

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

***Schedule 1: Proposed schedule of objections to the Draft Regional Spatial Strategy***

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. . . . . Against . . . . . Abstentions . . . . .
1	1.3.1	The 'vision' is inadequate, failing to include the quality of the environment in the description of 'what sort of region do we want to be?' despite its central importance to the character of the region and in the aspirations of its residents	Object	None	Add to 1.3.1: " <b>The environment of the region is protected for its own sake and for the enjoyment of residents and visitors</b> "	For: Unanimous Against: 0 Abstentions: 0
2	Policies SD1, SD2, SD3 and SD4	The policies for sustainable development are of primary importance in securing the long term future of the Region	Support			For: Unanimous Against: 0 Abstentions: 0
3	2.3.13, 6.1.1 and elsewhere	There is an inconsistency between the figure of 25,000 dwellings per annum referred to at various points in the RSS and the proposals for a	Object	'...technical forecasts predict that around 25,000 new dwellings a year will be needed to keep pace with	'... <del>technical forecasts predict that around 25,000 new dwellings a year will be needed to keep pace with</del>	For: Unanimous Against: 0 Abstentions: 0

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
		lower rate of growth of about 23,000 per annum, based on the advice of the Strategic Planning Authorities		estimated demand. As set out in section 4.5 the strategy makes provision for about 23,000 dwellings per year...'	<del>estimated demand.</del> <b>Forecasting is uncertain and gives a range of possible outcomes, which also have to be balanced against constraints on growth.</b> As set out in section 4.5 the strategy makes provision for about 23,000 dwellings per year..." (para 6.1.1)	
4	3.1.3	The proposed emphasis for SE of the region of managing growth within identified environmental limits is appropriate, recognising the particularly strong environmental constraints in this part of the region.	Support			For: Unanimous Against: 0 Abstentions: 0
5	Development Policy A, Development	The Development policies fail to give adequate strategic direction for the settlements	Object	None	Add to Development Policy A <b>"Towns and villages serving as</b>	For: Unanimous Against: 0 Abstentions: 0

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres- entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
	Policy B and Development Policy C	around the main conurbations which have a commuter belt or dormitory rôle.			<b>‘dormitories’ for SSCTs should be developed to become more self contained. Strategic housing developments related to the parent SSCTs should be avoided except where they are close to the main centres of employment growth and can be supported by local service centres.’</b>	
6	4.3.4	There is a danger that economic growth will be allowed of a kind which would add to employment growth, and consequently additional pressure for housing which could not be accommodated within environmental constraints	Object	Opportunities and pressures should be managed to maintain the intrinsic quality that attracts employers to the sub-region, whilst not limiting the economic growth potential of the area. The ability to deliver	Opportunities and pressures should be managed to maintain the intrinsic quality <del>that attracts employers to the sub-region</del> <b>of the environment</b> , whilst not limiting the economic growth potential of the area. The ability to	For: Unanimous Against: 0 Abstentions: 0

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

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				increased productivity and prosperity without continuous physical outward expansion underpins the economic strategy for the sub-region.	deliver increased productivity and prosperity without continuous physical outward expansion, <b>or adding to employment and housing pressures</b> , underpins the economic strategy for the sub-region.	
7	Policy SR 25	Because of the high level of demand for housing to accommodate in-migration, population growth is fuelled by housebuilding. Policy SR 25 needs to recognise this and is misleading. Only local housing needs can provide a basis for establishing levels of housing growth.	Object	“... Sufficient housing will be provided to complement their economic rôle and to meet the needs of a growing population.”	“... Sufficient housing will be provided to complement their economic rôle and to <del>meet the needs of a growing population</del> <b>contribute towards meeting local housing needs</b> , while accepting in-migration will be restricted.”	For: 13 Against: 0 Abstentions: 1

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

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8	4.3.2	There will need to be substantial investment from regional and central funds as well as from developer contributions if the infrastructure needed is going to be achieved. This should be recognised. Also the necessary infrastructure and therefore the contributions is likely to emerge from the LDD work, rather than prior to it.	Object	“...In particular, a joint system to secure key infrastructure contributions from smaller residential developments will be required in advance of adopted LDDs to deliver the strategy for South East Dorset.”	“...In particular, a joint system to secure key infrastructure contributions from smaller residential developments will be required <del>in advance of adopted</del> <b>in parallel with the preparation of LDDs to deliver assist in delivering</b> the strategy for South East Dorset. <b>However, it is recognised that not all the infrastructure required can be provided through developer contributions alone and yet are prerequisites of the development proposed.”</b>	For: Unanimous Against: 0 Abstentions: 0

