

**Policy and Resources
Committee
9th August, 2006**

Agenda Item No **5**
Public Report

Draft Regional Spatial Strategy

Item for Recommendation:	To propose representations to be made to the Panel on the draft Regional Spatial Strategy
Contributors:	Chief Executive
Contact Officer:	William Wallace, Head of Policy Planning
Financial Implications:	None
Council Priorities:	CUL1 CUL3 ENV3 H&H1 H&H2
Recommendations:	It is recommended that the proposed representations 1 - 34 set out in Appendix A to the report be approved.

1. Applicable Lead Member Area

1.1 Environment.

2. Crime and Disorder – Section 17 Implications

2.1 None.

3. Introduction

- 3.1 The draft Regional Spatial Strategy (RSS) was submitted to the Secretary of State in April, and published for comment in June. The closing date for representations is the 30th August. The representations will be considered by a Panel appointed by the Secretary of State. Where the Panel consider there are matters which require discussion they will invite selected participants to attend a session of the Examination in Public (EiP). This will be held, in Exeter, between mid-April and mid-June next year. Other representations will be dealt with in written form.
- 3.2 The Council will have the opportunity to see the representations which have been made and to submit supplementary comments – for example on proposals by landowners and developers for additional housing sites – with a closing date in March. It may be necessary to bring a further report to this Committee, to establish the Council's position on some of the representations and additional proposals that have been made.
- 3.3 The Panel will report to the Secretary of State who will publish proposed modifications for comment, and adopt the Strategy. While the Panel report may be expected later in 2007, it is likely that adoption will not be before 2008.
- 3.4 The Regional Spatial Strategy process is thus entering its most formal phases. The Strategic Planning Authority for the area (Dorset County Council) will have a greater rôle, be more likely to be invited to sessions of the Examination in Public, and lead in promoting the needs and aspirations of the area and of the local people whom it represents.
- 3.5 The Panel will also be receiving representations from major national and regional bodies such as the South West Economic Regional Development Agency, English

Nature, the Highways Agency, the Regional Housing Body, developers', landowners', and builders' representative bodies, the CPRE, Sustainability South West and the Regional Government Office. Among these, the District Council must expect to carry limited weight. It cannot be certain of being invited to attend the sittings of the Examination in Public, although it may hope to do so where local issues are involved. Local residents should be advised to make their views known to the Panel Secretariat by the closing date for representations, or to lobby the County Council as the strategic planning authority for the area.

- 3.6 The main documents to which Members attention is drawn are the Draft Regional Spatial Strategy itself and the Implementation Plan. Copies are on deposit in the Members' Room. Further important documents are the Strategic Sustainability Assessment and the Statement of Community Involvement, also on deposit. A copy of the Executive Summary has been supplied to all Members.
- 3.7 In this report, reference is made in the body of the report to proposed representations as they arise. A schedule of the proposed representations is appended (Appendix A to the report).

4. Chapter 1 of the Draft RSS

- 4.1 The opening section of the RSS sets the context for the Strategy. Section 1.3, paragraph 1.3.1 sets out a vision of the regional future. This includes a number of references to the benefits of development, economic growth, regeneration and prosperity, and some particular aspirations such as that Bristol should become a major European city, which are of limited interest to the Region as a whole. It contains no reference to the quality of the Region's environment, although this is its most outstanding characteristic, and includes no aspiration to cherish or enhance it. **It is recommended that a representation should be made against this narrow and limited vision (Representation 1, Appendix A).**
- 4.2 The policies for sustainable development and communities, SD1 to SD 4, are worthy of **support (Representation 2, Appendix A)** and form the basis of much of the subsequent strategy. In particular, they lead to proposals that future population, housing and employment growth should be located close together, for a number of reasons including to minimise the need to travel. As employment growth is expected to take place in the principal urban centres, as it has done in the recent past, this implies that these centres should also be the *foci* of housing and service provision. This has implications for south east Dorset, where a substantial part of the County's future economic growth is expected to take place.

5. Chapters 2 and 3 of the Draft RSS

Population, Housing and Economic Growth

- 5.1 Chapter 2 introduces other important issues, including forecasts of economic and population growth (Section 2.3, pages 22 - 26. and Section 8.1, pages 172 - 174). The RSS notes that since 1996 economic growth in terms of both employment and Gross Value Added (GVA, the modern replacement for the previous common measure, Gross Domestic Product) has exceeded expectations. The Region has grown faster than the national economy. The RSS assumes a future growth in regional GVA at a rate of 2.8% a year or higher, that is towards the upper end of the range 2.4% - 3.2%. This equates to a growth in jobs of between 365,000 and 465,000 and an increase in the population of the Region of 750,000 over the Strategy period 2006 to 2026. Because births and deaths in the Region are roughly in balance, the population growth will come, as in previous years, through

continued net in-migration from elsewhere in the UK. This, and the need to meet existing housing needs, for example for affordable housing, leads to an estimated need for an average annual growth of 25,000 dwellings.

- 5.2 Economic forecasting is notoriously uncertain, and the Strategy notes that there is already some evidence that regional growth is slowing in the light of oil and resource prices. The Region is particularly affected by remoteness from the Country's main economic centre based in London and the South East, and is therefore sensitive to increases in transport costs. A second assumption, critical for the estimates of housing need, is that average household size will continue to decline rapidly.
- 5.3 The predicted need for 25,000 dwellings a year is inconsistent with the actual RSS proposals for about 23,000 dwellings a year (Table 4.1, page 104). These lower proposals for growth reflect the advice of the strategic planning authorities across the Region, which have taken into account the constraints which they see operating in their areas. The retention of the 25,000 figure in various sections of the RSS suggests a failure of the Assembly to fully accept this advice, and possibly, an implied intention to revisit the development proposals if economic growth remains high. This inconsistency needs to be resolved, and the planned growths of the economy, population and housing need to be balanced and set within the context of the environmental and resource issues in the Region. The Strategy's positive stance on economic growth needs to be tempered by the environmental issues. **It is recommended that an objection be made to this effect (Representation 3, Appendix A).**
- 5.4 The Strategy itself makes distinctions between the approach to be taken in different parts of the Region. These are shown on the Diagram 3.1 on Page 33 and in the case of south-east Dorset in particular recognises that a balance needs to be struck. It indicates that the approach in South East Dorset will be to manage growth within identified environmental limits and that though development pressures are high, future outward expansion and development is heavily constrained. **It is recommended that this approach should be welcomed and supported (Representation 4, Appendix A).**

