

Christchurch and East Dorset Core Strategy (September 2013)

Green Belt (KS2)

1. Is the proposal to make limited changes to the GB justified?

- 1.1 Paragraph 84 of the National Planning Policy Framework (NPPF) makes clear that when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. We therefore refer to our statement in respect of Matter 1 which highlights significant shortcomings with the Council's approach to objectively assessing housing needs. In short, we consider there is compelling evidence for the need for Green Belt release, above and beyond that identified by the Consolidated Version of the Core Strategy (no. SD28). The limited changes proposed to the Green Belt boundaries will not meet the identified requirements for sustainable development for the reasons set out below.
- 1.2 Firstly, the Consolidated Core Strategy confirms that a Strategic Green Belt Review (no. OD19) (February 2006) was used to guide choices for the locations of strategic housing and employment allocations (paragraph 4.13). The study was commissioned as part of the evidence base for the preparation of the Draft South West Regional Spatial Strategy (RSS) (ref. OD18). The review only therefore considered the development needs of the Joint Study Area (SDA) up to 2026, and did not consider the need for growth beyond this period.
- 1.3 We therefore contend the Council's failure to objectively assess the need for Green Belt release. The Council's assessment of housing needs up at least until the end of the plan period (2028), and beyond this point is clearly questionable. The Core Strategy Consultation Response Analysis (May 2013) (no. SD29.4) indicates (paragraph 2.90) that "the Local Authorities consider that the future needs of the area beyond the plan period are currently unknown, and that in particular the local housing market area is wider than the Plan area". The Draft RSS advocated a co-ordinated review of the Green Belt (Policy SR26), and these recommendations should be carefully considered in the context of objectively assessed, up-to-date housing and population evidence.
- 1.4 Secondly, we consider there are fundamental shortcomings in terms of the adequacy and relevance of the Council's evidence base. Paragraph 1.1.4 of the Strategic Green Belt Review indicates:
- "The recommendations from this review are intended to allow the Regional Planning Body to identify the general extent of the Green Belts in the RSS and does not determine precise locations for review of Green Belt..... The reviews undertaken by the JSAs (Joint Study Areas) are not comprehensive in that they have not reviewed the principle for the establishment of the Green Belt in the first place, but have provided advice on potential release areas" (our emphasis)*
- 1.5 It is therefore considered that there are similarities to be drawn with the recently examined Rushcliffe Borough Council Core Strategy in January 2013. In this case, the Inspector emphasised the importance of the need for a strategic review of the Green Belt in the District in order to determine whether parts of it met national policy aims and purposes. It was indicated that such a review was necessary in order ensure that the proposed sites and alternatives were the most appropriate to deliver sustainable growth. The joint authorities have not undertaken such an assessment and cannot therefore in our view

Matters and Issues 2
Turley Associates for Bellway Homes Limited (Wessex)
Respondent No. 719394

satisfy the positively prepared or justified tests of soundness nor NPPF paragraph 182. For example, the absence of a comprehensive Green Belt review calls into question the joint authorities conclusion that they cannot meet more of their objectively assessed housing needs within their administrative areas and places less emphasis on adjoining authorities to deliver deficits.

- 1.6 We also note the current status of the Green Belt. Policies GB1-5 were not saved by EDDC in September 2007 following the Secretary of State's Direction under (paragraph 113) Section 8 of the Planning and Compulsory Purchase Act 2004 and all the Bournemouth Dorset and Poole Strategic Policies (setting out the outer limits of the Green Belt) were revoked in May 2013 under the Localism Act 2011. This gives added reason for a fundamental review of the Green Belt boundaries in line with NPPF 83-85.
- 1.7 Paragraph 3.4.31 of the Councils' Duty to Co-Operate statement (ref. SD4) indicates the Broadway Malyan masterplanning exercise was undertaken 'in order to consider how and where development could be delivered, causing as little harm to the Green Belt and provide sustainable forms of development'.
- 1.8 The East Dorset Housing Options Masterplan Report (2010) (no. ED62) considers areas for growth to the east of Wimborne, to the north and south of Leigh Road respectively. The study indicates that both of these options have implications for maintaining separation between settlements. However, the conclusions of the study indicated a preference for the 'southern sub-area' (south of Wimborne Road) on the basis that it could play an important role in the wider spatial strategy of the town. We therefore contend that there is a case to look at the role and benefits of growth to the north of Leigh Road.
- 1.9 Turley Associates, on behalf of Bellway Homes Ltd, has submitted evidence to the Proposed Changes to the Core Strategy Pre-Submission December 2012 including a Landscape and Visual Impact Assessment (LVIA) as part of the site promotion. This provides reassurance that the development of land north of Leigh Road, would maintain the integrity of the Green Belt, with limited visual and landscape impact. The site represents a logical expansion of the Colehill area, whilst maintaining visual separation between Wimborne and Colehill. The development of the site has the potential to deliver significant social and community benefits through the delivery of approximately 100 dwellings, and valuable public open space and SANG provision. We therefore recommend this site for inclusion as a 'new neighbourhood' for allocation through the Consolidated Core Strategy, releasing the site from inclusion within the Green Belt.
- 1.10 As set out above, we have serious concerns about whether the Plan has been positively prepared as it currently stands. The limited Green Belt review is not based on a strategy which seeks to meet objectively assessed development requirements for sustainable growth. We therefore highlight the opportunity north of Leigh Road to deliver sustainable growth, and much needed housing to meet local need.