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### Draft Regional Spatial Strategy

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For: . . . . . Against: . . . . . Abstentions: . . . . .
9	Policy SR29	As above	Object	"... Investment will be made in key infrastructure to enable the achievement of the development proposed in this Policy."	"... Investment will be made in key infrastructure, <b>partly through developer contributions</b> , to enable the achievement of the development proposed in this Policy."	For: Unanimous Against: 0 Abstentions: 0
10	4.3.13	It is essential that key infrastructure required under Policy SR 29 is provided in time to allow the proposed developments to take place in an orderly and progressive way. The proviso applied to Area of Search Q should be applied to any urban extensions.	Object	"Ferndown (Area of Search Q – west of Ferndown), subject to the provision of necessary infrastructure ...Urban extensions should be developed in accordance with Policy F."	<del>"Ferndown (Area of Search Q – west of Ferndown), subject to the provision of necessary infrastructure</del> <b>Any</b> urban extensions should be developed in accordance with Policy F, <b>subject to the timely provision of necessary infrastructure.</b> "	For: 10 Against: 0 Abstentions: 4
11	Implementati on Plan Appendix 3 Regional	As above	Object	N/A	The Regional Funding Allocations should recognise the need for key infrastructure,	For: 12 Against: 0 Abstentions: 1

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### **Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. . . . . Against . . . . . Abstentions . . . .
	Funding Allocation				particularly the A31 to Poole Corridor Improvements and the Bournemouth Airport surface access, to be provided in order to enable any proposed developments to take place without delay.	
12	Policy SR 26	The Council is fully prepared to participate as an equal partner in a system for the distribution of financial contributions arising from Section 106 agreements and other funding mechanisms to deliver key infrastructure as proposed in Policy SR 26	Support			For: 13 Against: 0 Abstentions: 1
13	Paragraph 4.3.3, Policy SR 26 and Table Page 79,	The urban extension areas of search N and P lie wholly within East Dorset. The proposal that the LDDs covering these areas should	Object	Para 4.3.3: "...With a complex delineation of administrative boundaries it will be essential for all the	Para 4.3.3: "... <del>With a complex delineation of administrative boundaries it will be essential for all the</del>	For: 13 Against: 0 Abstentions: 1

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### Draft Regional Spatial Strategy

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. . . . . Against . . . . . Abstentions . . . . .
	Implementati on Plan	be prepared jointly with Bournemouth Borough and Borough of Poole is therefore unnecessary, confusing in terms of responsibility, and likely to delay the preparation of the LDDs. Any cross boundary issues are likely to be transport ones and will be dealt with through the continuing joint work of the highways authorities. This also applies to the proposal that EDDC should be involved in the preparation of the Area Action Plan for Bournemouth Airport. Financial contributions will require co-operation between <i>all</i> the local authorities in south east Dorset and will apply to <i>all</i> development sites in the area.		appropriate local authorities (as identified in Policy SR26) to work jointly in defining the precise boundaries to accommodate the identified urban extensions through Joint LDDs, where appropriate.” Policy SR 26 “...This will require co-operation, particularly at cross-boundary locations, through joint work on LDDs, addressing the distribution of financial contributions arising from Section 106 agreements and other funding mechanisms to deliver key infrastructure.”	<del>appropriate local authorities (as identified in Policy SR26) to work jointly in defining the precise boundaries to accommodate the identified urban extensions through Joint LDDs, where appropriate.”</del> Policy SR 26 “...This will require co-operation, particularly at cross-boundary locations, through joint work on LDDs, addressing the distribution of financial contributions arising from Section 106 agreements and other funding mechanisms to deliver key infrastructure.” Delete proposals on P	

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

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					79 of the Implementation Plan for joint LDDs.	
14	Policy SR27	It is essential for the efficient and speedy preparation of Local Development Documents that the RSS makes it clear that, except in the locations where there are areas of search for urban extension sites, the Green Belt is intended to remain undisturbed. Any opening up of the Green Belt boundaries in general to review and revision would create a protracted period of uncertainty for local residents, and result in a long-drawn out process for the preparation of LDDs, with an unnecessarily wide range of options to be considered. Policy SR27 is therefore strongly supported, both in	Support			For: 10 Against: 4 Abstentions: 0

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres- entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
		reaffirming that the inner boundary of the Green Belt shall generally follow the limits of existing development or that already committed and that only where urban extensions are proposed will boundaries be changed.				

