



MATTERS AND ISSUES 2

Green Belt (KS2)

REPRESENTATION 524090

Hearing Statement

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1 Is the proposal to make changes to the Green Belt justified?

- 1.1 The proposals to make limited changes to the Green Belt are justified however the plan does not go far enough. The changes proposed are to facilitate new much needed housing development. The changes allow just sufficient changes to be made to accommodate housing needs identified now but no more than this. The Council do not appear to have undertaken a full assessment of the Green Belt and nor does it appear from the evidence base that they have taken account of the other requirements of the NPPF.
- 1.2 The NPPF facilitates changes to the Green Belt to meet objectively assessed needs but the NPPF goes much further stating that, when a Green Belt review is being undertaken it should be done so that the Green Belt can be permanent in the long term, which leads to the Inspector's second question on this issue and also interlinks with the requirements of paragraph 85 of the NPPF and the representations I have made in respect of issue 1.
- 1.3 The spatial strategy has not undertaken a full and proper and objective analysis of the Green Belt both in terms of allocating sites for residential development and in terms of a detailed analysis of land within the Green Belt in terms of paragraph 83 and 85.
- 1.4 I have attached an extract from the Green Belt review undertaken in 2005. This plan shows the most sensitive areas in Green Belt terms. The proposed urban extensions within East Dorset with the exception of Verwood, all fall within identified key gaps or areas identified as being important in providing an historic setting. The review extract shows land which, when assessed against the five purposes of including land within the Green Belt, are the most important.

- 1.5 Therefore, while it is clear that changes need to be made to the Green Belt to accommodate the additional housing it is not accepted that the proposed allocations are the most appropriate strategy based on an assessment of reasonable alternatives and an assessment against the five purposes.
- 1.6 Some of the gaps identified within the Green Belt review may be considered to be more important than others. The Council have allocated urban extensions within some of the gaps but refused to accept development in others because the Council advised these are gaps between settlements. The reason given for example for not considering the areas of search to the north of Leigh Road as appropriate for development is because they would fill an identified gap. However the same could be said of land to the west of Wimborne, land to the south of Leigh Road and land to the south of West Parley. The Council have simply not set out the objective analysis which has taken place in respect of assessing the proposed sites in terms of appropriateness of preferred sites against the other reasonable alternatives. This point links back to issue 1 in relation to the overall spatial strategy, that is, the strategy does not reflect an objective analysis of all reasonable alternatives.
- 1.7 Bearing in mind the sensitivity of the various sites, the setting of adjoining historic settlements and landscapes and the significant reduction of identified important strategic gaps it is considered that the Council should at the very least provide a detailed objective analysis of the various sites, that is those put forward in the plan and other potential alternatives against the 5 purposes for including land within the Green Belt. It is clear that the Council's preferred sites will either result in encroachment or coalescence. Nowhere has the Council provided an assessment of the relative harm caused by each of the prepared sites against any other reasonable alternative. The preferred sites therefore are not fully justified.

1.8 The Council have not demonstrated that the preferred sites are the most appropriate in terms of paragraph 80 of the NPPF against other similar sites and based on the available evidence. It would be reasonable to expect the Council to have provided a matrix of tests against which all sites should be assessed. Such tests should include the 5 purposes set out in paragraph 80, other requirements of strategic Green Belt reviews i.e. those set out in paragraphs 83 and 85 of the NPPF and other material considerations.

1.9 Instead the Council have picked a number of sites and simply discounted others. It would appear that the main driving force for the Council's decision and promotion of preferred sites does not lie with the importance of the Green Belt, the reasons why it was so designated in the first place and the requirements of the NPPF in this regard but whether or not there would be readily available SANGS land. While the ability to provide SANGS land is important it is not the only factor to be considered. The land adjacent Brookside, for example, has an ability to provide a certain amount of housing with the required amount of SANGS either using existing and additional facilities. This land however has been discounted for reasons which would equally apply to other sites which are being promoted. It would seem much more sensible to facilitate development on this land which represents infilling rather than development within the much lower level Stour Valley in the remaining gap between Bournemouth and Ferndown.

2 Have the Green Belt boundaries been assessed to consider their capability to endure beyond the plan period, as advised in NPPF paragraph 83?

2.1 Paragraph 83 advises that when altering Green Belt boundaries through the plan preparation process Councils should examine closely Green Belt boundaries. This requirement is also linked to the provisions of paragraph 85.

