

**Matter 1 Evidence / 52291  
Seaward Properties**

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

**MATTERS & ISSUES 1/1, 1/4, 1/5 & 1/8**

**OVERALL STRATEGY**

**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 Seaward Properties Ltd. (“Seaward”), the owners and promoters of land at Manor Road, Verwood. The site was previously allocated in Policy VWM 4 for the residential development of 165 dwellings in the CS Options for Consideration Document (CD 6), October 2010. However, following the failure to agree a strategy for the delivery of a Sustainable Alternative Natural Green Space (SANGS) off of the site, the allocation was omitted from the Pre-Submission and Submission versions of the CS.

1.2 It is submitted on behalf of Seaward that to make the CS sound, the site should be re-allocated for residential development within a Main Modification (MM); and to remove it from the Green Belt (GB). Agreement has now been reached with Natural England for the delivery of a SANGS on the site that will allow for the development of approximately 85 dwellings. Evidence of this is set out in **Appendix 1** to this statement and comprises:

- Natural England Letter Dated 7<sup>th</sup> August 2013.
- Statement of Common Ground dated 7<sup>th</sup> August 2013.
- SANGS Outline Proposal 29017-02-003.
- Proposed Master Plan 29017-02-002

1.3 The re-allocation of the site for residential development forms the basis of the representations that are now submitted on the Matters and Issues identified by the EIP Inspector.

## 2.0 MATTER & ISSUE 1/1

2.1 DO THE CS VISION AND OBJECTIVES SET OUT A ROBUST BASIS FOR TACKLING THE KEY ISSUES THAT HAVE BEEN IDENTIFIED?

- 2.2 The CS Vision and Objectives are not considered to be a robust basis for tackling certain key issues, in particular housing delivery - including affordable housing. This is already of significant concern. The Strategic Housing Market Assessment (SHMA) (East Dorset Summary Update - ED 29), states that there is a need for 426 affordable housing dwellings per annum over the period 2011 - 2016; 2,130 in total.
- 2.3 However, this can be compared to past affordable housing completions (for which there is conflicting data). The SHMA states, in Figure 2.2, that only 28 have been constructed in the last four years. The East Dorset AMR (OD 11), in the table on Page 42, sets the figure at 65. The difference is likely to reflect whether the completions are counted on the basis of net or gross additions to the housing stock. Evidence from Dorset County Council monitoring suggests that the SHMA properly counts the dwellings on a net basis.
- 2.4 At an average of 7 dwellings per annum, this is woefully short of actual need. This again indicates that the CS can only be made sound by allocating additional sites for development where affordable housing delivery can best be achieved; i.e. on additional greenfield sites. They can deliver high levels of affordable housing that can not be achieved on small sites.
- 2.5 The CS relies on two principal sources of residential supply; greenfield urban extensions and windfall sites from within the urban area. If either of these sources do not deliver the required quantum of housing, the CS housing objective will fail.
- 2.6 In respect of sites within the urban area, a 'step change' in the delivery of affordable housing is introduced through a new policy; LN 3. This requires all residential development sites to contribute to affordable housing, irrespective of the size of the site - provided that there is a net increase in the number of dwellings. ED 29 also acknowledges this, but states (in Paragraph 5.18) that maximising affordable housing must be tested against the viability of developing land for housing; and that sites will need to be available and suitable, as well as viable (Paragraph 6.8).

