

South West Regional Spatial Strategy

Examination in Public

Statement of Christchurch Borough Council

Matter 4/7

Bournemouth & Poole HMA Sub-regional strategy.



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Statement of Christchurch Borough Council – Summary.

- 1 This statement sets out the following concerns of the Council:
 - That the sub-regional strategy lacks a clear vision, and that the scope of policies is confused.
 - That debate over higher housing numbers lacks justification, and will potentially have significant impacts locally.
 - That the extent of Area of Search M, as shown on the key diagram, also lacks justification and will have adverse impacts locally.
 - That the RSS needs more robust policy on provision of key infrastructure, and should identify key projects to be funded regionally.
 - That this approach is particularly important for transport infrastructure projects such as Bournemouth Airport which should also be identified as the main employment site for the sub-region.
 - That the RSS should contain policies on delivery of green infrastructure.

- 2 Throughout the Council's statement, suggestions are made as to how the RSS should be amended to reflect these concerns, in particular:
 - There should be a vision statement or policy at the start of the South East Dorset section in the RSS, and that South East Dorset should be defined on the Key Diagram.
 - This vision should clearly set out appropriate policy approaches within the different parts of the sub-region.
 - It should explicitly be clarified whether Christchurch forms part of the SSCT, as set out in Table 3.1.
 - Area of Search M should exclude notation of land north of the main London to Weymouth railway line, and east of Burton village.
 - Housing requirements should reflect the robust figures put forward by the strategic authorities, and should, for Christchurch, indicate a lower rate of delivery in the earlier part of the plan period (2006-2016), than shown in table 4.1.
 - If consideration is given to accommodating higher housing numbers, then the alternative development strategy for Dorset, as put forward by the strategic authorities in December 2006, should be supported.
 - The list of key infrastructure projects set out in paragraph 4.3.14, should have policy status.
 - There should be a policy indicating which of these key projects will receive regional funding.
 - There should be explicit policy in the RSS relating to green infrastructure.

Matter 4/7

Bournemouth & Poole HMA sub-regional strategy.

Statement of Christchurch Borough Council

1 General

- 1.1 This statement sets out a response from Christchurch Borough Council to the questions posed by the EIP Panel relating to the Bournemouth & Poole HMA sub-regional strategy.
- 1.2 The Council very much welcomes the opportunity to participate in the Examination in Public.
- 1.3 The Council has read and fully supports the detailed responses made by the South East Dorset strategic authorities in relation to this topic. This response does not therefore repeat the broad representations made by the strategic authorities, but provides a response based on likely local impact of the sub-regional strategy.
- 1.4 Under each question, the Council has indicated the changes it wishes to see to the RSS, where applicable.

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 sub-regional roles and their relationship with other parts of the HMA?*

- 2.1 This Council considers that the sub-regional strategy for South East Dorset should begin with a much clearer vision and objectives for the area. Whilst policy SR25 provides a general strategy, it fails to recognise the complexity of accommodating development within the sub-region.
- 2.2 More detail is provided in paragraph 4.3.5 of the RSS, and, in particular, this recognises the need to plan for sustainable growth within the outstanding environment of the area. It also recognises that growth may have to be achieved in alternative ways to purely physical means.
- 2.3 However, the Council considers that even this text fails to provide a sufficiently detailed vision for the area.
- 2.4 Firstly, the sub-regional strategy needs to provide clarity on the extent to which the strategy applies across the sub-region. The policy approach set out in section 4.3 of the RSS appears to treat

Christchurch as part of the SSCT, and indeed, this has been the approach taken by the strategic authorities in their submission of detailed proposals to the Regional Assembly.

