

**THE SOUTH WEST EIP**  
**STATEMENT OF EVIDENCE**  
**LYTCHETT MINSTER & UPTON TOWN COUNCIL (716), matter 4/7**

**BOURNEMOUTH AND POOLE SUB REGIONAL STRATEGY**  
**STATEMENT OF EVIDENCE**  
**MARCH 2007**

**General Summary.**

**The Lytchett Minster and Upton Town Council supports:**

- The Draft Regional Spatial Strategy as written.
- The agreed 105 new dwellings per year to be built in Purbeck District without harming the natural and built environment of the area.
- New development in sustainable locations that reduce the need to travel.
- Small scale developments outside the Strategically Significant Cities and Towns to meet the needs of local people and the local economy.

**Our Council opposes:**

- Strategically large developments where the developments, the supporting infrastructure and the improvement of existing inadequate infrastructure are not fully supported by adequate funding.
- Any strategic large development within the Purbeck District such as the proposed development of 3,000 new homes to be located in the area known as the Western Sector as proposed by J S Bloor (Newbury) Ltd. (576) (JSB).

Our objections relating to the given questions are given below:-

**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 other parts of the HMA?**

A1 Yes. We agree with the spatial outcomes set out in the RSS. Large increases in housing numbers should be contained within the SSCT's in order to minimise the consequences of extended travel to work journeys. Therefore any significant new development such as proposed by Bloor for the Western Sector would be unacceptable.

**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 proposed scale of development in the Draft RSS is acceptable when the Purbeck District environmental constraints are taken into account.

B2 Providing adequate funding is provided there are adequate opportunities for urban renewal within the Bournemouth and Poole SSCT. The new Poole Bridge regeneration should provide considerable new housing close to the Purbeck District boundary which will assist with the Purbeck District affordable homes need.

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- B3 Any large extension into the Green Belt such as the area to the west of Poole would not be acceptable for the following reasons:
- The proposed development would not be a sustainable development because it is not located at a strategically significant settlement and therefore it would not provide an acceptable balance between homes and jobs as specified in 2.5.10 of the Draft RSS.
  - A development such as the Bloor proposed 3000 homes would not include sufficient business development to provide work for all the new residents. Many residents would choose employment in Poole, Bournemouth, Wareham and other towns where there is a wider choice of employment. This would lead to many people travelling to work outside the Western Sector and for travelling for recreation in the tourist areas of the Purbeck District via the A351, which is already operating at maximum capacity. The above additional travelling will increase CO2 emissions contrary to government guidelines.
  - Parts of the proposed Western Sector lie within and close to the 400m housing exclusion zone of the Dorset Heathlands interim Planning framework 2006 – 2009 for Upton Heath. It is also close to the Wareham Forest Dorset Heathland site. The effect of such a proposed large development would cause harm to these international conservation areas due to the increased use by pedestrians, motor cyclists, cyclists, horse riders and dog walking even if restrictive measures were put in place.
- 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?**
- C1 Yes, but concern that an adequate transport infrastructure would not be provided at an early stage.
- 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 conservation areas around the conurbation?**
- D1 Yes, the Draft RSS does take adequate account of flood risk and the protection of environmental assets in Purbeck District. It should be noted that Purbeck is one of the most bio-diverse areas in England. Large areas of Purbeck come under the Habitats Regulation with approximately 21% being accorded European designation such as Special Protection Area SPA or special Areas of conservation (SAC). Purbeck's importance is recognised as having approximately 33% of the District designated as SSSI.