Growth at SSCTs

- 5.5 It is expected that 80% of the economic and employment growth will take place in the 21 Strategically Significant Cities and Towns of the Region (SSCTs) shown in this diagram. This leads to proposals that about 20,000 jobs and at least 15,125 dwellings a year (out of the total of 23,000 a year proposed for the Region as a whole) will be delivered in these settlements. Bournemouth and Poole are named as two of the SSCTs (Table 3.1 page 35 and Map 3.1 page 33). It is unclear from these references how far the proposals Development Policy A (page 35) for development in the SSCTs, apply to the South East Dorset conurbation as a whole and what policy stance is to be taken towards the outlying, commuter belt settlements, many of which lie in this District. Paragraph 4.3.2 recognises these as part of the conurbation, but it is unclear whether they are included in the SSCTs and Development Policy A.
- 5.6 Section 4.3 contains specific proposals for development at some of these outlying settlements, but if these proposals were to be deleted from the RSS there are no general policies which could be relied upon to establish the principles which should be followed. Neither Development Policy B (page 37): "Development at Market Towns", nor Development Policy C (page 38): "Development in Small Towns and Villages" appear to apply satisfactorily to their circumstances, although

there is a cross reference in paragraph 3.3.3 which seeks to ensure that dormitory relationships are not exacerbated by development proposed at SSCTs. The possible deletion of the specific proposals in Section 4 of the RSS is discussed below. In the meantime **it is recommended that objection be made to the lack of strategic policy guidance for these and similar settlements (Representation 5, Appendix A).**

The strategic approach and its application to SE Dorset

5.7 The concentration of development on the 21 SSCTs seeks to promote a more sustainable pattern of development for the future. In the recent past employment growth has clustered at these settlements while housing has been more widely scattered, leading to the build-up of heavy daily tidal flows of commuters. It has also led to the creation of dormitory settlements with limited facilities of their own, where residents have become increasingly dependent on car transport for many of the necessities and amenities of life. A more sustainable pattern of development is clearly needed if the strategy is to be 'future-proof' in the face of increasing uncertainty and competition for fuel and other resources. However it does sharpen the dilemma over the growth of the South East Dorset conurbation. Economic growth in this, the 'second city' of the Region cannot be served, as in the past, by the development of relatively distant, outlying commuter settlements such as Verwood, if a sustainable pattern is to be followed. On the other hand, the environmental capacity in and around the conurbation limits the amount of development which is possible.

6. Chapter 4 of the Draft RSS – economic issues

Economic aspirations and constraints in SE Dorset

6.1 In facing this dilemma in SE Dorset, the RSS needs to be clearer and more decisive. Section 4.3 on South East Dorset (pages 81 – 85) states: "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 increased productivity and prosperity without continuous physical outward expansion underpins the economic strategy for the sub-region" (paragraph 4.3.4, page 82).

6.2 However, the pressure for physical outward expansion arises primarily from housing and not directly from industrial development. The Strategy needs to make clear that the positive encouragement of economic growth should increase output and productivity but not add to employment beyond the planned levels, as this would increase the pressure for more housing beyond the capacity of the area. **It is recommended this clarification should be made (Representation 6, Appendix A).**

6.3 The issue of growth is also raised by Policy SR25 (page 80), which concludes: "...Sufficient housing will be provided to complement [the SSCTs'] economic rôle and to meet the needs of a growing population." This suggests the growing population, together with the economy, is a driver of housing provision. However, the population of south east Dorset has an excess of deaths over births and would decline if it were not for constant in-migration. Housebuilding accommodates more in-migration and therefore creates population growth rather than being a response to it. The Policy, as it is phrased, is therefore misleading. **It is recommended that objection be made to this policy (Representation 7, Appendix A).**

7. Chapter 4 of the Draft RSS – infrastructure

- 7.1 The second paragraph of this Section (4.3.2) states that “a joint system to secure key infrastructure contributions from smaller residential developments will be required in advance of adopted LDDs¹ to deliver the strategy for South East Dorset.” This is cross referenced to Policy SR 26 which states that planning for the balanced growth of the conurbation “will require cooperation, 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.”
- 7.2 Key infrastructure required will be identified through a (local) implementation plan and will include items set out in paragraph 4.3.14. These are:
- (a) Investment in public transport, walking and cycling provision
 - (b) Increased demand management by transferring more road space to priority vehicles and managing the supply and use of parking
 - (c) Prime transport corridor improvements
 - (d) Poole bridge regeneration network
 - (e) A31 to Poole corridor improvements
 - (f) Provision for a new passenger terminal at Bournemouth Airport and a package of measures to secure access, including a link road to the A338 (further work required)
 - (g) Port of Poole deeper access channel and berth improvements (subject to further study)
 - (h) Provision of new local rail passenger services and stations, including a Swanage connection, and use of rail for local Park and Ride
 - (i) Improvements to rail links to other major centres in the South West
 - (j) Provision of green infrastructure close to the urban areas
 - (k) Improved accessibility by public transport, cycling and walking to significant areas of countryside recreation including the Dorset and east Devon Coast World Heritage Site, Cranborne Chase and the New Forest.
- 7.3 The infrastructure proposals raise a number of issues. Firstly the requirements are extensive. While some are clearly to be provided by the private sector, such as the new passenger terminal at Bournemouth airport, others will be public sector. Developers are likely to be asked to contribute to these, to affordable housing on sites over a threshold to be determined through the LDFs, and towards measures to mitigate the impact of development on the heathlands and other sites of European and international importance in the sub-region. These measures of mitigation are likely to overlap with the ‘Green Infrastructure’ proposals and have been the subject of a previous report to this Committee. Both they and affordable housing are of the highest priority, as would be any specific pre-requisites to enable individual sites to develop, and would have first call on the resources released by development.
- 7.4 Other policies in the RSS, such as Development Policy G (page 45) requiring sustainable construction, including inbuilt micro-generation of renewable energy,

¹ Local Development Documents, the components of the Local Development Framework, which will replace the Local Plan

energy efficiency, grey-water and sustainable drainage systems, are necessary to 'future-proof' development but will add further to costs.

7.5 The increase in land values, which is the source of developer contributions, is far greater on greenfield sites and is less on infill and redevelopment sites within existing urban areas. Since the great majority of the development proposed in South East Dorset is on just such infill and redevelopment sites, principally within the coastal boroughs, the scope for extensive developer contributions is limited. There are therefore grounds for suspecting that developer contributions will be unable to meet all the identified needs. The local authorities in South East Dorset intend to seek advice on development economics in the area, taking account of a variety of factors including the housing market, the types of sites available, and the nature of the local housebuilding industry. This will provide evidence which can be submitted at the Examination in Public on the potential level of contributions which may be expected. It is expected that this advice will demonstrate that developer contributions will be inadequate for all the calls upon it. **It is recommended that the Council should anticipate this evidence and object that the proposals for infrastructure provision have failed to demonstrate that they are practical, in the absence of substantial regional and central government funding, particularly for transport (Representations 8 and 9, Appendix A).** The proposed Regional Infrastructure Fund (para 3.6.8) would allow investment ahead of development but, although welcome, would still require subsequent repayment from developer contributions and therefore would not add to the resources available.