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### **Draft Regional Spatial Strategy**

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15	SR29 Housing provision	The level of housing proposed in south east Dorset in Policy SR29, and in East Dorset District, is below the expected level of market demand. Despite the expected pressures which are likely to result in the housing market, EDDC considers that the environmental constraints in the area and the lack of credible opportunities for sustainable development, make it impossible to increase development levels beyond those set out in this policy.	Objection to any increase in housing levels			For: Unanimous Against: 0 Abstentions: 0
16	SR 29	The level of urban intensification proposed for East Dorset in Policy SR 29 (140 dwellings per annum) is considered reasonable and is	Support			For: 13 Against: 0 Abstentions: 1

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### Draft Regional Spatial Strategy

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For: . . . . . Against . . . . . Abstentions . . . . .
		supported.				
17	4.3.10 and SR 29	The range of development proposed for south east Dorset is not based on any technical work and represents an unsupported supposition that higher levels of development could be achieved through innovative design. The range should be deleted and the lower end of the range, which is supported by technical work, should be used in the policy. Higher densities would be likely to lead to damage to the urban environment.	Object	4.3.10 "...Whilst such a strong urban focus is welcomed in the strategy, adding to its sustainability, increased densities and a more innovative approach to urban form and design could increase the urban contribution and assist in delivering the vision. A higher level of provision could aid the availability of affordable housing, increase the viability of prime transport corridors, raise additional private sector finance yet reflect the importance of protecting the surrounding high-	4.3.10 " <del>...Whilst such a strong urban focus is welcomed in the strategy, adding to its sustainability, increased densities and a more innovative approach to urban form and design could increase the urban contribution and assist in delivering the vision. A higher level of provision could aid the availability of affordable housing, increase the viability of prime transport corridors, raise additional private sector finance yet reflect the importance of protecting the surrounding high-</del>	For: Unanimous Against: 0 Abstentions: 0

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
				<p>quality environmental assets, enhancing the delivery of the vision for the conurbation. The additional increase in urban concentration should be focused at the main urban areas of Bournemouth, Christchurch and Poole distributed on a proportionate basis, approximately 55% (Bournemouth), 35% (Poole) and 10% (Christchurch) respectively. Further technical work is being progressed by the relevant strategic planning authorities, in conjunction with sub-regional partners, to refine this contribution.</p>	<p><del>delivery of the vision for the conurbation. The additional increase in urban concentration should be focused at the main urban areas of Bournemouth, Christchurch and Poole distributed on a proportionate basis, approximately 55% (Bournemouth), 35% (Poole) and 10% (Christchurch) respectively. Further technical work is being progressed by the relevant strategic planning authorities, in conjunction with sub-regional partners, to refine this contribution. To facilitate this process a range has been</del></p>	

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

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				<p>To facilitate this process a range has been estimated, incorporating an additional 3,300 dwellings distributed across the three main urban areas, to be refined through this additional technical work.</p> <p>Policy SR29 “...Provision should be made for an average of about 1,555 to 1,720 dwellings per annum within the South East Dorset conurbation over the plan period... 680 to 780 dwellings per annum in Bournemouth Borough... 450 to 500 dwellings per annum in</p>	<p><del>estimated, incorporating an additional 3,300 dwellings distributed across the three main urban areas, to be refined through this additional technical work.</del></p> <p>Policy SR29 “...Provision should be made for an average of about 1,555 <del>to 1,720</del> dwellings per annum within the South East Dorset conurbation over the plan period... 680 <del>to 780</del> dwellings per annum in Bournemouth Borough... 450 <del>to 500</del> dwellings per annum in the Borough of Poole ... 165 <del>to 180</del> dwellings per annum in Christchurch Borough...”</p>	

