

**Matter 2 Evidence / 558499
Sembcorp Bournemouth Water**

**CHRISTCHURCH & EAST DORSET CORE STRATEGY
EXAMINATION IN PUBLIC**

MATTERS & ISSUES 2/1, 2/2, 2/3 & 2/4

GREEN BELT

AUGUST 2013

1.0 INTRODUCTION

1.1 This statement comprises a response to the issues identified by the Inspector for the Examination in Public (EIP) into the soundness of the Christchurch & East Dorset Core Strategy (CS). This submission is on behalf of Sembcorp Bournemouth Water (“Sembcorp”), the owners of land at Marsh Lane, Christchurch. It is one of a number of submissions, the objective of which is set out at the commencement of our statement in respect of Matters and Issues 1.

2.0 MATTER & ISSUE 2/1

2.1 IS THE PROPOSAL TO MAKE LIMITED CHANGES TO THE GREEN BELT JUSTIFIED?

2.2 The South East Dorset Green Belt (GB) has been established around the conurbation since the 1980's. It has therefore endured for approximately twenty five years. Over that time, all development has taken place either on existing sites within the urban area, or on urban extension sites that were identified at the same time that the green belt was established.

2.3 In the main, the historic urban extension sites have now been fully developed. This has resulted in residential development being concentrated on sites within the existing urban area. The 2012 Strategic Housing Land Availability Assessment (SHLAA) for Christchurch (ED 32) demonstrates, in Table 3, that almost all dwelling completions over the last six years have been on windfall sites, with the majority being classified as Previously Developed land (PDL).

2.4 The CS housing delivery strategy will not be sound if it relies solely on the continued re-development of inner urban sites. Table 10 of ED 32 indicates that 3,186 dwellings could be developed from within the urban area; a figure that only just exceeds the strategic target. However, as set out in our statement in respect of Matters and Issues 1, it is considered that the SHLAA substantially over estimates the anticipated contribution from sites within

the existing urban area. It is for this reason that the additional urban extension site at Marsh Lane is proposed in these representations.

2.5 A related issue is the extent to which sites within the existing urban area will contribute to the provision of affordable housing. Table 6 of ED 32 analyses housing development by the type of site, and compares the number of sites to the amount of dwellings built on them. In the past six years, 172 sites have been developed, delivering 686 units - an average of four per site. Under the proposed new affordable housing policy, LN 3, sites of this size could provide affordable housing on site, but due to their small size, it is highly unlikely. An off site financial contribution, also acceptable under the terms of the policy, is more likely to occur - provided that it is viable to do so.

2.6 Our representations in respect of Matter 1 concluded that the combined planning costs of CIL and off site affordable housing at £450.00 per metre² would be a major constraint to the delivery of housing on small sites. This results in the need to amend green belt boundaries to accommodate urban extensions so as to achieve the strategic housing target; and in particular to deliver the much needed affordable housing.

3.0 MATTER & ISSUE 2/2

3.1 HAVE THE GB BOUNDARIES BEEN ASSESSED TO CONSIDER THEIR CAPABILITY TO ENDURE BEYOND THE PLAN PERIOD, AS ADVISED IN NPPF PARA. 83?

3.2 The CS does not indicate that the GB boundaries are to be established for any purpose beyond the plan period. This may mean that when the CS is reviewed, GB boundaries will also have to be reviewed if there is a need to plan for development that cannot be accommodated within the urban area.

3.3 In addition to Paragraph 83 of the NPPF, the second bullet point of Paragraph 157 requires plans to; *“be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.”* (Our Underlining)

- 3.4 The 2011 Census based population projections already provide evidence of an increase in the population to the year 2031. In Christchurch, there is a predicted increase of 2,000 additional people between 2026 and 2031. This suggests a growth in the population of circa 1,000 in the three years following the 2028 end date of the CS.
- 3.5 Therefore, in addition to amendments to the GB to accommodate the proposed urban extensions, alterations to cater for longer term needs are also merited. Land could be removed from the GB and safeguarded from development until such time as it is needed in the future.
- 3.6 The principle of this approach has been adopted elsewhere in South East Dorset. At North Poole, land has been safeguarded from development for longer term needs in both the Poole Local Plan (2004) and the Poole Core Strategy (2009). The policy wording differs slightly between the two documents, but the effect is the same; the land is excluded from the GB and available for development in the future, if the need arises. It is a “contingency” for development, as set out in Paragraph 6.166 of the Core Strategy. Extracts from both documents are included as **Appendix 1** to this statement.
- 3.7 It is submitted that the same policy approach can be adopted in the Christchurch & East Dorset CS.