7.6 There is therefore likely to be a need for regional and national government contributions to the infrastructure necessary for the proposed growth. Despite the emphasis on managed growth, the absolute level of development proposed for South East Dorset remains high. It remains one of the principal growth centres of the Region (see section 10 of this report below). However, while Sections 2.4.8 and 2.4.9 of the Implementation Plan and the accompanying table (pages 34-36) repeats the key infrastructure requirements set out in the draft Strategy, these are poorly represented in Appendix 3, the Region's submitted advice to government on the Regional Funding Allocation up to 2016. Some of the elements of the key infrastructure cannot rely wholly on developer contributions yet are likely to be pre-requisites of developments proposed by the RSS. In particular these include the A31-Poole corridor improvements and the Bournemouth Airport Access Improvements (table, page 94 of the Implementation Plan). These must be provided in time to allow the RSS to be implemented. **It is recommended that an objection be made that the RSS must ensure that infrastructure is provided in time to allow the orderly progress of development (Representations 10 and 11, Appendix A).**

8. Chapter 4 of the Draft RSS – joint working

8.1 The second issue which arises is that Policy SR26 proposes "joint work on LDDs, addressing the distribution of financial contributions arising from Section 106 agreements". This is reinforced by the preceding supporting paragraph 4.3.3 which states that in the case of urban extensions: "With a complex delineation of administrative boundaries it will be essential for all the 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." Reference to page 79 of the Implementation Plan shows that the Assembly propose that, while this Council would be solely responsible for the planning of the urban extensions proposed to Wimborne Minster, the plan for

Corfe Mullen would be done jointly with the Borough of Poole, and that for the urban extension proposed to the east and south east of Ferndown would be done jointly with Bournemouth Borough. In the reverse direction it is proposed that East Dorset should participate in the preparation of the Area Action Plan for Bournemouth Airport.

- 8.2 It is entirely unclear from the text how far this joint working is intended to ensure agreed systems of developer contributions and agreed objects for spending the money, and how far it may arise from a misapprehension at the Assembly that the proposed 'areas of search' cross district and borough boundaries. If it is the first reason, then it equally would be a reason for the participation by this Council in the preparation of the LDFs for Poole and Bournemouth Boroughs. This is not proposed, nor is it necessary. The Councils in the sub-region must agree on joint financing of necessary infrastructure not only in individual urban extension areas but across the conurbation and **it is recommended that this Council should make it clear that it is prepared to do so, as an equal partner in a joint approach to development needs (Representation 12, Appendix A).**
- 8.3 If the proposal for joint LDDs is the result of a misapprehension about boundaries, it should be made clear that the proposed urban extension areas lie wholly within East Dorset and there is no need for joint working, which would add to the complexity of plan preparation, delay the work and result in decisions on critical local matters being subject to agreement by councillors of a neighbouring authority. Nor is it necessary for this Council to have a formal say in the Airport Area Action Plan. It already enjoys a close working relationship with Christchurch Borough Council and, as with the other adjoining boroughs, any cross border issues can be dealt with by mutual agreement, as they have been in the past. **It is therefore recommended that objection should be made to paragraph 4.3.3, Policy SR 26 and page 79 of the Implementation Plan of the Regional Spatial Strategy (Representation 13, Appendix A).**

9. Chapter 4 of the Draft RSS – Green Belt Policy

- 9.1 Policy SR27 (page 82) relates to the Green Belt. Paragraph 3.3.4 sets out the position of the RSS on Green Belts and their review. This notes that Green Belt review was proposed in the previous regional strategy, RPG 10, and was expected to be carried into effect in reviews of Structure Plans. The introduction of the new planning system has overtaken this, and reviews of the Green Belt have been carried out instead as part of the sub-regional work for the RSS in the Joint Study Areas. Green Belt policy is expected to be long-term but not permanent. The South East Dorset Green Belt has been in place since 1981 and it is therefore legitimate for its boundaries to be reviewed. The review has taken place against a national background where the Green Belt concept is being challenged as an impediment to proper planning, and the Barker report for the Treasury has argued that substantially more land should be released for housing so as to permit the market to be more responsive to demand.
- 9.2 This Council has long supported the principle of the Green Belt and its purposes and should continue to do so. Policy SR27 for South East Dorset (page 82) (and policies SR3 for Bristol and Bath, and SR 11 for Gloucester and Cheltenham) state that: "... the inner boundary of the Green Belt shall generally follow the limits of existing development or that already permitted." This re-confirms the basis on which the inner boundary of the Green Belt has been drawn in South East Dorset. The wording of the Policy is particularly helpful because in many cases across the country, the inner boundaries of Green Belts have been set at some distance from

the urban edge to allow for urban expansion, with areas of ‘white land’ reserved for possible future development, though given interim protection. Strong pressure has been applied over the last three decades for the same approach to be taken in South East Dorset. It has been resisted consistently by this Council and the County Council. It is quite possible that renewed pressure will be brought to bear through the Examination in Public process for the ‘white land’ approach to be introduced into the RSS Green Belt policies. It is important that this Council should continue to resist this and should stand behind the present Policy SR 27. **It is therefore recommended that this element of Policy SR27 should be supported (Representation 14, Appendix A).**

- 9.3 A second element of Policy SR27 states: “The general extent of the South East Dorset Green Belt is maintained subject to changes in boundaries that will be defined in LDDs to ...accommodate the urban extensions [and] ...exclude land at Bournemouth International Airport.” This second element is also important as it confines any roll-back of the Green Belt boundary to accommodate development to the locations specified in the RSS. There is a significant risk that the Panel will conclude that these specific proposals raise issues of detail which should be dealt with at the level of the Local Development Framework rather than the RSS, and that the RSS should simply propose that a certain amount of development should be accommodated in East Dorset in urban extensions in locations to be determined through the LDF process. If the Panel were to do so, it would put all the Green Belt boundaries in East Dorset in question. This would be of great concern to residents, and would lead to an immense amount of work which would have to be undertaken by the Council in preparing the Local Development Framework and reviewing all the possible development options. **It is therefore recommended that this section of SR27, in its present form, be supported (Representation 14, Appendix A).**

10. Chapter 4 of the Draft RSS – levels of growth

- 10.1 Policy SR29 (page 85) establishes the broad scale of growth which is expected and which should be accommodated in South East Dorset. It proposes that provision should be made for an additional 42,000 jobs over the period of the Strategy. These would be split between 23,000 in the Bournemouth Travel to Work Area and 19,000 in that of Poole. The figures for the Bournemouth Travel to Work Area include jobs created by development at Bournemouth Airport.
- 10.2 In contrast to employment, which is given as totals for the period covered by the Strategy, housing figures are given as average annual amounts. For clarity, the total figures over the 20 year period of the Strategy, derived from the annual figures, are also given here.

