

**REGIONAL SPATIAL STRATEGY FOR THE SOUTH WEST
EXAMINATION IN PUBLIC**

SOUTH WEST REGIONAL ASSEMBLY SUBMISSION

**MATTER 4/7
BOURNEMOUTH & POOLE HMA SUB-REGIONAL
STRATEGY**

March 2007

- 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?

Executive Summary

EX1 When considering the future of Bournemouth, Poole and Christchurch, the Draft RSS has, reflecting on the section 4(4) advice, not considered the urban areas in isolation. There is a surrounding network of small settlements that, interspersed by sites subject to the Habitat Regulations, form a broader conurbation. The scale of growth proposed in the Draft Regional Spatial Strategy (Draft RSS) for South East Dorset by 2026 is 34,400 dwellings, about 10% higher than RPG10 levels. There are three key challenges facing SE Dorset.

EX2 Firstly, environmental constraints in SE Dorset have played a dominant role in formulating the sub-regional strategy. Development plans are subject to 'Appropriate Assessment' under the Habitat Regulations to demonstrate that their implementation will not adversely affect designated European sites. In SE Dorset the quantity and extensive spatial distribution of such sites has heavily influenced the strategy.

EX3 Secondly, a strategy for SE Dorset should not restrict its economic potential yet take account of implications arising from environmental designations. Reconciling potentially conflicting pressures through a 'managed' approach will be critical to ensure that economic growth can occur whilst ensuring there are no adverse impacts on sites subject to the Habitat Regulations.

EX4 Lastly, the RPB considers that a robust Green belt review has been undertaken which, combined with a sustainability analysis of urban extensions, confirms the most sustainable directions of growth. Whilst individually the proposed urban extensions may be considered non-strategic, their collective significance, particularly in light of environmental constraints, has played a key factor as a rationale for their identification.

EX5 The Draft RSS sets out a policy framework to deliver SE Dorset's vision through a robust strategy. It seeks to ensure that SE Dorset's economic potential is realised, provides housing to meet future needs in a sustainable pattern of development with cross-cutting sustainability principles permeating through all forms of development. The strategy for SE Dorset offers the greatest opportunity to create a more sustainable pattern of development. Further technical work is being undertaken to update the sub regional transport model to refine the investment requirements needed to support the implementation of the strategy as well as major scheme bids.

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?

A1 Bournemouth, Poole, Christchurch and surrounding hinterland (referred to as the South East Dorset conurbation) is the main centre in the south east of the region, adjoining south west Hampshire and the South East region. Regional Planning Guidance (RPG10) identifies Bournemouth/Poole as a Principal Urban Area (PUA), subsequently referred to as Strategically Significant Cities and Towns (SSCTs), highlighting its key role as a major centre for employment, service, shopping, cultural and education facilities. The Port of Poole and Bournemouth Airport are important economic assets, along with an international tourism industry. The surrounding environment, of which much is subject to European legislation and protection through the Habitats Regulations, plays a critical role in shaping the future of the sub-region.

A2 “The Way Ahead – Delivering Sustainable Communities in the Region” (SWRD30.25) identifies Bournemouth and Poole as being:

“.. the second-largest population centre in the region and, under current strategy, will see a significant increase in population and economic activity.” (SWRD30.25, paragraph 3.35, page 21)

In addition, ‘The Way Ahead’ also refers to SE Dorset as being well connected to London and the South East, increasing pressure on the housing market from in-migration. Reference is also made to the strong economy and need to reconcile this with environmental designations. The Draft Regional Spatial Strategy (Draft RSS) seeks to take into account the European Habitats Regulations and the implications this has for development through a ‘managed’ approach (Policy SR25 and paragraph 4.3.1).

A3 In preparing the Draft RSS a Steering Group was formed to test different growth assumptions and strategic development strategies for the SE Dorset Joint Study Area (JSA). The Steering Group coordinated by Dorset County Council (DCC) included South West Regional Development Agency (SWRDA), Housing Corporation, Environment Agency (EA), health providers, economic partnerships and English Nature (EN) now Natural England (NE).

A4 The JSA progressed the technical evidence base and produced “Looking to the Future: SE Dorset in 2026” (2004/05) for consultation. A range of supporting technical documentation has been made available to the Regional Planning Body (RPB) throughout the process to support the conclusions and can be located on the DCC website (SED01-17).

- A5 The SE Dorset JSA Strategy Report (SED02, *South East Dorset Strategy - The Strategy*, November 2005) sets out the broad vision for the sub-region:

“In the future South East Dorset will strengthen and develop its regional, national and international role within its outstanding environment and be recognised internationally as a prime example of a sustainable conurbation.” (SED02, Section 5, paragraph 5.3, page 31)

- A6 The key challenge facing SE Dorset through the vision is not to restrict its economic potential yet take account of implications arising from environmental designations within and surrounding the conurbation, particularly those subject to the Habitat Regulations. Reconciling potentially conflicting pressures through a ‘managed’ approach will be critical to ensure that economic growth can occur whilst ensuring there are no adverse impacts on sites subject to the Habitat Regulations. Other challenges include:

- i. Increasing the supply of affordable housing when the majority of new housing will be on small urban sites where current planning mechanisms struggle to deliver sufficient quantity;
- ii. Providing for an ageing population and the impact this could have on service provision, accommodation and future labour supply;
- iii. Improving accessibility within the conurbation and externally to support growth whilst minimising impacts on the road network;
- iv. Ensuring that an urban focused approach leads to improvements in residents quality of life, not worsening the situation or increasing congestion to unacceptable levels;
- v. Achieving investment to deliver the infrastructure needed to implement the spatial strategy.