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### **Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For: ..... Against ..... Abstentions ....
				the Borough of Poole ... 165 to 180 dwellings per annum in Christchurch Borough..."		
18	Policy SR 29 and Inset Diagram 4.6	The use of generalised areas of search instead of the more specific locations indicated in the advice of the 4/4 authorities will open up a range of options which will have to be explored through the LDF process. This will extend the time before definite proposals can emerge and development proceed.	Object		Delete 'areas of search' and replace with specific proposals	For: 8 Against: 0 Abstentions: 6
19	Figure 4.6	The inclusion of a separate housing figure for the urban extension area at Corfe Mullen in Figure 4.6 appears to be based on the belief that this is part of the Borough of	Object		Combine figures for areas of search N, O and P in Figure 4.6: show figure of housing for Poole in Table 4.2 as 450 [to 500] in line with	For: Unanimous Against: 0 Abstentions: 0

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres- entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
		Poole and to enable a separate figure for Poole to be included in Table 4.2. This figures is itself confusing in that it differs from the specific proposal for Poole in Policy SR 29. It also leads to greater inflexibility for EDDC in determining the levels of growth in the 3 housing urban extensions. There a number of uncertainties remaining over the areas of search, including this, and flexibility is needed either in the form of a range of figures or freedom to distribute housing between the areas.			Policy SR 29	
20	Inset Diagram 4.6	The Inset Key Diagram misleadingly indicates some areas as parts of the areas of search for urban extensions which are ruled out by	Object		Amend areas of search shown on Key Diagram Inset 4.6: delete area of search east of Ferndown and southern part of	For: Unanimous Against: 0 Abstentions: 0

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### **Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For . . . . . Against . . . . . Abstentions . . . . .
		absolute constraints of nature conservation sites of European and International importance.			area of search at Corfe Mullen	
21	SR 29 Area of Search Q	The viability of Area of Search Q (20 ha of industry west of Ferndown) is dependent on the acceptability of development in the area of Blunt's Farm. The Panel are asked to recommend the retention of this proposal and, by doing so, confirm that the Inspector's view of the value of the land as part of the Green Belt here in considering its use for an MBT waste plant, does not place an overriding constraint on its development for industry.	Support			For: 10 Against: 2 Abstentions: 1
22	SR 29 Area	<ul style="list-style-type: none"> <li>• Parts of the area of</li> </ul>	Object	SR 29 "Within East	SR 29 "Within East	

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

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	of Search N	<p>search in the Stour Valley and the Waterloo Valley are of high landscape value. Parts have been designated as Areas of Great Landscape Value in the Council's Local Plan policies. The areas perform the Green belt function of preventing urban sprawl</p> <ul style="list-style-type: none"> <li>• Parts of the area of search are on steep slopes or are separated by them from the facilities which lie on the top of the plateau.</li> <li>• It would be difficult or costly to integrate some parts of the areas of search with the local transport network</li> <li>• There would need to be measures to prevent downstream flooding</li> </ul>		Dorset District ...(Area of Search N – north west of the main urban area at Corfe Mullen..."	Dorset District ...( <del>Area of Search N – north west of the main urban area at Corfe Mullen...</del> )	<p>For: 12 Against: 0 Abstentions: 1</p>

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
		<ul style="list-style-type: none"> <li>• Parts of the area could be constrained by the need to protect groundwater supplies</li> <li>• Routes into the conurbation and along the A31 are congested at peak times</li> </ul>				
23	SR 29 Area of Search O	<p>That part of the Area of Search in Colehill Parish should be deleted</p> <ul style="list-style-type: none"> <li>• Parts of the area of search are distant from the town centre, particularly north of Colehill</li> <li>• Parts of the area of search are of importance in landscape or conservation terms, including the proposed Burt's Hill – Merrifield Conservation Area</li> <li>• The area north of</li> </ul>	Object	SR 29 "Within East Dorset District ...Area of Search O – north and west of Wimborne Minster..."	SR 29 "Within East Dorset District ...Area of Search O – <del>north and</del> west of Wimborne Minster..."	<p>For: 5 Against: 0 Abstentions: 7</p>