4.0 MATTER & ISSUE 2/3

- 4.1 DOES THE CS SET OUT A PRECISE TIMESCALE AND CLEAR PROCESS FOR THE GB BOUNDARY CHANGES?
- 4.2 The CS does not indicate when, or how, the GB boundary changes will occur. Policy KS 3 states that the new neighbourhoods will be the subject of development briefs in advance of planning approval being granted. This implies that either the development brief, or the subsequent planning application, will be the vehicle for establishing revised GB boundaries.

4.3 This approach is considered to lack certainty, in particular as the timing of the submission of a planning application is entirely at the discretion of the landowner or developer; and could be at any time within the period of the CS - or even beyond it.

5.0 MATTER & ISSUE 2/4

5.1 ARE THE GB BOUNDARIES FOR EVERY DEVELOPMENT PROPOSAL CLEARLY DEFINED ON THE PROPOSALS MAPS?

5.2 Policy KS 2 of the CS states that new green belt boundaries will follow the edge of the new urban area; i.e. at the edge of the proposed urban extensions. However, the aerial photographs / illustrations for each of the proposed urban extensions within the CS do not indicate where the boundaries will be. This approach is contrary to Paragraph 83 of the NPPF, which states that:

“Local Planning Authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy.”

5.3 Additionally, the last bullet point of Paragraph 85 of the NPPF requires GB boundaries to be defined clearly, using features that are readily recognisable and likely to be permanent.

5.4 It is considered that to make the CS sound, the illustrations of the proposed urban extensions should also show the revised GB boundary. In some instances, this may depart slightly from the NPPF guidance in that development proposals incorporating Sustainable Alternative Natural Green Space (SANGS) may establish new boundaries that do not currently exist. However, where a planning permission for an urban extension is implemented, the boundary to the SANGS will be established and will endure in the long term; as it is envisaged that SANGS will come under public ownership and will remain in the GB.

- 5.5 The proposed GB boundary for the Marsh Lane site is shown on the plan reproduced as **Appendix 2** to this statement. It is consistent with the plan reproduced within Appendix 1 of our statement in respect of Matters and Issues 1.

APPENDIX 1

Extracts from Poole Local Plan & Poole Core Strategy

6.31 Government advice (Planning Policy Guidance Note 2: Green Belts) indicates that where major developed sites already exist within the Green Belt it may be necessary to define an envelope within which limited infilling would be appropriate. This will enable these uses to continue to contribute to the local community and its economy. Two such uses exist within the Green Belt identified on the Proposals Map: Canford School and Corfe Hills School. It is essential that these schools are allowed to continue to satisfactorily meet educational needs provided that the Green Belt is not prejudiced.

NE5 MAJOR DEVELOPED SITES IN THE GREEN BELT

AT MAJOR DEVELOPED SITES WITHIN THE GREEN BELT, AS SHOWN ON THE PROPOSALS MAP, LIMITED INFILLING WILL BE PERMITTED PROVIDED THAT IT:

- i) LIES WITHIN THE ENVELOPE IDENTIFIED ON THE PROPOSALS MAP;
- ii) IS ANCILLARY TO THE EXISTING USE;
- iii) DOES NOT EXCEED THE HEIGHT OF THE MAIN SCHOOL BUILDING, IN THE CASE OF CORFE HILLS SCHOOL, AND DOES NOT AFFECT THE SETTING OF THE LISTED BUILDINGS, AND DISTANT VIEWS OF THEM, IN THE CASE OF CANFORD SCHOOL;
- iv) HAS NO GREATER IMPACT ON THE PURPOSES OF INCLUDING LAND WITHIN THE GREEN BELT THAN THE EXISTING DEVELOPMENT; AND
- v) DOES NOT LEAD TO A MAJOR INCREASE IN THE DEVELOPED PROPORTION OF THE SITE.