Housing provision in Policy SR29:

	a year		total 2006-2026	
Conurbation	1,555	1,720	31,100	34,400
Bournemouth	680	780	13,600	15,600
Poole	450	500	9,000	10,000
Christchurch	165	180	3,300	3,600
East Dorset	260		5,200	

- 10.3 Table 4.1 (page 103) indicates a further 10 dwellings a year, on average, to be provided in the northern part of East Dorset District, outside the Joint Study Area and outside the area covered by the proposals of Policy SR 29.

- 10.4 There are three significant concerns over these figures:
- (a) Household forecasts recently published suggest a much higher number of households will be created, leading to greater housing need
 - (b) Employment forecasts suggest that the level of employment generated by the local economy could be much higher than the totals given in the RSS. The proposed housing could fall well short of what would then be needed to house the additional workers drawn in by this growth
 - (c) The need for affordable housing is so great that even if 100% of the new housing proposed in South East Dorset were affordable, it would not suffice.
- 10.5 Forecasts are always uncertain. However, these factors suggest that there may well be significant strains in the local housing market arising from the restricted levels of development which are proposed. These could impact in turn on the growth of the economy. Conversely, a key issue is that development in South East Dorset is heavily constrained by environmental factors, both within the urban areas and in the surrounding countryside. The levels of development being sought in the RSS places pressure on these. **Therefore it is recommended that the Council should resist any attempt to increase further the levels of employment and housing provision in Policy SR 29, especially in East Dorset District (Representation 15, Appendix A).**

11. Chapter 4 of the Draft RSS – urban intensification

- 11.1 The larger part of the housing development proposed for East Dorset (2,800 dwellings) is in the form of infill within the urban areas. The figure has been based on the urban capacity studies in which the Council has participated and represents a plausible total if current policies are continued. It implies continued urban intensification, in line with national policy. There is concern that this could have a damaging effect on the environment within the urban areas and the types of housing which result do not meet the full range of housing needs. However, restricting this element of housing provision further would lead to added strains in the housing market and increase pressure for the release of green field (and therefore Green Belt) sites. **It is recommended that this element of Policy SR 29 is supported** as representing an acceptable balance (**Representation 16, Appendix A**).
- 11.2 Infill within the other urban areas of the conurbation provides the main source of housing which is proposed for South East Dorset. In paragraph 4.3.10 (page 84) of the supporting text of the Strategy, which refers to Bournemouth, Poole and Christchurch, it is suggested that “increased densities and a more innovative approach to urban form and design could increase the urban contribution and assist in delivering the vision ...To facilitate this process a range has been estimated incorporating an additional 3,300 dwellings distributed across the three main urban areas...” The urban potential studies carried out by the local authorities offer no support for this and there is concern that it could lead to damage to the urban environment. Although the statement does not directly affect East Dorset, the environmental quality of the conurbation is important for this District, not least by reducing the pressure for movement to the suburbs. **It is recommended therefore that objection should be made to this proposal, and the lower end of the range be used in Policy SR 29 (Representation 17, Appendix A).** The Urban Potential Studies are being reviewed, and if credible alternative figures emerge from this work, the urban intensification figures could be revised through supplementary evidence to the Panel.

12. Chapter 4 of the Draft RSS – urban extensions and areas of search

- 12.1 The final part of Policy SR29 contains the proposal for urban extensions within four areas of search in East Dorset (and one in Christchurch). The three in East Dorset which are for housing are: “north west of the main urban area at Corfe Mullen”, “north and west of Wimborne Minster” and “east and south east of Ferndown”. The fourth, for 20 hectares of employment land, is described as “west of Ferndown”. Some indication of these areas is given in the key diagram on page 81.
- 12.2 For clarification, the proposal at Corfe Mullen should be interpreted not as “north west of Corfe Mullen” but as “at Corfe Mullen, north west of the main urban area” (of the conurbation).
- 12.3 The first issue which arises is that the “areas of search” are wider than the more precise locations proposed by the Strategic Planning Authorities in their advice to the Regional Assembly in 2005, on which this Council commented previously. The Assembly apparently considers that level of certainty too limiting to the work of the Local Development Framework, and likely to deny landowners and developers the opportunity to promote detailed alternative options within the framework of the Strategy. Several difficulties arise from this change. The main ones are that, firstly, opening the way to such options will increase the work and lengthen the time taken to prepare the Local Development Framework. Secondly, the area of Green Belt (and the number of local residents) subject to uncertainty is increased until the time where the Local Development Framework is adopted (although this uncertainty remains limited to the named areas). Thirdly the ‘areas of search’ have no defined outer boundaries, making it difficult to limit the options that would have to be considered. **It is recommended that an objection be made to the use of these more generalised areas of search (Representation 18, Appendix A), and that if urban extensions are to be proposed in the RSS they should be at specific locations.** However, it should be recognised that it is unlikely that the Panel will recommend the restoration of the more precise, original proposals.

13. Chapter 4 of the Draft RSS – urban extensions – options for the Panel

- 13.1 There are four options that the Panel and the Secretary of State could take on the urban extension proposals. The Council will need to cover these and to frame its responses accordingly.
- 13.2 The *first option* is for the Panel to recommend and the Secretary of State to confirm the draft RSS proposals, with or without minor modifications which do not destroy their essential character.
- 13.3 The *second option* is for the Panel to recommend they be deleted, individually or in their entirety. Although together they contribute 3,000 dwellings (including the urban extension proposed in Christchurch) or between 8.7% and 9.6% of the total additional housing proposed for the sub-region, plus 20 hectares of industry, they are individually small and below the generally recognised threshold of 1,000 dwellings that would make them individually of strategic significance. Secondly the majority have significant, acknowledged problems in terms of environmental and Green Belt impact and access to services and employment. If the Panel and the Secretary of State take this option, it would severely limit the ability of the Council to provide affordable housing to meet the known high level of need. It would, however, greatly simplify its task in planning for the future of the District.
- 13.4 A *third option* for the Panel and the Secretary of State would be to accept any arguments that may be put forward for the enlargement of the extensions or the

introduction of new ones such as the 'western sector'. This would address the problem, from the national and Regional perspective, that the current housing proposals in the sub-region are limited, while the area has high economic growth potential and high housing demand, exacerbating the 'affordability crisis'. Throughout the preparation of the RSS, the pressure on the local strategic planning authorities has been to seek viable opportunities for higher growth in the sub-region.