- 2.5 It is notable however, that Christchurch is excluded from the list of SSCTs in table 3.1 of the RSS (but which specifically mentions Bournemouth and Poole). This implies that the development strategy for Christchurch will focus on sustaining it as a self sufficient market town in line with RSS Development Policy B.
- 2.6 There is confusion of definition throughout the sub-regional strategy section in the RSS, for example:
- Policy SR25 refers to “enabling the SSCTs to develop and improve their roles as service and employment centres”.
 - Policy SR26 refers to local authorities working together to plan for “balanced growth of the conurbation (Bournemouth, Poole, Christchurch and its immediate hinterland)....”
 - Policy SR29 is focused on realising the potential of South East Dorset, but also refers to focusing on the intensification of Bournemouth, Poole and Christchurch’s urban areas.
 - Job provision is based on the Bournemouth & Poole Travel to Work Areas. The Bournemouth TTWA runs beyond Christchurch into the New Forest and to New Milton and Milford.
 - This EIP session is focused on the Housing Market Area which includes parts of North Dorset.
- 2.7 This is potentially, a recipe for confusion and lack of focus.
- 2.8 Clearly, South East Dorset (Bournemouth, Poole, Christchurch, parts of East Dorset and Purbeck) functions as a large, primarily urban area with a series of satellite towns and villages around it. It is quite appropriate to plan for this holistically on a sub-regional basis, and this Council supports the work of the sub-regional study to plan on this basis.
- 2.9 There should therefore be a clear definition of this sub-region, and a clear vision of how individual parts of the sub-region will be treated in development terms. This defined area should be shown on the key diagram.
- 2.10 The strategy should recognise the functional links which exist through the conurbation, for example by planning for a range of housing and employment to meet sub-regional needs, and to plan for strategic infrastructure provision. However the strategy should also recognise the different character of settlements within the sub-region.
- 2.11 Christchurch may be economically and functionally linked to the rest of the sub-region, but it has a quite different character to Bournemouth and Poole. At its heart, it is a relatively small market town, with an

important historic centre and coastal and riverside settlement pattern. There is limited scope to focus development outside the existing urban area, and it is generally appropriate to make best use of the existing urban area of the Borough.

2.12 However, given the size and character of the town, there is much less scope to achieve significant intensification of the urban area without

- Impacts on the historic character of the town centre.
- Altering the character of lower density housing areas which themselves form part of the character of the town.
- Reducing the range of family housing though higher density flats development.
- Impacting on important coastal and riverside townscapes.

2.13 In response to this question, the Council wishes to see the following changes to the RSS:

- 1. A vision based on one agreed defined area of the South East Dorset conurbation, set out at the start of section 4.3.**
- 2. This vision to recognise both issues which should be planned across the whole sub-region, particularly infrastructure provision, but also planning for appropriate levels of development in different parts of the conurbation.**
- 3 That this defined area should be shown clearly on the key diagram.**

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?

- 3.1 The Council considers that, given the housing figures proposed by the strategic authorities in their submissions to the Assembly, it will be preferable to meet part of this housing requirement through a sustainable urban extension.
- 3.2 The Council was involved in the process of selecting general locations for urban extensions as part of the South East Dorset sub-regional study, and considers that the identification of land around Roeshot Hill (now part of Area of Search M) represents the only realistic opportunity in the Borough to achieve a sustainable urban extension.
- 3.3 Development in this location will not be without impacts, and provision of infrastructure will be critical. Nevertheless, the development of approximately 600 dwellings in this location has the following benefits:

- It is well related to the urban area of the town, and reasonably close to the town centre and other facilities.
- There is potential to provide good road access, and to link the site to high frequency bus networks, and to the footpath and cycleway network.
- The site offers excellent opportunities to provide significant numbers of affordable dwellings.
- The site avoids significant constraints, and its bounding by the main London to Weymouth railway line means the urban area will have a defensible edge.
- The opportunity to provide approximately 20% of the Borough's housing requirement outside the urban area, will reduce the impact of higher density housing development on the urban and historic character of the town.

3.4 It is important to stress two points however. Firstly, the Council supports the strategic authorities position that the higher figures in the RSS lack justification. The figures submitted by the strategic authorities represent a maximum based on robust assessments of urban potential and capacity assessments of the urban extension areas. By implication, any increased housing figures must be supported by a demonstration of how they will achieve the vision for the sub-region and avoid detriment to the character of urban areas.

3.5 South East Dorset generally, and Christchurch in particular, offers few significant opportunities for urban renewal to achieve high quality housing developments. In contrast, the housing requirements of the RSS will be met primarily through small to medium sized sites developed on a windfall basis. In Christchurch, a total of just 55 units remain to be developed on 5 allocated sites in the adopted Borough Local Plan, and the Council has not identified significant new brownfield opportunities for housing as part of its urban potential work.

3.6 It follows that any attempt to meet the revised household projections through even higher levels of housing in the South East Dorset sub-region would have significant detrimental effects on the character of the urban area. This Council supports the conclusions of the strategic authorities that, to meet these forecasts, an alternative development strategy must be adopted.

