

MATTER 4/7

BOURNEMOUTH AND POOLE HMA SUB-REGIONAL STRATEGY

PARTICIPANT'S STATEMENT

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Executive Summary

- 0.1 The spatial outcome of the HMA needs greater direction and specificity in the RSS – giving strategic direction to the LDF process in all Districts, and must reflect the evidence of demographic, housing and economic need as well as reflecting the infrastructure and environmental carrying capacity of the HMA. Too much emphasis has been placed on the weight given to environmental constraints, including AONB and to an extent the Green Belt. This is made in spite of the profound weight of evidence relating to economic and social need, the jobs to homes balance, as well as sustaining rural market towns in the hinterland of the conurbation.
- 0.2 In order to achieve the step-change in development to address need and demand for housing there is a need to increase the number of urban extension sites, which involves more developers and creates greater choice for purchasers, and which can make use of existing facilities while helping to meet local housing and employment needs. Appendix 1 of this Statement refers to a location at West Wareham that is deliverable in the first half of the RSS period.
- 1.0 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?**
- 1.1 The Draft RSS fails to demonstrate clarity between the role of the Bournemouth/Poole conurbation and the direction and quantum of growth and development in the remainder of the HMA. There is little by way of further detail to provide specificity to the focus for growth particularly in the other towns listed within the hinterland of the conurbation.
- 1.2 GOSW and SWRDA both have raised concern in this regard, in particular highlighting the lack of rationale in the scale of housing development and the location of employment and housing within the HMA, preventing towns from realising their economic growth and housing needsⁱ.

1.3 The RSS must address the jobs and homes imbalance. The consequence of jobs/homes mismatch is that local people are unable to buy into the local housing market and look for housing elsewhere, leading to migration out of the region or more long distance commuting. Dorset CC area has a predicted excess of jobs over people between 2001-2016 of between 8,700 and 10,200 across a range of growth scenariosⁱⁱ.

1.4 More sustainable patterns of commuting are likely to be realised where there is proximity between residential and employment developments:

“A key challenge for the South West is to connect our cities and towns with their surrounding hinterlands so more people can contribute to, and benefit from, the region’s continuing economic prosperity.”ⁱⁱⁱ”

1.5 The Bournemouth and Poole combined TTWAs need to produce between 32,800 and 41,900 new jobs (1,640-2,095 jobs pa) to maintain a stable share of the regional economy^{iv}.

1.6 Rural areas suffer from acute affordability problems, exacerbated by limited housing supply, leading to increasing unsustainable development patterns and constraint to rural and urban economic growth. For example, Purbeck has delivered only 67% of its Structure Plan required housing between 1996 and 2005.^v

1.7 There is a shortage of available employment land. Only 12.42ha and 12.69ha of the 67ha and 85ha forecast demand for employment land are available in Bournemouth and Poole respectively^{vi}.

1.8 It is therefore vital for firms to be able to recruit skilled replacement labour or their production, innovation and overall competitiveness will be affected, and inward investment may be jeopardised.

2.0 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?

2.1 Barton Willmore has made the case for a step change in housing delivery on the basis that the number of homes provided in the Draft RSS fails to support the level of job creation proposed. Cambridge Econometrics' projections indicate job growth of 45,400 in the HMA. Applying our ratio of 1.2 homes per job, this requires housing provision of 54,500 houses. This is probably conservative, given that in the South East Sub-Region the ratio should probably be higher. However, we have proposed provision of 53,000 houses, which relates more closely to the ONS Household Projections, but accords quite well with what is required to support the economic strategy for the area.

2.2 House prices and affordability have been identified as a key issue in the South West, where average house prices have been driven upwards by in-migration in areas where average wages are typically below the national average^{vii}. There is only a three to five year supply of housing land supply based on past trends^{viii}.

2.3 House price affordability in the HMA is a significant problem with a house price to income ratio of 5.47:1 compared to the regional average of 4.66:1^{ix}. In total the SE Dorset area requires 3,700 new affordable dwellings per annum, but in 2004 only 100 new dwellings were built. The South East Dorset housing register has increased in size by 30% since 2001. The Strategic Authorities in Dorset accept that the:

"...best prospect for such provision [of affordable housing] is on larger sites on Greenfield land."^x

2.4 Attracting labour is problematic due to the affordability gap particularly for young people and graduates. After 2016 the shortfall of economically active people relative to available jobs will be very significant.

2.5 Bournemouth BC note that there is little potential for further urban intensification, with concern regarding a poor urban environment and problems of congestion.

Dorset CC in particular has noted that the Draft RSS needs to clarify the role of Purbeck in meeting development needs.

- 2.6 We give strong support to the necessity of urban extensions though we have reservations with regard to the deliverability of those specified in Draft Policy SR29. We share the concern that wider sustainability issues, including social and economic objectives, do not appear to have been fully considered as part of the review process^{xi}.
- 2.7 We therefore contend that economic growth needs to be balanced with housing development and this requires mixed use strategic development on Greenfield (as identified as Areas of Search M, N, O, P and Q) plus further specified growth in other important towns in the conurbation and HMA.

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

- 3.1 In short **no**: the proposed urban extensions, identified in Draft Policy SR29 can be criticised for a number of reasons, including:
1. no overarching urban design study to assess how the proposed urban extensions would be linked to existing settlements;
 2. Blunt's Farm (Area of Search Q) would have insufficient highway and public transport infrastructure to serve development of this scale;
 3. Area's of Search P and N are proximate to and/or include internationally protected nature conservation sites – detailed studies of buffer zone requirements will be a priority;
 4. Insufficient analysis in the Draft RSS Implementation Plan to long lead in times for urban extensions and lack of specificity regarding transportation infrastructure required.
 5. The Appropriate Assessment of the Draft RSS has been unable to conclude that there will not be adverse effects on some internationally protected sites and recommends a new Policy to address Dorset Heathlands SPA.

