

**MATTER: 4/7 – Bournemouth and Poole HMA sub-regional strategy
PARTICIPANT (REF): BOROUGH OF POOLE (418)**

SOUTH WEST REGIONAL SPATIAL STRATEGY

EXAMINATION IN PUBLIC

**MATTER: 4/7 – BOURNEMOUTH AND POOLE HMA SUB-REGIONAL
STRATEGY**

STATEMENT ON BEHALF OF BOROUGH OF POOLE (REF: 418)



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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?

1. Borough of Poole is broadly supportive of the overall spatial strategy in which the main urban areas are the focus for economic and housing growth. We also support the principle of allowing for different approaches for parts of the region as this takes account of the fact that the South West is geographically the largest region in England and one of great diversity. We would support the emphasis placed upon the significance of the conurbation and wish to see a strategy which promotes innovative ways of developing the area's economic potential and meeting housing needs. We also support the assertion in Policy SR25 that a key part of the strategy is to *'[enable] the SSCTs to develop and improve their roles as service and employment centres, enhancing regional prosperity...'*
2. We are of the view, however, that the strategy emphasis of 'managed growth' for the south eastern part of the region could create a perception of a highly constrained urban area within which only limited change is likely to occur. It is felt that this does not accurately convey the opportunities which exist or the dynamics at play in the conurbation. Our view of Poole and the wider conurbation is that of an urban area in a state of constant change and rejuvenation, this is being done with a much greater urban focus than any other sub-region. **Table 1** illustrates the distribution of housing in all of the identified sub-regions.

Table 1

Sub-region	Total annual housing requirement (upper end where range quoted)	SSCT urban (brownfield) share
West of England	4,625	1,775 (38.4%)
Swindon	1,750	950 (54.3%)
Gloucester & Cheltenham	1,500	1,150 (76.7%) [900 in Cheltenham & Gloucester – 60%]
Exeter	925	525 (56.8%)
Taunton	1,100	550 (50.0%)
Chippenham	225	?
Trowbridge	250	?
Yeovil	320	?
South East Dorset	1,720	1,430 (83.1%)
Plymouth	1,575	1,200 (76.2%)
Torbay	500	360 (72.0%)
Cornwall Towns	690	490 (71.0%)

3. Table 1 shows that, in terms of actual housing numbers proposed in RSS, the South East Dorset sub-region is the third most significant in the South West. When looking at the share of housing taking place on brownfield sites within SSCTs (i.e. excluding urban extensions and settlements which are not part of

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SSCTs), Table 1 shows that South East Dorset's share of housing out-performs every other sub-region with the exception of West of England. Furthermore, the relative share of housing taking place on such sites is the greatest in the Region, making up over 83% of its total.

4. It is contended, therefore, that RSS's portrayal of a constrained sub-region and a subsequent emphasis upon managed growth fails to recognise the urban focus in the south eastern part of the region in general, and Bournemouth and Poole in particular. The Panel's attention is drawn to the fact that, in Poole, a major regeneration initiative is being planned by the Local Authority as an innovative and proactive way of delivering the redevelopment of derelict and under-used sites in the central area of Poole. As well as meeting a large proportion of the future housing requirements both of Poole and the wider sub-region, the regeneration initiative includes aspirations for up to 36,000 square metres of employment uses.
5. A favoured approach would be to articulate more clearly some of the key characteristics, attributes and aspirations of each of the three areas, as well as some of the potential pressures and constraints. In the case of South East Dorset, the urban focus needs to be recognised, as does the role of Poole's Twin Sails Regeneration Initiative. This is key to the Government's Growth Points agenda as it will enable Poole to deliver accelerated growth. RSS should acknowledge the significance of this and provide appropriate hooks for Poole to enable future funding to be secured for necessary infrastructure.
6. There is a growing concern amongst local residents and politicians that a continued urban focus is leading to town cramming. It is critical, therefore, to avoid harming locally valued features of landscape, townscape or wildlife interest. RSS tends to be focused only upon protected features such as habitat designations, listed buildings and conservation areas. It is important, however, to recognise the importance of local character even where it is not of sufficient merit to warrant formal protection. Consequently, when considering how best to express the strategy emphasis, it is requested that the Panel places urban renaissance and the creation of high quality urban environments as key priorities.