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- D2 One of the reasons why the RSS does not support large development to the west of Poole is that parts of the Western Sector or the JSB site come within the 400m heathlands constraint area or housing exclusion zone of the Dorset Heathlands interim Planning Framework 2006-2009 for Upton Heath and housing development should not be permitted in these areas.
- D3 The remainder of the JSB site or Western Sector is outside the 400m zone for the three internationally important conservation sites of Upton Heath, Wareham Forest and Poole Bay. In the Atkins report<sup>1</sup> English Nature objected to development in the Western Sector, beyond the 400m zone, because of the potential harm that would be caused by the cumulative impact of such development on the ecological aspects of these heathland sites. We support the above objection in the belief that such development would lead to irreversible damage to the conservation sites and wildlife therein, and ask that no development should be permitted in the JSB site
- D4 The proposed JSB development would result in considerable land use for the required highway improvements, general infrastructure recreational space and flood alleviation requirements. We consider the above would have a detrimental impact on the integrity of the heathland sites and would be an unacceptable loss of Green Belt.
- D5 Even if alternative natural green space were to be provided we believe that the proposed Western sector development would cause harm due to the above proximity of the sensitive habitats of Upton Heath, Wareham Forest and Poole Bay.
- D6 Due to the internationally important environmental constraints it would not be possible to build a bypass for the A351 or to add additional lanes to the Upton Bypass even if sufficient funds were available.
- D7 The Atkins Report on The Western Sector Feasibility Study has identified the following in relation to flood risk:

Quote - A number of potential water related constraints to development in the study area have been identified at this stage. Potential significant impacts related to water quality are described as follows which may significantly constrain the potential for development. The watercourse receiving rainfall runoff from the site is of good quality and is subject to nature conservation designations. They also eventually discharge into two harbours of amenity and ecological importance - Poole and Christchurch harbours. It is therefore likely that the discharge of foul and surface water from the study area will be subject to stringent constraints.

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<sup>1</sup> Atkins Western Sector Feasibility Study Dorset Final Report January 2005

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Obtaining additional discharge consents (foul and surface water) is therefore potentially a significant constraint for the development of the study area. To minimize the impact of a development on runoff rates, water quality and groundwater recharge, a Sustainable Drainage System (SUDS) may be required. This could require a significant land-take around the study area, of the order of 5-10% of the development area.

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

- E1 We feel the RSS has taken into account infrastructure constraints to the west of Poole. The Atkins Report also showed there was concern over the cost of any required infrastructure.
- E2 Our Town Council strongly objects any proposal to build 3,000 new homes on land to the west of Poole as this would dramatically increase the current overload on existing highway systems. That is on the A351 between the Bakers Arms and Wareham, the A35 travelling in both directions around the Bakers Arms roundabout and the roads into Poole and Bournemouth. These roads are already very congested during peak periods with considerable delays on peak period journeys to and from Poole and Bournemouth and especially on the A351 at weekends and at peak times. Although the majority of new residents that would be generated by the JSB Proposal would travel to work along the A35 to Poole and Bournemouth a number of them would inevitably use the A351. However, at weekends and in the evenings a very considerable number of the additional vehicles would be using the A351 for their recreation in Wareham and in the Purbeck's
- E3 In 2002 the proposal for a Holton Heath A351 By-Pass was rejected by an inspector (June 2002 inspectors report) because of English Nature's environmental concerns. At that time the Buro Happold Study<sup>2</sup> considered the A351 was operating at its maximum capacity, consistently carrying 20,000 vehicles per day. These figures demonstrate that this section of road is effectively saturated. In the Purbeck Transportation Strategy it is planned to carry out some highway changes in order to reduce the flow of traffic on the A351. However it was stated that the expected reduction in vehicle numbers would again increase over a number of years. Dorset County Council modelling work shows a predicted 33% increase in traffic in the area by 2026 and this would require major investment for the existing highway system.
- E4 Our Council is concerned that the already stretched facilities such as schools and health services would be overloaded to breaking point if the Bloor proposal for 3,000 additional homes were to be permitted. Please note that the current number of dwellings in Lytchett Minster & Upton is 3100, and therefore 3,000 new homes would be a 100% increase on the number of homes in Upton. This dramatic increase would create a tremendous strain on existing infrastructure.