- 3.2 PPS3 (paragraph 37) requires the RSS to identify broad strategic locations for development so that the need and demand for housing can be met in a way which addresses sustainable development principles, taking into account evidence of need and demand for housing as well as availability of land and infrastructure to support the proposed distribution of development. The Draft RSS fails to reflect the overwhelming evidence base and infrastructure required.
- 3.3 As such, there must remain serious concern that growth will not occur at sufficient rate in the first half of the RSS period.
- 3.4 The Draft RSS Implementation Plan acknowledges that the delivery of each urban extension proposed will need to be subject to detailed work, presumably through the form of an Area Action Plan in the corresponding LDF. It will be the early to mid part of 2010 before an AAP is developed to guide each urban extension and up to two years to go through the development control process.
- 3.5 It is reasonable to assume that the reliance on five major urban extensions, with known transport and ecological constraints is unlikely to deliver housing of sufficient quantum until the middle of the RSS period at the earliest.
- 3.6 As such we recommend that further mixed use urban extensions are identified which can deliver housing in the early part of the RSS period, in order to meet economic and housing needs, sustain rural communities and provide for a balanced, measurable and deliverable pattern of sustainable growth, focussed on existing settlements, key public transport corridors and ensuring the jobs to homes balance is retained, to achieve sustainable social and economic growth as protection of environmental constraints.

4.0 Have environmental limits arising from matters such as flood risk and the protection of environmental assets been adequately taken into account and in particular reflecting the need to avoid any impact on the integrity of the important nature conservation areas around the conurbation?

4.1 RSS recognises that greenfield urban extensions will be required in the B&PHMA; but that the area is heavily constrained by environmental designations^{xii}, ^{xiii}. A balance needs to be found between locating necessary housing sustainably, whilst protecting the integrity of the designations. The designations are scheduled at **Appendix 3**, para 4.2.1 and main designations mapped at **Appendix 4**.

4.2 Four main constraints, in order of weight, are:

- **Habitats Regulations:** International legislation; no development within 400m;
- **Flood risk:** Physical constraint; no development;
- **AONB:** Development only if alternatives are less acceptable;
- **Green Belt:** Adjusted to accommodate sustainably-located development.

4.3 **Habitats Regulations:** Policy SR28 requires, with international legislation, that there are **no adverse effects** on these sites; this means no development **within** SPAs, or within 400m,^{xiv} and development within 5kms to provide £7.25 million, or substantial 'SANGS' greenspace^{xiv}.

4.4 The effect is: '...strategic-scale urban extensions^{xv} are inappropriate'.^{xvi} RSS therefore focuses development **within** the conurbation; then 'Areas of Search' at the hinterland towns.

4.5 Habitat Regulation sites are a legal and policy constraint of international weight. However, Areas of Search N and P are within such sites, and their 400m zones.^{xvii}

4.6 The 5km zone will affect deliverability – it will add substantial costs, so also affecting affordability; and/or requiring extensive greenspace.

4.7 Wareham is a better Area of Search than Areas N and P in these terms. West Wareham is not within 400m of an SPA; like other sustainable hinterland towns, it is within 5kms. However, our clients have land within their control to provide SANGS.^{xviii} West Wareham would not directly affect SPAs, and mitigation will not affect deliverability or affordability of housing.

- 4.8 **Flood risk** is a physical constraint. RSS requires development where there is '...with little or no risk of flooding'.^{xxix} West Wareham is not subject to flooding.^{xx}
- 4.9 **The Dorset AONB** lies south-west and north-west of the conurbation.^{xxi} National designations of AONB/ National Park cover 37% of the region^{xxii}. Major development should not take place in those areas, except in the public interest; assessed against local/ national need, alternatives and impacts.^{xxiii xxiv}
- 4.10 Policy ENV3 extends protection beyond the AONB.^{xxv} This goes beyond national policy, which applies to development '**in**' those areas.^{xxii}
- 4.11 The AONB is a substantial constraint; national and regional policy requires its protection. However, AONB is not of the same order as the Habitat Regulations. Policy does allow for development within AONBs, in certain circumstances; and protection beyond the AONB is a regional, not national requirement.
- 4.12 West Wareham lies partly within the AONB.^{xxvi} It is accepted that development could have a detrimental effect on the AONB. However, national policy requires that effect to be weighed against alternative effects. In the context of the RSS, those alternative effects could be damage to Habitat Regulation sites.
- 4.13 **Green Belt:**^{xxvii} RSS recognises that Green Belt review is necessary.^{xxviii} National policy confirms that Green Belt is a spatial planning tool, not relying on the inherent quality of the land.^{xxix}
- 4.14 West Wareham is outside the Green Belt.^{xxx}
- 4.15 **Soundness of the RSS:** In the B&P sub-region, the Habitats Directive introduces substantial uncertainty as to the extent of its effect. It has removed from consideration the most sustainably located extensions to the conurbation. Smaller towns beyond the main built-up area are now identified as Areas of Search, including Habitat Regulations sites. However, Wareham has been excluded; apparently because of the AONB.

4.16 In the context of the Habitat Regulations, it is not sound to exclude areas of AONB for consideration, at a strategic level. In an area as environmentally constrained as south-east Dorset, and with strong economic and affordable housing needs, sustainable locations should not be excluded at this stage. The AONB is an important, national, designation. However, Wareham is a sustainable location; and development could potentially occur at this AONB margin without damaging the integrity of the designation.

5.0 Have infrastructure considerations been adequately taken into account?

5.1 None of the growth levels proposed by the Regional Assembly (i.e. including RPG10 + 50%) implies major difficulties with regard to water supply and sewage treatment although investment will be required to support growth and to improve capacity^{xxxi}.

5.2 We contend that transport infrastructure will not be sufficient to support the draft RSS proposal for 2,400 dwellings within East Dorset District (areas of search N, O and P).

5.3 The areas of search are close together and lie along the A31. The A31/A35/A30 – South East Dorset to Exeter route is classified as a regionally significant road route in paragraph 5.5.2 of the draft RSS document.