The Role of Poole Town Centre

7. The South East Dorset Conurbation contains the two main town centres of Bournemouth and Poole, as well as a number of other significant centres. Both towns have potential for growth. However, they also face competition from out-of-centre retail floorspace in the conurbation as well as from Southampton and, to a lesser extent, Portsmouth. It is important to the conurbation and wider sub-region that both Poole and Bournemouth town centres continue to prosper.
8. Poole is preparing an Area Action Plan for part of the Town Centre. This proposes ambitious plans for significant additional retail and leisure floorspace, as well as housing and student accommodation, public spaces, a better pedestrian environment and improvements to the bus station. This could lead to around 45,000 square metres of additional retail floorspace. All of this can be achieved through more efficient and effective use of land within the Town Centre. Positive

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statements in RSS could have a bearing upon future investor confidence and will lend weight to Poole Town Centre North Area Action Plan.

Employment Land

9. RSS contains positive statements about the economic growth potential in the Bournemouth-Poole TTWA and this is welcome. From Poole's perspective, however, a potential constraint to growth is the availability of employment land. We have already developed more than the adopted Structure Plan's requirement of 29 hectares for 1994-2011 and, at current rates of development, only have about three and a half years of currently available land left. The town's economy still retains a high proportion of jobs in manufacturing (above the national and regional averages), and recent economic work by DTZ, commissioned by the RDA, suggests that Poole's manufacturing sector is not forecast to decline "...as it is closely associated with marine manufacturing and aviation".¹
10. There are a few key points we would make about economic growth in Poole:
- RSS needs to recognise the importance of retaining and providing an adequate supply of employment land; and
 - the strategic locations of Poole's Twin Sails Regeneration Initiative and Bournemouth Airport (for aviation-related sectors) will be crucial to the health of the sub-regional economy
- b) Has the scale of additional greenfield development been adequately justified against the likely levels of housing requirements and in particular the urban renewal opportunities in the main urban areas?**
11. Poole is supportive in principle of the approach which RSS has taken. The environmental constraints are such that the South East Dorset conurbation has a more urban-focused strategy than any other main urban area in the South West. It is considered that RSS accurately reflects this position.
12. More of an issue for Poole is that we wish to ensure that housing levels planned for the urban areas are achievable in a manner which positively enhances the character and vitality of the town and leads to an urban renaissance. Poole would favour a stronger expression in Policy SR29 of the need to make efficient and effective use of land, and to direct the highest densities to the most suited and accessible sites. A minimum density is not considered helpful (Policy H2), although an aspiration to achieve an average density would not in itself be seen as a problem as this would allow for local character and accessibility issues to be taken into account. Although quality and place-making do receive mention in RSS, we consider that this needs to be more strongly expressed, given that such a high share of the HMA housing requirement is to be met in the Poole and Bournemouth urban areas.

¹ The Demand and Supply of Employment Land, Sites and Premises in South West England – January 2007, SWRDA (report prepared by DTZ)

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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?

