

# Christchurch and East Dorset Core Strategy – Examination in Public

## Matter I-Overall Strategy

Statement on behalf of  
Meyrick Estate Management Ltd )

Prepared by Jackson Planning (521508)

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## **Matter I –Overall Strategy**

1. This statement is made on behalf of Meyrick Estate Management Ltd (MEM) (Rep 360382) in response to the matters and issues to augment evidence provided in the statements and technical reports made at pre submission and proposed modification stage. This statement considers the questions raised by the Inspector under **Matter I** and highlights why the plan as proposed remains unsound and how modifications to the plan can make it sound. This statement concentrates on the strategy within Christchurch Borough.

### **Question I Do the CS vision and objectives set out a robust basis for tackling the key issues that have been identified?**

#### **Do they reflect an objective assessment of alternatives?**

2. The plan does not have an assessment of alternatives to meet the housing needs of the Councils. In representations made at the pre submission stage the flaws of the model to provide sufficient housing over the plan period, but particularly in the first five years of the plan, were raised an issue and this has been given little serious consideration. Our evidence, a detailed review of housing land supply points to a serious problem within the urban area of Christchurch (annex I). Alternative solutions have been put forward but these have not been fully tested or examined in the preparation of the plan.

#### **Is the CS Vision reference to “reducing” unmet housing need consistent with NPPF (para 47)?**

3. The plan cannot be found sound as it is not consistent with national policy on housing as its premise is to reduce unmet housing needs of the area, this is not consistent with meeting the full objectively assessed need for housing especially within Christchurch Borough and our evidence in response to this question is supported by a statement and evidence on Matter 2 and Matter 7C.
4. Objective 5 of the plan is not sound in relation to the urgent need for new market and affordable housing and the need to boost housing supply consistent with the aims of the NPPF. Annex I to this statement is a critical assessment of the housing land supply situation

in Christchurch by experts and it demonstrates that the plan is not effective if it is to rely on sites within the urban area and the site CN1 to bring forward sufficient market and affordable housing in the early part of (first five years) the plan to meet identified need. Given the lead in time for site CN1 (acknowledged by the developer in the response on matter 12) and problems identified with viability on urban sites, affordable housing delivery will continue to be close to the previous three years' output of nil affordable units. Other sites should be identified as part of the spatial strategy to meet the needs in the Borough.

5. The five year supply situation with regard to affordable housing is critical the assessment in Table C of annex 1 shows that an average affordable housing delivery in the five year period of 40 dwellings per annum is predicted by CBC, woefully short of the Bournemouth & Poole Strategic Housing Market Assessment Update 2011 assessment which states that the annual shortfall of affordable housing in Christchurch has increased from 243 dwellings per annum in 2007 to 332 dwellings per annum in 2011. The critical assessment in table C of Annex 1 shows delivery actual delivery based on consents is even lower, showing a combined delivery of just 65 affordable dwellings out of 454 dwellings (14%) in the five year period 2012 to 2017, an average of just 13 dwellings per annum, including a continuation this year of the nil delivery of the last two years.

**Question 2 Is the CS supported by a robust Infrastructure Delivery Plan (IDP)?**

6. The trajectory for housing delivery is incorrect in the IDP. The Statement for Matter 12 on behalf of Taylor Wimpey/ Bodorgan Properties (CI) Ltd (507541) explains why it is not correct. Furthermore there is a discrepancy between the draft policy CN2 and the housing trajectory in relation to site CN2. In addition the assessment of delivery as shown in Annex 1 does not match the trajectory and is over optimistic about market and affordable delivery.

**Question 3 Is the settlement hierarchy (KSI) based on robust evidence?**

7. MEM provided evidence of why the settlement hierarchy is incorrect in relation to Burton in their pre submission representations and supporting documents (360382 June MEM Representation Evidence Report CBC.pdf). This explains why Burton should be a rural service centre to be consistent with East Dorset settlements. MEM believes it is wrong to class Burton as Village it should be classified as rural service centre. The definition by function in the hierarchy suggests that villages are those that serve the home community only. Burton serves a wider rural hinterland in particular for the school/ GP practice/ churches and shop. The Council's position is not justified by evidence. The appendices to the above report (previously submitted) include details and catchment plans that show the school, nursery, Church and GP practice drawn from a significantly wider area. The Council have not provided counter evidence to support their contentions and in particular the evidence to show parity with East Dorset Settlements.