5.4 According to Highways Agency's 2005 traffic monitoring report peak period congestion is prevalent on the A31. Congestion will be increased further by the addition of 2,400 new dwellings. This will badly affect the regional function of the A31 with increased delays for long distance freight and passenger traffic.

5.5 The South East Dorset Local Transport Plan (2006-2011) forecasts overcapacity and congestion in 2016 at many junctions in the area. The proposed urban extensions would greatly increase congestion over a wide area requiring a level of infrastructure improvements that is unlikely to be affordable and deliverable.

5.6 We believe that the inclusion of an area of search for an urban extension of Wareham would reduce the concentration of housing to the north of the

Bournemouth / Poole area so reducing pressure on the A31 and the roads linking to the town centres and minimising transport infrastructure improvements.

- 5.7 The A351 to Wareham suffers from congestion due to commuting and holiday traffic but there are a number of proposals to relieve the A351. Dorset CC's Purbeck Transportation Study recommended improvements to the A35 together with improvements to the C6 from the A352 at Wool and a Bere Regis bypass that would divert traffic from the A351 to the A35. The A351 Sandford bypass is still a possibility and there have been other proposals for traffic diversion and traffic calming that would ease conditions on the A351.
- 5.8 A mixed use urban extension of Wareham, including a park and ride facility, would also encourage facilities and shops so increasing the self containment of the area and reducing the need to travel to Bournemouth and Poole. The infrastructure improvements would be associated with the development and feasibility work already carried out has shown them to be affordable and deliverable.

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

- 6.1 We consider that the draft RSS proposal for 2,400 dwellings within East Dorset District (areas of search N, O and P) and the accompanying infrastructure proposals will not achieve these objectives, with low levels of self containment which will not provide suitable corridors for economic public transport provision and congestion will increase.
- 6.2 The 2001 Census shows that Wimborne has a car driver commuting proportion of 62% with over 70% for the other proposed housing areas. The proportion of public transport commuting is less than 4% in the proposed development areas. Only 19% of commuting in Wimborne is on foot or by cycle and is less than 10% in the other proposed housing areas. Over 50% of all commuting trips from Corfe Mullen and around 40% from the other proposed housing areas are car driver trips to Poole, Bournemouth and Christchurch.

- 6.3 The 2001 Census data shows that Wareham has a car commuting proportion of 58% which is lower than the proposed housing areas, and the highest proportion of public transport commuting including over 4% by rail and 18% commuting by foot and cycle. The rail proportion has great potential for increase with the introduction of park and ride at Wareham Station supported by the additional track capacity and power supply improvements between Poole and Weymouth as recommended in the draft RSS (Policy TR5 and paragraph 5.3.13).
- 6.4 The above data shows that Wareham has more sustainable commuting than the proposed housing areas. An urban extension at Wareham would improve sustainable transport objectives and would be large enough to support local bus services and links to Wareham station, which together with park and ride would provide good access to rail services for Dorchester, Weymouth and the town centres of Poole and Bournemouth. There is also the possibility of direct connection to the privately run Swanage railway which is being promoted by Dorset County Council.
- 6.5 Concentrating housing development in the proposed areas of search will increase congestion on already congested roads. The A31 trunk road in the area is at or near to capacity and there are no plans to improve the single carriageway road. The South East Dorset Local Transport Plan (2006-2011) forecasts overcapacity and congestion in 2016 at junctions on the A31, A348, A349, A341, B3073 and B3074 in the area. The proposed urban extensions would greatly increase congestion over a wide area requiring a level of infrastructure improvements that are unlikely to be affordable and deliverable.

7.0 Are the proposed modifications to the Green Belt adequately justified?

- 7.1 We do not propose to respond to this question.

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

- 8.1 The key function of Green infrastructure (GI) is accessibility. However, this is likely to conflict with other intended functions, particularly nature conservation. If accessibility is the key function, then uses such as 'nature reserves' should not also be GI objectives. Such areas could be complementary to GI, but not part of it.
- 8.2 GI also includes 'linkages', such as floodplains. For there to be connectivity, this might include uses such as agriculture. Such land may not be in the control of the developer, or be treated by the landowner as a 'blackmail strip'.
- 8.3 However, policy requires GI to be provided with development, requiring the developer or LPA to have land control. The aspirational tone of this policy may not be achievable in terms of physical provision of GI. A similarly vaguely-worded intention has recently been rejected at EIP.^{xxxii} GI may affect deliverability and affordability within the Areas of Search. At West Wareham, there is sufficient area of land in single control to provide GI.^{xxxiii}

Appendix 1

STRATEGIC DEVELOPMENT LOCATION AT WEST WAREHAM

- A.1 Ashvilla Estates Ltd propose a strategic mixed-use development allocation to the west of Wareham in Purbeck District. Draft RSS Development Policy B, Market Towns, supports locally significant development at locations where an analysis of its role and function meets a series of criteria. Wareham has an existing concentration of employment and there is potential for employment opportunities to be developed and enhanced. Shopping, cultural, educational and public services exist and can be provided to meet the needs of the town, and the located on the Weymouth-Poole railway line results in a settlement that can ensure a range of transport opportunities exist to avoid dependence on the car. Mixed used development can retain and enhance the self containment of the town, serving a rural hinterland.
- A.2 The location lies on the western periphery of Wareham (with an approximate site area of 127 hectares (**see Appendix 2**)). Built development can be accommodated on an area of about 37ha with the remainder of the land to the south and west left for the purposes of public open space, recreation and nature conservation. The location lies predominantly to the west of the A351 Wareham by-pass and to the south of the A352. The western extent of the location is defined by the formation of the Bournemouth to Weymouth railway and the spur to Swanage. The southern boundary generally follows the edge of slope above the floodplain to the River Frome. The majority of the land is currently used for agricultural purposes.
- A.3 Development in this location could comprise the following:
- up to 1,000 dwellings including some 300 affordable housing units
 - SANGS area of 46 hectares
 - employment sites potentially able to provide about 12,000 square metres of floorspace;
 - a local centre;
 - a public house/restaurant;
 - a community hall;
 - a terminus for a local high frequency bus service linking the development directly with local schools, the railway station and the Town Centre. This service would be guaranteed for 5 years by Ashvilla.