- 13.5 When they have seen the representations which are submitted, the Council may wish to comment on any such proposals for further or wider urban extensions.
- 13.6 A *fourth option* would be for the Panel and Secretary of State to consider the location of urban extensions to be a matter for the Local Development Framework. The RSS would include a housing and an employment land figure for East Dorset District and the Council would then have to determine the location of development, and possibly also the relative proportions to be met from urban infill and redevelopment, or from green field sites. The Panel would be encouraged towards this conclusion if the representations made on the urban extension locations were of a very detailed, local and 'non-strategic' nature. This option would defer the decision but would leave complex and difficult issues to be resolved by the Council. The Council would have to consider all the potential locations throughout the District. All the inner Green Belt boundaries would be called into question, including proposals for multiple, small scale local changes to achieve the total required. The Council would have to take very contentious decisions on the preferred locations. The process would add very considerably to the time taken to prepare its Local Development Framework.
- 13.7 It would be in these circumstances that it would be most essential for there to be a clear policy framework in the RSS, setting out the strategy to be adopted for outlying, commuter settlements, in order to guide the Council's LDF work (this comment relates back to **Representation 5, Appendix A**).

14. Chapter 4 of the Draft RSS – clarification of extension proposals and flexibility

- 14.1 If the Panel were to take the first option and recommend the proposals in the RSS should stand, some clarification and minor amendments would be needed. Policy SR 29 proposes the urban extensions in East Dorset should provide 120 dwellings a year (total 2,400 dwellings over the Strategy period). The Policy does not give figures for each individual location in East Dorset. While this increases uncertainty, it also provides flexibility to develop proposals through the Local Development Framework, allowing emerging facts to be taken into account and the weight of development to be redistributed between different urban extension areas in the light of these facts. However this flexibility is then undermined by subsequent tables which also introduce some confusion into the RSS.
- 14.2 Figure 4.6 (page 86) suggests that out of the 120 a year, the urban extensions at Ferndown and Wimborne should contribute 85 dwellings (total 1,700). This still allows some flexibility between the two locations, although it is more limited than the potential three way split in Policy SR 29. However, Corfe Mullen is shown in Figure 4.6 as being a fixed amount: 35 dwellings a year (total 700).
- 14.3 It is not clear whether Figure 4.6 carries the weight of Policy and if so whether this Figure or Policy SR 29 with its overall total takes precedence. The reason for the subdivision in Figure 4.6 becomes apparent in Table 4.2 (page 105) which sets out the level of development in individual SSCTs. In this table the figure for Poole is given as 485 to 535 dwellings a year (total 9,700 to 10,700). This is the figure

given in Policy SR29 plus the 35 a year for the proposed urban extension at Corfe Mullen. The urban extension at Corfe Mullen is thus being treated as an extension to Poole. This is confusing and inflexible. **It is recommended that objection be made to this separation of the figures for the extension at Corfe Mullen (Representation 19, Appendix A), and that a single figure be given for the total of any development to be accommodated in any urban extensions in East Dorset.**

- 14.4 A second issue, if the Panel were to take the first option of retaining the urban extension proposals, is that some parts of the areas of search shown in the Inset Key Diagram 4.6 are unrealistic. That at Ferndown is shown extending across the eastern side of Ferndown and West Parley, and this is reinforced by the text description. However, this area contains Parley Common which is a heathland site of European importance. There is no possibility of development in this area, which should therefore be excluded. The area of search should include only the land to the south and south east of Ferndown and West Parley.
- 14.5 A similar point applies at Corfe Mullen: the area of search now appears to include the southern part of the Waterloo Valley, where there are also internationally recognised sites.
- 14.6 **It is recommended that objection be made to the descriptions and definitions of these two areas of search, if the Panel and Secretary of State are minded to retain them (Representation 20, Appendix A).**
- 14.7 A further issue has arisen over the area of search 'west of Ferndown' within which the 20 hectares of employment land are to be found. Within this area of search there is only one practicable option, at Blunt's Farm. The remainder of the area is either heathland (Ferndown Common) or is the important area of Green Belt around Stapehill Abbey. In dismissing the proposal in the Waste Local Plan for the waste treatment plant (MBT plant) at Blunt's Farm, the Inspector said: ""Although unremarkable in its appearance in terms of landscape or natural beauty, the land contributes significantly and, in my view, importantly, to Green Belt openness at this location. It serves as a natural buffer between the employment land and the A31" **It is recommended that the Panel should be asked to consider whether this view overrides the need for further industrial expansion and precludes the retention of this proposed urban extension (Representation 21, Appendix A).**

15. Chapter 4 of the Draft RSS – urban extensions – position of the Council

- 15.1 This leads to consideration of the second of the options which the Panel might follow, which is to recommend the deletion of the urban extension areas. The Council can adopt one of three positions on each of the proposed urban extensions:
- To support the retention of the urban extension proposal
 - To take a neutral position and allow the supporters and the opponents of each area to make their cases to the Panel either in writing or at hearings of the Examination in Public, if they are invited
 - To seek the rejection of the urban extension proposal.
- 15.2 In each case the proposals are now for an area of search, not for a specific location. Therefore the factors for and against each proposal are less precisely defined. The decisions for the RSS are also strategic ones: and high levels of local detail are inappropriate.

