

# Christchurch and East Dorset Core Strategy – Examination in Public

Matter 4B –Land South of Burton Village

Statement on behalf of  
Meyrick Estate Management Ltd (360382)

Prepared by Jackson Planning (521508)

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**Matter 4B – Land South of Burton Village**

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 4B** and highlights why the plan as proposed remains unsound and how modifications to the plan can make it sound.

**Question 1. Does the allocation take account of the potential effect on the Green Belt between Burton and Christchurch?**

2. Burton is an inset village within the Green Belt, as opposed to a village that is washed over by the Green Belt notation. This is in recognition that this is a significant settlement that must be allowed to continue to adapt and change within the inset boundary. The NPPF (paragraph 86) confirms that where it is necessary to prevent development in a village primarily because of the important contribution, which the open character makes to the openness of the Green Belt, the village should be included in the Green Belt. As Burton is an inset village for the vast majority of the village it must be concluded that it does not contribute to openness of the Green Belt. It follows therefore that land to the south of Burton was considered to contribute to openness as it is excluded from the inset boundary and was confirmed as Green Belt.
3. In making an allocation of site CN2 the Council have not carried out any assessment of the visual impact of the development and the effect of openness of the Green Belt. This was also the case when MEM put forward the land South of Burton in the SHLAA in 2011 as a potential housing site. It was after this submission that MEM commissioned an expert Landscape and Visual Impact Assessment (LVIA) by James Blake Associates. This was in order to test the impact of development at land south of Burton and to consider the appropriate boundaries for development in order to make the representations to the Pre submission Core Strategy. The LVIA formed part of the CS pre-submission representations to the Council.

4. What is evident from a critical study of the southern boundary of the inset part of the village of Burton when viewed from the east is that the boundary nearly extends to the railway embankment. This is because of the elongated nature of development along Stony Lane and in depth behind at Sandy Plot; this reduces the physical and visual separation between the village and the railway embankment to a single field. Although small, this remains a distinct visual break in the line of development (Views 6 and 7 in the (LVIA). However, the developed edge of the village is just visible from south of the railway as a glimpse under the bridge, and is immediately evident when emerging along Stony Lane from under the bridge. This distinct visual break is an important one in separating Burton and Christchurch and does serve a GB function of separating two settlements.
  
5. However, when viewed from the west, along Salisbury Road (LVIA Views 2, 3a and 3b) the area within the Green Belt, beyond the inset boundary at the south of Burton village to the railway does not have the same distinct separation where buildings end and an open area starts. This is due to the frontage historic ribbon development along Salisbury Road including the considerable extent of the farm buildings of Burton Farm. Also clearly visible from Salisbury Road beyond the fields at the centre of this area the suburban style houses of Sandy Plot, Condor Way, and Medlar Close. These are visible in the gaps along the Salisbury Road frontage, especially around the historic barns. At any point on the land south of the village of Burton there is development visible on three sides so this area cannot be considered to contribute to openness of the Green Belt.
  
6. The development proposals masterplan previously submitted by MEM in their pre submission representations shows how the remaining fields to the south of the proposed development area will be retained as open space to maintain a green gap between Burton and Christchurch, which creates a distinct physical separation between Burton and Christchurch and which the LVIA study by James Blake identified. This would allow the GB to circle the village as a defensible boundary as it would represent the consistent linear built edge of development from Sandy Plot across to Salisbury Road.

7. To the south of this gap is the railway embankment which prevents any coalescence with Christchurch and south of the railway there is a significant further physical gap and visual gap created by the Sewage Treatment Works (STW) complex and adjacent field to the east as well as the very significant physical barrier of the Christchurch by-pass and further south still the Purewell Meadows which are within the floodplain and protected by nature designations.
  
8. The Councils have not carried out the necessary GB review of the boundaries to consider their capability to endure beyond the plan period (refer to statement for 360382 under Matter 2) which means that the plan cannot be found sound as it is a requirement under the NPPF paragraph 83. Notwithstanding this, the preparation of an alternative masterplan for land south of Burton has been prepared based on evidence examined in detail with the support of an expert Landscape and Visual Assessment submitted with the pre-consultation representations. The alternative masterplan clearly shows how it would be possible to have a long term defensible boundary to the south of the village and this would keep it quite separate from Christchurch visually as the embankment contains the settlement from views from Christchurch and can be augmented by the proposed planted screen to the south shown in the masterplan which could be secured by a local open space designation.
  
9. The allocation boundary that the Council have chosen for site CN2 is arbitrary and cannot form a defensible boundary that will endure beyond the plan period, particularly given the potential for significant change within the existing farm buildings on Salisbury Road which have a limited life, and the obvious pressure on for housing land supply given significant constraints to development in the Borough. Given the very real technical problems with the CN2 allocated boundary described in response to question 2 below it is not possible to create a sensible extension of the inset boundary that will be possible to defend in the longer term as currently proposed.