**Question 4 Is the proposed quantum of housing development (KS3) justified by the evidence?**

8. MEM believes that the approach as set out above in paragraph 3, 4 and 5 above shows that the quantum of housing in the plan is not sound. The five-year supply situation is critical. Additional housing capacity has been identified by this respondent to increase supply in the first five years of the plan at site CN2, which is fully supported by technical evidence. Therefore the plan as currently drafted is not based on robust evidence as the substantiated alternative position shows and is not justified.

**Question 5 Should the housing provision:**

- **allow 10% for vacancy rates and second homes?**
  - **provide a separate target for each Council area?**
9. MEM has previously identified in their representations to the proposed modifications a problem with a single housing market area for the two Councils, as it does not reflect reality. We support this position with an assessment of the housing market areas by experts. The

report attached as Annex I has considered the housing market areas from a number of perspectives including the evidence of estate agents who are at the 'coal face' of this market.

10. The practical considerations of geography of the area and how this affects the markets are relevant here. The Christchurch settlements are closely related to the coast whereas the East Dorset settlements are closely related to the A31 and the Dorset countryside. There is a significant gap between the two groups of settlements comprised of the protected heathland and Bournemouth airport. (see Annex I paragraph 2.09 and figure 2) The single housing figure fails to respond to these distinct Housing sub market areas in CBC and EDDC.

11. Also very telling at a simple level is the evidence of local estate agents who confirm the different housing sub markets in the two administrative areas. This is encapsulated well by this statement:

*“Every market place is different but I believe buyers looking in Christchurch wouldn't be looking in Wimborne as they are completely different areas and offer different things.”*

12. The SHMA (ED32 and ED33) updates for each Council show the two Councils have distinctly different dwelling type make up, this is partly based on property values, average incomes, demographics and the employment market.

13. Each Council should have its own housing target, as they have quite separate housing markets to serve different needs. The supply of housing in East Dorset will not meet the needs of households in need in Christchurch and vice versa, especially for affordable households, as they are less mobile than market households. In addition the plan will need to be monitored by Borough/ District split in order to ensure needs in each area are met. A single housing target for the combined administrative areas would create the risk of an inappropriate quantum of housing delivery compared with the geographical distribution of housing need.

**Question 10 -Is the need for housing to be located outside the urban areas/ in the green belt justified by the SHLAA and other evidence?**

14. The need for green belt releases beyond the town of Christchurch is fully justified by evidence. The town is heavily constrained by the coast, the existing urban area and protected habitats and accordingly the delivery of the North Christchurch urban extension and land south of Burton is vital to meeting strategic housing needs in the Borough. No comment is made in respect of East Dorset sites.
  
15. The supply of housing delivery from within the Christchurch urban area has significantly slowed since the recession as the 'recycling' of urban sites, and from garden land infill sites as this considerably less viable which has meant the sites have not come forward to deal with unmet needs. No affordable housing units have been completed in the Borough in the last three years – refer to CBC Annual Monitoring Reports 2009-2012 . (OD 10). With the imposition of the new affordable housing threshold and CIL there is an expectation that urban sites will not be viable and will continue to limit delivery of affordable housing in the Borough. This is addressed in more detail in response to Matter 7C and this is supported by the evidence in Annex I to this statement, that shows at best the urban sites can deliver only 8 affordable housing units per year in the first five years of the plan. This is significantly below the objectively assessed need, let alone the reduced need identified by the Council in their housing trajectory (FD1).
  
16. The evidence in Annex I shows that the SHLAA sites cannot deliver sufficient supply of housing land in the first five years of the plan and this provides the very special circumstances required to release Green Belt sites, as this is the only way to ensure that there is a 'step change' in supply of affordable housing units within Christchurch Borough from the very poor record of the last five years.

**Does the plan fail the Soundness Tests in its Overall Strategy?**

17. The plan fails all the 'Soundness Tests' on the basis that it is not the best overall strategy for the Borough, it does not meet national policy requirements and a needs to modified to have an alternative more positive plan that and is justified and effective in delivery.

**How the plan can be made sound?**

18. In order to be found sound the plan must identify further sites to make up the shortfall within Christchurch Borough to meet the objectively assessed housing needs where it can. The representations by MEM have shown that supply within the first five years can be boosted significantly by the allocation of a bigger site at Burton site CN2 afforded by an increase of the inset area of the village to allow a comprehensively master planned development consistent with the quality of the area.

19. The IDP needs to reflect the housing trajectory correctly and have more information with regard to delivery.

20. The plan must have separate housing market areas and separate targets for development for each Council to be consistent with the NPPF and ensure that needs in each market are met.

21. The settlement hierarchy needs to be changed to rank Burton correctly as a rural service centre to reflect the role it already plays within the area.

**Annex I – Intelligent Land Report I**