

# **Christchurch and East Dorset Core Strategy Examination**

**MATTER 2: GREEN BELT (KS2)** 

## Statement by Christchurch and East Dorset Councils



Prepared by Christchurch Borough Council and East Dorset District Council

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#### 1 Issue 1: Green Belt Changes

#### Response to Issue

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

- 1.1 The South East Dorset Green Belt was established by the South East Dorset Structure Plan in 1980, with the first boundaries drawn in 1982. No formal 'safeguarded land' was identified in the Structure Plan to allow for development beyond the Plan period. These boundaries have not significantly changed in the last 30 years, and in the intervening years the remaining greenfield sites within the existing urban areas have been largely developed to their full extent, with the exception of a small number in East Dorset which are largely no longer suitable for development due to their proximity to areas of internationally protected heathland.
- **1.2** Evidence from the SHMA (ED27) and the Workspace Strategy (ED43) identify the need for additional residential and employment development within the Plan area to meet the needs of the local area. This evidence is examined in more detail in the Councils' Response to Matters and Issues 1 The Overall Strategy.
- 1.3 Evidence from the Councils' SHLAA Reports (ED32,33) indicate limited potential within the existing urban areas to accommodate the level of residential development required to meet the needs within the Plan area identified within the SHMA (ED27). The only way the Councils consider that sufficient land can be made available to meet the residential and employment needs within the Plan area is for limited changes to be made to the Green Belt boundary. Large parts of East Dorset District are not within the Green Belt, but are remote from major settlements, services and facilities and would not provide a sustainable form of development.
- 1.4 Within East Dorset in particular, the capacity of the existing urban area to accommodate additional residential development has been reduced by between 20 and 25% by the recognition by Natural England that additional residential development within 400m of internationally protected heathland caused unacceptable harm to these areas and that these impacts could not be mitigated. A number of the areas where additional residential development is now unacceptable are low density areas where re-developments at a higher density were taking place prior to the embargo, and which could have provided additional residential development opportunities. This situation is not so extreme in Christchurch Borough as it affects limited areas of Jumpers and St Catherine's Hill.
- 1.5 The majority of the remainder of East Dorset is allocated as part of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty where large-scale residential and employment development would not be acceptable. In Christchurch, the whole of the rural area of the Borough outside of the urban area boundary is within the Green Belt, and parts of the urban area are heavily constrained by areas of flood risk.
- 1.6 The sub regional strategic requirements over the plan period and local residential and economic requirements provide the exceptional circumstances for removing these sites from the Green Belt. The identification of the proposed employment sites has also been informed by the Workspace Strategy (ED43) which examined the fitness for purpose of

existing allocated sites in Christchurch and East Dorset and demonstrated that insufficient potential was available on brownfield sites to effectively contribute towards requirements for the SSCT over the plan period.

- 1.7 The identification of land for residential development has been informed by the East Dorset New Neighbourhood Master Plan Reports and the Christchurch Urban Extension Master Plan Reports (Documents ED62 69).
- 1.8 Table 1.1 sets out the scale of change to the SE Dorset Green Belt proposed in the Core Strategy. It should be noted that half of this land relates to the removal of the operational airport from the Green Belt.

	Existing Green Belt (Hectares)	Proposed Amendment (Hectares)	% change
Christchurch	3,477	200.7 (150 relate to Bournemouth Airport)	5.77
East Dorset	16,840	103.9	0.62
Total SE Dorset Green Belt	33,000	304.6	0.92

Table 1.1

1.9 In conclusion the Councils consider that they have demonstrated that the proposal to make limited changes to the Green Belt to accommodate development to meet the needs within the Plan area is justified by the evidence.

#### 2 Issue 2: Green Belt Boundaries

#### Response to Issue

Issue 2: Have the GB boundaries been assessed to consider their capability to endure beyond the plan period, as advised in NPPF para 83?