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<sup>2</sup> Buro Happold, Purbeck Transportation Study, 2004

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- E5 We consider that the proposed JSB development would not be sustainable, in that the development would not be of sufficient size to include adequate facilities for the new residents and therefore they would have to travel to the surrounding towns for their work, education, shopping, recreation and other facilities.
- E6 The Lytchett Minster (Upper) School, the Upton and Lytchett Matravers Junior Schools are already running at full capacity and to almost double the catchment area would mean that additional Junior and Upper schools would be needed to cope with the extra numbers.
- E7 Recent cuts have cancelled the public transport between Upton and Poole via Hamworthy and the service between parts of Upton and the Upton Town Centre and public transport within Upton/Lytchett Minster is minimal. This would need vast improvement by the private sector who are reluctant to provide the required transport
- F) Do the proposals adequately reflect the need to reduce the need to travel, support the use of public transport and minimise congestion?**
- F1 Yes, our council consider that by keeping the majority of new development within the confines of the SSCT'S will minimize the need to travel to work and other facilities.
- F2 The Council objects to any strategic scale urban extension outside the SSCT'S as that would have a substantial impact on the need to travel. Indeed, this is already the case in settlements such as Lytchett Matravers which exhibit a very high level of commuting. The current travel to work pattern suggests that 61% of residents within this locality commute into the Bournemouth/Poole urban area. Even if employment were provided within any new urban extension it is likely that many residents would still commute in order to assess the choice and range of employment opportunities in Bournemouth and Poole. In comparison to the existing settlements that have developed incrementally, it is considered that out-commuting is likely to be exaggerated reflecting the time delay in establishing new businesses or in the case of business relocation, take on new/additional staff. The points outlined above are acknowledged in the work Atkins study into the feasibility study of the Western Sector.
- G) Are the proposed modifications to the Green Belt adequately justified?**
- G1 Our Council supports the general extent of the South East Dorset Green Belt in Purbeck District as defined in the Draft RSS.
- G2 The proposed area of search for the JSB development is part of the Green Belt which in our opinion should not be allowed to be developed.
- G3 The Green Belt is important within the Purbeck District in order to maintain the separate identities of existing towns and villages in the historic tourist setting of Purbeck District. The purpose of the Green Belt as set out in PPG2 is:

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- To check unrestricted sprawl of large built up areas
- To prevent neighbouring towns and villages from merging into one another
- To assist in safeguarding the countryside from encasement
- To preserve the setting and special character of historic towns and villages

The intrusion of the proposed JSB development into the Green Belt would result in an unacceptable contiguous urban sprawl extending the Bournemouth and Poole conurbation to include Upton, Lytchett Minster and Lytchett Matravers which is in opposition to the Green Belt policy.

G4 A thorough approach has been taken to the reviewing of the Green Belt. The Secretary of State made clear in his acceptance of the Panel's recommendation for a green belt in South East Dorset that it should be some 5 to 8 miles wide with the inner boundary following the edge of the existing main built-up area (South East Dorset Structure Plan Notice of Approval, Section 8, 1980).

G5 This matter was re-examined at the EiP of the Alteration to the South East Dorset Structure Plan. Here, although the Panel recommended modification to the green belt policy to allow for the inclusion of safeguarded land, the Secretary of State did not accept this recommendation. While recognising that the inner boundary had been drawn very tightly to the edge of the urban area, he weighed this against the fact that South East Dorset is subject to major environmental constraints that require a long term commitment to a policy of restraint in which the Green Belt has a major role to play. It was felt that the built-up area of South Dorset could not continue to expand and that as development came up against definitive limits consideration would have to be given to the need to accommodate these pressures in other ways (First Alteration to the South East Dorset Structure Plan, Notice of Approval, 1990, Section 5). Similarly, the Panel Report on the County Structure Plan, 2000. saw no case for the inclusion of safeguarded land.

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

HI No comment.