North Poole

6.32 Land at North Poole was previously safeguarded in the 1998 adopted Poole Local Plan for later comprehensive development for housing and employment uses. North Poole is identified at paragraph 6.36 of the Bournemouth, Dorset and Poole Structure Plan, July 2000 as a potential housing site for 750 dwellings. The development of this area was dependent on the A31 to Poole Link Road which identified the western boundary

of North Poole and the interim boundary to the Green Belt.

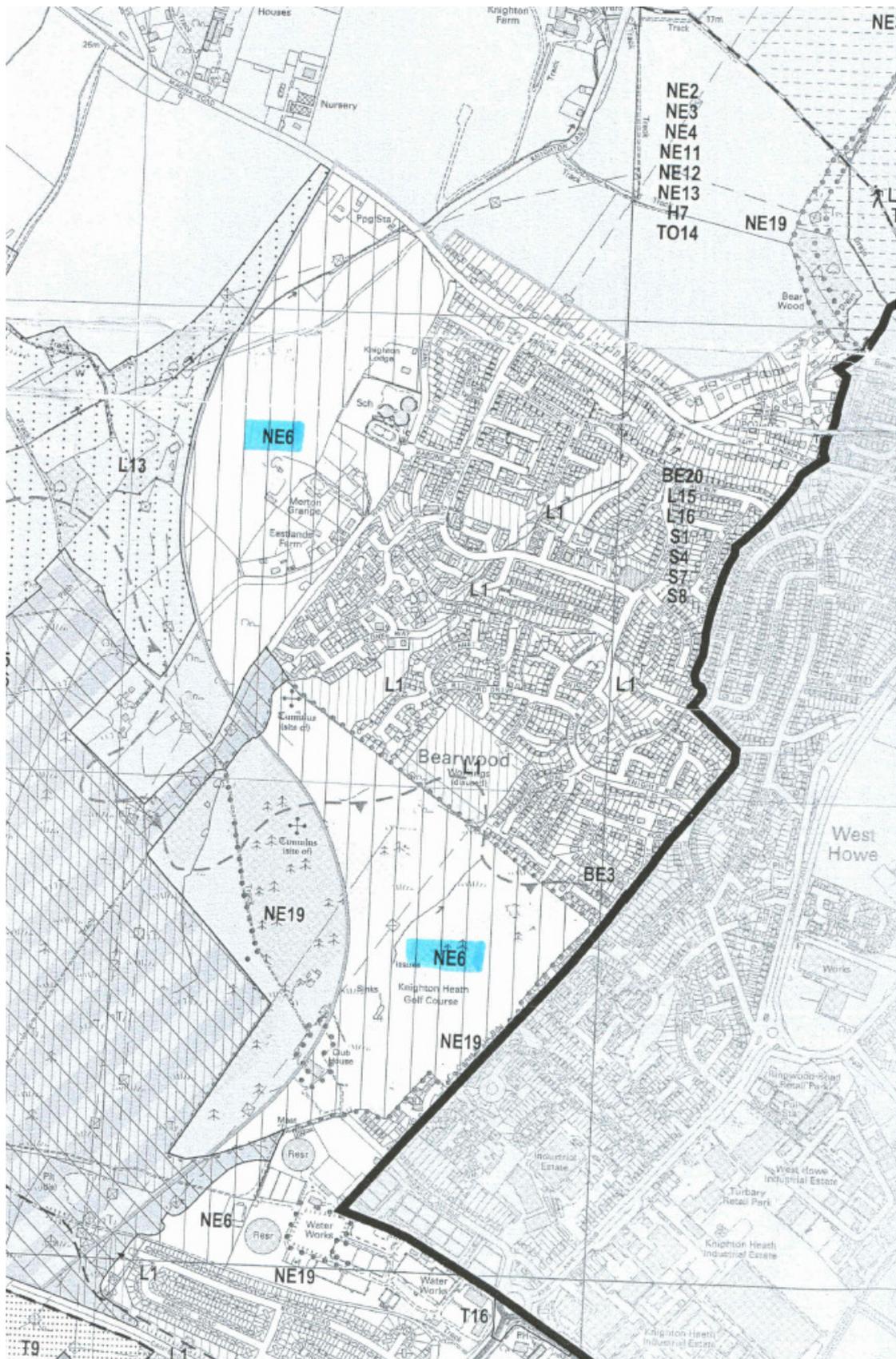
6.33 RPG10: Regional Planning Guidance for the South West was adopted in September 2001 and this is informing the current Structure Plan Review. Policy SS4 maintains a commitment to the role of Green Belts in the region, but states that, in preparing their development plans, local authorities should 'critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs'. The policy goes on to state that this could include removing or adding land to the Green Belt. Such a review is taking place as part of the Structure Plan Review and safeguarding the land at North Poole for future development could serve to prejudice the outcome of this. The Structure Plan Review will, therefore, determine the future of North Poole and the Local Plan will cease to safeguard this site. Instead, only development which would normally be permitted in the Green Belt will be considered. This will ensure that development appropriate in the Green Belt will be allowed and that development which might prejudice the outcome of the Review will be resisted.

