

**BOURNEMOUTH AND POOLE HMA SUBREGIONAL STRATEGY  
STATEMENT OF EVIDENCE  
MARCH 2007**

***Executive Summary***

***Purbeck District Council wish to see:***

- New development that is capable of being delivered without harm to the outstanding natural environment of the Bournemouth Poole HMA.
- 'Managed growth' and 'Smart growth' are essential strategies for the Bournemouth Poole HMA in supporting the local economy and the cultural vitality of the Bournemouth Poole HMA.
- Small scale development specifically to meet local needs outside of the SSCT's where supported by employment opportunities, social and physical infrastructure.
- New development in sustainable locations that reduce the need to travel.
- Clear links between funding and provision of new infrastructure to support the delivery of new development.

***Key Points:***

- Environmental limits severely constrain development in South East Dorset and opportunities for further Green Field development are limited.
- Emphasis is rightly placed on development and regeneration within the existing built up area of the SSCT's, but spatial outcomes need to convey the overall aspirations of an urban renaissance supported by a prosperous hinterland.
- The retention of the general extent of the South East Dorset Green Belt, in so far as it relates to Purbeck, is supported.
- Existing infrastructure is already inadequate in the Bournemouth Poole HMA. The submission draft RSS must incorporate greater assurances over the funding of new and improved infrastructure to meet the needs of new development.

**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 The Bournemouth Poole SSCT's are very important in meeting the needs of Purbeck residents, providing higher order employment, retail and leisure opportunities. Conversely, Purbeck is often viewed as the 'play ground' for the conurbation, increasing the pressure on infrastructure. The urban area of Hamworthy in Poole and Upton in Purbeck are contiguous and uninterrupted. However, Development Policy A and table 3.1 of the submission draft RSS identifies only the administrative areas of Bournemouth and Poole as being SSCT's.

A2 The eastern part of the Purbeck lies within the 'Joint Study Area' (JSA), which was the geographic area used by the Strategic Authorities to look at

the conurbation as a whole. The JSA includes Christchurch, the north eastern part of Purbeck and southern parts East Dorset. The publication of draft PPS3 on housing (adopted November 2006) also introduced Housing Market Areas into the equation. Finally the wider 'Travel To Work Area' (TTWA) takes in the majority of Purbeck, including the towns of Wareham and Swanage.

- A3 Unfortunately the SSCT's, HMA's and TTWA's are referred to in different parts of the submission draft RSS resulting in inconsistency about the geographic extent of policy area's. This causes confusion in the relationship between Bournemouth and Poole and other parts of the HMA. This point is elaborated in the statement of evidence produced by the South West Strategic Authorities (SE), reference 4/7<sup>1</sup>.
- A4 The Council support the recognition given in the Strategy to the natural environment of the Bournemouth Poole HMA.
- A5 It is important that the Poole Bournemouth HMA continues to be able to attract and retain an economically active population, to provide a workforce with the necessary range of skills and expertise. However, the Council concur with the points made in the South West Strategic Authorities (SE) statement of evidence for matters 2/1<sup>2</sup>. This highlights concerns about the way in which economic growth aspirations are translated into population and housing growth and encourages an approach based on 'managed growth' and 'smart growth' in the Poole Bournemouth HMA.
- A6 With regard to the SSCT's relationship with the wider HMA, the Council support Development Policies B and C in establishing a suitable strategy for assessing the potential for further development in Local Development Frameworks.
- 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 South West Strategic Authorities in the Bournemouth Poole HMA approached the need for additional Greenfield development in a thorough and systematic way. This inevitably involved assessing what could realistically be delivered by way of strategic urban extensions. The technical report on Development Options SED04<sup>3</sup> indicated that the amount of land was very limited owing to:

- The need to avoid potential harm to the patchwork of sites of international nature conservation importance and other absolute constraints such as flood risk;

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<sup>1</sup> South West Strategic Authorities (SE) (1042) statement of evidence in respect of matter 4/7.

<sup>2</sup> South West Strategic Authorities (SE) (1042) statement of evidence: matters 2/1 a-c, Level of economic change.