- cycle ways and footpath links;
- managed ecological areas for Biodiversity enhancement amounting to approximately 44 hectares
- contributions to transport improvement works and in particular a sum of £15 Million towards the proposed Bere Regis By-pass as recommended in the Purbeck Transportation Study.
- Ashvilla will build an on site railway halt and park and ride facility to enable the Swanage railway to make the connection to Wareham.

A.4 There is a serious shortfall in housing land supply in the District of Purbeck, when assessed against the Adopted Structure Plan, with the draft RSS proposing essentially to shift the onus on housing provision out of the District altogether, utilising the Bournemouth/Poole PUA to consume the required housing land supply, requiring a high proportion of all new development to take place in a PUA constrained on all sides by either water or Green Belt land. Even with selected release of Green Belt land in the form of urban extensions – already discounted by Purbeck District in their Green Belt review, this places an unrealistic reliance on windfall sites within the PUA, and as such an over dependence on windfalls.

A.5 There is a need to provide for balanced economic and social growth by avoiding the cramming of new development into an already constrained conurbation. The Purbeck District Local Plan Inspector and LPA both called for the need for the Structure Plan to assess the shortfall in housing provision in the District and to respond with the consideration of alternative forms and locations of development. Since the Structure Plan review has been abandoned it falls to the RSS to provide strategic guidance to the need for and location of development in Purbeck District.

A.6 A strategic mixed use development allocation is therefore the most appropriate way forward in order to meet the particular needs of Purbeck, a view backed up by the Local Plan Inspector:

“In the circumstances of this District, where the urban areas are limited and few in number, and where much of the area is tightly constrained by environmental factors and designations, there are reasonable grounds for concentrating much of the new development so as to take advantage of the limited sustainable development opportunities and avoid scattered forms of development...”

...The Structure Plan envisages some migration-led population growth, albeit at a reduced level, to provide for economic prosperity. Similarly, RPG10 (7.5-6) sees a need for some continuing inflow of labour to maintain the regional economy's buoyancy and innovative edge; although economic migrants will no longer be attracted to Dorset at past rates. That apart, there is evidently a great need for affordable housing in Purbeck District, and the more substantial development proposals can make a significant contribution to meeting that need"

- A.7 On the premise that a strategic allocation is required to meet the required needs of the District, Wareham, the dominant market town, with a variety of services and facilities, located on the Weymouth-Poole railway line is the most suitable location for new planned development, providing an opportunity to seek to reduce reliance on car-borne journeys and to reinforce the long term sustainability and viability of Wareham as a key market town.
- A.8 The Purbeck Local Plan Inquiry enabled the consideration of a wide range of sites for development needs, including Holton Heath and Redbridge Pit, but also sites to the north of Wareham within the Green Belt (Worgret Road and Bestwall Road). The Local Plan process was failed to produce a site or combination of sites, which can meet even the basic housing requirement for the District, let alone the chronic need for affordable housing and employment to sustain the local economy.
- A.9 The west Wareham development can provide the means with which to provide for the natural extension of the settlement to the west, as the town is constrained by areas of floodplain, topography, AONB and the Green Belt to the south north and east. However, part of the location lies within the AONB and therefore the tests set down by PPS7 must be followed in the consideration of development in the AONB:

"the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy"

- A.10 Both Local Plan Inspector and District Council have identified a shortfall in housing provision within Purbeck District. In relation to Holton Heath, the Local Plan Inspector noted that:

"It is clear from the Council's recent Urban Potential Study and Housing Land Availability Report that a

substantial amount of housing land needs to be allocated outside the urban areas of Purbeck in order to meet the Structure Plan requirement for the District...

...The argument that the countryside should be protected for its own sake is difficult to reconcile with the need to make full provision for housing in the District. Purbeck is a largely rural District and it is evident from Background Paper 5 and other evidence that it would be impossible to make the level of provision required in the Structure Plan without encroaching on countryside."

- A.11 Due to the deletion of Holton Heath largely due to the impact of the development on internationally designated sites of nature conservation interest, a serious shortfall has been identified within the District for new housing development. The draft RSS seeks to effectively sidestep this difficult issue by concentrating this entire shortfall outside the District, predominantly in the PUA on previously developed land identified in the urban potential study and on the release of Green Belt land in the form of urban extensions. The reliance on urban windfall sites cannot provide the certainty required by strategic planning, and does not provide for a level of development within Purbeck District to meet the needs of the area. The now abandoned Structure Plan provision of 90 dwellings per annum and now the Draft RSS proposed provision of 105 dwellings per annum are both woefully inadequate in order to meet both market and particularly affordable housing needs, essential in a District blighted by the impact of secondary home owners out pricing local people and the influx of retirees taking up additional local housing. A solution within the District is essential to meet the basic needs of the population in terms of providing housing and in sustaining the local economy. A strategic development within Purbeck is therefore required.

"the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way"

- A.12 The deletion of Holton Heath and Redbridge Pit as proposed allocations within the Local Plan review have left a serious shortfall in housing provision. Other sites within the Green Belt have been considered through the Local Plan process but were rejected as premature to a Green Belt review. Purbeck have now completed their Green Belt Review, 2006, which concludes that the present Green Belt is fit for purpose and does not propose any deletion of land from the Green Belt. The Local Plan has therefore exhausted other potential sites and in a District, which is largely covered by AONB and Green Belt designations, and the primary focus for

development – the principal market town of Wareham is constrained by Green Belt, AONB and the floodplain areas. The only reasonable location to extend Wareham lies on the western edge of the settlement; physically adjoined to the original town, rather than the more detached Northport area, which in itself is constrained by the Green Belt. The Purbeck Green Belt review proposes further consideration of an extension of the Green Belt to the west of Wareham and states that the site can meet all five purposes for inclusion of land within the Green Belt (PPG2), but we entirely reject this review which does not provide substantive evidence to demonstrate such a case. Given the existing landform and AONB status of the land, it is clear that development within this area must already meet the tests set down by PPG7 in relation to AONB and therefore we question the purpose of considering such land for Green Belt purposes.

