

4/7: Bournemouth and Poole HMA sub-regional strategy

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 the 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?*

SUMMARY

- The draft RSS fails to recognise the ‘dormitory’ nature of the settlements where the urban extensions are proposed. Once these are recognised as not being a part of the conurbation, but separate unsustainable settlements, then they are no longer viable as centres of growth. In the same context the role of Christchurch also needs to be clarified. The implications of recent publications on environmental matters will be to further restrict growth.
- The inclusion of North Dorset in the B/P HMA is we understand for convenience. It is vital that the rural character of this area is maintained.
- Given the possibility of restrictions on absolute growth, if the HMA is to achieve its required outcomes it may have to consider alternate methods of achieving economic growth, not relying on extensive house building.

- The self-containment index illustrates the opportunities that still exist for a more intense urban renewal, not just blocks of flats for retirement and second homes, but developments of mixed housing/tenures to encourage vibrant communities living and working in the urban areas.
- There is a failure to justify the scale of Green Belt development given the existing non-sustainability of the outlying towns and villages. This non-sustainability contravenes all current Government guidelines.
- The draft RSS fails to take into account the impacts of climate change in general, and the more localised draft Dorset Stour Flood Catchment Management Plan.
- Although the draft RSS does recognise the vulnerable heathlands in South East Dorset, it does not take into account the full implications of The Dorset Heathlands Interim Planning Framework 2006-2009.
- The proposed growth will just increase traffic congestion further, unless a step change in sustainable transport choices is made.
- Nothing can justify modifications to the Green Belt in this area. Policy SR29 should be modified to delete Search Areas N and P in their entirety, and Search Area O in part. The South East Dorset housing figures should be reduced by 2,200.
- There are alternate methods to promote growth without using house building to stimulate the economy.
- Green Belt (greenfield) sites are not the only means of delivering affordable housing.

DETAILED COMMENTS

Question a – Spatial outcomes

1. In SR25 it states that the strategic emphasis is to develop and improve their (Bournemouth and Poole) roles as service and employment centres, enhancing regional prosperity whilst recognising environmental constraints.
2. The role of Christchurch in this conurbation is uncertain. In the draft RSS, Map 3.1 and Table 3.1 do not show Christchurch as an SSCT, but in Section 4.3.1 it is included in the South East Dorset Conurbation, while SR25 through its wording leaves out Christchurch as it is not a designated SSCT. Dorset County Council (DCC) notices this omission (Map 3.1) in its response to the draft RSS, but in its 'Shaping our Future: The Sustainable Community Strategy for Dorset, 2007-2016', refers to the Bournemouth and Poole Conurbation naming Christchurch as one of the significant settlements along with Wareham and the other East Dorset settlements. It is important that the role of Christchurch is clarified. The self-containment indices of 2.2 are neither within the 1+ of Bournemouth and Poole or the 4+ of some of the

South East Dorset settlements. These containment indices, from the South East Dorset Strategy 2005: SED09 Commuting Figure 7.1, are an indicator of the sustainability of settlements and the sustainability of further urban expansion.

3. The constraints to the outward expansion of Bournemouth and Poole - the Green Belt and the valley of the River Stour - are recognised by DCC, so alternative locations for growth have been proposed. These locations are not within the conurbation: they are separated by the Green Belt and the flood plain of the Stour and are within East Dorset District and Christchurch Borough. These East Dorset District settlements are dormitory towns, as recognised by East Dorset District Council in its submission on the draft RSS. Draft RSS recognises that where a 'dormitory' relationship exists this should not be exacerbated by further development (3.3.3). This unsustainability has now been confirmed by new publications since the submission date in August. The publications are: PPS1 Supplement on Planning and Climate Change, the Draft Dorset Stour Catchment Flood Management Plan, and the Dorset Heathlands Interim Planning Framework.

4. PPS1 Supplement on Planning and Climate change advises us that 'Climate change is real and it is happening now.' For the UK this could mean more extreme weather events such as drier summers, flooding and rising sea-levels. The river Stour has a very active flood plain and with global warming this may expand into adjacent areas causing flooding to properties. The Draft Dorset Stour Catchment Flood Management Plan examines various factors that will increase flooding. Although modelling shows the catchment largely insensitive to urban development overall, in areas of urban development it states that small changes 'may result in locally significant increases in flood damage.' It did conclude, however, that over most of the catchment climate change would lead to a significant increase in flooding'. In the lower Stour rises in sea-levels will also be a major factor. Rising sea-levels meeting higher levels of flood water could have very serious consequences for those areas already susceptible to flooding. The Interim Heathland Mitigation Policy will also restrict development, forcing it into ever smaller locations.