- 2.1 The Core Strategy has undertaken a rigorous assessment of appropriate locations for new neighbourhoods, as well as the needs for new housing and employment land. The analysis of needs cannot predict beyond the plan period, so it is difficult to judge what will be required in the period beyond 2028. Additionally, it is uncertain as to where needs beyond 2028 should be accommodated, for example it could be that future needs are accommodated by a new settlement, on a sub-regional basis. These uncertainties mean that it would be inappropriate to identify land safeguarded from the Green Belt for future development. As part of the Duty to Co-operate, ongoing work with neighbouring authorities will examine how future housing and employment land requirements will be met across the sub region.
- 2.2 The proposed alterations to the current Green Belt boundaries to accommodate the level of development proposed in the Plan only affect very limited areas of the South East Dorset Green Belt. The majority of the Green Belt, as currently designated, will remain and will continue to endure beyond the end of the Plan period as much of it includes land with significant constraints which would preclude it from future development, such as flood plain or internationally protected heathland or other wildlife designations.
- 2.3 The Councils therefore consider that the Green Belt boundary will endure beyond the end of the current Plan period, as required by paragraph 83 of the NPPF.

#### 3 Issue 3: Boundary Changes Timescale

#### Response to Issue

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

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

- 3.1 The Core Strategy proposes two main areas of change to the existing Green Belt boundaries. The first is to remove limited areas of land from the Green Belt and to re-draw the boundary to allow for specific residential, educational, employment allocations, and Airport operational requirements to meet the development needs of the Plan area, and the second, within East Dorset, is to identify areas of land within the Green Belt which were previously safeguarded for possible residential development in the previous Local Plan.
- 3.2 Dealing with the second areas first, the new Green Belt boundaries around the sites identified in Policies FWP2, VTSW3 and VTSW8 are clearly identified on the inset maps which accompany each policy and as no development is involved, the revised Green Belt boundaries will be established once the Core Strategy is formally adopted by the Councils following receipt of the Inspector's Report.
- 3.3 The other Green Belt boundary changes required in the Core Strategy relate to the specific strategic allocations to identify land for residential and commercial development to meet the needs within the Plan area, and within East Dorset for amendments to the Green Belt boundaries to allow for limited extensions to two existing schools to meet the increased need for school provision arising from the increase in residential development. The changes required to the school site boundaries are clearly set out in the plans which accompany Policies WM8 and 9 and these revised boundaries will be established once the Core Strategy is formally adopted by the Councils following receipt of the Inspector's Report.
- 3.4 The employment and Airport allocations set out in the Plan also have defined boundaries, therefore Polices BA2, BA3, FWP8, VTSW7 and RA1 are clearly defined on the proposals maps and will be confirmed on the adoption of the Core Strategy.
- 3.5 The revised Green Belt boundaries for the two strategic housing allocations in Christchurch will follow the boundaries as shown on the maps which accompany each allocation. For Policy CN1 the railway line will establish a strong, defensible boundary that will endure. SANGs will be provided on land that will remain as Green Belt. These boundaries will be confirmed on the adoption of the Core Strategy.
- 3.6 The broad areas of the allocations within East Dorset have been identified on the maps which accompany each site specific allocation in the CS. However, due to the need to establish boundaries that will endure and comply with the requirements of paragraph 85 of the NPPF, the exact Green Belt boundary for each of the allocations will be determined at the time the detailed planning consent is granted for the development. This will ensure that the boundaries will follow defined, physical features that are likely to be permanent, and will not include land which it is unnecessary to keep permanently open. This process

was successfully implemented on a major housing development in southern Ferndown in recent times where , like the SANG proposals which accompany the residential allocations, there was a major amount of open space associated with the scheme, but the final boundaries between the built form and the open space could only be determined once the detailed layout of the roads and dwellings was fixed at the application stage.

- 3.7 The wording of each specific East Dorset housing policy in the CS which relates to the re-alignment of the Green Belt boundary to facilitate development makes reference to the fact that the Green Belt boundary will be amended to exclude the land identified for new development, which makes it clear that the revisions will take place on a site specific basis, and the timing will be dependent on when the development comes forward. Policy KS2 (Green Belt) also makes reference to the fact that the revised GB boundaries will follow the edge of the new urban area.
- 3.8 The Councils consider that this mechanism for defining the revised GB boundaries will result in detailed boundaries that will endure beyond the Plan period. To identify the detailed boundaries, before new physical features are defined on the ground, at the allocation stage, the Councils argue, could lead to anomalies at the application stage and may result in further minor amendments to ensure that the resultant development complies with the remainder of the pre-requisites set out in the allocation policy and is acceptable in that location. The method proposed by the Councils will give greater certainty that the final boundaries will comply with the provisions of the NPPF, in particular paragraph 85.

#### 4 Issue 4: Proposals Map Boundaries

#### Response to Issue

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

**4.1** The response to this issue is provided within Issue 3 of Matter 2.