<sup>3</sup> Bournemouth BC, Dorset CC, Borough of Poole; Development Options SED04, November 2005

- The purposes of the South East Dorset Green Belt (NB. this was not an absolute constraint, but the impact of releasing any of the land within the existing Green Belt was assessed against its statutory purposes);
  - The need to ensure sustainable locations close to the main centres of Poole and Bournemouth;
  - The potential to deliver supporting social and physical infrastructure to make sites viable for new development.
- B2 The constraints to outward expansion in the Bournemouth Poole HMA should not be underestimated. The Urban Potential Studies undertaken by all of the District and Unitary authorities in South East Dorset demonstrate that there is significant potential for additional housing within the existing urban area. The majority of urban potential sites in the Bournemouth Poole HMA are small scale, but cumulatively very significant. This does present a particular challenge in terms of managing changes in character and addressing the cumulative impacts arising from new development.
- B3 Purbeck District Council updated its Urban Potential Study in 2006, utilising the methodology for the South West, but also taking on board the advice set out in the Baker Associates Study<sup>4</sup> and the emerging guidance set out in the DCLG's Housing Land Availability Assessment: Draft Practice guidance<sup>5</sup>. The Council consider that the housing figures set out in the submission draft RSS are capable of being delivered, optimising the use of land within the existing built up areas.
- B4 The Poole Bridge Regeneration Initiative presents a significant opportunity to create a new sustainable community adjacent to Poole Town Centre. Whilst the equitable delivery of physical and social infrastructure presents a challenge, the Borough of Poole are progressing an Area Action Plan setting out how and when development will be brought forward. The phasing of the urban extensions proposed in the submission draft RSS must be carefully considered in relation to the development of the regeneration initiative. It is considered that the submission draft RSS should also place greater emphasis on the employment potential of this location, which relative to potential green field sites presents a location readily accessible by a range of transport modes.
- 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, with the exception of transportation infrastructure – see South West Strategic Authorities (SE) (1042) statements of evidence in respect of matters 4/7 and 5/2.<sup>6</sup>

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<sup>4</sup> Baker Associates, Review of Urban Capacity and Potential Studies in the South West (Final Report), July 2005

<sup>5</sup> CLG Housing Land Availability Assessments: Draft Practice guidance, December 2005

<sup>6</sup> South West Strategic Authorities (SE) (1042) statement of evidence in respect of matter 4/7 and 5/2.

**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?**

- D1 South East Dorset has a rich and diverse ecology, as recognised by the numerous International and National nature conservation designations. Purbeck is one of the most bio-diverse places in England. The patchwork of lowland heaths and much of the foreshore of Poole Harbour are of European importance and enjoy protection under the Habitats Regulations. Approximately 21% (88.56kmsq) of Purbeck has European designation either Special Protection Area (SPA) or Special Area of Conservation (SAC). In some cases sites also have RAMSAR designation. Approximately 33% (14,208ha) of the District is designated SSSI. Purbeck's importance is also recognised regionally with 72% (30,943ha) identified within a proposed '*Strategic Nature Area*'. A review of map 7.3 of the submission draft RSS serves to highlight just how concentrated opportunities for habitat expansion are in Purbeck, relative to the rest of the South West Region.
- D2 Whilst Appropriate Assessment is the subject of a separate EIP session, it is important to emphasise the significance of the Habitats Regulations on future development across the Bournemouth Poole HMA. The Council support the South West Strategic Authorities (SE) (1042) statement of evidence on matter 1/2: Appropriate Assessment. The Council also acknowledge the need for additional policy wording relating to the need for a SE Dorset Heathlands DPD, as put forward by Natural England (589) under matter 1/2.
- D3 The Dorset Heathlands Interim Planning Framework 2006-2009<sup>7</sup> has been adopted by the District and Unitary Authorities in the sub-region. This cites evidence indicating that the occupation of housing within 400m of heathland sites has the potential to cause harm to the ecological integrity of sites that could not be avoided or mitigated. In applying the precautionary principle, any proposal for new housing development within 400m of a heathland site would fall foul of the Habitats Regulations and planning permission ought not to be granted. In addition to the actual heathland sites, the 400m buffer covers 23.6% (101sqkm) of Purbeck<sup>8</sup>.
- D4 Evidence prepared by Footprint Ecology et al<sup>9</sup> suggests that the cumulative impact of housing development beyond 400m could potentially cause harm to the integrity of heathland sites. The Dorset Heathlands Interim Planning Framework 2006-2009<sup>10</sup> demonstrates how the implementation of a strategic package of avoidance, management and mitigation measures will negate the potentially harmful impacts of cumulative new housing

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<sup>7</sup> Dorset Heathlands Interim Planning Framework 2006-2009, PDC et al

<sup>8</sup> Excluding the actual area covered by the notification

<sup>9</sup> Evidence to support Appropriate Assessment of development plans and projects in south-east Dorset

<sup>10</sup> Dorset Heathlands Interim Planning Framework 2006-2009, PDC et al

development on heathland sites and goes on to establish a system for securing financial contributions from new housing development.