- 2.2 The Council have stated that they will only be reviewing Green Belt boundaries at the strategic Core Strategy stage and then only in respect of enabling a number of strategic housing allocations. That is to say the Council will not be facilitating other minor changes on an individual request basis. The Council also advised they do not intend to make provision for safeguarded land.
- 2.3 In essence therefore, the Core Strategy is intending to redefine the Green Belt boundary. The Councils advise they have no other plans to change the boundary.
- 2.4 This approach does not accord with the requirements of the NPPF. Policies or proposals which are contrary to the NPPF are not considered to be consistent with achieving sustainable development and not consistent with national policy and therefore fail the tests of soundness.
- 2.5 The Council therefore need to undertake a process or facilitate a process where they can investigate in detail land within the Green Belt to ascertain whether or not it is necessary to keep permanently open.
- 2.6 The New Forest Core Strategy, for example, includes a policy within the spatial strategy which facilitates limited small scale changes to the boundary of the Green Belt which are to be considered under a review of the boundary within a separate DPD process. Facilitating such a review would enable compliance with paragraphs 83 and 85, in part, to ensure land which is not necessary to keep permanently open is removed from the Green Belt.
- 2.7 A number of representations have been made seeking amendments to the Green Belt boundary on this basis but the Council say they are simply not

willing to process these. Again, from personal experience, the NFDC Council have since agreed to remove small parcels of land from the Green Belt within the DPD consultation process because it has become clear to them that these sites are not needed to be permanently open. Not only does this approach ensure land which is not necessary to keep open is removed from the Green Belt but it also potentially increases urban capacity and opportunities for additional infilling and residential development.

- 2.8 The Council have also not included any safeguarded land. I am not aware that the Council have investigated housing need to beyond the plan period. The Council have advised they have simply chosen not to consider safeguarding land and will not do so unless requested to do so by the Inspector.
- 2.9 It would appear, to be consistent with the NPPF, the Council need to at the very least consider requirements beyond the plan period and to present their findings as to whether or not needs beyond the plan period can be met within the existing strategy and without the need to further amend the Green Belt boundary. Any such findings would need to form part of the spatial strategy being considered now. If it is clear that additional housing land will be required and paragraph 85 is quite clear that safeguarded land should be identified at this stage to meet longer term needs.
- 2.10 It is also of paramount importance that land which is being proposed as SANGS due to proximity to urban extensions is not itself land which should perhaps be considered as safeguarded land for future needs. The failure to consider safeguarding land is a significant failing of the Core Strategy particularly given the housing need issues in other boroughs such as Purbeck and Bournemouth.

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- 2.11 It is important that future land which may be considered necessary and appropriate for development does not become undeliverable because of decisions taken now in respect of Green Belt boundaries and the location of SANGS. It would also seem poor practice to set out SANGS to meet short term mitigation needs of development of the urban extensions proposed now which would then either result in future development being provided on the SANGS which is then re-provided elsewhere or any additional development being beyond the SANGS and thus separated from the main urban area.
- 2.12 Essentially, the time to consider such matters is now when the Green Belt is being reviewed and the Council have not done this. The plan is therefore not positively prepared, not justified and nor is it consistent with national policy.
- 2.13 Additional safeguarded land can be provided on land adjacent Brookside and Colehill and on land north of Edmonton Road, Eastworth Farm in Verwood. Both sites would also help address problems with the spatial strategy identified in the submission relating to issue 1.
- 2.14 In relation to parts 3 and 4 of the Inspector's questions there are no specific details provided in relation to timetabling or clearly defining the Green Belt boundaries.
- 2.15 The plan is not therefore positively prepared and does not address all requirements across the district. The plan is not the most appropriate strategy and indeed does not, as it is required to do, look beyond the plan period. The plan does not accord with the NPPF, particularly paragraphs 83 and 85.
- 2.16 The plan can be made sound by accepting that some of the allocations are not the most appropriate when assessed against the purposes for including land within the Green Belt and against the reasonable alternatives. Moreover, it

should be acknowledged that alternative designations, such as within Colehill, will much better address development and infrastructure requirements than new neighbourhoods which extend into open countryside.

- 2.17 The plan should accept that there is a greater housing need than identified and thus increase the number of allocations and introduce safeguarded land. The plan should facilitate a detached Green Belt review to take account of paragraphs 83 and 85.