3.7 Secondly, this Council supports only an urban extension area based on the assessment carried out through the South East Dorset sub-regional study. The draft RSS proposes an area of search which extends to cover land east of Burton, a village to the north of Christchurch. This area was specifically rejected as a potential location for an urban extension during the sub-regional study assessment for the following reasons:

- Development in this location requires access to the road network along Stony Lane, through a "pinch point" under-bridge

beneath the main railway line. This road, and its roundabout junction with the A35, is already a source of significant congestion on the local road network

- Development in this area would encroach much more significantly into attractive open countryside, with less defensible boundaries.
- It would represent much more of a village extension to Burton than an urban extension to Christchurch.
- There would be potential impacts on the conservation area in Burton and through development in close proximity to the New Forest National Park.

3.8 In response to this question, the Council wishes to see the following changes to the RSS:

- 1 The housing requirements in the RSS be reduced to reflect the robust figures produced by the strategic authorities in the South East Dorset sub-regional study, therefore to a total requirement for Christchurch of 3,200 dwellings 2006-2026 (160pa).**
- 2 That the urban extension Area of Search M, as identified on the key diagram, should be restricted to land south of the main London to Weymouth railway line, thereby excluding the area of land east of Burton village.**
- 3 That, in considering a strategy for meeting increased household projections, the alternative strategy proposed by the South East Dorset strategic authorities in their further advice dated December 2006, should be included in the RSS.**

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?

- 4.1 The Council considers that this is primarily a matter for the strategic authorities, and the statement of these authorities is supported.
- 4.2 The assumptions made in table 4.1 of the Regional Spatial Strategy are that Christchurch will see a higher rate of development in the first 10 years of the plan period 2006-2016.
- 4.3 The Council has concerns with this assumption. It appears to be justified by text at paragraph 4.3.11 of the RSS which states:

.....a higher rate of housing growth is likely to occur in the earlier part of the plan period up to 2016 (and, in particular up to 2011). This is due to the fact that there are some significant sites within the urban area

which are planned for delivery within these earlier periods, notably those within the area of the Poole Bridge Regeneration Initiative and neighbouring central sites. After 2016, the opportunity for bringing forward major urban sites will be limited, and so annual completions will rely more heavily upon windfall sites.

- 4.4 Within Christchurch, a very significant proportion of housing does, and is predicted to, come from small windfall sites. Whilst certain parts of the conurbation, notably Poole, have clear opportunities for early delivery of considerable amounts of housing, this is unlikely to be mirrored in Christchurch.
- 4.5 Predictions from the Council's urban potential studies (currently under review), show annual completion rates reducing over time from present levels of 160 per annum, downward to 145pa by 2011 and to 125pa by 2016. This reflects the constrained nature of the urban area, and the lack of opportunities to deliver significant housing sites.
- 4.6 In addition, the Council considers that there is considerable assessment work to be carried out on the urban extension area of search, in order to produce a defined allocation, and to set a comprehensive planning framework. In particular, the nature of transport infrastructure will be influenced by work on a review of the South East Dorset Transport Model, work which is not expected to report until 2009/10.
- 4.7 The Council has programmed work on an Urban Extension development plan document, but does not anticipate adoption of this document until late in 2011. It may therefore be reasonable to assume that the bulk of development on this urban extension will come forward after 2016.
- 4.8 In response to this question, the Council wishes to see the following changes to the RSS:**
- 1 The housing requirements in the RSS Table 4.1 should be revised for Christchurch to show a more even spread across the plan period, with a slightly higher proportion of housing delivered in the period 2016-2026.**
 - 2 The Council proposes the following figures, firstly an amendment of the existing RSS range, to which it has objected above, and secondly a phasing based on the strategic authority figures of 3,200 dwellings at 160 per annum average.**

Scenario	2006-2026	2006-2016	2016-2026
Existing RSS	165-180pa	200pa	130-160pa
Amended RSS Range	165-180pa	150-165pa	180-195pa
4/4 Authorities Range	160pa	135pa	185pa

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?