- 2.7 There is no evidence that Policy LN 3 will deliver affordable housing to help meet the required target. Thus far, viability testing has only been undertaken in the context of the introduction of the Community Infrastructure Levy (CIL) - see ED 23. This is of concern, given that the CS requires 2,800 dwellings to come forward on sites within the urban area, of which 40% (1,120) should be affordable.
- 2.8 Further submissions on affordable housing will be set out in the response to Matters and Issues 7 (C), but viability remains a key theme of this statement.
- 2.9 Paragraph 4.17 of the CS refers to the housing strategy being informed by a number of evidence based studies, including the 2011 Strategic Housing Land Availability Assessment (SHLAA). The SHLAA was updated to 2012 for East Dorset (ED 33), but without being the subject of the external scrutiny as set out in the SHLAA Protocol. This error was subsequently corrected, with the author of this statement being afforded the opportunity, as a Panel Member, to comment on the SHLAA assumptions.
- 2.10 It is considered that the SHLAA substantially over-estimates the contribution that inner urban, or windfall sites, will make to the housing delivery targets. The following have been identified as key issues:
- Environmental constraints.
  - Viability.
  - Development on garden land.
  - The implementation rate of planning permissions.
  - The recent change to the use classes order.
- 2.11 Environmental constraints and the recent change to the use classes order were considered in our SHLAA response to have a marginal impact on housing delivery. However, viability was considered to be a major constraint. Policy LN 3 will require sites to accommodate a substantially greater level of development in order to cross subsidise the affordable housing. The scale of development would be unlikely to be acceptable for a

variety of planning policy and other considerations, including visual impact and the effect on the character of the area.

- 2.12 Our SHLAA response considered that the impact of Policy LN 3 will result in many potential residential development sites failing to reach land values in excess of either (i) the Existing Use Value (EUV) or (ii) EUV plus sufficient enhanced profit to encourage a landowner to bring a site forward for development.
- 2.13 Also, the alteration to the definition of brownfield land to exclude residential gardens will lead to an inevitable slowing down of the rate of delivery from this supply source. Historic trends therefore need to be re-evaluated.
- 2.14 It is considered that the viability issues that now need to be considered in the implementation of Policy LN 3 will result in a number of planning permission not being renewed. The SHLAA Panel previously agreed a 10% non-implementation rate. This is advocated again here.
- 2.15 Given the prediction that windfall rates will reduce in the future, the CS needs to have alternative and additional sites allocated for development in order to meet the residential delivery target. The land at Manor Road, Verwood, is entirely suitable. It's deletion as an allocation was based solely on the failure to deliver a SANGS. That has now been successfully overcome.
- 2.16 On this basis, it is submitted that the CS can pass the test of soundness by including additional urban extension sites, including the Seaward land at Manor Road. This alternative approach, albeit one that was contained in CD 6, will positively plan for the objective of achieving the key issue of meeting the required dwelling targets for both open market and affordable housing.
- 2.17 It is also submitted that the CS fails to meet the requirements of Paragraph 47 of the National Planning Policy Framework (NPPF). This requires the Local Plan (or CS) to meet the *“full, objectively assessed needs for market*
-

*and affordable housing...". Meeting the full needs means to eliminate them. The CS fails to do this - it only seeks to reduce unmet housing need. Urban extensions to accommodate more new housing will fulfil the NPPF requirement.*

### **3.0 MATTER & ISSUE 1/4**

#### **3.1 IS THE PROPOSED QUANTUM OF HOUSING DEVELOPMENT (KS 3) JUSTIFIED BY THE EVIDENCE?**

3.2 There is no evidence to suggest that unmet need in adjacent districts, inward migration and employment growth have been ignored.

### **4.0 MATTER & ISSUE 1/5**

#### **4.1 SHOULD THE HOUSING PROVISION ALLOW 10% FOR VACANCY RATES AND SECOND HOMES; AND PROVIDE A SEPARATE TARGET FOR EACH COUNCIL AREA?**

4.2 This statement contains no evidence on vacancy rates. However, the inclusion of a separate housing target for each council is supported. Whilst the CS is a joint document, it would be inappropriate for one council to rely too heavily upon another to achieve the overall housing targets. These will continue to be monitored in the normal way, with separate AMRs advising of development progress - and any shortfalls.

4.3 For example, in Christchurch it would be inappropriate to rely on the East Dorset urban extension sites coming forward for development if the Roeshot Hill strategic allocation is delayed for any reason. Similarly, housing need in East Dorset should not be reliant on the delivery of housing in Christchurch if the Wimborne, Parley etc. urban extensions are delayed.