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 For brevity, our concerns about the Council's failure to 'objectively assess' housing needs are not repeated here. However, we highlight that Policy KS2 of the Consolidated Core Strategy indicates that the limited changes to the existing boundaries are proposed to

Matters and Issues 2
Turley Associates for Bellway Homes Limited (Wessex)
Respondent No. 719394

enable *some* new housing and employment (our emphasis) to help meet local needs. We therefore share similar concerns with many other respondents in that the policy and Plan fail to meet the full, objectively assessed development needs for its area (paragraphs 14, 17, 47, 182 of the NPPF).

- 2.2 The starting point should be whether the limited alterations to the Green Belt boundaries are sufficient to deliver the quantum of housing necessary to meet objectively assessed needs. Secondly, regard should be had to the permanence of the amended boundaries, and whether they are capable of being sustained beyond the plan period.
- 2.3 The Council allege there is nothing emerging in the current evidence to justify the safeguarding of land beyond the Plan period. Whilst the Options for Consideration Background Paper (October 2010) (no. CD4.5) acknowledges there are significant local housing needs in the area, the Council contend that “due to the severe environmental constraints on the Plan area, with particular reference to the areas affected by the Habitats Regulations, this need cannot be fully accommodated.” However, this does not provide an explanation or justify the Council’s decision to not identify ‘safeguarded land’ between the urban area and the Green Belt.
- 2.4 There is little evidence of joint authority commitment toward a strategic Green Belt review in the Council’s Statement on the Duty to Co-Operate (no. SD4). Policy SR26 of the Draft RSS indicated there would be a need for a joint strategic review of the Green Belt across South East Dorset in order to meet housing needs across the housing market area. Notwithstanding the limited amendments within the joint administrative areas of East Dorset and Christchurch, the authorities’ imply that a review of the Green Belt will take place (outside of this area) during the course of the plan period. However, this is inconsistent with national guidance which advises that local planning authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period (NPPF, paragraph 86).
- 2.5 National guidance is also clear that authorities should seek to work collaboratively to ensure strategic priorities are properly co-ordinated, and clearly reflected in individual Local Plans (NPPF, paragraph 179). As housing needs beyond 2026 have not been taken into account, the Plan does not comply with national guidance which seeks to ensure that Green Belt boundaries are capable of enduring beyond the plan period (NPPF, paragraph 83). There is no evidence to indicate that areas of ‘safeguarded land’ should not be identified to meet longer-term development needs, nor has it had regard to recognisable physical features which are likely to be permanent in the long term. It is therefore considered that the Council has failed to demonstrate that development requirements can be wholly met within their own area within and reasonably beyond the plan period.
- 2.6 In summary, the Council’s evidence does not therefore, demonstrate that the Plan is sufficiently ‘Justified’ when assessed against other reasonable alternatives, nor is the Plan effective in demonstrating that the amended Green Belt boundaries are capable of accommodating the Council(s)’ housing needs over the plan period. Moreover, there is a distinct lack of flexibility for the boundaries to accommodate housing growth beyond the Plan’s lifetime. The Plan therefore cannot be considered to be ‘Positively Prepared’, ‘Justified’, ‘Effective’ nor ‘Consistent with national policy’.

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

Matters and Issues 2
Turley Associates for Bellway Homes Limited (Wessex)
Respondent No. 719394

- 3.1 No.
- 3.2 The Consolidated Core Strategy does not set out a mechanism for the Green Belt boundary review. Nor does it set out the related timescales or process for doing so.
- 3.3 The Consolidated Core Strategy emphasises that the policy will be delivered through Development Management, which will be monitored on an annual basis to assess the development on the Green Belt (paragraphs 4.14-4.15). We therefore have significant concerns about the means of delivery as currently proposed. This is inconsistent with the guidance in the NPPF and the legislative provisions of the Planning and Compulsory Purchase Act 2004 which clearly state that the planning system should be plan-led. In this respect, in order to be effective the Plan should provide certainty about the Green Belt boundary changes as proposed. The Plan is not therefore 'Positively Prepared', 'Justified' or 'Effective' for the reasons set out above.