“any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”

- A.13 The location is predominantly used for agriculture and there is no public access over the land at present, it therefore does not have a recreational function. The value of the location lies in its visual association with the settlement of Wareham and the surrounding landscape. Worgret West Wareham is on the northern periphery of the Dorset AONB. A landscape and Visual Appraisal undertaken by Hankinson Duckett Associates has identified that the landscape character of the location does not fully reflect the Dorset Heathlands of the AONB. The location's landscape comprises medium sized agricultural fields and the remnant hedgerows. As a residual impact, there will be some limited landscape and visual impact on the character and appearance of the AONB. However, this impact can be mitigated through the design and layout of the built forms of new development and the identification of appropriate areas to introduce new structural landscaping.
- A.14 The location shares the same topographical characteristics as Wareham, being situated on the same ridgeline with scarp slopes to the north and south. There is a strong relationship between the town and the proposed development location. A planned extension of the existing town would seek to ensure that this relationship is strengthened both physically and visually. In summary therefore the proposed urban extension at West Wareham meets the tests outlined in PPS7 for the consideration of major development proposals in the AONB.

Appendix 2: West Wareham – Master Plan

**Appendix 3: Evidence on panel's questions (d) and (h):
a fuller response than in the main evidence.**

APPENDIX 3: EVIDENCE ON PANEL'S QUESTIONS (d) AND (h)

INTRODUCTION

This Appendix sets out the response to Questions (d) and (h) more fully. The sections are numbered as in the main evidence: i.e. Section 4 and 8.

Section 4 QUESTION d): ENVIRONMENTAL LIMITS

4.1 Scope of evidence

4.1.1 This evidence is prepared by Moira Hankinson of Hankinson Duckett Associates; for Ashvilla Estates, represented by Barton Willmore.

4.1.2 RSS recognises that greenfield urban extensions will be required in the B&PHMA; but that the area is heavily constrained by environmental designation^{1, 2}. A balance needs to be found between locating the necessary housing sustainably, whilst protecting the integrity of the designations.

4.2 Designations and constraints

4.2.1 The conurbation and its hinterland are substantially surrounded by environmental designations and constraints. In terms of importance, these are:

1 International designations

- 1.1 European Habitats Directive designations: Ramsar Sites, Special Protection Areas, Special Areas of Conservation (*RSS Policy SR 28*).
- 1.2 Jurassic Coast World Heritage Site (*RSS para 4.3.5*).

2 National designations related to inherent quality

- 2.1 Sites of Special Scientific Interest.
- 2.2 Heritage Coasts (*Policy C01*).
- 2.3 Areas of Outstanding Natural Beauty (*RSS Policy ENV 3; para 7.2.7*).
- 2.4 Environmentally Sensitive Areas.
- 2.5 National Nature Reserves
- 2.6 Historic Environment (*Policy ENV5*).

3 Physical constraints to development

- 3.1 Flood risk (*Policy F1; Maps 7.4, 7.5*).

4 National designations, in which the inherent quality or the land is not relevant

¹ RSS p 80, para 4.3.1.

² Main constraints mapped at Appendix 4.

4.1 Green Belt (*RSS Policy SR27; para 4.3.12*).

5 Local designations

5.1 Local nature reserves.

5.2 Other valued habitats (*Policy ENV 4; Map 7.3*) (At local level, some of these will be more important, where they support protected or rare species).

4.2.2 These designations are mapped at Appendix 4.

4.2.3 The effect and weight of four main constraints are considered in this evidence:

- Habitats Regulations
- AONB
- Flood risk
- Green Belt.

4.3 Habitats Regulations

4.3.1 This applies to the SPA sites in the sub-region. RSS Policy SR28 requires, in line with international legislation, that there are **no adverse effects** on the sites covered by the Habitats Directive.

4.3.2 How the protection required by the Directive will be implemented is still in discussion. The Interim Planning Framework identifies that development within 400m of the Dorset Heathlands is likely to have a significant adverse effect; and that, up to 5km, may have such an effect, but with the potential for mitigation. The 5km zone is mapped in our Appendix 4.

4.3.3 The Dorset Heathlands Interim Planning Framework considers an area up to 5km from the Heathlands. It seeks a contribution of £7.25 million to reduce the impacts of development to an insignificant level. This is 'interim' guidance: a long-term strategy has yet to be developed.

4.3.4 The effect that international legislation has is recognised in the RSS:
'...strategic scale urban extensions [*to Bournemouth, Poole, Christchurch*] are inappropriate' (*RSS para 4.3.12*).

The RSS therefore focuses on redevelopment **within** the main conurbation; then identifies 'Areas of Search', generally associated with smaller towns **beyond** the main built up area and its environmental constraints (*RSS Inset Diagram 4.6*).

- 4.3.5 As the RSS recognises, the international Habitat Regulation sites are a substantial constraint on the location of strategic development. That constraint applies to the designated areas themselves, certainly to 400m beyond and, potentially, to areas up to 5km from their boundaries³. Within that wider zone, the deliverability of housing will be affected, by the requirement to identify and deliver alternative greenspace of a very large scale; and/or by a substantial 'head tax' per dwelling. These are expensive in land area requirements and money; so are likely also to affect the achievability of affordable housing.