13. From Poole's perspective the lead-in times has played a significant part in the housing number split between the two halves of the RSS period. Our own housing capacity assessments have shown that accelerated growth is feasible in the period up to 2016 due to the significant brownfield opportunities on named sites in the heart of the urban area. The Twin Sails Regeneration Initiative and other sites in the central area are starting to come forward to the extent that last year's housing completions reached 828 dwellings, some 80% higher than the annual average anticipated in RPG10. Over the first 10 year period Poole's average is set out at 700 dwellings per annum in RSS, falling to 300 per annum for the period 2016-26. Over the entire period this would give an average of 500 dwellings per annum. Poole supports this approach as it accurately reflects the detailed work we have carried out locally. Having said this, there remains some concern in Poole that achieving the mix of housing and employment growth, together with social infrastructure, could prove difficult to deliver due to the costs of bringing forward former industrial sites in the Regeneration Area. There are real difficulties in realising the aspirations in the Regeneration Area, and we consider that insufficient recognition has been given to this. The Panel is requested to consider including a positive statement in RSS which promotes financial support for the Regeneration Area through the Regional Funding Allocation, Growth Points funding, and other national and regional bodies (including English Partnerships and the RDA).
14. Poole considers phasing to be a critical issue, particularly with regard to bringing forward employment land at the airport. We consider it is critical that RSS prioritises employment land in Poole's Twin Sails Regeneration Area in advance of the airport. It also needs to be clear about the nature of uses considered appropriate at the airport, as well as parking regimes. A scenario whereby the airport is developed for any mix of employment uses with a relaxed parking regime is likely to compete directly with the town centres of Poole and Bournemouth. Businesses will locate or decant to the airport to secure favourable parking conditions and relatively unrestricted sites. This would be likely to generate an increased need to travel and would undermine attempts to attract employment investment into Poole's regeneration area.
15. Poole thus would like to see some statement in RSS about the phasing and type of employment at the airport, such that it does not come forward in advance of the regeneration area, and is for appropriate uses (not, for example, unrestricted office use). It should also state that parking controls will need to be regulated in accordance with wider parking strategies for the conurbation.

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d) Have environmental limits arising from matters such as flood risk and protection of environmental assets been adequately been 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?

16. RSS should not devolve excessive responsibility for Appropriate Assessment work to LDFs. Where AA could have a bearing upon the strategy, this needs to be considered at RSS level. Equally, local authorities should not be burdened with commitments to detailed AA work if this is not necessary. This is not something which RSS itself can easily set out, so it might be a matter to consider at the EiP itself, and to follow up through detailed discussions between the Regional Assembly, local authorities and Natural England.

17. RSS should allow for sufficient local discretion for the affected local authorities to deal with the mitigation necessary to avoid adverse impacts upon Natura 2000 habitats. Issues such as the provision of alternative recreation sites (SANGs) needs to be considered in a comprehensive way alongside other measures such as management of sites and car parks and improvements of existing open spaces within the urban areas. It is important that RSS does not set out prescriptive requirements in respect of SANGs or green infrastructure as the details of this will need to be agreed across a number of local authority areas and in partnership with Natural England. There is already in place an 3-year interim mitigation plan which all affected authorities are signed up to, as well as a commitment on the part of those same authorities to develop a long-term strategy through their Local Development Frameworks. RSS needs to reflect this.

e) Have infrastructure considerations been adequately taken into account?

18. RSS contains an implementation plan which sets out some of the key pieces of infrastructure needed to deliver the strategy. It also states that investment will be made in key infrastructure to enable development (Policy SR29). Both of these aspects of RSS are welcome. However, whilst there is some understanding of the infrastructure needed to enable development to take place, there is no clear strategy or mechanism for delivering this. In particular, the South East Dorset Conurbation will be expected to meet the vast majority of new development within an existing urban form. The incremental impact of development upon existing infrastructure could undermine delivery of the strategy, as could the failure to provide essential new infrastructure needed to enable development.

19. Poole has received growth point status in recognition of its importance in delivering accelerated growth. The town is planning for a 52% increase in its housing development rate in the next 10 years over and above RPG10 levels. Poole is endeavouring to open up for regeneration purposes around 40 hectares of previously developed or under utilised land, focused on the Twin Sails Regeneration Initiative, to assist in delivering a step change in the growth and prosperity of the sub region. (This issue is dealt with as part of a joint statement on behalf of Bournemouth Dorset and Poole - refer to matter 9/1d.) Delivering growth will be extremely costly, with an extensive list of needs ranging from transport infrastructure to heathland mitigation, water services, affordable housing

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and community facilities, not to mention remediation of contaminated sites. There is only limited public funding available and the Council does not own any of the land. Hence, a heavy reliance is being placed upon developers and viability work undertaken to date suggests there may be a significant shortfall in funds.