- A7 The Draft RSS, policy SR29, proposes growth in the sub-region totalling 34,400 dwellings over the plan period, about 10% higher than RPG10 levels. The RPB considers that Draft RSS provides a framework to deliver the vision for SE Dorset by:

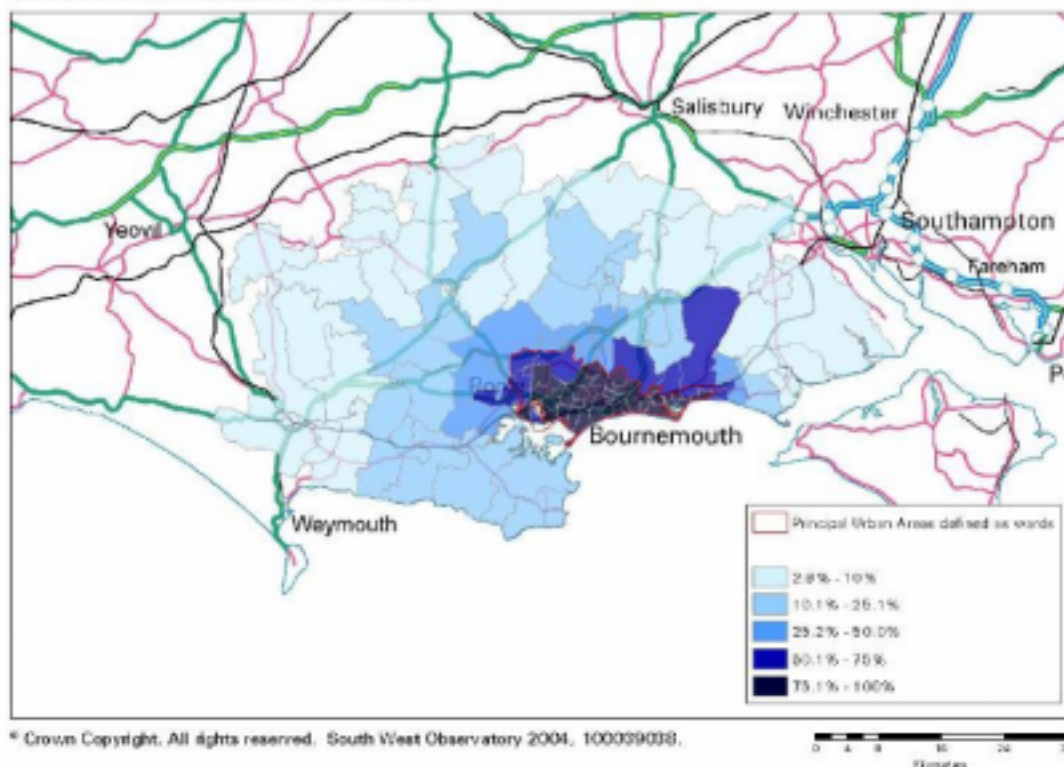
- i. Regenerating Bournemouth and Poole with a continuation of urban renaissance – including the Poole Bridge Regeneration Initiative;
- ii. Maintaining the separate identity of the main urban areas and surrounding settlements through Green Belt;
- iii. Embracing the significance of the environmental assets and their legal status through the provision of an up-front mitigation strategy;
- iv. Identifying urban extensions avoiding areas at risk from flooding;
- v. Providing sufficient growth to meet economic growth forecasts;
- vi. An urban focused approach to minimise potential increases in commuting and maximising non-car based opportunities;
- vii. Maintaining a high quality environment and residents’ quality of life.

- A8 When considering the future of Bournemouth, Poole and Christchurch, the Draft RSS has, reflecting on the section 4(4) advice, not considered

the urban areas in isolation. There is a surrounding network of small settlements that, interspersed by sites subject to the Habitat Regulations, form a broader conurbation. Whilst some of the surrounding settlements do have mixed uses, on the whole they support economic activity in the main urban areas of Bournemouth and Poole. Self-containment of people living and working within SE Dorset is 87% (2001 Census), reinforcing the point that there is a broader urban area beyond Bournemouth and Poole with relatively high patterns of movement in-between. Functionally, Bournemouth, Poole, Christchurch and surrounding settlements, such as Wimborne Minster, Colehill, Ferndown, West Moors, St Leonards and St. Ives and Verwood collectively operate as one. Consequently, the Draft RSS has embraced the wider conurbation principle and 4(4) advice, planning for a wider sub-region.

- A9 Outside the SE Dorset conurbation there are a range of market towns with varying degrees of accessibility, facility provision and economic base. The Draft RSS does not inhibit development coming forward at these locations but, through Development policies B & C, will require Local Authorities to assess their respective sustainability according to a similar functionality analysis undertaken in the Draft RSS to determine their scale of growth. Those settlements with lower accessibility, facility provision and jobs should accommodate lower levels of growth.

Bournemouth Zone of Influence.



