where it states in relation to the Urban Heaths Project *'it is unlikely to be successful in the short term, or without additional greenspace to divert users'*.