

**EAST DORSET DISTRICT COUNCIL**

Submissions on Matter 4/7 **Bournemouth and Poole HMA Sub Regional Strategy**

**South West Regional Spatial Strategy Revision**

**Examination in Public**

**June 2007**

## 1 .Executive Summary

2. East Dorset District Council consider in respect of South East Dorset sub region that the Draft Regional Spatial Strategy is fundamentally flawed. The sub region is an area of high housing demand with high quality environment. This combination demands as the Strategy itself states a constructive and creative approach to these issues. There is no evidence that such an approach has been examined. Instead the Policies are effectively more of the same, a slow erosion of a high quality environment and the green belt. Once this happens the areas built over cannot be restored. The policy will not solve the problems that the area faces. This inevitably means that at subsequent reviews the process is likely to be repeated. It is essential that the Panel recognise as has a previous Secretary of State that, “South East Dorset is subject to major environmental constraints that require long term commitment to a policy of restraint in which the Green Belt has a major role to play”. The Panel are therefore asked to recommend the deletion of Areas of Search N, the larger part of O and P

## Introduction

3. East Dorset District Council acknowledge that there are continuing pressures for growth in South East Dorset. However there has been no strategic approach as to how these pressures could be managed without destroying the high quality environment in the sub region. They consider there has been a failure to explore the full range of

options. The starting point for considering this matter is Government Policy as set out in ‘Securing the Future - UK Government sustainable development strategy’ March 2005, “a new strategy for sustainable development”. This builds on the 1999 Strategy and sets out five principles, “with a more explicit focus on environmental limits” (Executive Summary page 1). The test of this new emphasis is whether it is translated into policies and actions wherever possible. It is the view of East Dorset District Council that the Draft RSS fails to incorporate this new emphasis in respect of the policies for South East Dorset. It continues existing policies and fails completely to examine the challenge of growth from a fresh perspective. The RSS acknowledges this at 1.4.1 which states, “The momentum of change in the South West looks set to continue. Unless it is planned for in a constructive and creative manner, with sustainable development at the heart of the strategy, growth has the potential to erode the very quality of life that makes the region distinctive”. The RSS has not been creative and has not put sustainable development at its heart.

4. The failure to examine a full range of options is referred to in the Strategic Sustainability Assessment which in the non technical summary at paragraph 28 questions why a different economic approach would not have had a more sustainable outcome (This is also referred to in the main body of the text at paragraph 8.24). It is also not clear from the summary at Table 2.2 why one or more freestanding new towns was rejected.

5. This failure is set out in the conclusions to the Strategic Sustainability Assessment which states “However the scale and pace of growth that is proposed in the draft RSS, as well as some of the other policies that are included in the draft RSS, suggest that it

will be difficult to deliver development that is in accordance with the principles set out in Policies SD1 to SD4 (paragraph 17.5)

**6.** East Dorset faces two conflicting demands. It is an area of intense housing pressure, which is not driven by growth of the indigenous population but by in-migration. The natural population is static or declining with one of the principal needs being for additional affordable housing. It is also a District constrained by a high quality environment and landscape, much of it included in Green Belt. The paradox being it is in part this high quality environment, which is attracting in migration. It is the Council's submission that a fundamental choice has to be made. If the issue of protection of the environment is a fundamental plank of the RSS then the necessary strategy must be in place to preserve those assets. The RSS fails to do this.

**7.** The Greenfield allocations N, the largest part of area O and area P should be deleted from the Strategy. Set out below are the more detailed responses.

**8.** If the proposals are approved damage to the environment will occur and is irretrievable. However the proposals will not solve EDDC housing problems. Current Local Plan (1994 to 2011) suggests 260 houses per annum, with completion of 4,253 dwellings having taken place by the end of March 2006. The RSS suggests continuation of this. This will be insufficient to solve housing issues with affordable housing need running at 600 per annum (East Dorset District Housing Needs Survey)

**9.** Approximately 3,000 houses can be built from existing commitments and brownfield sites. The proposed urban extensions for housing would provide a further 2,400 dwellings at a substantial loss to the environment and Green Belt. The Council

considers that the technical work has shown clearly that no more sustainable or less environmentally damaging alternative areas are available.