- 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?**

- B1** The Draft RSS scale of housing growth at SE Dorset of 34,400 dwellings (SR29) over the plan period is 2,800 dwellings higher than the advice received from the section 4(4) authorities (31,600 dwellings). The Draft RSS provision equates to about RPG10 +10%, whilst the section 4(4) advice equates to about RPG10 (SWRA07: Information Note 4, *Joint Study Areas – Process and Approach*, Annex 6c, Appendix 2).
- B2** The RPB considers that the Draft RSS level of growth will enable a better balance between jobs forecast and workforce supply to be achieved in a more sustainable pattern of development through an increased concentration at the three main urban areas of Bournemouth, Poole and Christchurch. The RPB notes that the JSA technical work identifies an excess of jobs over people (2001-2026) ranging from 3,300 to 16,400 at growth levels RPG10 and RPG10+25% at the PUA. (SED07, *South East Dorset Strategy - Economy*, November 2005, page 48)
- B3** The RPB considers that housing provision in the Draft RSS (as apposed to the 4(4) advice) will provide a better opportunity to provide the quantity of economically active people and supply of labour to satisfy the projected under supply of workforce. The focus of additional housing within the main urban areas will enable a greater opportunity to use non-car based methods of movement, thus minimising commuting impacts. The Draft RSS housing provision is considered to continue the renaissance of the urban areas and deliver the SE Dorset vision.
- B4** To assist regeneration of the urban area and maximise the potential of brownfield sites, there has been a strong inward focus, in accordance with national planning policy, minimising the requirement for greenfield sites (Draft RSS, policy SR4). However, the scale of development proposed cannot be accommodated within the urban area and five sustainable urban extensions totalling 3,000 dwellings and 20 hectares of employment land are proposed, areas of search M – P (Draft RSS, inset diagram 4.6). The scale of housing provision is considered sufficient to minimise in-commuting and provide opportunities to work and live in close proximity, appropriate to employment growth.
- B5** Demonstrating the delivery of the Draft RSS housing levels in urban areas has been partly evidenced through Poole's New Growth Point Bid (NGP) submission which has increased housing provision from 450 dwellings per year (as stated in the 4(4) advice) to at least 500 dwellings per year, dependent on future urban capacity.
- B6** Whilst the RPB acknowledges that Poole and Bournemouth are different in character, the RPB considers that delivering an appropriate type, mix and supply of housing is essential to ensure that housing provision is sufficient to meet the requirements over the plan period.
- B7** The RPB considers that an annual rate of 780 dwellings per year for Bournemouth and 500 dwellings per year for Poole is appropriate to satisfy the economic forecasts over the plan period. The scale of economic

growth (23,000 jobs at Bournemouth and 19,000 jobs at Poole, policy SR29) is supported by technical work undertaken by the SWRDA ‘Spatial Implications of Economic Potential in the South West’, June 2006, paragraph 4.72 (SWEDS32.07).

- B8 In accordance with national planning policy guidance, and as part of the brief for the JSA, all three urban areas have undergone an urban capacity assessment to determine their respective capacity. The Draft RSS SE Dorset assumed housing trajectory is:

	2006-2016	2016-2026	Total
Pdl & greenfield in Bournemouth	8500	7100	15600
Pdl & Greenfield in Poole	7000	3000	10000
Pdl & Greenfield in Christchurch	1500	1500	3000
Area of search M	300	300	600
Area of search N	300	400	700
Area of search O	500	300	800
Area of search P	300	600	900
Remainder of HMA	1600	1200	2800
Total	20000	14400	34400

- B9 The RPB considers that a strong urban focused, sequential approach has been followed in SE Dorset. Urban capacity has formed a key part of the process. The RPB considers that an increased urban concentration would position the urban areas in a more advantageous position to supply the quantity of labour over the plan period, particularly the latter part. Sustainable urban extensions total 3,000 dwellings (8.7% of the sub regional total).

C) Has sufficient consideration been given to the impact of the lead-in times for all or any of the development areas the on the required annual output for the HMA?

- C1 The Draft RSS reflects the section 4(4) advice in terms of both scale and identifying areas of search matching the SE Dorset JSA conclusions, areas M, N, O & P (SED01, *SE Dorset Strategy - First Detailed Proposals*, November 2005, paragraph 5.1, page 7). Projected completion rates for the areas of search M, N, O, P and Q have been submitted to the Panel in response to Panel Note 2 collectively by the section 4(4) authorities (NLD20). In all instances, it is considered that delivery will begin after 2011. This identifies a reduction of 90 dwellings which the RPB does not consider a strategic issue.

- C2 The RPB is aware that the section 4(4) authorities have been working closely together to ensure that the evidence base for this proposal is robust and consistent. The RPB is confident that collectively, the response provided to Panel Note 2 demonstrates that the Draft RSS proposals can be delivered.

C3 The RPB considers that the individual scale of the urban extensions, relative to others across the region, is substantially smaller in size and does not require the provision of strategic infrastructure to be in place before commencement, except for measures to address the implications of the Habitat Regulations, including green infrastructure. The importance of infrastructure provision relates to the collective impact combined with increasing concentration within the existing urban areas. To quantify the implications of this collective impact more precisely will require further investigation.

C4 It should be noted that the proposals by the Borough of Poole to increase its housing delivery through the New Growth Point Bid are not included in the response to the Panel (NLD20). Including this proposal based on the most recent evidence would increase the housing delivery rate within the urban area from an average of 450 dwellings per year (as stated in the section 4(4) advice) to at least 500 dwellings per year (higher end of the Draft RSS range).

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 adequately reflect the need to avoid any impact on the integrity of the nature conservation areas around the conurbation?

D1 Having adopted the Bournemouth, Dorset and Poole Structure Plan 2011 (Formally Dorset County Structure Plan) in July 2000 and publication of RPG10, the section 4(4) authorities in SE Dorset were progressing a review of the structure plan. Consequently, a substantial quantity of technical evidence was gathered as part of this review process. SE Dorset Strategy 'Development Options' (SED04, *SE Dorset Strategy – Development Options*, November 2005, section 3, page 9 and 10) states the methodology followed to identify sustainable urban extensions highlighting the key stages. Of key importance are Stage 1, consolidate baseline information which included environmental designations, Stage 3, identifying broad areas of search based on sustainable location criteria (including accessibility) and Stage 4, identification of constraints including flood risk (SED04, paragraph 3.16, page 14).