- 15.3 The Council has previously supported the urban extension proposals in the form of the submissions from the Strategic Planning Authorities to the Regional Assembly (Policy and Resources Committee 26th October 2005). In the absence of greenfield sites there will be greater pressure for urban infill and redevelopment sites. However, these are unlikely to provide significant amounts of affordable housing, even if the Council succeeds in reducing the size threshold of sites from which an affordable housing contribution can be required, through the work on its Local Development Framework policies. Urban sites are frequently small, and initial land values are high. The urban extension sites suffer neither of these disadvantages, although they will also have to make significant contributions to infrastructure.
- 15.4 The Council faces a continuing need for affordable housing. Over the past eight years the Housing Register has consistently contained more than 1,700 households, and often rises to above 2,000. House and rental prices remain very high and opportunities to address the needs of the community are extremely limited. The Housing Needs Survey of 2002 identified an overall *annual* need of about 600 dwellings. Provision of affordable dwellings over the last four years since the Housing Needs Survey was completed totals only about 100 dwellings. A new Housing Needs Survey is soon to be commissioned in conjunction with the other Dorset Authorities. It would be surprising to see a reduction in the level of need.
- 15.5 None of the areas of search is ideal. All of them have strong environmental factors which argue against their development. However, there are no better sites which have been found during the work carried out in the Joint Study Area. Nor, in any of the areas of search, are there factors which have been found – such as nature conservation sites protected as European sites under the Habitats Regulations – which would preclude development. A fuller analysis of the strengths and weaknesses of the potential areas was given in the report to Committee on the 26th October 2005, although this related to the specific sites being proposed by the Strategic Planning Authorities in their advice to the Assembly, and reflected information as it was understood at that time.

Area of Search N – north west of the main urban area at Corfe Mullen

Some positive factors

- The proposal could provide perhaps 300 – 400 affordable dwellings in various tenures
- The area of search is close to the facilities of Corfe Mullen. Although a relatively weak centre, this is one of the few areas where development could be related to existing local facilities
- Additional population and investment in infrastructure, including Green Infrastructure, might help to strengthen the facilities
- Parts of the area of search could offer highly attractive locations for development
- The area is the closest to Poole and the industrial areas at Nuffield and Creekmoor. Employment in the Poole Travel to Work area is expected to grow and the area could provide housing for those working in this part of the conurbation
- The area is within easy car reach of the main local centre of Wimborne, and at a greater distance, of Ferndown Industrial Estate

Some negative factors

- Parts of the area of 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
- 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.
- It would be difficult or costly to integrate some parts of the areas of search with the local transport network
- There would need to be measures to prevent downstream flooding
- Parts of the area could be constrained by the need to protect groundwater supplies
- Routes into the conurbation and along the A31 are congested at peak times

15.6 The Council has to balance the issues of housing need (and to some extent economic growth) against the environmental and social impacts of further growth. **It is recommended that no objection be made to area of search N (Representation 22, Appendix A).**

Area of Search O – north and west of Wimborne Minster

Some positive factors

- The proposal could provide 300+ affordable dwellings in various tenures
- Wimborne Minster is the main centre of the District, providing a wide range of services and facilities
- Parts of the area of search, particularly at Cuthbury and north of Walford Bridge, would be within relatively easy access of the centre.
- Additional population could help to support the commercial centre of the town
- There would be the opportunity for creating a positive, high quality urban environment

Some negative factors

- Parts of the area of search are distant from the town centre, particularly north of Colehill
- Parts of the area of search are of importance in landscape or conservation terms, including the proposed Burt's Hill – Merrifield Conservation Area
- The area north of Walford Bridge is important as part of the rural setting of the historic town, and performs that Green Belt function
- Traffic from areas north of Wimborne would pass through the town centre or over the Colehill ridge
- Junctions on the A31 and routes into the conurbation are congested

- There would be additional pressure on infrastructure which would need to be offset by further investment
 - Parts of the area could be constrained by the need to protect groundwater supplies
- 15.7 There would need to be investment in Green Infrastructure to offset any potential impacts of recreational demand on the heathlands, particularly Holt Heath. There would also need to be investment in sustainable drainage to prevent enhanced risk of flooding downstream where there is a particular risk.
- 15.8 This is the most promising of the areas of search. The Council has to balance the issues of housing need (and to some extent economic growth) against the environmental and social impacts of further growth. **It is recommended that area of search O be supported (Representation 23, Appendix A).**

Area of Search P – east and south east of Ferndown

Some positive factors

- The area could provide perhaps 350+ affordable dwellings in various tenures
- Parts of the area of search are close to the shops, village hall, recreation ground and other facilities of West Parley
- Much of the area of search is within relatively easy reach of Bournemouth Airport, which is a major location for employment growth
- The area is also relatively close to Bournemouth, where employment is also expected to grow
- The area enjoys good north-south bus services
- Any development would require Green Infrastructure in the form of major open spaces: these could serve the existing residents as well as the new, and help to protect the historic village of West Parley
- Additional population could strengthen local facilities

Some negative factors

- Although West Parley provides a range of facilities, these are limited. In particular, schools are distant
- There is serious congestion at the cross roads, which would need to be alleviated by a new junction, probably a gyratory.
- The busy roads would hinder the connection of the new development to the existing urban area
- Development on the slopes of the Stour could be prominent
- 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 noise areas would ensure an open strip would remain and there is existing development in the area.
- Routes south and east into the conurbation are congested

15.9 The Council has to balance the issues of housing need (and to some extent economic growth) against the environmental and social impacts of further growth. **It is recommended that area of search P should be supported (Representation 24, Appendix A).**

Area of Search Q – west of Ferndown – 20 ha. of industry

Some positive factors

- The area adjoins the existing, and growing Ferndown and Uddens Industrial Estates and would provide for the future growth of their businesses
- Part of the area – at Blunt’s Farm – could be well-concealed in the landscape and directly linked to the existing industrial estates, providing a through link
- There is easy access from the area to the Trunk Road

Some negative factors

- Parts of the area of search are in sensitive areas of the Green Belt
- Downstream drainage for surface water would be likely to require not only attenuation but also pollution control measures as it would be likely to discharge in to the Uddens Moors River system, which is an SSSI in its lower reaches
- Routes into the conurbation and along the A31 are congested.

15.10 The needs of local businesses should be accommodated. **It is recommended area of search P should be supported (Representation 24, Appendix A).**

16. Chapter 4 of the Draft RSS – development in the north of the District

16.1 Table 4.1 of the RSS (page 103) summarises the effects of the housing proposals. Included in this table is a proposals that the north of the District, including the Alderholt, Cranborne and Sixpenny Handley areas, should provide 10 dwellings a year. There is no reason to doubt that this total can be achieved without difficulty. **It is recommended that no objection be made to this proposal (Representation 25, Appendix A).**

17. Chapter 5 of the Draft RSS – transport

17.1 The section of the RSS dealing with transport has suffered from the difficulty that proposals for specific schemes have proved hard to include in the Regional Strategy because of the need for each of these to undergo individual environmental appraisal or assessment, and many of the schemes have not been developed to the point where this could be done. Strategic transport links are set out in Section 5.3. They now include recognition of both the M3/M27/A31 London to Bournemouth-Poole inter-regional road link, and the London to Bournemouth-Poole strategic rail link (page 115). Road access to Bournemouth Airport is also acknowledged. However, a key route for the south-eastern part of the Region is the A31/ M27/ A34 route to the north and the midlands, although it lies largely outside the South West Region. **It is recommended that an objection be made to Paragraph 5.3.4 that the A31/ M27/ A34 route should be included as part of the inter-regional strategic road network (Representation 26, Appendix A).**

