



MATTERS AND ISSUES 1

Overall strategy

REPRESENTATION 524090

Hearing Statement

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1 Vision and objectives

- 1.1 The vision and objectives only allow for limited release of Green Belt to meet some housing needs. They do not take a longer term view. Any review of the Green Belt needs to be more thorough and look beyond the plan period. The Core Strategy does not do this. These points are set out in the respondent's hearing statement in relation to issue 2 – Green Belt.
- 1.2 The Core Strategy needs to meet fully objectively assessed housing needs of the district and not simply reduced needs. In addition the strategy needs to consider whether or not the unmet needs of adjoining settlements need to be met within East Dorset or taken into account. Furthermore, in accordance with paragraphs 83 and 85 of the NPPF any changes to the Green Belt need to consider safeguarding land to meet future needs. Therefore, simply reducing unmet needs is nowhere near sufficient.

3 Settlement hierarchy

- 3.1 The settlement hierarchy as set out does not reflect the existing situation in terms of the relative significance of settlements. Corfe Mullen, for example, is an extensive suburban area to the north of Poole with no real district or even local centre as such. There are a number of shops but not what one could consider to be a district or even local area centre. The centre of West Moors or Highcliffe, for example, which are identified as lower level centres to Corfe Mullen have much more of an identifiable centre with a greater level of retail provision particularly in respect of Highcliffe. Corfe Mullen is actually similar in character to those areas identified as suburban centres and therefore should be so identified. This should not necessarily prove to be a bar on additional development and indeed it appears from the background papers that

the suburban centres have problems and issues which can only be addressed by way of facilitating additional development. Corfe Mullen is identified as being the recipient of large scale development whereas Colehill, for example, within the main part of that built up area is subject to a policy which only allows for some residential development. While the area is identified as having issues and problems it is not clear how the strategy is to resolve these.

- 3.2 Furthermore, Colehill is set out as a separate settlement to Wimborne when for all intents and purposes they are a single urban area in the same way that the hierarchy identifies Ferndown and West Parley as a single entity. The built up area of Colehill should therefore be dealt with in the same manner throughout the plan and thus be a location where additional development will be allowed to take place. St Leonards and St Ives, by contrast, are a separate settlement not physically attached to any other urban area and can be referred to as a self-contained suburban residential area. Colehill, on the other hand is physically linked to and interdependent with Wimborne. Detailed representations are made on this point within the respondent's main representation.
- 3.3 The hierarchy does need to take account of the needs of all urban and rural areas and does not provide sufficiently for the needs in the north of the area.
- 3.4 The hierarchy, with the exception of Corfe Mullen and Colehill, in itself seems reasonable however it is the manner in which the distribution of development is provided for throughout the strategy which is at issue. Much of the proposed development within East Dorset is directed to the south of the district.
- 3.5 For example the key strategy and settlement hierarchy identify Verwood as one of the main settlements where development should be directed. Paragraph 4.5 of the plan recognises that there are important local needs for new housing

and other development which need to be provided. But only a limited amount of new housing is being provided.

- 3.6 The key strategy identifies the main settlements but there is no discussion, based on objectively assessed needs, as to why certain amounts of development are to be located in certain settlements or within certain areas.
- 3.7 There is no evidence to justify the choice of the various allocations in strategic or spatial planning terms. The individual sites are appraised in physical terms relative to particular settlements, sustainability in terms of the nearest local centre and the ability to provide SANGS but not in terms of the settlement strategy or relative to each other on a district wide basis. There has been no similar analysis of other reasonable alternatives to demonstrate that the chosen sites are the most appropriate.
- 3.8 I have set out in detail within the initial representations the issues concerning site selection around Wimborne and Colehill.
- 3.9 The Verwood and West Moors background papers to the Core Strategy at paragraph 2.11 refer to the various areas of search which were considered. In discussing the eastern sub area the paper refers to the Area of Great Landscape Value as being important but only comprising a local designation. The central sub area is also covered by the same designation however the paper refers to the disused railway track to the west of the sub area which helps to form a natural edge to the settlement. The paper concludes that the wider AGLV will not be compromised and the area is considered suitable for development.
- 3.10 The initial areas of search for Verwood are shown within the East Dorset Housing Options Masterplan Report which specifically relates to Verwood. The area to the north of Edmondsham Road is referred to as the eastern sub

area and the study shows that a large part of this area should be left as undeveloped as it comprises open and gently undulating countryside which forms a key strategic structural landscape element. This is not accepted as being a primary constraint to development. When one compares with the other sites being promoted on the edges of Wimborne, for example, to the north of Birts Hill, a site which is within the AONB and within the historic setting of Wimborne town centre and the other sites such as at Cuthbury Allotments, Leigh Road and West Parley, all of which are within the Stour Valley, or within areas identified as strategic gaps then the land to the north of Edmondsham Road is not so constrained. Indeed, the land to the north of Edmondsham Road is no more constrained than the land to the south which has been considered acceptable for development. The point has been made above that the various housing allocations have been tested against each other around the respective settlements but not tested against each other across the district.

- 3.11 The land immediately to the north of Edmondsham Road is relatively flat and it is only further to the north that the land begins to rise. The land is contained on its western side by the disused railway line which has already been identified within the study as a good strong and defining edge for the town and indeed for any new neighbourhood. There is no reason why this strong edge cannot be provided further to the north of Edmondsham Road.
- 3.12 Therefore, there is support for a much greater housing allocation in Verwood both in strategic spatial planning terms and in physical planning terms. The size and importance of the town, the need to support and encourage the development of its town centre and the need to support a new secondary school would all call upon a greater housing allocation. There are also fewer infill opportunities and urban capacity generally than the other settlements and

therefore a more pressing need for the housing needs of Verwood to be met by way of Greenfield allocation.