D2 The SE Dorset 'Environment Report' (SED10, *SE Dorset Strategy – Environment*, November 2005) comprised a thorough environmental analysis of all potential constraints and opportunities in the sub-region. This was supplemented by SED16 (*SE Dorset Strategy – Strategic Sustainability Appraisal*, November 2005) to ascertain which strategy would be the most sustainable for the sub-region, minimising potential adverse effects on environmental features. Key environmental features assessed included:

- i. Ramsar sites, Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) and Environmentally Sensitive Areas (ESAs);
- ii. New Forest National Park;
- iii. Heritage Coast;
- iv. Areas of Outstanding Natural Beauty (AONBs);
- v. Highly vulnerable groundwater aquifers;
- vi. Landscape;
- vii. Agricultural land quality
- viii. Biodiversity (Flora and Fauna)
- ix. Water including Sea level rise and flooding
- x. Cultural Heritage
- xi. Landscape/Townscape
- xii. Air Quality
- xiii. Waste

D3 The identified constraints and environmental issues were overlaid to generate broad areas of search within which to consider urban extensions (SED04, figure 1, page 12). Subsequent to this exercise more detailed technical work was undertaken to refine the broad areas of search through the application of more rigorous test criteria, eighty in total (SED04, table 4, pages 19-21), resulting in a reduced number of potential locations, as well as their respective size. The results of this exercise can be seen in Table 5, 'Refined Selection of Search Areas' (SED04, page 21).

D4 In addition, SED16 assessed alternative strategies against the different environmental issues. SED16 concluded that strategy 1¹, 2A² and 2B³ potentially have moderate adverse impacts on the SSA objectives, of which the environment is one. This conclusion fed into the overall strategy analysis influencing the direction and scale of growth.

D5 The RPB considers that based on the wealth of technical evidence undertaken in the SE Dorset JSA there is sufficient robustness to demonstrate that environmental issues have been fully addressed. The involvement of English Nature (EN), now Natural England (NE) on the JSA Steering Group adds credibility and robustness of the process followed.

D6 'PPS25 Development and Flood Risk' (December 2006), requires a Regional Flood Risk Appraisal (RFRA) to be carried out to inform the RSS. This national policy requirement was established after the Draft RSS was published. However, considerable work has been undertaken as part of development of the Draft RSS to take into account flood risk.

¹ Strategy 1 is to develop within the existing Principal Urban Area (PUA – includes Bournemouth, Poole and Christchurch conurbations).

² Strategy 2A is Strategy 1 plus development on edge of PUA sites (urban extensions)

³ Strategy 2B is Strategy 2A plus development at sites on edge of Wimborne and Ferndown.

- D7 The 'South West Regional Flood Risk Appraisal' (February 2007), completed by RPB and the Environment Agency (EA), used EA modelling to broadly assess areas at potential risk of flooding, consistently across the region, focussing in particular on the SSCTs and strategic infrastructure. This was supplemented in discussion with local authorities to reflect the more detailed work undertaken by each JSA. Key issues from known information indicate that in broad terms land at Christchurch and Poole will be heavily influenced by tidal and fluvial flooding and land at all of the major settlements in the conurbation are at risk from coastal flooding.
- D8 The section 4(4) authorities have undertaken an assessment of potential flood issues, including sea level rise and groundwater flooding. The assessment recognised that the most sustainable option for growth would be to focus development in the SSCT. The 'Urban Extension Re-assessment Report' (UERR) (February 2007, Appendix A, pages 23 - 30), identifies flood risk as a significant factor, but not a 'showstopper' and recommends that it is a priority for further investigation. The RPB considers that the technical work undertaken in this area of search validates the strategic ability of these areas to accommodate urban extensions of about 3,000 dwellings, policy SR29 (Draft RSS).
- D9 Development plans are subject to 'appropriate assessment' under the Habitat Regulations⁴ to demonstrate that their implementation will not adversely affect designated European sites⁵ (Matter 1/2 specifically addresses 'appropriate assessment'). The Habitat Regulations Assessment (HRA) is based on a rigorous application of the precautionary principle and therefore requires those undertaking the exercise to prove that the plan will not have a significant impact on these conservation objectives. Where uncertainty or doubt remains, an adverse impact should be assumed.
- D10 The SE Dorset JSA commissioned Footprint Ecology to gather evidence to support a HRA of the sub-regional strategy. Working in close cooperation with NE, the EA and other stakeholders Footprint Ecology employed statistical data and measures to show the potential impact⁶ that development could have on designated sites, especially heathland areas. Assumptions were then made for the level of mitigation needed to offset any potential adverse impacts on the European sites.
- D11 The HRA of the Draft RSS acknowledges that some policies could potentially cause adverse effects on the SE Dorset heathlands. General safeguards have already been included to limit the pressure on the environmental assets from policies on tourism, recreation and other urban pressures. It has however been recommended in the HRA that more emphasis is put on addressing potentially adverse impacts on

⁴ Conservation (Natural Habitats &c) Regulations 1994

⁵ Collectively European sites are termed 'Natura 2000' [N2K] sites and comprise Special Areas for Conservation [SACs], candidate SACs [cSACs] and Special Protection Areas [SPAs]). PPS9 notes that potential SPAs (pSPAs) & Ramsar sites should be included in the assessment.

⁶ Footprint Ecology concluded a rise in visitor pressure of 1.4-1.8 % by foot and 9.8-13% by car. This was modelled on Draft RSS housing allocations and later household projections.

specific sites and also promoting mitigation measures where pressures are already having an adverse effect⁷.