17.2 Paragraph 5.5.2 lists *regionally significant* road routes. These include the A31/A35/A30 South East Dorset to Exeter route and the A350 South East Dorset

to M4 (as well as the A37 route to Yeovil and the A303). The policy towards these routes is set out in Policy TR10 (page 123) as a 'corridor management' approach. This does not preclude local improvement schemes but does not give a high priority to new construction. In view of the constraints on regional spending on roads and the need for investment to be focused on the main urban areas, including the South East Dorset conurbation, **it is recommended that no objection is raised to this Policy but that attention is drawn to the poor quality of the A31/A35 section of the route from SE Dorset to Exeter (Representation 27, Appendix A).**

- 17.3 However, the Regional Freight Map, shown as Map 5.2 with the associated Policy TR12 (page 125), shows the A350 as a 'county' route rather than as a 'regional' route. As the A350 has been included as a regionally significant route in Paragraph 5.5.2, **it is recommended that objection should be made to this (Representation 28, Appendix A).** Investment in this route should reflect this regional rôle.

18. Chapters 6 and 7 of the Draft RSS – housing and other issues

- 18.1 Section 6 deals with harnessing the benefits of population growth and managing the implications of population change. This includes balanced housing markets and the provision of affordable housing.

Affordable Housing

- 18.2 Policy H1 (page 131) proposes that, of the annual average of 23,060 dwellings to be built in the Region under the RSS proposals, at least 7,500 (or 33%) should be 'affordable'. The policy requires 30% of all housing development annually across each local authority area should be provided as affordable with authorities specifying rates up to 60% or higher in areas of greatest need. The regional target of 7,500 dwellings a year in the 'affordable' category falls well short of estimated need. There is an estimated need of about 5,700 affordable dwellings a year in Dorset alone. The proposals raise two issues: the need for subsidy and the need for greater flexibility in setting thresholds.
- 18.3 While developers can be asked to provide affordable housing ranging from 'turn-key' provision to bare plots for local authorities and housing associations to build on, the higher levels of affordable housing are unlikely to be achieved without substantial subsidy, particularly where other demands, e.g. for infrastructure, are being placed on developers. In areas like East Dorset, where over half the development will come from infill and redevelopment, much of it on relatively small sites, this policy is unlikely to be workable because many sites will fall below the threshold where contributions can be required, even if these thresholds are reduced (see below). **It is recommended that the proportion of affordable housing should be presented as a target, rather than a policy requirement, and the need for subsidy should be recognised (Representation 29, Appendix A).**
- 18.4 If higher proportions are to be achieved on average, contributions will also have to come from the smaller sites. Paragraph 6.1.5 notes that 'site thresholds' should be reduced to levels below those recommended by Government guidance where possible. However, it also suggests that there is likely to be a difference between rural and urban areas. In the case of South East Dorset, where a large majority of development will be on infill and redevelopment sites within existing urban areas, lower thresholds will be needed in urban areas as well. **It is recommended that the reduction in thresholds should be included in Policy H1 to give it greater**

force and assist in the reduction of thresholds through LDD policies (Representation 30, Appendix A).

Densities

18.5 Policy H2 (page 132) proposes *average* housing densities of in excess of 40 dph. over the plan period. Housing at the SSCTs and in urban extensions should be at least 50 dph. This figure appears excessive, particularly on infill sites within SSCTs where design and environmental constraints may apply most strongly and it will be difficult to create a wholly new environment. Even in new areas it is likely to restrict adequate private space around dwellings. **It is recommended that objection should be made to this figure (Representation 31, Appendix A).** It will be preferable for an average to be sought, allowing flexibility on sites where higher densities may be inappropriate.

Gypsies and Travellers

18.6 Policy GT1 (page 133) reflects an assessment that about 1,100 additional pitches will need to be provided for Gypsies and Travellers across the Region. The issue must be addressed through local surveys, but Members are advised that this will be likely to prove a contentious area of policy which they will need to face in the future. The target is based on insufficient survey information: it is likely to be an underestimate, and may allow authorities that have failed to carry out full assessments of need to under-provide, throwing additional burdens onto other authorities. **It is recommended that targets should be revised in the light of comprehensive needs assessments (Representation 32, Appendix A).**

Green Infrastructure

18.7 Policy GI1 (page 138) provides for Green Infrastructure. Members have received a report on this issue previously. **It is recommended that this Policy should be supported. (Representation 33, Appendix A)** “GI networks will comprise multifunctional, accessible, connected assets, planned around existing environmental characteristics.” It is likely that Green Infrastructure will receive a relatively low priority among other spending needs, except where it also performs the function of mitigating the impact of increasing recreational demand from new development on heathlands, where it will be an essential pre-requisite of development.

Micro-generation of renewable energy

18.8 Policy RE5 (page 157) requires that larger scale developments (which should be taken to be sites of 10 or more houses or 1000m² of floorspace for other developments) should provide sufficient renewable energy generated on-site to reduce CO₂ emissions from the use of the building by 10%. This appears to be one of the most promising ways in which renewable energy can be provided, with a far lower environmental impact than wind farms (although some of these will still be needed) and with direct benefits to occupiers. **It is recommended that the policy should be supported (Representation 34, Appendix A).**

19. Chapter 8 of the Draft RSS – employment

19.1 The Regional Economic Strategy identifies eight key sectors as important for the future prosperity of the region’s economy: advanced engineering and aerospace; food and drink; creative industries; tourism; marine; bio-medical and health; ICT; and environmental technologies. They are well represented in the South East

Dorset area. The Bournemouth-Poole conurbation has been assessed in a recent study as one of four areas in the Region (together with Bristol, Swindon and Exeter) as “well placed to play a more significant rôle in the regional economy.”

- 19.2 Policy E1 (page 178) requires local authorities to assess supply and demand for employment land in their areas and maintain a ready supply. Policy E2 requires sites to be identified to accommodate the employment growth identified for the SSCTs in Section 4 of the RSS, Policy E3 (page 179) for the supply to be reviewed at least every three years and Policy E4 requires sites which no longer meet business needs or are poorly located to be considered for redevelopment for alternative uses.
- 19.3 The concern over this last policy is that the long-term supply of land and sites in South East Dorset is limited by Green Belt and environmental constraints. The higher value of land for other uses and in particular for residential use, encourages landowners to seek to transfer land out of employment where possible. **It is therefore recommended that objection should be made that the policy should be amended to safeguard sites where alternatives may be hard to find (Representation 35, Appendix A).**

20. Representations Received

- 20.1 The Council has received copies of representations on the RSS sent to the Panel for consideration. These include 4,536 individual representations objecting to the proposed urban extension at Corfe Mullen and approximately 300 relating to fears of development at Colehill. In addition a number of individual letters have been received, including letters from campaign groups. Copies of these are available in the Members' Room.