- D5 The framework also recognises the advice from Natural England, that larger developments should ‘consume their own smoke’, most notably in respect of the provision of suitable natural green space for recreational purposes such as dog walking. Standards for Strategic Alternative Natural Greenspace have been debated as part of the EIP into the SE RSS and are also considered in the Footprint Ecology work. These standards provide only a benchmark and any schemes will need to be considered on their own merits. The existing level of housing provision as set out in the draft RSS is considered to be capable of being delivered without harm to sites of European importance.
- D6 However, with regard to some of the strategic objection sites being put forward as part of the debate on urban extensions, concern is voiced as to whether large scale development can be located and / or designed so as to avoid detrimental impacts to the integrity of heathland sites. For instance, direct land take for supporting infrastructure (for instance potential road or junction improvements on the A350, A351, A35 – see comments under infrastructure below) and / or the need for recreational space could potentially cause harm. The attractive rural setting of Purbeck and the proximity of sensitive habitats (such as Upton Heath and Wareham Forest), make it difficult to guarantee that no additional pressure will come to bear on Heathland sites even if alternative natural green space were to be secured.
- D7 Much of the southern part of the District lies within the Dorset AONB and is recognised for its landscape beauty. Within the Green Belt the historic setting of Purbeck’s towns and villages is noted and need to avoid harm by way of coalescence.
- D8 The Regional Flood Risk Assessment makes only fleeting reference to the River Frome and Piddle catchments. The land to the immediate west of Poole fronts Poole Harbour and is generally relatively low lying, (with large parcels of land only 2m above datum). The land is crisscrossed by a network of small rivers, streams and drainage ditches. It should also be noted that much of the foreshore of Poole Harbour is a Special Protection Area. The impact of rising sea levels is increasingly likely to necessitate the managed re-alignment of such habitats.
- D9 The Strategic Authorities commissioned Giffords to undertake a Strategic Sustainability Appraisal of their advice.<sup>11</sup> Under objective 5, ‘to maintain and improve environmental quality and assets’, the study concluded that focussing development on the re-use of land within the built up area of the conurbation would place least pressure on environmental resources. Widening the scope of development to include planned extensions to the SSCT’s and limited growth at the other towns within the JSA, as in the

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<sup>11</sup> Bournemouth BC, Dorset CC, Borough of Poole; Strategic Sustainability Appraisal, SED 16, September 2005

strategic authorities advice, would have slight to moderate adverse impact on the surrounding environment. Outside of the JSA, the Council concur with the strategic authorities that the level of growth set out in the submission draft RSS is set at a level that can be accommodated without any serious environmental thresholds being broken.

D10 For the reasons set out above, the Council believe that environmental limits arising from matters such as flood risk and the protection of environmental assets has generally been adequately taken into account, although the implications of habitat translocation arising from sea level rise are unclear.

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

E1 Concern has previously been voiced by Purbeck District Council regarding the poor infrastructure in the Bournemouth Poole HMA, the uncertainty of funding and therefore the ability to deliver improvements to meet the needs of new development. Whilst Bournemouth Poole HMA is the second largest conurbation in the South West and is taking the third highest level of absolute growth, the Council's understanding is that funding from the RFA is comparatively low due to capacity / transport modelling issues.

E2 The Council is concerned that the submission draft RSS does not fully recognise poor existing infrastructure, particularly in terms of the transportation network. Accordingly the Council would like to see clearer statements in the submission draft RSS to provide confidence that additional investment to accompany the growth identified in the Strategy will be forthcoming.

E3 It is evident that outside of the SSCT's very limited funding has been made available. It is important to re-emphasise the attraction of Purbeck's outstanding natural environment for recreation to those living within the conurbation. As such, new development within both Purbeck and the conurbation serves to place additional pressure on the transport network.

E4 A previous Local Plan Inspector expressed concern about the capacity of the A351, which serves the southern half of Purbeck and the main towns of Swanage and Wareham, to support further development. In response to the steady decline of transportation conditions in Purbeck and the need to take action to arrest this decline, Dorset County Council commissioned Buro Happold to undertake a Purbeck Transport Study.<sup>12</sup> Without substantial investment in new or improved transportation infrastructure new development will only serve to exacerbate an already unacceptable situation. However, this is not purely an issue of funding as the presence of international and national nature conservation sites and species poses significant constraints on the provision of new or improved transport infrastructure in some parts of Purbeck or precludes them altogether.