D12 As part of the assessment of the Dorset Heaths, the HRA has drawn on the work recently done at the Thames Basin Heaths SPA for the South East of England Plan. In the Assessor's Report recently submitted for Thames Basin Heaths SPA, it was concluded that:

“...a ‘three-pronged’ approach is needed to avoid and mitigate adverse effects on the Thames Basin Heaths SPA including zones for development restriction close to the SPA, provision of SANGS⁸ and access management measures.”⁹

D13 In SE Dorset the HRA has highlighted the River Avon SAC, Dorset Heaths SAC, Dorset Heathlands SPA and Ramsar and Avon Valley SAC and Ramsar as being sites where further study is required to ensure that proposed development does not have the potential to adversely effect the integrity of the Natura 2000 (N2K) sites. The relevant LDDs will need to protect these sites' integrity from adverse effects and the likely need for HRAs at the more detailed planning level. In recognition of the severity of the implications arising from the HRA in SE Dorset the RPB proposes that an additional policy is included in the Draft RSS to support the Dorset Heaths (Appendix 1), implemented through a joint LDD.

D14 The Draft RSS acknowledges that SE Dorset is privileged to have a wide selection of environmentally designated sites and also an internationally important coastline. The statutory bodies NE and the EA have been consulted throughout the HRA process and have agreed the chosen methodology and use of information. The RPB considers that growth proposals in the Draft RSS adequately recognise the need to avoid negative impacts on the integrity of the environmental assets in the SE Dorset conurbation. The RPB is therefore satisfied that it has adequately assessed the situation of the Dorset Heaths and with the inclusion of the proposed policy (Appendix 1) adequate safeguards for the significant environmental assets in the sub-region will be in place, to avoid adverse impact and integrity of Natura 2000 sites.

E) Have infrastructure considerations been adequately taken into account?

E1 As part of the JSA process, SE Dorset produced an implementation plan (SED03, *SE Dorset Strategy – The Implementation Plan*, November 2005) which seeks to identify the strategic infrastructure required to deliver the strategy. Appendix 4 (SED03) pulls the estimated costs of

⁷ LUC on behalf of SWRA (Feb 2006) Habitats Regulations Assessment, Draft RSS, para 4.90

⁸ Suitable Alternative Natural Green Space.

⁹ Thames Basin Heathlands Report, paragraph 4.89.

various pieces of infrastructure together and attempts to establish funding sources.

- E2 In summary, the technical work indicated that total costs in the sub-region would amount to about £1.865 billion. Reflecting on funding sources such as the Regional Funding Allocation (RFA), Section 106 (S106), local authority sources and other sources, the conclusions of the report suggest that whilst developer contributions were estimated to be in the realm of £580 million, there would be a potential requirement on public and external funding to bridge the £1.285 billion gap (SED03).
- E3 It should be noted however that the infrastructure list does include some items that have yet to be tested fully through a transport analysis and will therefore require further assessment. Mitigation measures to reduce the impact on the strategic network, particularly by the urban extensions, may not have been fully factored in at this stage. Likewise, when compared to Swindon's potential tariff mechanism, there may be other areas of financial sources which could reduce the 'gap'. However, work in this area has yet to be undertaken to the level of detail required. Furthermore, there may also be other funding streams which could assist in reducing any 'gap', for example Local Transport Plans (LTPs).
- E4 Whilst there may be a potential infrastructure funding 'gap' the Implementation Plan (SED03) concluded that:
- “Through this Plan, the Strategy has been shown to be generally robust and realistic in that there are potential delivery mechanisms. However, the success of the delivery will rely on partners, developers and agencies investing in the area and on funding sources being available. Government funding will be sought through Housing Bids and LTP procedures for significant components of the strategy. There may still be funding gaps for which government funding will be sought.”* (Appendix 4, page 3)
- E5 Transport infrastructure considerations have been taken into account as part of the JSA work. The South East Dorset JSA Transport Study (SED08, *SE Dorset Strategy – Transportation*, November 2005) assessed spatial options utilising the SE Dorset traffic model, supported by qualitative assessments of urban extensions and specific studies for particular options. Whilst it is accepted that further technical work will be required to add robustness to this modelling (of which recent funding from the 4(4) authorities and New Growth points Bid monies will assist) the infrastructure identified in the Draft RSS (page 85) is consistent with the findings of the JSA conclusions and considered appropriate to deliver the strategy. Further technical work should address the collective impact from the urban extensions on the whole network. Measures identified to date include:
- i. Prime transport corridor improvements;
 - ii. Poole Bridge regeneration network;

- iii. Increased demand management by transferring more road space to priority vehicles and managing the supply and use of parking;
 - iv. Investment in public transport, walking and cycling;
 - v. A31 to Poole corridor improvements;
 - vi. Improvements to rail links to other major centres in the South West.
- E6** The Draft RSS identifies improved access to Bournemouth Airport as a key infrastructure requirement and:
- i. Provision of a new passenger terminal and package of measures to improve access, including a link road to the A338 (subject to further work). To meet the requirements of the Aviation White Paper further studies will look at future access requirements to Bournemouth Airport. The Bournemouth Airport Draft Master Plan, Consultation Document (July 2006) will replace the existing Airport Surface Access Strategy (ASAS); however, a number of measures from the ASAS have been prioritised by the LTP (*SE Dorset Local Transport Plan (2006-2011)*, pages 54-55).
- E7** The Draft RSS identifies improved access to the port of Poole as a key infrastructure requirement and:
- i. Deeper access channel and berth improvements (subject to further work). Additional study work will be commissioned to look at options for reducing congestion on the A31 to Poole corridor, where a scoping study has previously been prepared, (LTP p.25) as well as improving access to the Port.
- E8** The RPB considers that the strategy for the SE Dorset sub-region offers the greatest opportunity to create a more sustainable pattern of development. Further technical work is being undertaken to update the sub regional transport model to refine the investment requirements needed to support the implementation of the strategy as well as major scheme bids. Additional work is being commissioned to look at options for reducing congestion on the A31 to Poole corridor, where a scoping study has been prepared, as well as improving access to the Port.
- E9** Overall, the RPB considers that at the present time and based upon the best available information transport infrastructure considerations have been adequately taken into account. The Urban Extension Re-assessment Report (UERR) concludes that the range of quantitative and qualitative assessments has informed the selection process and the need for certain highway schemes, although further evidence to support these conclusions would be beneficial. (*Urban Extension Re-assessment Report*, February 2007, Summary and scoring, page 107).

