

**Matter 2 Evidence / 521642
Libra Homes**

**CHRISTCHURCH & EAST DORSET CORE STRATEGY
EXAMINATION IN PUBLIC**

MATTERS & ISSUES 2/1, 2/2, 2/3 & 2/4

GREEN BELT

AUGUST 2013

1.0 INTRODUCTION

1.1 This statement comprises a response to the issues identified by the Inspector for the Examination in Public (EIP) into the soundness of the Christchurch & East Dorset Core Strategy (CS). This submission is on behalf of Libra Homes (“Libra”), the owners of land at Holmwood Park, Ferndown. It is one of a number of submissions, the objective of which is set out at the commencement of our statement in respect of Matters and Issues 1.

2.0 MATTER & ISSUE 2/1

2.1 IS THE PROPOSAL TO MAKE LIMITED CHANGES TO THE GREEN BELT JUSTIFIED?

2.2 The South East Dorset Green Belt (GB) has been established around the conurbation since the 1980’s. It has therefore endured for approximately twenty five years. Over that time, all development has taken place either on existing sites within the urban area, or on urban extension sites that were identified at the same time that the green belt was established.

2.3 In the main, the historic urban extension sites have now been fully developed. This has resulted in residential development being concentrated on sites within the existing urban area. Historic Annual Monitoring Reports for East Dorset (AMR’s), including the most recent dated March 2013 (OD 11) demonstrate that between 54% and 99% of dwelling completions have been on Previously Developed Land (PDL) over the last five years; with the reporting year 2009/2010 approaching nearly 100%.

2.4 The CS housing delivery strategy will not be sound if it relies solely on the continued re-development of inner urban sites. Section 5 of the Strategic Housing Land Availability Assessment (SHLAA) (ED 33) indicates that over 3,000 dwellings could be developed from within the urban area. However, as set out in our statement in respect of Matters and Issues 1, it is considered that the SHLAA substantially over estimates the anticipated contribution from sites within the existing urban area. It is for this reason

that an increase in the number of dwellings on the CS Policy FWP 3 site is proposed in these representations.

- 2.5 A related issue is the extent to which sites within the existing urban area will contribute to the provision of affordable housing. Under the proposed new affordable housing policy, LN 3, sites of up to four dwellings can provide affordable housing on site, but due to their small size, it is highly unlikely. An off site financial contribution, also acceptable under the terms of the policy, is more likely to occur - provided that it is viable to do so.
- 2.6 Our representations in respect of Matter 1 concluded that the combined planning costs of CIL and off site affordable housing, at £450.00 per metre² would be a major constraint to the delivery of housing on small sites. This results in the need to amend green belt boundaries to accommodate urban extensions so as to achieve the strategic housing target; and in particular to deliver the much needed affordable housing.

3.0 MATTER & ISSUE 2/2

- 3.1 HAVE THE GB BOUNDARIES BEEN ASSESSED TO CONSIDER THEIR CAPABILITY TO ENDURE BEYOND THE PLAN PERIOD, AS ADVISED IN NPPF PARA. 83?
- 3.2 The CS does not indicate that the GB boundaries are to be established for any purpose beyond the plan period. This may mean that when the CS is reviewed, GB boundaries will also have to be reviewed if there is a need to plan for development that cannot be accommodated within the urban area.
- 3.3 In addition to Paragraph 83 of the NPPF, the second bullet point of Paragraph 157 requires plans to; *“be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.”* (Our Underlining)
- 3.4 Therefore, in addition to amendments to the GB to accommodate the proposed urban extensions, alterations to cater for longer term needs are also merited. Land could be removed from the GB and safeguarded from development until such time as it is needed in the future.

4.0 MATTER & ISSUE 2/3

4.1 DOES THE CS SET OUT A PRECISE TIMESCALE AND CLEAR PROCESS FOR THE GB BOUNDARY CHANGES?

4.2 The CS does not indicate when, or how, the GB boundary changes will occur. Policy KS 3 states that the new neighbourhoods will be the subject of development briefs in advance of planning approval being granted. This implies that either the development brief, or the subsequent planning application, will be the vehicle for establishing revised GB boundaries.

4.3 This approach is considered to lack certainty, in particular as the timing of the submission of a planning application is entirely at the discretion of the landowner or developer; and could be at any time within the period of the CS - or even beyond it.

5.0 MATTER & ISSUE 2/4

5.1 ARE THE GB BOUNDARIES FOR EVERY DEVELOPMENT PROPOSAL CLEARLY DEFINED ON THE PROPOSALS MAPS?

5.2 Policy KS 2 of the CS states that new green belt boundaries will follow the edge of the new urban area; i.e. at the edge of the proposed urban extensions. However, the aerial photographs / illustrations for each of the proposed urban extensions within the CS do not indicate where the boundaries will be. This approach is contrary to Paragraph 83 of the NPPF, which states that:

“Local Planning Authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy.”

5.3 Additionally, the last bullet point of Paragraph 85 of the NPPF requires GB boundaries to be defined clearly, using features that are readily recognisable and likely to be permanent.

- 5.4 It is considered that to make the CS sound, the illustrations of the proposed urban extensions should also show the revised GB boundary. In some instances, this may depart slightly from the NPPF guidance in that development proposals incorporating Sustainable Alternative Natural Green Space (SANGS) may establish new boundaries that do not currently exist. However, where a planning permission for an urban extension is implemented, the boundary to the SANGS will be established and will endure in the long term; as it is envisaged that SANGS will come under public ownership and will remain in the GB.
- 5.5 The proposed GB boundary for the Holmwood Park site is shown on the plan reproduced as **Appendix 1** to this statement. It is a plan that is also reproduced in the Planning Statement that supports the impending application on the FWP 3 site.

APPENDIX 1

Proposed Green Belt Boundary



Green Belt 