CHRISTCHURCH AND EAST DORSET CORE STRATEGY

MATTER 2 (GREEN BELT (KS2))

STATEMENT OF BEHALF OF MESSRS R J NEWSOME AND M C NEWSOME

Question 1 - Is the proposal to make limited changes to the Green Belt justified?

It is acknowledged and accepted that the level of housing required in both Christchurch and East Dorset (as identified in the Bournemouth and Poole Strategic Housing Market Assessment) exceeds the capacity of the existing urban areas and as such that it is necessary to identify sites in the Green Belt in order to meet identified housing need.

It is however considered that the level of new housing to be accommodated on land currently within the Green Belt is not justified and does not provide the most appropriate strategy, when considered against the reasonable alternatives and based on proportionate evidence (as required by paragraph 182 of the NPPF).

As well as proposing limited changes to the existing Green Belt boundaries to enable some new housing to meet local needs Policy KS2 proposes to include areas in the Green Belt that are no longer capable of providing for these needs.

Paragraph 79 of the NPPF sets out the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open with the essential characteristics of Green Belts being their openness and their permanence. Paragraphs 84 and 85 continue to set out central government policy for drawing up, reviewing and defining Green Belt boundaries. In particular it is advised that LPA's should take account of the need to promote sustainable patterns of development and that LPA's should not include land which it is unnecessary to keep permanently open. The purpose of Green Belt policy is not therefore to include areas which are simply no longer capable of providing housing (or employment) to meet local needs as proposed by Policies KS2 and FWP2. Such an approach is therefore neither justified nor consistent with national planning policy.

The Core Strategy proposes (through Policies FWP2, VTSW3 and VTSW8) to include five out of six previously safeguarded sites (as allocated by East Dorset Local Plan Policy HSUP3) within the Green Belt. Four¹ of the five sites are within 400m of internationally protected heathland and as such are concluded by the Council as being incapable of being developed for housing with the site at Woodland Walk Ferndown (owned by the representor) considered to be unsuitable for development due to being heavily wooded with poor access. For the reasons set out in the representor's original representation land at Woodland Walk is considered to be suitable for limited residential development contrary to the LPA's conclusion and furthermore would help to promote sustainable patterns of development by virtue of the sites proximity to Ferndown town centre.

Notwithstanding the LPA's conclusions regarding whether the five aforementioned sites are suitable for development this is not a policy test for defining Green Belt boundaries with the fundamental aim to keep land permanently open and to prevent urban sprawl.

Whilst it is acknowledged that land at Woodland Walk Ferndown could not accommodate the number of units proposed on even the smaller of the two sites proposed to be allocated for residential development in Ferndown (namely Holmwood House (Policy FWP3) and Coppins (Policy FWP4)) it could help to meet identified local needs on land outside of the Green Belt reducing the extent of land to be removed from the Green Belt.

In summary, Policy FWP2² (and therefore Policy KS2) is not considered to be justified and as such the Core Strategy is considered to be unsound.

For the reasons set out above and in the representor's original representation reference to Woodland Walk should be removed from Policy FWP2 and map 10.3 should be deleted. In addition a new policy should be inserted into Chapter 10 – 'Ferndown and West parley Housing, Employment and Town Centre' including the land edged red at map 10.3 within the urban area of Ferndown.

¹ Namely: Coopers Lane Verwood, Doe's Lane Verwood, Blackfield Farm West Moors and Forest View Drive, Ferndown

² Forest View Drive and Woodland Walk Green Belt boundaries, Ferndown

Whilst this Statement is primarily concerned with land at Woodland Walk Ferndown should the Inspector find that the LPA's overall strategy towards the inclusion of sites within the Green Belt is not justified Policy KS2 should also be amended as follows:

"Development in East Dorset District and Christchurch Borough will be contained by the South East Dorset Green Belt. The most important purposes of the Green Belt in the area are to:

- Protect the separate physical identity of individual settlements in the area by maintaining wedges and corridors of open land between them.
- To maintain an area of open land around the conurbation. Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs and also to include areas in the Green Belt that are no longer capable of providing for these needs"

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

For reasons set out in the representor's original representation land at Woodland Walk is considered to be a deliverable site (in accordance with paragraph 47 of the NPPF) and as such does not serve the fundamental purpose of Green Belt land. The site is in a highly sustainable location and would therefore promote sustainable patterns of development (as sought by NPPF paragraph 84). By virtue of the sites deliverability for residential development (as well as its failure to comply with the criteria for defining Green Belts) the proposed Green Belt boundary around land at Woodland Walk is not considered to be capable of enduring through or beyond the plan period due to inevitable pressure to develop a deliverable site which has previously been allocated for residential development.

Questions 3 and 4

No additional comments.