*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?*

**10.** In the context of EDDC the key issue is affordable housing. To put this in context a Joseph Rowntree Study in 2003 in a list of authorities with the highest house price to income ratio EDDC came 10<sup>th</sup>, those with the highest proportion of households unable to purchase a home in the lowest price quartile it came 8<sup>th</sup> (NB We could include this as a core document, available at [www.jrf.org.uk](http://www.jrf.org.uk)). [Yes, fine.] In absolute numbers the current estimate is a need for 600 affordable homes per annum. In view of housing costs this will require a substantial subsidy, which must be found from Housing Corporation allocations, or a subsidy in form of reduced land costs. The key point here is that even if the housing proposals in the draft Strategy are adopted it will not solve this problem. As building yet more houses is not a solution then as outlined in the introduction more creative policies are required. There are two ways the supply of affordable housing can be increased. The first is to reduce the size threshold at which the requirement for affordable housing is triggered. This currently stands at sites of 0.5ha or more or where 15 or more dwellings are to be built. The second approach is to acquire houses from the existing market stock. In East Dorset District 85% of the housing stock is privately owned compared to a national average of 70% with only 8% public sector owned as compared to 19% nationally. Acquisitions in the market would improve the supply of affordable homes. This increase in supply can all

be achieved without any damage to the environment. It is this creative approach that is absent in the draft Regional Spatial Strategy

**11.** In EDDC special justification is needed due to unique environmental sensitivity of the area related to the heathlands. This is combined with the vulnerability and importance of the Green Belt which is highlighted in the existing adopted local plan “Because of their (settlements in Stour valley) limited size, nowhere within the settlements is more than half a mile from open country. This and the separate identities conferred on them by their physical separation, are two important benefits of the Green Belt” (EDLP para 3.15)

*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 of the HMA?*

**No comment**

*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?*

**12.** This has not been fully addressed. The RSS in Policy SD3 and at paragraph 3.1.3 suggests the importance of the Environment. But the importance of the environment has been excluded in answer to the question What sort of Region do we want to be? The issue has been fudged. A brief analysis of each green field extension is attached.

It is considered in each case the environmental damage is such that it undermines policy SD2

**13.** Area N Corfe Mullen. This is in the Green Belt, parts are in an Area of Great Landscape Value, there are numerous Sites of Nature Conservation Interest, and there are SSSIs in the Waterloo Valley to the south. Part of the site is within Zone 1 of the Water Source Protection Area around the Corfe Mullen Waterworks. Major Heathland is close by and steep slopes make development difficult and hard to connect to local facilities; relative distance from employment and town centre of Poole. Similar issues to those at Sleight, which was rejected (3.33 SED 04)

Area O North of Wimborne is important in landscape and conservation terms. There are serious and unresolved issues surround the drainage of any development north of Wimborne, whose surface water will flow in to the River Allen, a chalk-fed stream, which suffers prolonged high-flow conditions in winter, and where the town centre is vulnerable to flooding. The impact of traffic on the town centre and on Colehill and whether measures to mitigate its impact are possible, are also yet to be assessed. The part of Area O west of Wimborne is considered acceptable.

**14.** Area P demonstrates problem of referring to one urban area. Parley is separated from Bournemouth by a narrow strip of Green Belt. This is critical to preserve the separate identities of the towns. Because of constraint of heathlands any development in this area would erode gap to the point of non-existence. Any development would also be within noise footprint of Bournemouth airport, which does not constitute a quality environment for future residents. There are also significant traffic problems in the area and the potential sites are distant from key facilities e.g. schools.

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

**15.** The infrastructure requirements have not been properly considered. The strategy is designed to deliver a substantial amount of affordable housing. As the South East strategy Document SED 1 states “providing affordable housing must take into account, the viability of individual sites and other demands on developers” (para 5.2i). This same document refers at paragraph 4.6 to the need for “substantial investment” in water supply and sewage treatment without quantifying the figure.

**16.** SED 02 Refers at paragraph 4.56 to the need for major investment in the transport infrastructure again without quantifying a figure. The seriousness of this issue is demonstrated by the Highways Agency representations, which state at p15 “we must therefore object to these allocations” (N,O,P) . This is based on the significant impacts on the A31 and A350. Until the impact of these proposals are known it is impossible to say whether transport improvements can be made to make them acceptable. Other costs such as education have not been quantified. It is notable that it is not just the scale but also the feasibility of solutions, which have yet to be assessed.

**17.** The South East Dorset Strategy Implementation Plan in respect of the urban extensions has no figures for costs, is silent on the delivery mechanism and delivery risks. This amply demonstrates that infrastructure provision has not been dealt with. The ability of these extensions to provide developer funded affordable housing, which is a main justification, has therefore not been demonstrated.

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

**18.** The main employment centres are in Poole and Bournemouth with limited employment in the immediate vicinity of sites N and O. Although P is close to the airport which is a major employer it is poorly related to other employment areas This inevitably means there will be increased commuter flows into the main urban area. Therefore these allocations do not reflect the need to reduce the need to travel. More detailed points for each area are set out below.

**19.** Site N. Corfe Mullen is at the western end of the conurbation furthest from main employment centres. Development here would be hard to integrate into the public transport network. The bus routes at present follow the Wareham and Blandford Roads and the development would effectively form a cul-de-sac off this spine. This inevitably means residents would rely on their cars creating more traffic along the already congested A 31.

**20.** Site O The larger part of this is on the north side of Wimborne so traffic would have to filter through historic centre of Wimborne, detrimental to its environment, or through residential area of Colehill. This leads onto congested A31 particularly at Colehill.