4.4 AONB

- 4.4.1 The Dorset AONB extends along much of the Dorset coast, south-west of the conurbation, and the Downs to the north-west (*Appendix 4*). The national designations of AONBs and National Parks cover about 37% of the land area of the region (*RSS para 7.2.7*).
- 4.4.2 National policy requires that 'major developments should not take place in those designated areas except in exceptional circumstances ... (they) should be demonstrated to be in the public interest before being allowed to proceed'. Such developments should be assessed against criteria of local and national need, alternatives, detrimental impacts and their moderation (*PPS7 para 22*).
- 4.4.3 RSS Policy ENV3 (*last para, p 146*) extends AONB protection to areas beyond the AONB where development would damage the AONB objectives. This final paragraph of Policy ENV3 goes beyond national policy, which applies only to development '**in** those areas' (*PPS7, paras 21-23*).
- 4.4.4 A recent change in the statutory definition of 'natural beauty' means that conservation of wildlife is part of the reasons for AONB designation (*Appendix 5*).

³ The Dorset Heathland Interim Planning Framework 2006-2009. January 2007, paras 2.4, 2.5.

4.4.5 National policy is reflected in RSS Policy ENV3, which should be more restrictive than PPS7.

4.4.6 The AONB is a substantial constraint on development; national and regional policy require its protection. However, the AONB has less weight as a constraint than the Habitat Regulations sites. The AONB is a national, not international designation; and international law does not apply to the designated area or its hinterland, as it does for SPAs. Policy does allow for development within AONBs, in certain circumstances; and the wider protection of the natural beauty of the AONB is a regional, not national requirement (*para 4.4.2 above*).

4.5 Flood risk

4.5.1 Flood risk is not a designation; it is a physical constraint on development. RSS requires new development to be in areas '...with little or no risk of flooding (*Policy F1*). (*RSS Map 7.4 and our Appendix 4*).

4.6 Green Belt

4.6.1 The current extent of the Green Belt is tight around the main conurbation and the hinterland settlements, such as Ferndown, Wimbourne Minster and Wareham (*Appendix 4*).

4.6.2 RSS recognises that the strategic policy requires a review of Green Belt boundaries (*paras 3.3.5, 4.3.3, Policies SR26, 27*).

4.6.3 National policy confirms that the Green Belt is a spatial planning tool, and does not rely on any inherent qualities of the land (*PPG2*).

4.6.4 Green Belt is, therefore, less of a constraint than SPAs, their hinterland, or AONBs. It is more 'man-made', in that the identification of necessary and sustainable development allows for long-term variation in Green Belt boundaries.

4.7 Comparison of constraints

4.7.1 In summary, the policies applying to these four main constraints are:

- **Habitats Regulations:** International legislation; development should have 'no adverse effects' on the site; that effect could apply to developments up to 5km from the designated area.
- **AONB:** National legislation; major development could only take place in exceptional circumstances, and subject to rigorous examination related to public interest, need, alternatives, impact and its moderation.
- **Flood risk:** A physical constraint: development should only take place in areas with little or no flood risk.
- **Green Belt:** National policy: boundaries are to be reviewed, to allow for the necessary regional growth, taking into account, in particular, the Habitats Directive constraint.

4.7.2 We would suggest, therefore, that the weight given to each constraint should be, in order:

- **Habitats Directive:** No development within the designated area, or its immediate vicinity. Restraint on development potentially up to 5kms distance;
- **Flood risk:** Effectively, no development within the flood risk areas;
- **AONB:** Development only if other alternatives are less acceptable;
- **Green Belt:** Would be adjusted to accommodate development that best meets environmental constraints and sustainable objectives.

4.8 Soundness of the RSS

4.8.1 In theory the RSS has treated the Habitat Regulations sites, AONB and Flood Risk areas as equivalent constraints: they have been excluded from consideration as Areas of Search at the first stage. In fact, Areas of Search P and N are within or adjacent to international nature conservation sites.

4.8.2 This is not a sound basis for regional strategy. These are not equal constraints:

- **Flood Risk** is a physical constraint; it applies to areas likely to flood.
- **Habitat Regulation designation** has international weight. There should be 'no adverse effects'. This effectively applies to the designated area and the 400m zone.
- **Habitat Regulation hinterland** is an, as yet undefined, zone within which development would require either extensive open space or substantial costs, to mitigate potential adverse impacts.
- **AONB** is a significant constraint. However, if the public interest, local social and economic considerations, and need, are sufficient, development can occur within the AONB.

- **Green Belt** boundaries can be amended if exceptional circumstances, including housing need that cannot be met elsewhere, justify review.

4.8.3 In the B&P sub-region, the Habitats Directive introduces substantial uncertainty as to the extent of its effect. It has already removed from consideration the most sustainably-located extensions to the main conurbation. Smaller towns beyond the main built-up area are now identified as Areas of Search, including Habitat Regulations sites. However, Wareham has been excluded; apparently because of the AONB.

4.8.4 AONB is important. However, the policy hierarchy summarised above (*para 4.8.2*) identifies that AONB is not an absolute constraint.

4.9 West Wareham

4.9.1 Wareham is a sustainable location for development. The town is, however, constrained by flood risk in the valleys of the Frome and Piddle, to its north and south, and by Habitat Regulation sites to its east. The AONB lies to the south-west of the town (*Plan at Appendix 4*).

4.9.2 The town lies at the eastern end of a spur above the valley floors. The natural direction for growth of the town would be to the west, along this drier ground, on either side of the A352. However, the Dorset AONB extends up to the A352, from the south.

4.9.3 It is accepted, therefore, that development west of Wareham could have a detrimental effect on the AONB. However, national policy requires that effect to be weighed against alternative effects.

4.9.4 In the context of the RSS, those alternative effects could be damage to Habitat Regulation sites, up to 5km from their boundaries.

4.9.5 The reason for the inclusion of the land south-west of Wareham in the AONB is its heathland character. However, this spur of land north of the River Frome has been agriculturally reclaimed from heathland. This has two implications: firstly; that this area on the margin of a very large AONB (*Plan at Appendix 4*) is not critical to the integrity of the AONB; secondly, that there is potential within the land in our clients' control, to

provide substantial SANGS green space as mitigation for development within 5km of an SPA.