E10 In December 2005 the Government invited expressions of interest from local partners across England to put forward proposals for sustainable growth, which could form the basis of a long term partnership with Government and assist the delivery of growth. Applications were invited from authorities proposing an average rate of new house building at least 20 per cent higher than set in plans in October 2003 (in the South West this refers to RPG10) and delivering at least 500 new houses per year. In supporting these areas as New Growth Points (NGP) the Government is entering into a long-term partnership, subject to the statutory regional and local planning process.

E11 NGP is not a statutory designation. Regional Spatial Strategies (RSSs) set out strategic policies and proposals that shape the distribution of regionally or sub-regionally significant activities and development including, amongst other things, the scale and distribution of new housing. Poole has received provisional approval from a successful bid, as identified overleaf.

<i>Proposed Project</i>	<i>Capital/ Revenue</i>	<i>2006/07</i>	<i>2007/08</i>	<i>NGP Contribution</i>
Poole Bridge Regeneration Initiative	C		£625,000	£625,000
Poole Town Centre Transportation Model	R	£55,000		£55,000
SE Dorset Transport Model Phases 1 & 2	R	£10,000	£90,000	£100,000
Total				£780,000

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

F1 Development Policies A, B & C (Draft RSS) seek to promote a spatial distribution of growth that captures the economic opportunities present in the region whilst focusing significant development at the larger SSCTs. This strategy, collectively with policy SD4 and section 5, 'Regional Approach to Transport', seeks to collocate housing and employment,

thereby enhancing the opportunity for people to live and work in close proximity, thus increasing the potential to reduce commuting and encourage walking and cycling. This approach also enables economies of scale for public transport patronage to be maximised.

- F2 Specifically at SE Dorset, the strategy is to focus development within the Bournemouth, Poole and Christchurch urban areas, reflecting the implications arising from the Habitat Regulations, with urban extensions proposed to locate housing and employment in close proximity to increase the level of self-containment and reduce the need to travel. Development within the urban areas is proposed to be concentrated along transport corridors, near to public transport hubs.
- F3 The JSA study highlighted the fact that the conurbation would be likely to experience increasing levels of congestion without investment and management measures being put in place. The joint LTP for South East Dorset identifies Prime Transport Corridors (PTC) figure 2.3, which are to be the focus of investment in the first part of the plan period.
- F4 The key objectives of the SE Dorset Vision are to achieve a transport system that is capable of accommodating the proposed level of growth whilst reducing dependence on the car, delivering a step-change in public transport provision that is reliable, safe, affordable and accessible, and investing in traffic management solutions and the road network.
- F5 The Draft RSS strategy integrates land use with transport investment and management measures by focusing higher density development at “hubs” along these corridors. This approach will reduce the need to travel as well as providing an opportunity to generate a modal shift. A package of measures is being developed for each corridor with the objective of creating bus priority as well as addressing junction capacity problems. The RFA includes provision for Intelligent Transport Systems to be used on the transport corridors in the period to 2016. The Poole Bridge package of measures seeks to improve public transport and other access requirements to assist regeneration.
- F6 A criterion used in the preliminary consideration of potential areas of search was the possibility that these areas posed for utilisation of sustainable transport options: access to non-car and public transport were considered, as well as the potential of the location to accommodate mixed use development (SED04, page 11). It was on the basis of this preliminary consideration that areas were eliminated or selected for more refined study.
- F7 A concerted policy of demand management will be pursued in the sub-region. The parking pricing strategy in Bournemouth and Poole Town centres will seek to ensure that although parking spaces numerically will rise in accordance with economic and retail growth of these centres, the proportion of spaces available for commuters will fall (LTP, page 58). Parking restrictions will also be employed on the PTCs to complement the creation of new bus lanes (LTP, page 59).

- F8 The LTP also includes a bus strategy and policies for cycling and walking. Central measures to be included within the bus strategy are Intelligent Transport Systems (ITS) with a primary focus being the PTCs; and in particular of Real Time travel Information (RTI) (LTP, Page 51). Off the main corridors, demand responsive transport will be implemented (LTP, page 50).
- F9 With respect to cycling, the development of a comprehensive cycling network is envisaged, including strategic developments to the existing route (LTP, pages 51-52). More off-road facilities and more cycle lanes will be created to make cycling safer (LTP, page 99). A travel plan strategy is also to be introduced (LTP, page 55).
- F10 In summary, the RPB considers that transport accessibility has been incorporated into the areas of search selection process, whilst the strong urban focused development strategy has been complemented by the PTC approach and concentration around transport 'hubs'. The spatial strategy is considered the most appropriate approach to reduce the need to travel.