NE6 NORTH POOLE

PENDING THE OUTCOME OF THE STRUCTURE PLAN REVIEW (OR ITS REPLACEMENT) AND SUBSEQUENT LOCAL DEVELOPMENT FRAMEWORK, DEVELOPMENT WILL NOT BE PERMITTED ON LAND AT NORTH POOLE, IDENTIFIED ON THE PROPOSALS MAP, UNLESS FOR PURPOSES APPROPRIATE IN THE GREEN BELT.

Green Belt Special Policy Area: Arrowsmith Road

6.34 Arrowsmith Road and its immediate environs has a low density settlement pattern which is made up primarily of residential properties on large plots. It was, for about twenty five years, the subject of a policy eventually included in the District Plan for Poole, Corfe Mullen and Upton (1979) which restricted development to one dwelling on not less than 5 acres of land. The



POOLE CORE STRATEGY EXTRACT

6.165 Poole Local Plan First Alteration (adopted in March 2004) identified two safeguarded areas of land which historically had been earmarked for a mix of housing and employment development (North Poole). These were dependent upon a then proposed trunk road scheme (the A31-Poole link) which would have defined the outer edge of the development sites. This scheme has since been dropped from the national Trunk Roads programme but the land had remained safeguarded in the Local Plan pending confirmation in the Structure Plan Review (or its replacement).

6.166 The Structure Plan Review never reached adoption, it being superseded by the Regional Spatial Strategy. The RSS has not identified the North Poole sites as an area of search for new development. However, this land offers the only significant contingency for employment development should the need for further employment land be identified. This land will remain as safeguarded land until such time as it can be clearly demonstrated that the employment requirements for the conurbation to 2026, as identified by the RSS, can be met without this land needing to be considered.

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Within Poole the South East Dorset Green Belt will continue to follow the existing built-up edge. No changes are proposed to the boundary from that shown in the Local Plan First Alteration, 2004. Land at North Poole will continue to be treated as safeguarded land until such time as it is determined that it would not be needed to help meet the employment land requirements of the RSS.

Preparing Poole for Climate Change

6.167 Climate change is a global challenge and it is the predicted speed of change which poses a degree of threat which requires all nations to act in a concerted way. Thinking globally, but acting locally, is a crucial part of confronting this challenge, although it is clear that this needs to be backed up by major national and international decisions.

6.168 In Poole's case, the Core Strategy has a responsibility to set out a local framework for addressing climate change. This is a priority both for the Sustainable Community Strategy^(xxxiv) and the Council's corporate strategy^(xxxv). It is important, however, to ensure that the approach we take is relevant to Poole's circumstances so that the policies within the Core Strategy and wider Local Development Framework are given the chance to contribute in a meaningful way. There are two main strands of action which need to be taken:

- reducing carbon emissions so that our contribution to global warming is slowed down and, eventually, limited to levels which the planet can handle; and
- taking steps to adapt to, and mitigate for, the potential impact of climate change upon Poole, its residents, and the natural environment.

xxxiv Shaping Poole's Future - the Sustainable Community Strategy for Poole 2006-2012

xxxv Striving for Excellence: Poole's Corporate Strategy 2007

APPENDIX 2

Proposed Green Belt Boundary



— Proposed Green Belt Boundary