**21.** Site P West Parley is an area of existing serious congestion and is likely to need extensive road works, probably including a gyratory, which would place a major traffic feature in the centre of the development.

**22.** The Highways Agency concur with the above views as in their representations they state, “ we contend that because of their (areas N, O, P) relatively remote location even the investment in high quality public transport proposed under paragraph 4.3.14 is unlikely to fully mitigate the impact of these proposals upon the Strategic Network”

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

**23.** A brief consideration of the history of the Green Belt in S.E.Dorset is essential. The South East Dorset Structure Plan Consultative Document April 1977 stated, “The growth of the outer settlements has reached a critical point beyond which further development would threaten to join them up, with an adverse effect on landscape features and common identity”. A Green Belt was introduced by way of a modification to the submitted plan. This policy stated that the inner boundary of the Green Belt would follow the edge of the main urban areas but exclude urban extensions then proposed. The fact that no long-term safeguarded ‘whiteland’ was included is a clear indication the then Secretary of State agreed with the comment set out above. The issue of the Green belt was re considered at the Structure Plan Review in 1990. The Panel recommended that safeguarded white land should be included but the Secretary of State rejected this argument. In his decision letter he stated at paragraph 5.6 “The Secretary of State recognises that the inner boundary of the Green

Belt has been drawn close to the urban areas, thereby limiting the scope for further consolidation. Against this he has to weigh the fact that South East Dorset is subject to major environmental constraints that require long term commitment to a policy of restraint in which the Green Belt has a major role to play” and further, “Nevertheless the Secretary of state does not consider that the built up areas of South East Dorset can continue to expand in this way and takes the view that as development comes up against definitive limits consideration will have to be given to the need to accommodate these pressures in other ways. He considers that the present boundaries of the green Belt should be broadly maintained and does not accept the Panel’s view that land should be safeguarded for development after 2001...” . The issue of safeguarded land was reconsidered at the EIP into the County Structure Plan Review. The Panel concluded at paragraph 2.32 “It does not seem that there is anything very substantial to be gained by looking again at the Green Belt. In approving the First Review of the South East Dorset Structure Plan the Secretary of State was firm in his views that the boundaries of the Green Belt should be broadly maintained and that the expansion of the conurbation would consequently come up against definite limits. It was not accepted that land should be safeguarded for longer-term development. The panel see no reason to take a different view”

“Further releases of land for development would therefore run the risk of reducing it (the green belt) to a patchwork of open areas, or at best a series of green wedges”

**24.** “Also unless substantial enlargement were proposed, the development of settlements beyond the Green Belt would be likely to leave them as no more than satellites, dependent on the conurbation for employment, shopping and recreation.”

And further at paragraph 2.33”In the Panel’s view, the problems associated with the

longer term growth of the conurbation suggest the need to look more widely for solutions”.

**25.** In spite of this history RPG 10 at Policy SS2 suggested the green belts in the Region should be critically examined. This was based on the scenarios of growth proposed by The Regional Assembly. This did not amount to a critical examination as confirmed in The Strategic Green Belt Review carried out by Colin Buchanan Feb 2006. Para 4.9.4 states, “Within the three reviews, the methodologies employed do not provide a transparent and clear analysis of Green Belt purpose and thereby provide a link between potential for change (within the Green Belt and capacity and demand. Reviews must be objective.” The process was flawed from the start. It is also clear from a detailed analysis of the Development Options Paper SED 04 that it was comprehensive but not rigorous. There is no weighting of different constraints and no clear explanation of how the sites were selected.

The above is the strategic context why these proposals should be rejected. They should also be rejected because of the important function of the green belt at the proposed growth points N,O and P

**26.** Many parts of the urban area already depend on the Green Belt for their open spaces. For example, Corfe Mullen, Ferndown, West Moors and Verwood all lack a significant park or recreation space within their built-up areas, and are entirely reliant on open spaces in the surrounding Green Belt (SED 04 Development Options paragraph 4.25). The area to the west of Corfe Mullen has an extensive network of public footpaths. Development here would increase pressure on the heathlands to the south.

**27.** At Wimborne Minister the Green Belt is important not only for restricting growth but also to preserve the setting of the historic town of Wimborne Minister. The area to the west of the town could be developed with benefit: that to the north is a critical part of its setting.

**28.** Parley Cross lies in the very narrow gap between Bournemouth and the settlements to the north. This is a critical area in terms of retaining the separate identity of settlements.

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

**29.** What needs to be made clear in the strategy with respect to Green Infrastructure is the additional requirement to fund mitigation measures in accordance with The Dorset Heathlands Interim Planning Framework 2006-2009. It is suggested that the following 'bullet' point is added to 4.3.14

“Mitigation measures as set out in The Dorset Heathlands Interim Planning Framework 2006-2009”