

**CORE STRATEGY  
DEVELOPMENT PLAN  
DOCUMENT (DPD)**

**LDF EXAMINATION**

**Matter 1 – Overall Strategy**

**STATEMENT PREPARED BY:**

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**REPRESENTATION NUMBER: 507541**

**On behalf of:**

**Bodorgan Properties (Channel Islands)  
Ltd., Sainsbury's Supermarkets Ltd. &  
Taylor Wimpey Strategic Land**

**AUGUST 2013**

1. Our joint clients own and have interests in the proposed mixed use extension at North Christchurch (CN1) and wish to ensure that the planning policy framework aimed at securing release of the land is sound in that it is positively prepared, justified, effective and consistent with national policy. To do so it must be sufficiently flexible.

***Question 1: Do the CS vision and objectives set out a robust basis for tackling the key issues that have been identified?***

2. Our comments relate to Christchurch Borough only, where we recognise that there are significant constraints associated with any future new development within the Borough having regard to national designations and areas subject to flood constraints. Delivery of the Christchurch urban extension is therefore essential as it is the single largest site allocation, making up nearly a third of housing delivery as currently set out in the Core Strategy. It is a key site, which is a critical component of the delivery of housing strategy to help to meet objectively assessed housing needs in the Borough over the plan period.
3. It is apparent from paragraph 4.18 of the Core Strategy that there is a shortfall between the need identified in the SHMA for market and affordable housing in Christchurch (total 3,375 units) and the number of new homes proposed in Policy KS3 (3,020 units). Further the January 2012 SHMA identifies a requirement for an additional 332 units of affordable housing per annum if all needs to be met over the period 2011 to 2016. Accordingly the document is inconsistent with paragraph 47 of the NPPF in terms of the local Plan requirement to meet full, objectively assessed needs for market and affordable housing in the housing market area.
4. In order to be found sound the plan should identify further sites to make up the shortfall within Christchurch Borough to meet the objectively assessed needs where it can.

***Question 2: Is the CS supported by a robust Infrastructure Delivery Plan?***

5. The draft Infrastructure Delivery Plan (SD 11) provides an indication of the infrastructure to be delivered alongside the proposed growth throughout the

Plan area and identifies relevant delivery agencies. As provided in Policy CN1, the Christchurch urban extension offers the opportunity to delivery substantial community and environmental infrastructure on a strategic scale. However, as noted in our response to Matter 12, Question 1, the delivery time estimated by the Council for housing from the site of first completions in 2014/15 is not achievable. The earliest time for first deliveries will be 2016/17. This has implications for offsite infrastructure requirements including road improvements on the A35.

6. Transport projects identified for the A35 junctions are identified in the IDP for 2018-2022 with a cost of £5.5 million. The timing of this project is beyond the optimum release time of site CN1, even on our revised projection. Representations made by MEM Ltd (360382) whose client is BP(CI) Ltd (507541) to policy KS10 have already raised this issue, but the IDP has not been altered to reflect the previous objection on soundness.
7. To make the plan consistent with the housing trajectory would involve revisions to the timing of the funding of the A35 junction improvements from 2018 to 2016/17 in the IDP and in policy KS10.
8. However, our transport consultants iTransport have prepared a note on the matter which is attached at Annex 1 to this Statement. They note that there is some spare capacity on the network at present and certainly sufficient to accommodate the 100-150 dwellings deliverable on the site by 2018. Accordingly the solution is to revise the wording in CN1 to facilitate an early release of site CN1 in advance of the of A35 junction improvements based on traffic modelling impacts and with acceptance of additional traffic on the network in the meantime.

***Question 3: Is the settlement hierarchy (KS1) based on robust evidence?***

9. No comment.

***Question 4: Is the proposed quantum of housing development (KS3) justified by the evidence?***

10. For the reasons set out in our response to question 1, there is a discrepancy between the assessed need for housing and the proposed quantum of housing development. A balancing act has therefore been necessary between overarching housing needs and the environmental constraints that exist within the Borough mentioned within the council's evidence base including the Strategic Flood Risk Assessment and Habitat Regulations Assessment. However it is understood that further capacity has been identified within the Borough's area that is free from development constraints and this has been put forward by objectors to assist in making the plan sound.

***Question 5: Should the housing provision:***

- ***allow 10% for vacancy rates and second homes?***
- ***provide a separate target for each Council area?***

11. There is a need to take account of vacancy rates and second homes as these are the realities of the existing population and therefore need to be reflected in any assessment of housing need.
12. Each Council should have its own housing target, as they have quite separate housing markets. The supply of housing in EDDC will not meet the needs of households in need in Christchurch and vice versa, especially affordable households. As they are less mobile than market households, this justifies the very special circumstances for green belt release. In addition the plan will need to be monitored by Borough/ District split in order to ensure needs in each area are met.

***Question 6: Is the proposed quantum of employment land (KS5) justified by the evidence?***

13. No comment.

***Question 7: Does the overall strategy take account of the balance and linkages between workforce projections and housing growth?***

14. This matter is addressed in the Council's SHMA.

***Question 8: Is the need for housing to be located outside the urban areas/ in the green belt justified by the SHLAA and other evidence?***

15. Yes, the town of Christchurch is heavily constrained and accordingly the delivery of the North Christchurch urban extension is critical to meeting strategic housing needs.
16. In addition the supply of housing delivery from within the urban area has significantly slowed since the recession as the 'recycling' of urban sites and from garden land infill sites is now considerably less viable which means the sites are unlikely to come forward to deal with unmet needs. No affordable housing units have been completed in the Borough in the last three years – refer to CBC Annual Monitoring Reports 2009-2012. (OD 10). With the imposition of the new affordable housing threshold and CIL there is an expectation that urban sites will not be viable and will continue to prevent delivery of affordable housing in the Borough.
17. This fully justifies green belt releases, and provides the very special circumstances required as there is insufficient certainty over the delivery of urban sites to meet the affordable and market housing needs of the Borough, given the recent track record and increasing policy burdens and there are no other non-green belt sites available, as shown in the SHLAA (ED32).

***Question 9: Is the need for employment land to be located on greenfield / green belt land justified by the evidence?***

18. No comment.