- 3.13 No evidence has been presented specifically as to why the housing allocations in terms of number have been distributed in the manner which they have. Indeed it appears to be an arbitrary distribution in terms of available potential land rather than one based on the settlement hierarchy or Key Strategy.
- 3.14 Therefore the representation submits that there is a very strong case for a larger percentage of the overall Greenfield allocation to be within Verwood. This increase may be at the expense of other suggested allocations or as an acknowledgement that the infill target is optimistic, especially in relation to the percentage of infill development expecting to come forward in Verwood relative to that which will be delivered within the other urban areas. The option therefore also presents to increase the housing supply in recognition of the needs of Verwood without reducing allocations elsewhere, or to increase the Greenfield allocation and reduce the infill.
- 3.15 There does however seem to be an imbalanced distribution with no explanation as to why Wimborne should have an allocation of 1300 dwellings on sites which are either within an AONB, which affect important settings and in West Parley which has an allocation of 520 dwellings in an area which the Green Belt review considers to be an important strategic gap.
- 3.16 There is clearly support for additional housing numbers in terms of the overall spatial strategy and settlement approach to development within the district. Indeed the Council had considered an extensive area of land to the south of Verwood which provided 200 homes as being appropriate and this was only discounted because it could not provide SANGS (‘Verwood and West Moors background paper’).

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- 3.17 The Core Strategy does not appear to include any evidence in relation to the numbers of housing being required or allocated in Verwood to meet any particular stated objective. Policy VTSW4 for example states that there should be provision for about 230 homes. However, there is no justification of the number of homes allocated for Verwood against any housing needs / housing supply or urban capacity evidence. It simply appears that there has been a physical planning exercise undertaken and it is this which has dictated the numbers.
- 3.18 Less than 10% of all new housing is to be provided in Verwood yet there are 5 main settlements, one of which is Corfe Mullen, and housing distribution should be distributed accordingly. The Council provide no assessment in terms of the distribution.
- 3.19 The introduction to Section 8 of the Core Strategy recognises that the relative importance of Wimborne has declined as other settlements have grown. The area surrounding Wimborne also has a great many constraints. There is no reason within the plan why there is an allocation for 1300 new dwellings in Wimborne with a much smaller allocation at Verwood. Indeed, the Verwood allocation is not so different to that of Corfe Mullen which is a settlement with no centre. Likewise, the allocation is much less than that of West Parley where again there is no proximity to a town centre.
- 3.20 It is also apparent from the SHLAA that Wimborne and Colehill have significant potential to deliver new homes within the existing urban area. The SHLAA includes information on both assessed deliverable sites and also in terms of existing urban capacity both of which are significantly greater than in Verwood. The majority of the new housing allocations are directed around Wimborne with other allocations at Corfe Mullen and West Parley. The Key Strategy does not differentiate in importance between Wimborne and Verwood
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in terms of town centres other than to say the importance of Wimborne has diminished as other nearby centres have grown. Both Corfe Mullen and West Parley do not have town centres but rather local centres. There appears little logic, and certainly nothing by way of evidence which explains why those settlements should receive high housing allocations in preference to Verwood. It may be that these areas also have a housing need however if that is the case then evidence needs to be provided so that comparisons of that need relative to impact can be made and compared with provision elsewhere. It may simply be that the figure of 2,500 new homes on Greenfield allocations is insufficient with too much reliance being provided on infill to provide for the district's needs in some of the settlements. An acknowledgement that Verwood has limited urban capacity relative to some of the other settlements may result in the housing allocations for new Greenfield homes to be increased to allow additional land at Verwood to be allocated. Such an approach would result in a greater proportion of land being allocated commensurate with the settlement hierarchy and needs of a town the size of Verwood.

- 3.21 There is no reason why a similar number of new homes cannot be provided in the northern elements of Colehill to meet the infrastructure needs of that area rather than create a new neighbourhood centre to the north west of Wimborne where at present there are no existing needs.
- 3.22 The settlement strategy is not robust and the northern most elements of the district, where Verwood is the main settlement are not properly catered for. The settlement of Colehill has not been properly designated within the hierarchy and this will perpetuate the identified problems of that settlement.
- 3.23 The need for urban extensions in the Green Belt is justified to a point but the Council have not completed the exercise in accordance with paragraphs 83 and 85 of the NPPF and this is not consistent with national policy. This issue is

discussed separately under representations provided in respect of issue 2. However these matters are very much linked with issue 1 and I would ask that the representations from issue 1 and 2 be interlinked and considered in relation to each other.

- 3.24 The plan is not therefore positively prepared and does not address all requirements across the district. The plan is not the most appropriate strategy and indeed does not, as it is required to do, look beyond the plan period. The plan does not accord with the NPPF, particularly paragraphs 83 and 85.
- 3.25 The plan can be made sound by accepting that some of the allocations are not the most appropriate when assessed against the purposes for including land within the Green Belt and against the reasonable alternatives. Moreover, it should be acknowledged that alternative designations, such as within Colehill, will much better address development and infrastructure requirements than new neighbourhoods which extend into open countryside.
- 3.26 The plan should accept that there is a greater housing need than identified and thus increase the number of allocations and introduce safeguarded land. The plan should facilitate a detached Green Belt review to take account of paragraphs 83 and 85.