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<sup>12</sup> Buro Happold, Purbeck Transportation Study, 2004

- E5 In developing the strategy for SE Dorset various options were considered, including the opportunity for a strategic urban extension to the west of the conurbation. As part of the early preparation work on the SE Dorset Strategy, the strategic authorities commissioned Atkins to undertake a study of options for the development. The study focused on the potential for linked settlements comprising 7,000 new dwellings, employment, shops and community facilities, as well as giving consideration to a scaled back development comprising 2,750 dwellings. The study recognised that substantial infrastructure would be required in order to support any major new development in this area. The study also identified a number of absolute constraints, with respect to transportation most notably:
- the viability of providing the necessary social and physical infrastructure (development comprising 2,750 dwellings, employment, shops and community infrastructure would be unlikely to be able to viably meet the overall package of requirements, £23.7m (provisional estimate) required for transport infrastructure alone.
  - the requirement for the A35 eastbound and westbound to be upgraded to three lanes between the Upton roundabout and Poole is clearly an issue as the existing corridor passes a pinch point between Upton Heath and the built up area of Upton.
- E6 Dorset County Council commissioned DEC to undertake additional transport modelling work in summer 2006. The primary purpose of the additional modelling work was to assess the potential impact of new development and different locations would be over the next 20 years and to what extent the location of new development influenced its impact. The modelling work confirmed that some road and junctions within Purbeck are already at capacity and that background levels of car borne journeys are set to increase.<sup>13</sup> Observed flows for 2006 or the nearest available year have been compared with the 2026 modelled flows in the existing network with no development. This shows the predicted increase in traffic flows by 2026 on the key routes in the network. On the A351 at Holton Heath, the traffic flow is predicted to increase by 34% in the AM peak and by 26% in the PM peak with natural traffic growth. This means that the already difficult traffic situation along this road is predicted to worsen, even without any further additional development taking place.
- E7 Whilst towns such as Wareham and Swanage exhibit a greater level of self containment than many settlements within the Bournemouth Poole HMA,<sup>14</sup> opportunities for large scale growth are restrained by both the level of existing and potential capacity of the A351 and surrounding highway network. The Council supports Development Policy B of the submission draft RSS relating to development within market towns. It is considered that this provides an appropriate framework for developing the role of the

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<sup>13</sup> Purbeck District Council, Development in Purbeck 2006 – 2026: Transport Modelling Report

<sup>14</sup> South East Dorset Sub-regional Commuting Analysis, S. Garrett et al, October 2005

market towns (such as Wareham and Swanage) and their relation to the Bournemouth Poole SSCT's through the LDF.

E8 Officers from Dorset County Council have also advised that 105 new dwellings, employment, leisure and community uses could be accommodated providing that it is accompanied by the implementation of a package of transport measures<sup>15</sup>, including strengthening the A35 / C6 corridor. However, officers have also advised that some of the junctions on the A35 will begin to reach capacity towards the end of the RSS period, serving to further highlight the limited opportunities in Purbeck.

E9 The provision of social infrastructure in the rural areas has been in decline, with continuing questions about the future of schools, library, post office services. The Council re-emphasise the importance of addressing past deficits in funding infrastructure.

**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, the Council believe that the high proportion of development within the existing built up area of the SSCT's will help to reduce the need to travel. However, the submission draft RSS must provide sufficient confidence in securing funding towards new transport infrastructure to enable and encourage the use of public transport. It should also consider the impacts on the surrounding network, such as Purbeck's role in providing recreational space for the residents of the conurbation (see sub-matter 'e' above).

F2 In the alternative, the Council would have serious concerns about the self containment of any additional strategic scale urban extension and consider that this would result in 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 out 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 access 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 as weaknesses in the Atkins study into the feasibility study of the Western Sector.<sup>16</sup>

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

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<sup>15</sup> These measures are highlighted in the Purbeck Area Strategy set out in the Dorset (excluding SE Dorset) Local Transport Plan 2, DCC, 2006.

<sup>16</sup> Atkins, Western Sector Feasibility Study Dorset (Final Report) January 2005.

- G1 A thorough approach has been taken to the reviewing the Green Belt. The Secretary of State made clear in his acceptance of the Panel 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).
- G2 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 East 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.
- G3 All areas of land around the inner edge of the Green Belt have been examined as part of the RSS JSA work to identify suitable and strategic areas of search for sustainable planned urban extensions (see paragraph B1 above). In principle, the Council consider that a robust approach has been taken to the justification of the proposed modifications.
- G4 The submission draft maintains the general extent of the South East Dorset green belt as it applies to Purbeck – this is supported by the Council.
- H) Does the draft RSS set out adequate guidance on the provision of Green Infrastructure?**
- H1 The Council support the South West Strategic Authorities (SE) (1042) statement of evidence in respect of matter 4/7(H).