



Boyer
PLANNING

Christchurch and East Dorset Councils
Core Strategy-Local Plan
Examination in Public

MATTERS AND ISSUES 2: GREEN BELT

Prepared by Boyer Planning on behalf of Linden Homes Strategic Land
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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer Planning Limited on behalf of our clients, Linden Homes Strategic Land who control land north of Ringwood Road, Verwood which was proposed for allocation under Policy VTSW5 of the Pre-Submission Core Strategy.
- 1.2 In respect of the tests of soundness, we consider that, the Core Strategy as currently drafted is unsound. Although the principle of amendments to the GB boundary is supported, the Councils have not implemented this in a justified or effective manner. Our recommended changes are set out in Section Three of this statement.

2. MATTERS TO BE EXAMINED

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

- 2.1 Chapter 3 of the pre-submission Core Strategy sets out the overall vision for the authorities. In terms of the provision of housing the Vision states:

“The unmet housing needs of the area will be reduced, with housing delivered of a type and tenure which meets the aspirations of those wishing to buy or rent. An element of this housing will be in the form of new, well planned, sustainable residential areas in both Christchurch and East Dorset. These will be attractive new areas, including high quality and sustainable homes, areas of open space, new community facilities, and improved transport links to the surrounding area.

The Green Belt policy will be kept in place to protect the character of the area, subject to limited alterations of boundaries to enable its extension and elsewhere to allow for some housing and employment growth to help meet the needs of the local communities.”

- 2.2 Policy KS2 confirms that limited changes to the existing boundaries of the GB are proposed to enable some new housing and employment to meet local needs and also to include areas in the GB that are no longer capable of providing for these needs.
- 2.3 The Councils have proposed a housing target of 8,200 new dwellings to be provided across the plan period. The Councils have identified 4,800 dwellings to come forward from within the urban areas, based on the Councils respective SHLAAs. It is therefore clear that the authorities require the delivery of housing outside the urban areas.
- 2.4 Significant proportions of both authorities are designated as GB which restricts the potential for the housing target to be met without changes to the GB boundaries. Furthermore large areas of both authorities are subject to other designations including proximity to protected heathlands, within 400metres of which development is not permitted. As such the proposal to make limited changes to the GB is considered to be justified.
- 2.5 Paragraph 83 of the NPPF states:
- “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”*
- 2.6 In the first instance, the preparation of the Christchurch and East Dorset Core Strategy clearly represents such ‘exceptional circumstances’ which allow for alterations to the GB boundaries where required.
- 2.7 Given the extent of the existing GB in East Dorset relative to the principal settlements, and the limited alternative sources of housing land, it is clear that greenbelt releases will play a key part in accommodating the proposed housing requirement of 8,200 new homes in the plan area between the years 2013 and 2028.

2.8 We therefore support the Councils' approach to make limited changes to the GB in principle.

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

- 2.9 NPPF paragraph 83 states that, when reviewing GB boundaries, authorities should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.
- 2.10 Although we support the principle of changes to the GB, when assessed against NPPF paragraph 85, the proposed boundary changes are insufficiently justified in the CS. The lack of such justification does not allow for ease of comparison on the merits of the proposed allocations and their capability to endure beyond the plan period.
- 2.11 Our client, Linden Homes, control Land at Ringwood Road, Verwood, which, in the CS Pre-Submission version, was proposed for allocation under Policy VTSW5 North Eastern Verwood New Neighbourhood, herein referred to as 'VTSW5'. The site was later deleted as part of the Proposed Changes which were published for consultation in late 2012.
- 2.12 It is our view that the Council should re-instate VTSW5 on grounds, inter alia, that this site has the least impact of the available alternatives on Green Belt purposes. Site VTSW5 was deleted on grounds that have been fully addressed and resolved (see our Statement for Matter 5). If, in these circumstances, the Council's is to refuse re-instate the allocation, it must consider how the site performs against the available alternatives in Green Belt terms to justify that position. It will otherwise be unable to demonstrate that its allocations are the most appropriate for development.
- 2.13 We have assessed Site VTSW5 against the criteria in paragraph 85 of the NPPF to aid the Inspector's consideration of this matter, including, where appropriate, its relative merits against retained allocations in Green Belt terms. This assessment will also demonstrate that GB boundaries have only been partially assessed by the Councils when considering their capability to endure beyond the plan period. We set out our findings in respect of each of the requirements set out in NPPF Paragraph 85 below.

"Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development"

- 2.14 The Councils' vision for the authorities recognises the need to consider limited alterations to Green Belt boundaries to "*allow for some housing and employment growth to help meet the needs of the local communities*".
- 2.15 As such, the principle of including allocations for new neighbourhoods which require alterations to Green Belt boundaries is consistent with the overarching vision subject to the allocations being assessed against Green Belt purposes and satisfying the requirements of sustainable development.

"Not include land which it is unnecessary to keep permanently open"

- 2.16 The Council has not given explicit consideration to this issue. We have drawn attention to this omission in our various representations on the Core Strategy process and sought to remedy it by providing the relevant assessment for the VTSW5 site.

- 2.17 We have demonstrated that the VTSW5 site is well contained and divorced from wider countryside. It therefore does not contribute to the openness of the wider Green Belt. The previous Local Plan Inspector commented that the site has a dense wooded backdrop giving it a clear edge to the town.
- 2.18 This assessment confirms that a GB boundary revision in this location would safeguard two of the five purposes of Green Belt Policy namely “*to check the unrestricted sprawl of large built up areas*” and “*to assist in safeguarding the countryside from encroachment*”. The VTSW5 site performs better than all alternatives against these objectives and this is a very important consideration in the case for its reintroduction as an allocation.
- 2.19 Unlike the deleted VTSW5 site, we note that the proposed North West Verwood allocation (VTSW4) is open to adjoining countryside to the north east and does not perform quite as well against the above Green Belt objectives. Given the above conclusion we consider that the allocation of site VTSW5 has a particularly strong justification against this Green Belt consideration.
- 2.20 Elsewhere within the Plan area, we note that proposed allocations will impact upon Green Belt purposes to varying degrees. The Broadway Malyan East Dorset Housing Options Masterplan Report (Section 06 Constraints and Opportunities Analysis – Green Belt review) notes:
- “*The area of search to the north and north west of Wimborne Minster forms part of the setting of the historic town and is part of the wider area of open and unspoiled countryside around the conurbation;*
 - *At Corfe Mullen, it is recognised that there would be some encroachment into countryside, including into an area of high landscape value and that views out from Corfe Mullen would be affected;*
 - *At West Parley, the report recognises concerns about encroachment of development upon a “key edge” of the Green Belt as defined in the SE Dorset Green Belt review, impact on the setting of the West Parley Conservation Area and coalescence issues.”*
- 2.21 This is not to suggest that these proposed allocations are inappropriate, but does highlight the advantages of allocating the VTSW5 site which has no such impacts and will not impact on Green Belt purposes.
- 2.22 It is therefore clear that the VTSW5 site performs well against the available alternatives in relation to this measure within NPPF paragraph 85. However, there is insufficient similar justification in the CS in respect of the retained proposed allocations to allow for ease of comparison of their merits against those of the VTSW5 site.
- “Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period”***
- 2.23 The limits of development for site VTSW5 are clearly defined by the adjoining woodland and there is no question of further altering the Green Belt boundary in this particular location at the end of the Plan period. The release of VTSW5 therefore has no longer term implications in terms of balancing the integrity of the Green Belt against the need for development. It is a logical and limited release with a clearly defined basis for Green Belt boundary re-alignment. Not all of the retained allocations have these attributes and the Council needs to consider if new Green Belt boundaries drawn to include allocations will endure beyond the Plan period and will represent a logical, long term Green Belt boundary.

“Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

- 2.24 The re-alignment of the Green Belt boundary around the proposed allocation site VTSW5 would form a clearly distinguishable boundary. The Local Plan Inspector stated that the woodland to the north of the site would make a good defensible boundary for the Green Belt and edge to the town.
- 2.25 Given the above considerations it is clear that site VTSW5 performs more strongly against Green Belt purposes than the retained allocation VTSW4. The VTSW5 site is well contained and could be developed with no substantial impact on the surrounding Green Belt and would form a logical extension to the settlement. The lack of justification for the proposed GB boundary amendments in relation to VTSW4 and the other New Neighbourhoods does not allow for ease of comparison of the merits of the proposed allocations against our clients' site.
- 2.26 The assessment of the relative merits of the proposed allocations against site VTSW5 clearly demonstrates the suitability of the site for reintroduction as an allocation.