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

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		<p>Walford Bridge is important as part of the rural setting of the historic town, and performs that Green Belt function</p> <ul style="list-style-type: none"> <li>• Traffic from areas north of Wimborne would pass through the town centre or over the Colehill ridge</li> <li>• Junctions on the A31 and routes into the conurbation are congested</li> <li>• There would be additional pressure on infrastructure which would need to be offset by further investment</li> <li>• Parts of the area could be constrained by the need to protect groundwater supplies</li> </ul>				
24	SR 29 Area	<ul style="list-style-type: none"> <li>• Although West Parley</li> </ul>	Object	SR 29 "Within East	SR 29 "Within East	

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres- entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
	of Search P	<p>provides a range of facilities, these are limited. In particular, schools are distant</p> <ul style="list-style-type: none"> <li>• There is serious congestion at the cross roads, which would need to be alleviated by a new junction, probably a gyratory.</li> <li>• The busy roads would hinder the connection of the new development to the existing urban area</li> <li>• Development on the slopes of the Stour could be prominent</li> <li>• The area of search generally lies within the sensitive and relatively narrow Green Belt separating Ferndown/West Parley from north Bournemouth, although the floodplain and airport</li> </ul>		Dorset District ...Area of Search P – east and south east of Ferndown...”	Dorset District ...Area of Search P – <del>east and south east of Ferndown...</del> ”	<p>For: 8 Against: 0 Abstentions: 4</p>

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For..... Against ..... Abstentions ....
		noise areas would ensure an open strip would remain and there is existing development in the area.  <ul style="list-style-type: none"> <li>Routes south and east into the conurbation are congested.</li> </ul>				
25	SR 29 Area of Search Q	There is land within the Area of Search which is free from overriding constraints and which can be developed to provide needed employment land	Support			For: 8 Against: 2 Abstentions: 1
26	Table 4.1 Development Elsewhere in East Dorset District	The level of growth is one which can be accommodated without conflict with overriding constraints but the choice of sustainable development locations is limited and would not support higher levels of growth.	Support			For: Unanimous Against: 0 Abstentions: 0
27	5.3.4	The A31/ M27/ M3/ A34 is a	Object		Add	

## Policy and Resources Committee – 9<sup>th</sup> August, 2006

Minute No. 140

### Draft Regional Spatial Strategy

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
		strategic transport link from SE Dorset to the midlands, the north and Bristol. It should therefore be added to the strategic inter-regional routes listed in paragraph 5.3.4			Inter – regional road network <b>A31/ M27/ M3/ A34 Dorset to the midlands and the north</b>	For: Unanimous Against: 0 Abstentions: 0
28	Policy TR10	The route management approach is accepted in view of the need to focus on improvements to transport in the SSCTs, but the Panel's attention is drawn to the exceptionally poor standard of the A31/A35 section of the route from SE Dorset to Exeter which, as far as Dorchester, is also part of the route via the A37 from SE Dorset to Yeovil and the A303	Support			For: 10 Against: 0 Abstentions: 1
29	Policy TR 12 and Regional	The A350 is correctly identified as a Regionally	Object		Change classification of A350 from Poole to	

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. .... Against ..... Abstentions ....
	Freight Map	Significant Road Route from SE Dorset to the M4 in paragraph 5.5.2 and should therefore be included in Policy TR12 and the Regional Freight Map as a Regional Route rather than a County Route, in line with its status north of the A303			A303 from County Route to Regional Route.	For: Unanimous Against: 0 Abstentions: 0
30	Policy H1	Local authorities cannot guarantee a 30% proportion of all development being affordable housing. Where there is a high level of dependence on infill sites a significant proportion of sites may fall below thresholds where contributions to affordable housing can be obtained. The figure should therefore be a target, not a requirement. Higher rates, including the specified level of 60% in areas of greatest	Object	H1 "... Provision will be made for at least 30% of all housing development annually across each local authority area and Housing Market Area to be affordable, with authorities specifying rates up to 60% or higher in areas of greatest need."	H1 "... <del>Provision will be made</del> <b>Local authorities should seek for</b> at least 30% of all housing development annually across each local authority area and Housing Market Area to be affordable, with authorities <del>specifying</del> <b>seeking</b> rates up to 60% or higher in areas of greatest need <b>subject to the availability of</b>	For: 10 Against: 0 Abstentions: 1