**Question 2 –Is the Figure of 45 dwellings justified and achievable?**

10. MEM does not believe that the figure of 45 dwellings is properly justified in this allocation. It is not justified either on housing numbers grounds (see response for 360382 under matter 1) or in physical terms due to site constraints and design considerations as explained in the paragraph below. MEM has tested 90 units on a larger site area and has shown how this can produce a better contextual and sustainable development solution; the alternative masterplan was submitted previously at the CS pre submission consultation stage.
  
11. MEM has carried out a detailed assessment of the technical constraints of the site and has developed a concept masterplan for the site including a detailed site-specific flood risk assessment. This exercise has allowed for a more thorough review of the actual constraints to development and it has shown that about a quarter of the area currently allocated under CN2 is subject to zone 2, and part in zone 3 flood plain as identified in the site specific flood risk assessment (SSFRA submitted with pre submission consultation) which needs an equivalent mitigation area. There are significant root protection zones around the mature trees that would need to be retained as part of the development scheme, which further reduces the developable area. These physical constraints taken together with the heritage constraints (explored in paragraph 13 below) and identified by English Heritage in their representations and repeated in concerns expressed by residents in the consultation exercise (Consultation report previously submitted with CS pre submission representations) about keeping a sense of open space around the listed barns and the need to achieve a development scheme that preserves or enhances the conservation area may severely constrain the capacity of the area allocated.
  
12. The work on the alternative allocation of a larger site area (MEM Ltd Supporting Statement CS pre submission representations) has shown that this would allow a high quality development that preserves and enhances the special character of the conservation area, deals with the technical flooding considerations and would create a defensible boundary to

endure beyond the plan need whilst assisting with meeting the full objectively assessed housing need in the Borough.

**Question 3 – Does the Allocation take account of the effect on the Conservation Area (CA)?**

13. English Heritage submitted an objection to the Council's allocation of site CN2 which questioned whether the significance of the designated heritage asset had been taken into account in particular with regard to the assessment that characterises the CA as open, linear and rural in character. It is notable that the listed building (the northern barn) is not shown as retained on policy map 6.3 and is not mentioned within the text of the policy.
14. MEM Ltd have considered these objections and the need to take account of the designated heritage assets and believe they have a more specific proposal that would preserve and enhance the conservation area and retain and improve the setting and condition of the listed building and believe that could be incorporated within the policy allocation by retaining the north eastern part as open space to support the conversion of the listed barn.
15. The limited potential for the longer-term retention of the buildings for livestock is explained in the pre-submission supporting statement. Any redevelopment of the farm complex as part of the wider proposal could be designed in the farmyard idiom and would need to preserve or enhance the CA. The masterplan for the larger site prepared for MEM in their CS pre-submission consultation representations clearly shows how this could take place and with a larger site allocation could create separation and a separate identity from the remaining proposed development that would reflect the historic typology and character and distinguish it from the remaining development. This would not be possible under the current policy CN2 allocation as there is insufficient space to do this.

**Why does the allocation CN2 as drafted fail the tests of soundness?**

16. MEM believes the CN2 allocation fails the tests of soundness for the following reasons.

- Lack of full or localised Green Belt Review is not consistent with NPPF paragraph 83
- Lack of defined boundary for the Green Belt
- The allocation of 45 units on site CN2 is not justified by evidence
- The allocation area has failed to take account of the impact on the designated heritage assets and is therefore not effective, justified or consistent with NPPF 126

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

17. MEM Ltd believes the plan can be made sound in relation to policy CN2 with the following steps.

18. Review the Green Belt boundaries as required by the NPPF and confirm a permanent boundary to Burton village to the south that will endure beyond the plan period.

19. Increase the allocation at land south of Burton as shown in the masterplan produced by MEM to increase the delivery of housing to meet objectively assessed need, and to reflect the site specific circumstances that will shape the development to respect the heritage assets, flood mitigation, mature trees and community suggestions to keep a sense of former farm use of the site. Note the Sustainability Appraisal of the plan has tested the higher capacity as set out in the Statement of Common Ground with CBC and Burton Parish Council.

20. Amend the Green Belt boundary to extend the inset area of the village of Burton consistent with the revised allocated site.

21. Revise the policy in CN2. Replace the second bullet point with:

- **Approximately 90 dwellings will be delivered on the allocated site and located in accordance with the site-specific flood risk assessment. Development will be phased over a period of three years with commencement possible in 2014/15. Up to 30% of all housing will be affordable.**

22. (Note the position on affordable housing is justified under the statement for 360382 in response Matter 7C.)

23. The revised map at 6.3 should show the retained listed building.