- 4.9.6 We do not consider that, in the context of the constraint of the Habitat Regulations, it is sound to exclude areas of AONB for consideration, at strategic level, for development. In an area as environmentally constrained as south-east Dorset, and with the strong economic and affordable housing needs, sustainable locations should not be excluded at this stage. The Dorset AONB is an important, national, designation. However, Wareham is a sustainable location; and development could potentially occur at this AONB margin without damaging the integrity of the designation.

Section 8 GREEN INFRASTRUCTURE

8.1 Scope of evidence

8.1.1 This section considers RSS para 6.12.16-19, and Policy GI1 (*pp 137-138*).

8.2 Functions

8.2.1 The intended function of GI is 'strategic networks of accessible, multifunctional sites' and 'linkages'. It appears that the 'multifunctions' include recreation, woodland, nature conservation, historic sites and flood management.

8.2.2 These functions often conflict, as is implicitly recognised in RSS (*last line of para 6.2.17*). In particular if 'accessibility' is a key criterion for GI, then this is likely to conflict with 'nature reserves'; 'connectivity for wildlife' and 'biodiversity'.

8.2.3 If the main function of GI is 'accessibility', then sites of nature conservation interest should not be included within GI. If the main function of GI is to provide a rich network of greenspaces, each with different functions, then 'accessibility' should not be the main objective.

8.3 Delivery

8.3.1 The description of 'green infrastructure' includes linkages such as river corridors and floodplains. In order for there to be connectivity within this green framework, land uses not related to development, such as agriculture, might well therefore be included.

8.3.2 However, Policy GI1 requires GI to be provided with development. For that, either the developer or the LPA needs to be in control of the land.

8.3.3 It is not clear, therefore, whether GI is a planning tool, recognising the potential for areas of greenspace with different functions, to be linked; whilst retaining their functions; **or** whether it is a development control tool – specifically requiring land to be made available and accessible as a condition of development.

8.3.4 The aspirational tone of this RSS section and policy may not, therefore, be achievable in terms of physical provision of GI, if that is what is intended.

8.4 Scale and type of greenspace

8.4.1 Policy GI1 is also vague as to the quantum of greenspace expected. We do not consider that RSS should set a space-standard, but are concerned that policy may be applied onerously.

8.4.2 Cambridgeshire County Council is developing similar 'Strategic Open Space'; not yet incorporated into the Structure Plan; but being introduced into emerging LDFs. The South Cambridge LDF Inspectors have recently produced an Interim Report on the Northstowe AAP, in which they reject the requirement for Strategic Open Space (*Appendix 6*).

8.5 GI: conclusion

8.5.1 We consider that RSS Policy GI1 Policy and text are too vague to be implementable. It is not clear as to whether GI is an aspiration, brought in by a combination of ownership, agreement, and management; or whether developers will be required to be in direct control of extensive greenspace, in order to achieve an allocation or permission.

8.5.2 The GI functions appear to conflict. If land has to be accessible in order to qualify as GI, then land of nature conservation interest should not be included; and vice versa.

8.5.3 The requirement for GI, above the normal open space requirements, could potentially be onerous; and limit the deliverability of housing. This has been found at AAP Examination.

8.5.4 Should the policy to provide extensive greenspace remain in RSS, then West Wareham can deliver; there is sufficient land of an appropriate type and location available to meet the draft policy objectives.

Appendix 4: Plans: Designations in the B & PHMA.

Appendix 4: Figures

All data from 'MAGIC' website.

Contents

- Figure 1:** Special Protection Areas in south-east Dorset; a broad area 5km from their outer boundaries; the draft RSS Areas of Search and location of West Wareham.
- Figure 2:** Environment Agency: areas of flood risk in south-east Dorset.
- Figure 3:** Dorset Area of Outstanding Natural Beauty in south-east Dorset.
- Figure 4:** Green Belt in south-east Dorset.

**Appendix 5: New wording for the 'natural beauty'
statutory criterion for AONBs.**

REVISED NATIONAL PARK CONDITIONS

National Parks and Access to the Countryside Act 1949

5 National Parks

(1) The provisions of this part of this Act shall have effect for the purpose –
(a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and
(b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

(2) The said areas are those extensive tracts of England as to which it appears to the [Countryside Agency/Natural England] that by reason of –
(a) their natural beauty and
(b) the opportunities they afford for open-air recreation, having regard both to their character and to their position in relation to centres of population,
it is especially desirable that the necessary measures shall be taken for the purposes mentioned in the last foregoing subsection.

(2A) [The Countryside Agency/Natural England] may –
(a) when applying subsection (2)(a) in relation to an area, take account its wildlife and cultural heritage, and
(b) when applying subsection (2)(b) in relation to that area, take into account the extent to which it is possible to promote opportunities for the understanding and enjoyment of its special qualities by the public.

(3) The said areas, as for the time being designated by order made by the [Agency/Natural England] and submitted to and confirmed by the Minister shall be known as, and are hereinafter referred to as, National Parks.

N.B. The additional subsection (2A) will have effect from 30 May 2006.

Natural Environment and Rural Communities Act 2006

99 Natural Beauty in the countryside

The fact that an area in England or Wales consists of or includes—

- (a) land used for agriculture or woodlands,
- (b) land used as a park, or
- (c) any other area whose flora, fauna or physiographical features are partly the product of human intervention in the landscape,

does not prevent it from being treated, for the purposes of any enactment (whenever passed), as being an area of natural beauty (or of outstanding natural beauty).

N.B. This section will have effect from 30 May 2006.