20. **Appendix 1** highlights those costs (taken from the implementation plan which accompanied our First Detailed Proposals) which are most directly related to the Growth Point of Poole. This shows in the region of £125 million the Regeneration Area alone. In addition to this, landowner/developers are also faced with significant clean up costs of previous employment land, substantial improvements to quayside walls and flood protection measures.
21. Realising the potential of growth points is high on national and regional agendas. We thus consider that national and regional bodies, including English Partnerships and the Regional Development Agency, should ensure their funding allocations prioritise the delivery of growth points, including the necessary infrastructure requirements in Poole and the wider sub-region.
22. Port of Poole is an important gateway to the region. It has containerised and conventional cargo-handling as well as providing cross-channel ferry services to Normandy, Brittany and the Channel islands. Whilst RSS refers to the role of the port and improvements to the shipping channel, it fails to highlight the access to the port as being a key piece of the regional transport infrastructure. Poole is on the Trans-European Route Network and yet has constrained access to the main trunk road network. The proposed second harbour crossing will improve this, but there is also a need to improve links between Poole and the A31.
23. The South West Regional Funding Allocation includes only Poole Bridge in the list of schemes with secure funding. Given the significance of the urban areas in delivering the strategy, it is critical that funding priorities are recognised in regional and national decisions concerning investment and funding. This should be reflected in the strategy for South East Dorset. Furthermore, Policy SR29 should prioritise the following crucial pieces of infrastructure:
 - Poole Bridge (Twin Sails) Regeneration network;
 - Prime Transport Corridor improvements, including investment in public transport, walking and cycling facilities;
 - A31-to-Poole corridor improvements; and
 - a package of measures to improve access to the Port of Poole and Bournemouth Airport, including a link road to the A338 (subject to phasing issues – see paragraphs 14 and 15 above).
24. We believe an unrealistic burden is being placed upon development to deliver infrastructure requirements. There needs to be a clear strategy for delivery (including possible sources of funding) set out in RSS/the implementation plan. Without this it will be far more difficult for local authorities to deliver the strategy. Government support, the Regional Funding Allocation, and regional agencies such as the RDA are all possible areas where the south eastern part of the region could and should received greater commitment, given its significance to delivering regional aspirations. It would be helpful if RSS could set out the necessary policy framework for achieving this.

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25. Infrastructure provision needs to be front-loaded to take account of the phasing of development. Housing growth will take place at a faster rate in the period up to 2016 than in the latter half of the RSS period. This is due largely to the phasing of the Twin Sails Regeneration Initiative in Poole, in which major brownfield sites are expected to come forward between now and 2016. Much of the infrastructure identified in the Implementation Plan thus needs to be brought forward relatively early in the plan period if it is to adequately serve the proposed development.

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

26. Poole is supportive in principle of the urban focus. This will allow more people to gain access to jobs, schools and shops by means other than the private car and will allow employers to develop travel plans for their staff. Poole's main concern is that there will be a need to provide the necessary infrastructure to bring about a genuine shift in travel behaviour. As has been discussed in response to 4/7 d above, a heavy reliance is being placed upon developer contributions and this could struggle to cope with the full range of demands. Hence, we would reiterate our desire to see some recognition in RSS that other national and regional bodies and sources of funding need to be prioritised for those urban areas taking the majority of new development. Poole is a growth point and this should be reflected.

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

27. Poole is satisfied that the approach in both the Joint Study Area work and subsequent studies carried out on behalf of the Regional Assembly are sufficiently robust in identifying areas of search within the Green Belt. It is important, however, that the wording in RSS does not lead to confusion as regards Green Belt status or create an unnecessary level of challenge about the precise details of Green Belt boundaries when LDFs consider the issue. RSS thus needs to confirm the general extent of the Green Belt boundary and only allow for amendments for those urban extensions which come forward through the RSS.