4.4 It is for this reason that the CS will be sound if the housing delivery targets, and the components of supply, are robust. This statement proposes the following housing land supply table:

COMPONENT OF SUPPLY	SUB TOTAL	DELIVERY TARGET
Remaining East Dorset Local Plan Allocations <sup>1</sup>		110
Planning Permissions as at March 2012 <sup>2</sup>	530	
Less 10% for Non-Implementation	-53	
<b>Total</b>		<b>477</b>
CS Allocations:		
Wimborne Sites	1,260	
Corfe Mullen Sites	280	
Ferndown Sites	178	
West Parley Sites	520	
Verwood Sites	315	
<b>Total</b>		<b>2,553</b>
Unidentified Windfall Sites		2,110
<b>Total</b>		<b>5,250</b>

Table 1: Residential Land Supply in East Dorset

Note 1: Source - East Dorset Monitoring Report, March 2013 (OD 11).

Note 2: Source - Dorset County Council Development Statistics.

4.5 The Wimborne sites are as set out in the CS, but without allowance for the Rugby Club site as there is uncertainty over its delivery. The Corfe Mullen sites are slightly above the CS level as it is considered that there are opportunities for development adjacent to main roads in the settlement. There is a slight increase at Ferndown to reflect the greater potential on the FWP 3 allocation. The numbers for West Parley reflect the CS.

4.6 In respect of Verwood, the VTSW 4 site is included, although Seaward have previously objected to its allocation on the basis that the site is situated within an Area of Great Landscape Value. The North East Verwood site that was included in the CS Pre-Submission document (SD 1) is excluded as its allocation was deleted in the Schedule of Modification (SD 18). Seaward's Manor Road site is included.

4.7 The total for unidentified windfall sites equates to 140 per annum over the fifteen year plan period. This can be compared to the last six year completions amounting to a total of 742 dwellings for windfall and allocated sites (see the table on Page 36 of OD 11); an average of 124. The figure for windfall sites in Table 1 of this statement therefore still represents an increase on recent trends; notwithstanding the earlier representations regarding the affect of Policy LN 3.

## 5.0 MATTER & ISSUE 1/8

5.1 IS THE NEED FOR HOUSING TO BE LOCATED OUTSIDE OF THE URBAN AREAS / IN THE GREEN BELT JUSTIFIED BY THE EVIDENCE?

5.2 The matters set out earlier in this statement point to a justification to allocate additional urban extensions, based on a critique of the evidence base. In particular, the affordable housing policy change has been highlighted as a constraint to the development of windfall sites, where EUV's will be at prohibitive levels.

5.3 In addition, the introduction of CIL will add a further burden to the development process, restricting supply, particularly on PDL; and particularly on small sites. This is because Christchurch and East Dorset Councils have commenced consultation on an Affordable Housing Supplementary Planning Document (SPD) (OD 24.1). It suggests that where affordable housing cannot be provided on site, an off site financial payment is made at the rate of £350.00 per metre <sup>2</sup> (Gross Internal Floor Area). If this is eventually adopted, the combined CIL and affordable housing contribution will be £450.00 per metre <sup>2</sup>.

5.4 These costs are extremely high; amounting to anywhere between one third and one half of actual construction costs (which can vary according to how they are defined). This will inevitably impact on the deliverability of windfall sites, with the EUV again being prohibitive to development deliverability.

- 5.5 Because of their low EUV, greenfield sites do not suffer this constraint. They are more readily able to absorb the planning gain costs as the differential between the EUV and the residential development land value is far greater. The CS policy approach should therefore advocate the development of more urban extension sites - as submitted earlier in this statement.
- 5.6 This again points to the fact that the re-instatement of the Manor Road site for the residential development of 85 dwellings, and its removal from the GB, will produce a CS that is sound. The Manor Road site now also has the ability to deliver a SANGS. This will be a positive benefit in attracting new and existing residents to use it for passive recreation, thus reducing pressure on protected heathland in and around Verwood.