5. Further to these restrictions, Dorset County Council, in its submission to the draft RSS, states that there is little scope for redevelopment in the urban areas, and it questions the potential for intensification, yet in their response to the RSS implications of 2003 Revised Household Projections, the Section 4(4) Authorities suggest they may be able to deliver an additional 235 dwellings per annum over and above the RSS proposals. Returning to DCC's submission to the draft RSS, it shows concern at the number of flats being built, and whether the provision of housing, if it precedes jobs, will just encourage more retirees into the towns. This undermines the spatial outcomes.

6. The Bournemouth, Poole (and Christchurch) conurbation will doubtless remain the focal point of the HMA, but if it is to enhance regional prosperity then it may have to develop alternate methods of growth such as encouraging more highly skilled jobs, and not depend on extensive house building to generate this growth.

7. We understand that North Dorset (including Gillingham and Shaftesbury) has been included in the HMA for Bournemouth/ Poole for convenience, but it is of course well beyond the travel to work area. It is an area of highly quality landscape - with much in

common with West Wilts - and its special rural character needs to be maintained. See our overall comments on the need for a Travel to Work Area map to be included in RSS to clarify that the travel to work area of B/P, for example, does not extend over the HMA as a whole. See also our proposal that DEFRA's rural definition and sparsity methodology be used to assist in proofing rural housing levels, and identifying different types of rural area in LDFs, to ensure that the rural character of areas such as this in the region is protected (see, for example, Matter 3-3).

Question b – Additional greenfield development

8. We believe there is plenty of scope for urban renewal within Bournemouth. The background papers to the Housing Market Assessment - Dorset show that a total of 25,133 people were in-commuting and 25,408 out-commuting in 2001. With a self-containment index of 1.1 (less than 1 is good, more than 4 is poor) this is not a bad performance and far better than the dormitory towns around the urban core. But it does illustrate the need for a greater variety of mixed housing and jobs in Bournemouth to reduce unnecessary car trips. In its Section 4(4) Authority advice, Poole has now identified some potential for development beyond the draft RSS allocations and so may have the opportunity to reduce their in-commuting of 26,154 and out-commuting of 22,323. The self-containment index shows Poole at 1.2. The greenfield developments, when referring to East Dorset, are all Green Belt developments and we do not feel there is any justification for them.

9. The Housing Market Assessment – Dorset, contained in The Dorset Data Book 2006, implies that housing will not keep pace with job demand but at no time is there any evidence that the annual 11.5 per thousand deaths in Dorset vacate any properties and that these figures have been included in the projections. Over time, deaths should generate an average of about 6000 empty properties in Dorset a year. There is also an assumption that those leaving work or retiring are unlikely to leave the area and so vacate a property (Housing Market Assessment- Dorset Stakeholder Event: Area Profile – Bournemouth/Poole HMA). Much of the job demand has possibly been forecast on the increase of retail employment and jobs in 'care' services when all this new market housing has been built. This type of low paid work will just perpetuate the problem of a lack of affordable housing.

10. There can be no justification for further unsustainable Green Belt development in an area that already fails to meet the PPS1 (Supplement on Planning and Climate Change) sustainability guidelines. The existing dormitory towns around Bournemouth and Poole do not meet the key planning objectives set out in the guidance, neither do they meet the requirements of identifying land for development. The self-containment index referred to earlier show this index varies between 3.5 and 4.4 in these locations. Around Upton and Lytchett it falls to 6.8. We stand by our earlier submission and evidence that the proposed urban extensions are unsustainable as evidenced by our detailed sustainability appraisal of each of the five search areas.

Question c – Lead-in times

We have no further comment at this stage.

Question d – Environmental limits

11. The draft RSS recognises the outstanding environment and how this should be respected when considering further economic and physical growth (para 4.3.5). However, it fails to take into account the impacts of climate change or the implications of the draft Dorset Stour Catchment Flood Management Plan (CFMP). Although the RSS does recognise the vulnerability of the protected heathlands in South East Dorset, the Dorset Heathlands Interim Planning Framework is now in place and demands mitigation.

12. Although urban development itself does not have a major impact on flood levels when considered over Dorset as a whole, the draft Stour CFMP suggests that locally it will be very sensitive to changes in the number of properties and to climate change. The plan states that ‘Increased run-off rates and rising sea level as a result of climate change have a significant effect on flooding and flood damage across the catchment’ and (Table 4.3) that the properties at risk from flood will rise from 706 to 1746 over the entire catchment, and this does not take into account any future build.