- 5.1 To an extent, the issues raised in response to this question are the same as already set out in the response to question a) above.
- 5.2 In terms of Greenfield locations for new development outside the existing urban boundary of Christchurch, there is only one potential location for such development which would not be either within a flood plain, or within 400m of designated SPA habitats, within which Natural England would be likely to oppose further residential development.
- 5.3 Residential development in the entire Borough falls within the 5km zones of designated SPA habitats now subject to the Heathland Interim Planning Framework. This acknowledges that such development could potentially affect these sensitive habitats and should therefore contribute toward a package of mitigation measures.
- 5.3 This remaining area covers land at Roeshot Hill and east of Burton village, in part already identified as an area of search (M) for an urban extension in the RSS.
- 5.4 Even the levels of development proposed in the RSS are likely to create challenges in terms of ensuring that potential impact on designated sites and other environmental constraints are managed.
- 5.5 Any attempt to push for higher housing numbers within south east Dorset, is likely to have the following adverse impacts:
 - Pressure to develop all remaining Greenfield land outside 400m of designated habitats, and therefore raising concerns over the issues set out by the Council at paragraph 2.12 above.

- Pressure to squeeze much higher density of development within the urban area, perhaps increasing demands to develop on land at risk from flood, or in closer proximity to designated sites.

5.6 In response to this question, the Council wishes to see the following changes to the RSS:

- 1 The housing requirements in the RSS be reduced to reflect the robust figures produced by the strategic authorities in the South East Dorset sub-regional study, therefore to a total requirement for Christchurch of 3,200 dwellings 2006-2026 (160pa).**
- 2 That, in considering a strategy for meeting increased household projections, the alternative strategy proposed by the South East Dorset strategic authorities in their further advice dated December 2006 is included in the RSS.**

e) Have infrastructure considerations been adequately taken into account?

- 6.1 Failure to at least match infrastructure provision with new development has the capacity to fundamentally undermine the sub-regional strategy for South East Dorset.
- 6.2 This Council's experience is that often, public opposition to development, especially housing development, stems not from the impact the development would have in itself, but from a belief that existing infrastructure and services simply cannot cope with current demands, and that new development is unlikely to contribute to better infrastructure provision.
- 6.3 In Christchurch, this belief is exacerbated by the pattern of housing development coming forward on small to medium sized windfall sites. The vast majority of development provides no on-site infrastructure, and simply adds a financial contribution to a fund for future provision, inevitably creating a "lag time" between completion of development and mitigation of its impacts.
- 6.4 The Council welcomes the acknowledgements in the RSS that provision will be made in key infrastructure to deliver the strategy, but considers that this approach lacks the teeth to enable these aspirations to be realised.
- 6.5 In part this is an issue of drafting. The Council considers that the key infrastructure projects set out in the text of the RSS at paragraph 4.3.14 should form part of the key strategic development policy SR29, or as a separate main sub-regional policy. There is no sound reason why delivery of housing numbers and employment should have policy

status, yet delivery of the key infrastructure needed to accommodate this growth should not have equal weight.

- 6.6 More central however, is the extent to which it is reasonable to expect key infrastructure to be funded through developer contributions as part of the LDF process. Existing development patterns are likely to mean this is a complex and slow process, even allowing for a more integrated approach to policy making across the sub-region.
- 6.7 The Council is aware of work undertaken by the strategic authorities as part of their submissions to this EIP which estimates the total cost of infrastructure provision across the sub-region at a figure of £50,000 per dwelling. This is a significant cost, and it is unclear to what extent this will affect viability of development, or the potential costs in house prices passed on to the homebuyer.
- 6.8 This Council considers that the RSS should explicitly spell out the role of regional funding in the Implementation Plan. This is especially important for key sub-regional locations such as Bournemouth Airport, where the timely provision of vital infrastructure is essential to achieving high quality sustainable development, meeting RSS aspirations.
- 6.9 The Council has already proposed in its representations to the RSS, that Bournemouth Airport should be clearly identified as the main employment site to serve the future employment needs of the sub-region. On this basis, the site needs special consideration in terms of strategic infrastructure provision and funding.
- 6.10 The expectation that, on large sites such as Bournemouth Airport, major infrastructure must be solely funded through developer contributions is likely to be unrealistic, and to stifle the delivery of these key projects.
- 6.11 In response to this question, the Council wishes to see the following changes to the RSS:**
- 1 The key infrastructure projects set out in paragraph 4.3.14 of the RSS, included either within policy SR29, or given policy status through a separate policy. That policy should explicitly link the implementation of this key infrastructure provision with development.**
 - 2 That the RSS, particularly the Implementation Plan, should identify key development objectives, such as Bournemouth Airport, where regional funding will be used to secure timely infrastructure provision, as distinct from relying solely on developer contributions through the planning process.**