# APPENDIX 1

## Seaward Properties & Natural England: Statement of Common Ground

Date: 07 August 2013  
Our ref: South Verwood  
Your ref: VTSW4



Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Mr Atfield

**Planning consultation: South Verwood SANGs consultation  
East Dorset EIP**

Thank you for your consultation on the above which was received by Natural England on 07 August 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**The Conservation of Habitats and Species Regulations 2010**

Natural England confirm that the Statement of Common Ground dated 7 August 2013 and accompanying documents:

- Manor Road, Verwood, Dorset Ecological Appraisal(July 2013)
- 29017-02-002\_Proposed Masterplan
- 29017-02-003\_SANGS Outline Proposals

provide sufficient evidence that appropriate avoidance/mitigation measures can be provided by the developer to demonstrate that the proposal will not have a likely significant effect on the European and internationally designated heathland sites either alone or in-combination.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Nick Squirrell on 07766 133697. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

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## STATEMENT OF COMMON GROUND

### SANGS, SOUTH VERWOOD

7<sup>th</sup> August 2013

The following statement has been prepared by **Natural England** and **Seaward Properties Ltd** to set out areas of agreement in relation to the mitigation of European protected sites from any potential adverse effects of development land at Manor Road, Verwood, Dorset (formerly identified as Site VWM 4 in the Core Strategy Options for Consideration).

Following correspondence regarding a smaller housing proposal than previously considered in 2012, detail was agreed between Natural England and consultants acting on behalf of Seaward properties to address the requirement for the development to avoid harm to European protected sites. The current statement reflects a proposal for approximately 90 dwellings and a SANG provision of 3.25 ha and 1.5 km of new access routes for walkers and dog walkers.

Parties agreed to the principle of providing Suitable Alternative Natural Green Space (SANGS) to the south of Verwood specifically in order to mitigate visitor impacts to the Dorset Heathlands SPA, Ramsar and Dorset Heaths SAC (heathlands). The SANG will be secured as a mitigation/avoidance measure in perpetuity through the provision of necessary management resources and it will be managed by East Dorset District Council.

The SANGS will deflect new residents away from the heathlands and provide a convenient, newly accessible natural greenspace resource with access to the river for existing residents. This will ensure there is not an increase in visits and associated disturbance to nesting birds and other urban effects on nearby specially protected heathlands. There will be open access for local people to accommodate dog walking. The SANG will be a Green Paw site in accordance with the Dorset Dogs categories.

The SANGS comprises fields to the north of the River Crane, an easterly section between Manor Road and St Michaels and two fields west of St Michaels Road. Seaward Properties has prepared an outline masterplan for the SANGs, which forms part of this statement of common ground (Drawing Reference 29017 02 003).

The SANGS enjoys four principal points of access. For the eastern sector of the proposed SANGs, its eastern end may be accessed at its boundary with Manor Road, using proposed pedestrian crossings at the new access road. These will link in with existing footways to the wider area. To the east is land managed by East Dorset District Council which welcomes public access. A second access is provided off St. Michael's Road allowing access to the eastern sector of the SANGS at the western end.

For the western sector of the proposed SANGs, the area ( 3.25 ha) would be accessed via gates at St Michael's Road to allow two circular loops, one incorporating the northern bank of the River Crane and one the adjacent field to the north. This will give a length of approximately 1.5k m. Other enhancements

which may be considered will include opening up access points to the river for dogs and people.

The proposed access routes would be achieved by mowing and selective clearance of scrub as required and would be wide enough to allow a dog to be taken off the lead. Paths would for the most part, except those near entrance points where hoggins/gravelled paths will be required, will not be surfaced to have a semi natural feel (e.g. mown grass) but may include local areas of board walks where the route is wet (if needed) such as alongside the river's edge and to provide access & vantage points. Precise paths routes would be determined at the next stage of design. For those fields formerly used as paddocks, new tree planting would also be planted to create a semi natural area. The grassland area will be managed by cutting or light grazing.

Provision for a small area of informal car parking is provided at the existing field gate off St Michaels road, north of the River Crane. This may be removed or reduced during discussion at the detailed stage as the size of the SANG does not merit a car park.

Other facilities would include information boards and Dog 'litter' bins. Specific infrastructure details such as stock fencing, locations of bridge/gates, litter/dog bins and planting species, will be agreed in outline with the Council at a later stage preferably before the Core Strategy Examination in Public (EIP).

Prior to the EIP stage, the applicant will carry out a phase 1 habitat survey of the SANGs and housing land to consider if the proposed use may have adverse impacts on the biodiversity (including sensitive species such as water voles and otters) present and the impacts of proposed management.