13. All of the proposed urban extensions will drain directly or indirectly to the Stour and River Allen. It is unlikely that sustainable drainage systems will have much impact on slowing the flow of surface water into the rivers as efficiently as undeveloped agricultural land. This, in conjunction with climate change, will impact on flood damage the length of the Stour. When rising sea-levels enter the equation and tidal influences occur further up the Stour, then Christchurch and Bournemouth will have serious problems.

14. The Dorset Heathlands Interim Planning Framework restricts most development within 400m of designated sites and demands mitigation for any development between 400m and 5 km away. This will obviously impact on all development in South East Dorset as mitigation will be required on all sites. This will mean expanding existing heathland areas where possible, and introducing more green spaces close to development. The Draft RSS appears to recognise the environmental limitations, but then proceeds to ask for extensive growth in the Green Belt so it is not recognising the limitations of the vulnerable heathlands and river valleys.

Question e – Infrastructure considerations

See below.

Question f – Travel

15. To quote from our original submission **‘If a car is the only viable option for access to services and local employment then the location is unsustainable’**

16. Please see the annex to CPRE’s original submission:

See containment indices Table 10

See car ownership and commuting patterns Table 8

See distances travelled to work Table 9

See Table 7 for frequency and journey time of public transport in East Dorset District.

See Tables showing access to services/schools in the same locations.

There is nothing more to add. The Government guidance is to reduce travel and increase sustainability. The growth requested by RSS just exacerbates the existing problem of congestion and pollution.

17. Policies SD1 – SD4 should be the guiding principles. It is quite clear that in South East Dorset the development proposed pays only lip service to these policies. It would be interesting to know how many residents of the HMA already have to jump in their car just to fetch a pint of milk or a newspaper.

Question g – Green Belt

18. Nothing can justify modifications to the Green Belt in this area. Their purpose was, and is, to contain urban sprawl. They encourage urban regeneration, and in 'containing' the urban areas should help to reduce car dependency, or at least to reduce distances travelled to work. In containing urban sprawl they should also help to increase the sustainability of the SSCTs and the surrounding market towns and settlements. Policy SR29 should be modified to delete Search Areas N and P in their entirety, and Search Area O in part. The housing figures for South East Dorset should be reduced by 2,200.

19. We realise that the Bournemouth and Poole HMA must contribute to regional and national economic growth, but the growth required could be achieved through 'smart growth', which would avoid the need for so much new housing. To quote from Dorset County Council, response to RSS: Implications of 2003 Revised Household Projections. Section 6: Preferred Approach 'The concept of smart growth is most commonly applied to the economy, whereby increased productivity, higher skill and salaries, a focus on knowledge-based, less land-hungry business sectors and more efficient working practices can lead to economic growth without necessarily generating a major increase in housing requirements.' We understood that the Bournemouth and Poole HMA contained many good schools, colleges and a university: the objective should be to encourage the students to remain in/return to this location by encouraging the right type of well paid jobs.

20. The Equal Opportunities Commission: Changing the way we work, suggests that companies introducing radical flexible working increased their productivity considerably - one national company quoted increases of 20% in their productivity. Home working, part-time working and flexible hours helps some people combine work with child rearing and other family demands. It allows people to use and maximise their skills and wage earning ability to their full capacity rather than losing them. Perhaps the authorities could try and encourage this business practice as a means of boosting the economy.

21. Building to help stimulate economic growth is not a very efficient means of achieving it. It will not improve GVA. For example, RSS 4.3.6 states that Bournemouth expects to generate up to 23,000 jobs over the next 20 years. 40% of these will be in education and health to service the needs of those moving into the

area when all the houses are built. 27.1% of the population in DCC are retired - in Bournemouth 22.6%, Poole 23.7%, Christchurch 33% and in East Dorset 29.7%. It would be reasonable to assume a similar percentage of retired in-migrants purchasing the new housing. They would add little to the economy but would draw heavily on health care facilities. The additional home helps and carers are very low paid so this would perpetuate the need for affordable housing.

22. There is a real need in the HMA for additional affordable housing. One of the reasons argued for Green Belt build is that greenfield sites help deliver affordable homes. This is still no justification for sprawling ever outwards. The thresholds for s106 agreements must be lowered so affordable homes can be generated from much smaller sites.

23. The Bournemouth and Poole HMA needs to generate smart growth and to encourage business to operate more flexible work patterns to maximise the skills already within the area. This would increase our GVA, it would help more people buy into market housing and it would increase our contribution to the Regional and National economy without the need to modify the Green Belt.

Question h – Green Infrastructure

We have no further comment at this stage.