21. Background Papers

- 21.1 Draft Regional Spatial Strategy, Implementation Strategy and Strategic Sustainability Assessment; South West Regional Assembly, June 2006
- 21.2 South East Dorset Strategy Dorset County Council, Bournemouth Borough Council and Borough of Poole. November 2005.

22. Appendices

- 22.1 Appendix 1 - Schedule of proposed representations to the Panel

Appendix: Proposed schedule of objections to the Draft Regional Spatial Strategy

Representation	RSS Para or Policies	Reason for representation	Object or Support	Existing RSS text	Proposed RSS Text
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: "The environment of the region is protected for its own sake and for the enjoyment of residents and visitors"
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		
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 lower rate of growth of about 23,000 per annum, based on the advice of the Strategic Planning Authorities	Object	'...technical forecasts predict that around 25,000 new dwellings a year will be needed to keep pace with estimated demand. As set out in section 4.5 the strategy makes provision for about 23,000 dwellings per year...'	Forecasting is uncertain and gives a range of possible outcomes, which also have to be balanced against constraints on growth. 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		
5	Development Policy A, Development Policy B	The Development policies fail to give adequate strategic direction for the	Object	None	Add to Development Policy A "Towns and villages serving as

	and Development Policy C	settlements around the main conurbations which have a commuter belt or dormitory rôle.			'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."
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 increased productivity and prosperity without continuous physical outward expansion underpins the economic strategy for the sub-region.	Opportunities and pressures should be managed to maintain the intrinsic quality of the environment, whilst not limiting the economic growth potential of the area. The ability to deliver increased productivity and prosperity without continuous physical outward expansion, or adding to employment and housing pressures, 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 role and to meet the needs of a growing population."	"... Sufficient housing will be provided to complement their economic role and to contribute towards meeting local housing needs, while accepting in-migration will be restricted."
8	4.3.2	It is likely that 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	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 in parallel with the preparation of LDDs to assist in delivering the strategy for South East Dorset. However, it is

		emerge from the LDD work, rather than prior to it.			recognised that not all the infrastructure required can be provided through developer contributions alone.”
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, partly through developer contributions, to enable the achievement of the development proposed in this Policy.”
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 all 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.”	“Ferndown (Area of Search Q – west of Ferndown).Urban extensions should be developed in accordance with Policy F, subject to the provision of necessary infrastructure.”
11	Implementation Plan Appendix 3 Regional Funding Allocation	As above	Object	N/A	The Regional Funding Allocations should recognise the need for key infrastructure, particularly the A31 to Poole Corridor Improvements and the Bournemouth Airport surface access, to be provided in order to enable the 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		
13	Paragraph 4.3.3, Policy SR 26 and Table Page 79, Implementation Plan	The urban extension areas of search N and P lie wholly within East Dorset. The proposal that the LDDs covering these areas should be prepared jointly	Object	Para 4.3.3: “...With a complex delineation of administrative boundaries it will be essential for all the appropriate local	Policy SR 26 “...This will require co-operation, addressing the distribution of financial contributions arising from Section

		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.		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.”	106 agreements and other funding mechanisms to deliver key infrastructure.” Delete proposals on P 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 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.	Support		
15	SR29 Housing provision	The level of housing proposed in south	Objection to		

		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.	any increase in housing levels		
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 supported.	Support		
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-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	Policy SR29 "...Provision should be made for an average of about 1,555 dwellings per annum within the South East Dorset conurbation over the plan period... 680 dwellings per annum in Bournemouth Borough... 450 dwellings per annum in the Borough of Poole ... 165 dwellings per annum in Christchurch Borough..."

				<p>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 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 the Borough of Poole ... 165 to 180 dwellings per annum in Christchurch Borough..."</p>	
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
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	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

		of the Borough of 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.			line with 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 absolute constraints of nature conservation sites of European and International importance.			Amend areas of search shown on Key Diagram Inset 4.6: delete area of search east of Ferndown and southern part of 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		
22	SR 29 Area of Search N	There is land within the Area of Search which is free from overriding constraints and which can be supported by a range of local facilities.	No objection		
23	SR 29 Area of Search O	There is land within the Area of Search which is free from overriding	Support		

		constraints and which can be supported by a range of local facilities.			
24	SR 29 Area of Search P	There is land within the Area of Search which is free from overriding constraints and which can be supported by a range of local facilities.	Support		
25	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		
26	5.3.4	The A31/ M27/ A34 is a 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	Object		Add Inter – regional road network A31/ M27/ A34 Dorset to the midlands and the north
27	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		
28	Policy TR 12 and Regional Freight Map	The A350 is correctly identified as a Regionally 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	Object		Change classification of A350 from Poole to A303 from County Route to Regional Route.
29	Policy H1	Local authorities cannot guarantee a 30% proportion of all development being affordable housing. Where there	Object	H1 "... Provision will be made for at least 30% of all housing development annually across	H1 "...Local authorities should seek for at least 30% of all housing development annually

		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 need, are dependent on adequate subsidy being available.		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.”	across each local authority area and Housing Market Area to be affordable, with authorities seeking rates up to 60% or higher in areas of greatest need subject to the availability of adequate finance.”
30	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, “LDDs should reduce site thresholds below national government guidelines where local circumstances dictate a heavy reliance on smaller sites.”
31	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 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..	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 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.”	H1 “Housing developments should seek in excess of 30 dwellings per hectare (dph) in all parts of the region on larger sites and averages across housing market areas should have a target in excess of 40 dph over the plan period. Density of development of housing at the SSCTs should be at least 50 dph and may be considerably higher in well-planned mixed-use developments within the existing urban area. Planned extensions of SSCTs and adjacent new communities should seek to achieve 50 dph or more overall while achieving high quality living environments and meeting housing needs. Individual LDDs will reflect these targets with appropriate variations reflecting local conditions and will outline measures to ensure regular

					monitoring of delivery.”
32	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
33	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		
34	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 larger scale installations.	Support		
35	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. In areas where there is a long term constraint on the supply of employment land, LDDs may reserve sites for employment use even where there is no immediate demand.”