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

- 7.1 This issue is very closely related to the wider issues of infrastructure provision as set out in response to question e) above.
- 7.2 The list of infrastructure set out at paragraph 4.3.14 is welcome, but should be included as a policy requirement of the RSS and not simply set within the text.
- 7.3 Transport infrastructure in particular is an area where public perception is that increased development is adding to congestion without contributing to tangible improvements to the sub-regional transport networks.
- 7.4 Many of the transport schemes required to achieve a step change in the transport strategy for South East Dorset (e.g. Poole Bridge regeneration, A31 to Poole Corridor improvements, transport package for Bournemouth Airport) will be major projects, and financially costly.
- 7.5 The Council has already stated its opinion that the RSS should identify key infrastructure projects to receive regional funding in order to secure timely provision of infrastructure in advance of development, and to avoid a slow drip feeding of funding from small windfall developments.
- 7.6 Specifically in respect of Christchurch, there is strong political and public support for an outer relief road, the existing Christchurch Bypass being no longer fit for purpose. Traffic congestion throughout the town is now severe at peak periods, and throughout the day in summer. The Council considers that a Christchurch outer relief road should form part of the sub-regional transport strategy and that this project should be added to the list of schemes in paragraph 4.3.14.
- 7.7 In response to this question, the Council wishes to see the following changes to the RSS:**
- 1 The key infrastructure projects set out in paragraph 4.3.14 of the RSS, included either within policy SR29, or given policy status through a separate policy. That policy should explicitly link the implementation of this key infrastructure provision with development.**
 - 2 That the RSS, particularly the Implementation Plan, should identify key development objectives, such as Bournemouth Airport, where regional funding will be used to secure timely infrastructure provision, as distinct from relying solely on developer contributions through the planning process.**

3 That reference to investigation of routings for a Christchurch Outer Relief Road is added to the list of infrastructure projects in paragraph 4.3.14.

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

- 8.1 The Council has already indicated its general support for provision of an urban extension around Roeshot Hill, and that the need for, and benefits from this development are sufficient to justify amending Green Belt boundaries.
- 8.2 The Council does not support the extent of the urban extension Area of Search M, and considers that land north of the main railway line, and east of Burton village should remain as Green Belt.
- 8.3 One further matter requires justification, namely the reference in Policy SR27 to “exclude land at Bournemouth International Airport (subject to further technical work being undertaken).”
- 8.4 The Council supports the removal of Green Belt notation from the remainder of the airport site, as the designation contains an artificial constraint on future expansion of the airport. There is clear national, regional and local policy support for the expansion of aviation at Bournemouth, and it is considered that its inclusion in the Green Belt serves no useful purpose.
- 8.5 In response to this question, the Council wishes to see the following changes to the RSS:**

- 1 That the urban extension Area of Search M, as identified on the key diagram, should be restricted to land south of the main London to Weymouth railway line, thereby excluding the area of land east of Burton village.**
- 2 That Policy SR27 is amended to confirm the exclusion of land at Bournemouth Airport from the Green Belt, by the removal of the words “*subject to further technical work being undertaken.*”**

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

- 9.1 This Council supports the response on this issue submitted by the South East Dorset strategic authorities, that the RSS should contain a clear policy on the provision of Green Infrastructure, which is particularly critical in South East Dorset. The Council does not therefore intend to add further comments.

9.2 In response to this question, the Council supports the strategic authorities wishes to see the following changes to the RSS:

- 1 The RSS should set out the key objectives of green infrastructure in a general sense, for example:**
 - **To meet the recreational needs of new development;**
 - **To take account of essential mitigation measures where new development could threaten to have an adverse impact; and**
 - **To promote a sustainable and attractive sub-region by protecting and enhancing existing open spaces and providing new ones which support the previous 2 objectives.**

- 2 Establish that the precise nature, extent and purpose of green infrastructure, together with the delivery mechanism, will need to be set out in a joint development plan document, to be prepared by the affected authorities in South East Dorset (and also committed to in Local Development Schemes).**

- 3 Confirm that interim measures are in place in South East Dorset, as is the commitment to developing a joint development plan document.**