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

28. RSS is relatively vague on the matter of green infrastructure. Poole would reiterate the comments made in the joint statement (Bournemouth, Dorset and Poole) on this issue, namely that RSS needs to be clear about the purposes of green infrastructure in terms of serving a recreational need and providing mitigation for impacts upon heathlands. The local authorities in the sub region need to assess their own recreational needs to inform the level of provision needed in relation to the former, and are committed to joint working to deliver the latter. RSS could make appropriate reference to these points, but should avoid being prescriptive about the precise location or amount of green infrastructure.

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CONCLUSIONS

29. Overall, Poole is supportive of the approach in RSS, particularly with regard to its emphasis upon the importance of the main urban areas in delivering housing, employment and service needs. Our concerns are more a matter of tone and emphasis than detail. We would like to see greater evidence of linkages between key strands in RSS. In particular:

- Infrastructure needs to be prioritised and delivered early. It is too hopeful to expect developers to meet the brunt of these costs.
- Adequate hooks need to be provided to enable Poole, as a growth point, and other urban areas, to attract the necessary investment and funding support from national and regional bodies, including the Government, Regional Development Agency and English Partnerships.
- The strategy emphasis needs to be more sophisticated to allow for innovative responses to a constrained natural environment. The concept of managed growth is too simplistic.
- Matters related to townscape character and density need to be addressed to ensure Poole can deliver a high quality town.
- Greater certainty is needed over the Appropriate Assessment work in terms of how this is expected to support LDFs. We need to avoid too much responsibility for assessment being handed down to LDFs or too prescriptive an approach towards mitigation.

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Appendix 1: Infrastructure costs of most relevance to Poole's Growth Point Status

SE Dorset Spatial Strategy Objective	Cost
Concentrating majority of development in urban areas, particularly at town and local centres and within prime transport corridors	Cannot be costed
To focus the most intensive activities in the centres of Bournemouth and Poole to deliver an urban renaissance	Specific issues – to be identified through LDFs and other strategies
To continue Poole Bridge Regeneration Initiative as a regionally significant mixed development scheme	Housing: £38 M Education: £12.8 M Leisure/recreation: £3.36 M Community facilities: £2 M Government funding secured for £14.1 M for transport
	Total: £125.46 M
To improve the connectivity of the sub-region, including making best use of gateways such as Port of Poole	In excess of £100 M
Management of transport network and minimise need to travel within the conurbation	Sum of LTP bids over period 2005-2026: £200 M
Providing opportunities for the expansion of Bournemouth University, the Arts Institute and further education establishments (Note: the University, Arts Institute and Poole college are all located in Poole)	Unknown
Maintain Bournemouth and Poole Town Centre's roles as major sub-regional shopping centres	Cannot be costed
Providing for the development of up to 40,400 dwellings, 90% of which within existing urban areas	Not possible to cost but will incur infrastructure costs including transport, community, health, educational and utilities.
Securing affordable housing	Housing Corporation Grant: Approx. £340 M RSL: Approx. £340 M Developer subsidy: Approx. £300 M
Achieving higher densities than in the past	Cannot be costed
Costs of urban pressure mitigation strategy (green infrastructure to protect Natura 2000 habitats, etc.)	Urban Heaths Partnership: Land purchase of 1,500 ha: 500 ha through developer contributions: £5 M 1,000 ha remaining at a cost of £10 M Capital infrastructure: £2.5 M Revenue costs: wardening, public information, support costs: £450,000 p.a. to 2016 (rising to £600,000 p.a. thereafter)
Delivering strategically significant transport improvements	Prime transport corridor improvements: £90 M Poole Bridge Regeneration Network: £69 M A31 to Poole Corridor improvement: £132 M Port of Poole deeper access channel: £16 M (to be funded by Poole Harbour Commissioners)
Providing new local rail services and stations	Network Rail, TOCs £10 M Local authorities, developers: £14 M
Water supply	£25M - £30.3 M (utilities companies, developers, local authorities)
Waste water treatment	£24.2M - £28.2M (utilities/developers)
Sewerage and waste water treatment	£55.7M - £69.6M (utilities/developers)