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

- 2.27 The CS does not set out a precise timescale and clear process for the GB boundary changes.
- 2.28 In addition to the Christchurch Urban Extension proposed under Policy CN1, the CS currently makes provision for 11 new neighbourhoods across the plan area. With the exception of the Stone Lane New Neighbourhood, Wimborne (Policy WMC4), at the former Stone Lane Industrial Estate, all of the new neighbourhoods require amendments to the GB boundaries.
- 2.29 Within the policy wording for each of the respective new neighbourhoods however, in relation to the GB, each of these 10 policies merely state:

“The Green Belt boundary will be amended to exclude land identified for new housing”
- 2.30 There is no mention in either the supporting text to the new neighbourhood policies or the policies themselves as to how or when the GB boundary changes will come into effect.
- 2.31 Amendments to the GB boundary are also proposed in nine other policies in the CS, however, as above, there is no reference in either the supporting text or the policies themselves as to when the GB boundary changes will come into effect.
- 2.32 The CS should be amended to make it clear whether the GB boundary changes will come into effect immediately upon adoption of the CS, or whether they will come into effect at another point in time dependent on site-specific circumstances. If the GB boundary changes are to come into effect upon adoption of the CS, which would be the most sensible approach, the CS should be amended to make it clear that the amendments are as defined on the Proposals Maps. Our concerns regarding the definition of these boundaries is discussed in relation to Question 4.

4. Are the boundaries for every development proposal clearly defined on proposals maps?

- 2.33 The boundaries for every development proposal are not clearly defined on proposals maps. The extent of the new neighbourhoods proposed are broadly indicated on the Inset Maps published by

the Council in March this year. In addition, all of the proposed strategic allocations are accompanied by illustrative masterplans as part of the policy and supporting text. We have identified in relation to the North Western Verwood New Neighbourhood however that there appears to be a discrepancy between the boundary indicated for the SANG on the Verwood inset proposals map and the illustrative masterplan (Map 11.5) which should be rectified.

- 2.34 The Inset Maps indicate the broad extent of particular policy designations. However, some of the jpeg images of the Inset Maps available to view on the Councils' website are of a particularly low resolution. For instance, on the Verwood Inset Map, the image is of such a low resolution that the text indicating which policies are relevant is illegible. Although the Council have sent us a higher resolution version via email, it is still not possible to definitively determine the pattern of hatch which covers certain areas, making it difficult to determine which other policy designations are relevant.
- 2.35 Notwithstanding the above technical concerns, we have sought to interpret the information available to understand the location of the proposed boundaries. Having closely inspected the inset map for Verwood, it is our understanding that the hatching denoting the proposed North Western Verwood New Neighbourhood has simply been overlaid on the existing designations of Green Belt and Area of Great Landscape Value. This approach has also been followed in relation to the proposed Suitable Alternative Natural Greenspace associated with the site. Further clarification is therefore required as to the proposed realignment of the GB boundary, in particular whether this will encompass only the areas proposed for residential development or all the associated open space and potentially the SANG. We consider that the Green Belt boundaries should not be drawn too tightly around the assumed developable area as this would pre-empt the detailed design of development to determine the capacity, scope and limits of the development area in each case,
- 2.36 The boundary could follow the site boundary edged red on the masterplans. However, the illustrative masterplans are drawn at too large a scale to be able to determine the exact extent of the site boundary edged in red, and the issue is further exacerbated by the fact that the masterplans are drawn on aerial photograph bases, rather than on OS maps. Without more detailed plans with clearer site boundaries there would be inevitable dispute during the application process over the exact extent of the land which is allocated for development, leading to uncertainty in the local development framework and decision making process. Furthermore it is the proposals maps themselves which should formally define the boundaries without the need to cross-refer to illustrative plans.
- 2.37 It is unclear from both the proposals maps and the illustrative masterplans as drafted as to where the amended GB boundary will be located. Combined with the low resolution of some of the Inset Maps available to view on the Councils' website, it is not possible to determine the exact extent of the amendments to the GB boundaries with any sense of certainty. If the proposed GB boundary realignments are to coincide with the adoption of the Core Strategy these must be more clearly defined to make the Core Strategy effective.

3. RECOMMENDED CHANGES

3.1 In summary we recommend that the following changes be made to the Core Strategy:

- Additional information be included to justify the proposed changes to the GB boundary in relation to each of the proposed new neighbourhoods in order to allow for ease of comparison of the merits of the proposed allocations;
- Reinstate the allocation of site VTSW5 based on its merits in relation to Green Belt policy;
- Amend the CS to clearly state that the proposed changes to the GB boundaries will occur upon adoption of the CS, in accordance with the defined limits on the Proposals Maps;
- Amend the Illustrative Masterplans and Proposals Maps to clearly define the extent of the site allocations; and
- Amend the Illustrative Masterplans and Proposals Maps to clearly define the extent of the proposed changes to the Green Belt boundary.



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