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

Repres-entation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text	Voting For. . . . . Against . . . . . Abstentions . . . . .
		need, are dependent on adequate subsidy being available.			<b>adequate finance.”</b>	
31	Policy H1	In parts of the region there is a high reliance on infill development. In these areas there will be a need for lower thresholds to be set for an affordable housing contribution if adequate provision is to be made. This should be reflected in the policy	Object		Add to Policy H1, “ <b>LDDs should reduce site thresholds below national government guidelines where local circumstances dictate a heavy reliance on smaller sites.</b> ”	For: Unanimous Against: 0 Abstentions: 0
32	Policy H2	The policy will form part of the development plan and will apply in development control decisions. It therefore needs to have adequate flexibility. The specific densities set out in the Policy may not be appropriate to all circumstances, particularly on infill sites where	Object	H1 “Housing developments should exceed 30 dwellings per hectare (dph) in all parts of the region and averages across housing market areas will be in excess of 40 dph over the plan period. Density of	H1 “Housing developments should <del>exceed</del> <b>seek in excess of 30 dwellings per hectare (dph) in all parts of the region on larger sites</b> and averages across housing market areas <del>will be</del> <b>should have a target</b> in excess	For: 9 Against: 0 Abstentions: 2

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

**Draft Regional Spatial Strategy**

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		<p>constraints on individual sites are greater. It may also restrict the provision of a range of housing and could lead to inadequate private space around dwellings. Higher densities will tend to militate against family housing and exacerbate the trend towards retirement and second homes, reducing the ability of the strategy to meet the housing needs set by the economic growth of the region..</p>		<p>development of housing at the SSCTs should be at least 50 dph and considerably higher in well-planned mixed-use developments within the existing urban area. Planned extensions of SSCTs and adjacent new communities should achieve 50 dph or more overall. Individual LDDS will reflect this target with appropriate variations reflecting local conditions and will outline measures to ensure regular monitoring of delivery.”</p>	<p>of 40 dph over the plan period. Density of development of housing at the SSCTs should be at least 50 dph and <b>may be</b> considerably higher in well-planned mixed-use developments within the existing urban area. Planned extensions of SSCTs and adjacent new communities should <b>seek to</b> achieve 50 dph or more overall <b>while achieving high quality living environments and meeting housing needs</b>. Individual LDDS will reflect <del>this</del> <b>these</b> targets with appropriate variations reflecting local conditions and will outline measures to ensure regular</p>	

**Policy and Resources Committee – 9<sup>th</sup> August, 2006**

Minute No. 140

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					monitoring of delivery.”	
33	Policy GT1	The target of pitches should reflect a comprehensive assessment of need on a consistent basis across the region.	Object		New target for pitches	For: Unanimous Against: 0 Abstentions: 0
34	Policy GI 1	The policy provides for essential countryside access in a sustainable way and is of particular importance in south east Dorset in providing alternative recreational opportunities to the sensitive heathlands.	Support			For: Unanimous Against: 0 Abstentions: 0
35	RE5	The policy to incorporate micro-generation into new buildings offers an opportunity to provide substantial renewable energy in a form which will be of direct benefit to occupiers, without many of the environmental problems of	Support			For: Unanimous Against: 0 Abstentions: 0

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		larger scale installations.				
36	Policy E4	In some circumstances, where land supply and sites are particularly constrained, and where alternative uses are more attractive to landowners through high differences in values, there will be a need for sites to be safeguarded even where there is no immediate employment use available.	Object	E4 "Sites which no longer meet the needs of business or are poorly located for economic development purposes should be considered for redevelopment for alternative uses in the following sequence: for non-B use class employment generating uses; for mixed-use development including residential use taking account of the potential for higher employment densities; for residential use only."	E4 "Sites which no longer meet the needs of business or are poorly located for economic development purposes should be considered for redevelopment for alternative uses in the following sequence: for non-B use class employment generating uses; for mixed-use development including residential use taking account of the potential for higher employment densities; for residential use only. <b>In areas where there is a long - term constraint on the supply of employment land, LDDs may reserve sites for</b>	For: Unanimous Against: 0 Abstentions: 0

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					<b>employment use even where there is no immediate demand.”</b>	