Christchurch and East Dorset Core Strategy Examination

Statement submitted by Savills on behalf of the Canford Estate and Harry J Palmer Holdings Ltd on Matter 2: Green Belt

Respondent reference: 523532

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Matter 2: Green Belt

Issue 1. Is the proposal to make limited changes to the GB justified?

- Paragraph 83 of the NPPF states that Green Belt boundaries should be established by local planning authorities in their Local Plans, which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
- 2. The current Green Belt boundaries have remained largely unchanged since they were first drawn up in 1982. There is a critical need to deliver new homes to meet both market and affordable housing need. This need cannot be addressed within existing urban areas or beyond Green Belt boundaries in a sustainable manner. The extension of existing urban areas is the most sustainable option to accommodate identified housing needs. The proposal to make limited changes to the Green Belt is therefore fully justified.

Issue 3. Does the CS set out a precise timescale and clear process for the GB boundary changes?

- 3. The Core Strategy does not appear to set a clear timescale or process for the Green Belt Boundary changes. Policy KS2 states that the revised Green Belt boundaries will follow the edge of the new urban area. This is ambiguous as the Green Belt boundaries will need to be revised in order to allow proposals for the New Neighbourhoods to come forward in line with policy.
- 4. Discussions with EDDC Officers have indicated that it is not the intention of the Core Strategy to define the precise changes to the Green Belt boundary, and this will be drawn up to follow the edge of the new urban when the planning applications for the new neighbourhoods are determined.
- 5. It is clear from the Housing Trajectory (SD27, March 2013) and the Housing Supply, Housing Trajectory and Gypsy and Traveller Accommodation (FD1, June 2013) documents that the Council intends that the New Neighbourhoods / strategic sites will be delivering new homes by 2014/15. Given the typical lead in times for such sites, this would require the determination of planning applications in early 2014.

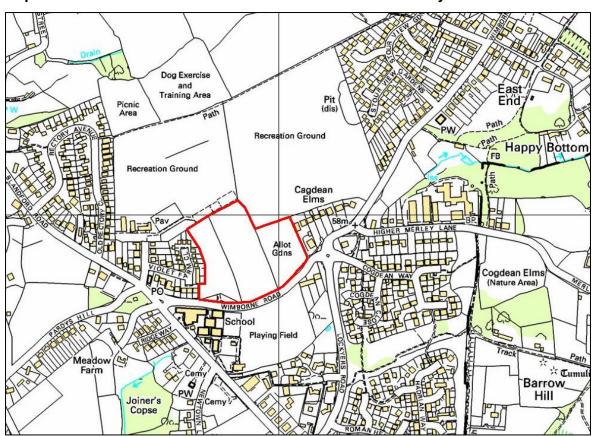
- 6. Policy KS2 would provide greater clarity if re-worded to explain that the revised Green Belt boundaries follow the extent of the proposed development sites as indicated by the red line in the illustrative plans in the relevant site chapters, unless the site includes SANGS and strategic open space, which will be incorporated into the revised Green Belt.
- 7. The following revised Policy wording is suggested as a replacement for the second and third sentences of the second paragraph of Policy KS2:

The revised Green Belt boundaries accommodate the allocated development sites by following the red line indicating the extent of the site as shown in the illustrative plans in the relevant site chapters, unless the site includes significant on site SANG or strategic open space provision, which will be included in the Green Belt.

Issue 4. Are the GB boundaries for every development proposal clearly defined on proposals maps?

- 8. It is unclear from the submission policies maps whether the Green Belt boundary has been amended to exclude the New Neighbourhood allocations, or if the Green Belt washes over theses sites in which case the Green Belt will therefore be subject to revision at a later date.
- 9. Policy KS2 states that significant open space and SANGs will be within the Green Belt, and will be shown on the Proposals maps for each individual development proposal. It should be noted that a SANG relating to part of the Policy CM1 designation is proposed to the east of Corfe Mullen outside the administrative area of East Dorset District Council and within the Borough of Poole, and is not therefore shown on the Proposals Maps.
- 10. The submission policies maps published alongside the submission of the Core Strategy show 'Potential Suitable Alternative Natural Greenspace (SANG) / Other Greenspace'. It is difficult to distinguish these areas from other landscape, recreation, and nature conservation designations on the maps. It is unclear whether these areas intended to provide an indication of the alignment of the revised Green Belt boundaries, but they do not appear be linked to Policy KS2 and have not been drawn up with sufficient clarity or accuracy to provide a definitive Green Belt boundary.
- 11. In summary, the GB boundaries are not adequately defined on the proposals maps. In order to provide a sound basis for decision making, and to ensure the timely delivery of the New Neighbourhoods / strategic sites proposed in the plan, the Core Strategy should

clearly identify Green Belt boundaries. For the avoidance of doubt, the Green Belt boundary should be drawn up to exclude from the Green Belt the Canford Estate and Harry J Palmer Ltd landholdings to the north of Wimborne Road as outlined in red on the map below. Policy CM1 also refers to an area of safeguarded land for the construction of a new school. This area is not shown on the map below, but for clarity and consistency should be removed from the Green Belt.



Map 1: Area to be removed from Green Belt in relation to Policy CM1