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

- G1 Policies SS8 & SS9 (RPG10) states that:
“Local authorities, developers, infrastructure and transport providers and other agencies should work together to achieve the following for the Bristol/Bath area:

- i. A review of the Green Belt in accordance with Policy SS4;” (*exert*)

Policy SS4 (RPG10) seeks to ensure that when considering long term sustainable development needs the Green Belt boundaries should be critically reviewed, both for the removal of land “...if, on balance, this would provide the most sustainable solution for accommodating future development requirements”, or the inclusion of additional land where it would be “...clearly necessary for the purposes set out in PPG2.” (Policy SS4, RPG10).

- G2 Information Note 4 ‘Joint Study Areas’ (SWRA07), specifically Annexes 5b and 5c clearly require all three respective JSAs where Green Belts apply (West of England, Gloucester/Cheltenham and SE Dorset) to review the general extent of the designation in the light of development over the plan period. The SE Dorset JSA undertook a review of the SE Dorset Green Belt, South East Dorset Strategy, Development Options (SED04) pages 31 to 46. This review assessed the designation against the purposes of Green Belt as well as further criteria.

- G3 Subsequent to RPG10 and the section 4(4) advice the RPB commissioned Colin Buchanan to undertake a ‘Strategic Green Belt Review’ (SWRD30.05) on those respective JSAs containing Green Belt designation, assessing the robustness of their methodology and extent of their coverage (SWRD30.05, paragraph 1.1.2), in accordance with the five purposes of including land in Green Belts, PPG2 ‘Green Belts’ (PPG2, paragraph 1.5).
- G4 Key conclusions from the Buchanan review (SWRD30.05) for SE Dorset was that the JSA technical work:
- i. Reviewed the five purposes as stated in PPG2 including a wider range of criteria (paragraph 4.3.5);
 - ii. Reviewed all of the Green Belt (paragraph 4.4.3);
 - iii. Concluded landscape assessment was assessed (paragraph 4.5.3);
 - iv. Sustainability assessment undertaken separately to Green Belt review with some overlap (paragraph 4.6.2);
 - v. Differentiates between different areas (paragraph 4.8.2).
- G5 The Buchanan Report (SWRD30.05) recognises that SE Dorset benefits from a detailed understanding of housing and employment targets and a detailed site search (ignoring the Green belt policy) and selection process based on sustainability criteria (SWRD30.05, paragraph 4.9.2). The report recognised the greater rigor to the SE Dorset assessment in that it identified the relative parts of Green Belt by purpose, supplemented by a separate exercise for development areas analysing their sustainability. The purposes of Green Belt designation were then compared to the outcome of the sustainability exercise to identify areas that could be developed.
- “This process means that strategic choices are able to be made, taking into account purpose of Green belt and other relevant strategic implications of growth.”* (SWRD30.05, Paragraph 4.9.10)
- G6 Reflecting on the Buchanan Report (SWRD30.05), the RPB considers there is sufficient robustness to the process followed in relation to assessing the merits of Green Belt with regard to the five purposes identified in PPG2. Taking account of the scale of growth proposed, the inability of the urban areas to accommodate such growth and the sustainability analysis identifying areas of search (M, N, O, P and Q), their respective performance against PPG2 purposes confirms that they are the most sustainable directions of growth having varying degrees of impact on Green Belt designation. Consequently, the general extent of the Green Belt should be amended to remove the areas of search M, N, O, P and Q from Green belt designation as they are the *“most sustainable solution for accommodating future development requirements”*, (RPG10, SS4).
- G7 The RPB wishes to draw the Panel’s attention to the removal of Green Belt designation at Bournemouth Airport for the following reasons:

- i. The Draft RSS does not seek to inhibit the economic opportunities arising at Bournemouth Airport through its role as a regionally significant employment site and therefore removes land from the general extent of the Green Belt, the detailed boundaries to be determined through the appropriate Local Development Document (Appendix 2).
- ii. The Draft RSS provides for the delivery of the Aviation White Paper (2003), highlighting an area for removal from the general extent of the Green Belt, the detailed boundaries to be determined through the appropriate Local Development Document, reflecting the Bournemouth Airport Draft Master Plan Consultation Document, 2006-2030. The RPB considers that the revised Green Belt wording proposed (Appendix 2) address the conclusions of the Draft Airport Master Plan.

G8 The RPB wishes to draw the Panel's attention to the opportunity through the Planning & Compulsory Purchase Act (2004) to make a request to the Secretary of State (SoS) to 'save' adopted structure plan policies beyond the automatic 3 year 'saved' period to avoid a policy void. In this particular instance the Bournemouth, Dorset and Poole Structure Plan 2011 (formally Dorset County Structure Plan), adopted July 2000 - 'saved' period expires 28th September 2007.

G9 Whilst RPG10 is the operative RSS for the region, and the outcome of the Draft RSS 2026 has yet to be determined, the SWRA is aware that Settlement Policy F of the adopted structure plan (page 32) will be replaced, either with policy SR27 of the Draft RSS, or in an alternative form when the RSS is published. As RPG10 (policy SS4) does not define the general extent of the Green Belt, the adopted Structure Plan fulfils this role. The RPB is promoting alternative wording to policy SR27 (Draft RSS) to ensure it defines the general extent of the Green Belt, which it presently does not (Appendix 2). This will enable SR27 (or an alternative wording) to expressly replace Settlement Policy F in the adopted structure plan when the RSS is published.

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

H1 It was recognised early on in the development of the Draft RSS that levels of growth and change in the region would need to be carefully managed to ensure that development contributes to, rather than detracts from the quality of life in the region, and contributes to the aspirations of the strategy to support sustainable communities (Draft RSS, Policy SD4, page 16). An important component of this is provision of Green Infrastructure (GI).