**Appendix 6: South Cambridgeshire LDF;
Northstowe AAP Inspectors' Interim Report.**

Independent Examinations of South Cambridgeshire District Development Plan Documents

NORTHSTOWE AREA ACTION PLAN

STATEMENT BY THE INSPECTORS

At the close of the hearings into the soundness of the Northstowe Area Action Plan on Thursday 25 January 2007, we were requested to provide, if practicable, an interim statement of important findings to enable continuing work on the preparation of Master Planning and the revised planning application for Northstowe new town. We were specifically requested to indicate our decisions on recommendations to be made in relation to:

- 1 The size of the new settlement
- 2 Width of and uses within the Green Separation
- 3 Strategic Open Space/Country Park requirements

In addition, since it has necessarily been an initial consideration for us, we consider that it would be of value to indicate our conclusion on the most wide ranging challenge to the soundness of the Area Action Plan: whether the new town should straddle the Cambridge Guided Busway and extend to the north and east

Therefore, with the Council's agreement, the Inspectors provide the following information in advance of the submission of their report:

- 1 The recommendation on the size of the new settlement will be that it should maximise the development potential of the area with a new town having a target of 10,000 dwellings, the precise figure to be the result of Master Planning for the town;
- 2 The requirement for the green separation to be a minimum of 200m wide will be removed, as will the restriction on "urban" open land uses within the green separation.
- 3 The Council's policy for Strategic Open Space has no sound evidence base and is to be deleted from the Development Control Policies DPD. **There will be no requirement to provide any country parks.** As a result, the Strategic Open Space requirement resulting from the Northstowe development will have to be subject to negotiation based upon factors including the existing Strategic Open Space provision accessible to future Northstowe residents, the work on the Master Plan and considerations of economic viability.
- 4 The Northstowe Area Action Plan is sound to the extent that it provides scope for the development of a new town of up to 10,000 dwellings within its boundaries, subject to the matters dealt with in 2 above and the need to provide for an area reserved for possible future development to the north west of Station Road. Because of the need to provide for a step-change in the delivery of housing development, the delay which would occur in revising the extensive front-loading planning work which has been undertaken, and the highly significant implications for changing important elements within the structure of the new town which would follow from any decision to take the town across the line of the Cambridge Guided Busway, the proposals put to us by The Fairfield Partnership are not necessary to make the plan sound, and would indeed make the document unsound due to failure when assessed

against soundness Test IV (conformity with national planning policies, the RSS and other relevant plans, policies and strategies); Test VI (coherence and consistency between development plan documents); Test VII (most appropriate in all the circumstances having considered the relevant alternatives); and Test VIII (clear mechanisms for implementation).

Cliff Hughes
Terry Kemmann-Lane

End of statement

23rd February 2007

References to Main Text

- ⁱ *Implications of the 2003 Revised Household Projections, Section 4(4) Advice, Bournemouth Borough Council, Borough of Poole, Dorset County Council, December 2006*
- ⁱⁱ *South East Dorset Strategy: SED 07: Economy, November 2005*
- ⁱⁱⁱ Regional Economic Strategy 2006-2015, South West Regional Development Agency (**SWEDS32.01**)
- ^{iv} *South West of England Regional Development Agency, Spatial Implications of Economic Potential in the South West, Roger Tym and Partners, Final Report, June 2006*
- ^v *South West Regional Assembly "Delivering Housing Growth: An overview of Housing Trends and Capacity in the South West Region, produced by DTZ, January 2007*
- ^{vi} SWRDA, "The Demand and Supply of Employment Land and premises in the South West", January 2007 (**SWEDE34.02**)
- ^{vii} *South West Housing Body "Housing in the South West – Overview Report, Bournemouth & Poole, February 2005, Final Report, (produced by DTZ)*
- ^{viii} *South West Regional Assembly, Delivering Housing Growth: An Overview of Housing Trends and Capacity in the South West Region, January 2007*
- ^{ix} *South West Housing Body "Housing in the South West – Overview Report, Bournemouth & Poole, February 2005, Final Report, (produced by DTZ)*
- ^x *South East Dorset Strategy: SED 06: Housing and Demographics, Bournemouth BC, Dorset CC and Borough of Poole, November 2005*
- ^{xi} South East Dorset JSA Green Belt Review, with the Colin Buchanan Strategic Green Belt Review (February 2006) (**SWRD30.05**)
- ^{xii} RSS p 80, para 4.3.1.
- ^{xiii} Constraints scheduled at Appendix 3, para 4.2.1; main constraints mapped at Appendix 4.
- ^{xiv} *Dorset Heathlands Interim Planning Framework 2006-2009, January 2007, para's 2.4, 2.5.*
- ^{xv} i.e. extensions to Bournemouth, Poole or Christchurch.
- ^{xvi} RSS para 4.3.12.
- ^{xvii} Figure 1 at Appendix 4
- ^{xviii} Draft Master Plan at Appendix 2
- ^{xix} RSS Policy F1; RSS Map 7.4. Figure 2 at Appendix 4.
- ^{xx} Figure 2 at Appendix 4.
- ^{xxi} Figure 3 at Appendix 4.
- ^{xxii} RSS para 7.2.7.
- ^{xxiii} PPS7 para's 21-23.
- ^{xxiv} RSS Policy ENV3, p 146.
- ^{xxv} RSS ENV3; last para.
- ^{xxvi} Figure 3 at Appendix 4.
- ^{xxvii} Figure 4 at Appendix 4.
- ^{xxviii} RSS para's 3.3.5, 4.3.3, Policies SR26, SR27.
- ^{xxix} PPG2 para's 1.4, 1.7
- ^{xxx} Figure 4 at Appendix 4.
- ^{xxxi} *South East Dorset Strategy: SED 06: Housing and Demographics, Bournemouth BC, Dorset CC and Borough of Poole, November 2005*
- ^{xxxii} Appendix 6: S-Cambridgeshire LDF: Northstowe AAP Interim Inspectors' Report, reference to Strategic Open Space.
- ^{xxxiii} West Wareham Master Plan at Appendix 2
- ^{xxxiv} Appendix 5: Revised National Park conditions (definition of natural beauty also applies to AONBs)