H2 The RPB commissioned a region-wide study with English Nature (EN) to provide supporting evidence on the role of the Draft RSS in delivering GI.

This study provided the basis for developing the region-wide GI policy for the Draft RSS (page 138). Other policies in the Draft RSS support delivery of this GI policy, particularly Development Policy D (page 41) which requires that infrastructure (including GI) should be delivered in step with development. Similarly, Development Policy F (page 43) requires a master planning approach, particularly for major development areas, including *“provision of amenity space and GI to enhance the living environment and support improved biodiversity”*.

- H3 Green infrastructure is extremely important in delivering future growth in SE Dorset. In particular, it will form part of ensuring that mitigation measures required by the Habitat Regulations are met, as proposed in the new policy and text (Policy SR28A, Appendix 1). The ability to deflect people from the designated sites through alternative options in a coordinated manner across the whole of the sub-region, through green infrastructure, is a mechanism of achieving appropriate mitigation measures.
- H4 The local authorities in SE Dorset are developing a GI strategy to deliver this goal. However, the RPB is aware that proposals have been made in a Stour Valley Country Park Concept Plan (Participant No. 2017) illustrating how such a mechanism could be delivered. Whilst the RPB is not suggesting this is the precise solution, it is a practical example of how the issue could be addressed.

Appendix 1

South East Dorset: Proposed New Habitat Regulations Assessment Policy Wording – SR28A (After paragraph 4.3.11)

SR28A New residential development in the sub-region will be facilitated by measures to secure effective avoidance and mitigation policy of the potential adverse effects on the ecological integrity of the Dorset heathlands internationally designated sites.

The relevant local authorities will work with Natural England, supported by central and regional government and other relevant stakeholders, to encourage appropriate forms and designs of development and to secure, through policy in Local Development Frameworks including a joint Local Development Document, appropriate and deliverable mitigation, and mechanisms that will fund and enable implementation of these measures.

Replace paragraph 4.3.12 with the following text:

4.3.12a SE Dorset contains significant areas of heathland within three European sites and a Ramsar site¹⁰ designated for their international importance for nature conservation. The designations cover parts of six local authority areas in Dorset and raise both statutory and policy considerations that affect the potential for development within the sub-region.

4.3.12b Technical work undertaken by the strategic planning authorities has concluded that strategic scale urban extensions are inappropriate, due to their potentially adverse impact on sensitive wildlife and environmental sites, specifically those covered by the European Habitats Directive. In addition, the cumulative effects of development across the conurbation have pointed to the need for a strategic approach to the mitigation of anticipated adverse effects on these sites from growing urban pressures.

4.3.12c Local Authorities affected by the designations should address, in their Local Development Documents, the effects of development on these sites and adopt a policy framework to safeguard the integrity of the international sites whilst meeting development requirements. This policy framework should include:

- i. Policy(s) to prevent the intensification of residential development in areas close to internationally designated heathlands where it is not possible to mitigate the effects of new housing, and,

¹⁰ Dorset Heathlands Special Protection Area (SPA), Dorset Heaths Special Area of Conservation (SAC), Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC and Dorset Heathlands Ramsar site.

- ii. Policy(s) to secure mitigation that will remove the adverse effects on the integrity of these sites from additional residential development in the wider area of the sub-region.
- 4.3.12d A joint Local Development Document (LDD) covering the sub-region should be undertaken, including other neighbouring local authority areas if appropriate, to ensure that mitigation measures are coordinated and consistent and to secure their delivery. An Interim Planning Framework covering the period until 2009 has been adopted by the relevant Dorset local authorities with the aim of securing mitigation against new urban pressures. A joint LDD should be adopted so that it can replace the Interim Planning Framework. It should build on the experience gained through preparation and implementation of the Interim Planning Framework.
- 4.3.12e Mitigation set out in the joint LDD must be appropriate and sufficient to remove effects on integrity of the international sites from additional residential development. Key types of mitigation measure are:
- i. The provision of alternative land for recreational use so as to deflect and re-direct pressure from internationally designated sites.
 - ii. Changes in the use and management of suitably located land (e.g. adjacent to international sites) to enhance their ecological robustness and give greater management flexibility against effects on site integrity.
 - iii. Access management measures to reduce unauthorised activity, guide and educate the public, to reduce preventable disturbance and to coordinate measures between authorities and across the heathland area.
- 4.3.12f The joint LDD must set out a clear process for the funding and implementation of mitigation measures. A range of options for alternative open spaces should be considered and their effectiveness tested leading to the identification of strategically important areas of land for mitigation (whether publicly or privately owned) where this would assist with implementation. Monitoring of the delivery and effectiveness of mitigation measures will be needed and if necessary, should trigger review of the phasing and/or distribution and/or scale of housing provision.

Appendix 2

South East Dorset: Proposed Revised Green Belt Policy Wording – SR27

SR27 The inner boundary of the Green Belt will generally follow the edge of the main urban area as extended by the development proposed in the plan. The general course of the outer boundary will be some eight to thirteen kilometres beyond this inner boundary. Existing urban areas will be excluded from the Green Belt.

Land at Bournemouth Airport will be removed from Green Belt, the detailed boundary to be established in the Local Development Document, having regard to its role as a regionally significant employment site and the development needs of the Airport and the need to prevent encroachment into the open countryside, unrestricted sprawl and the setting and character of surrounding settlements.

Land within the areas of search identified in the Regional Spatial Strategy for urban extensions in South East Dorset will be removed from Green Belt, the detailed boundary to be established in the Local Development Document, including land required to serve development needs in the longer term.