

## **Christchurch and East Dorset Core Strategy (September 2013)**

### ***Overall strategy***

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

- ***Do they reflect an objective assessment of alternatives?***

1.1 We have significant concerns that the Plan is not based on a strategy which has been informed by an objective assessment of all reasonable alternatives.

1.2 We are not aware of any evidence which has been submitted that demonstrates that alternative options have been tested through the Sustainability Appraisal (SA), to accommodate more of the proven need for housing in the joint LPA area (see response to Q4). Neither the iterative process adopted in producing the SA or the assessment of alternatives (SA Appendix 4: Matrix of Alternative Strategy Development Proposals) represent a rigorous and robust examination of alternatives. We refer to the examination of the Joint East Hampshire/South Downs National Park Core Strategy, in which the Inspector found the Councils' similar approach to that strategy unsound. The Inspector in that case concluded the joint authorities must first assess the total housing required in their area, having regard to unmet needs from adjoining authorities; an up to date SHMA and planned economic growth. As we contend in our response to the Inspector's Question 4 we believe the joint councils cannot demonstrate this and therefore the approach adopted fails the 'Positively Prepared' test of soundness in NPPF.

1.3 In addition the Inspector examining the Joint East Hampshire/South Downs National Park Core Strategy concluded the authorities, having assessed the total housing requirement, should have assessed alternative ways to meet such needs either alone or in partnership with neighbouring authorities in accordance with NPPF paragraph 182. Only once this exercise is complete can the authorities 'justify' a lower or 'objectively assessed' housing requirement.

1.4 The joint authorities have not undertaken an alternative testing exercise to satisfy the 'Justified' test of Soundness. For example, the authorities have not undertaken a comprehensive review of the Green Belt to establish whether more of the areas housing needs can be accommodated within the joint authority area. In the absence of such studies, we are unclear how the joint authorities can 'Justify' pursuing a housing requirement for lower than the evidence suggests. We elaborate on the latter at Question 4.

1.5 In their current form the Vision and Objectives cannot be considered to be the most appropriate basis for tackling key issues.

- ***Is the CS Vision reference to "reducing" unmet housing need consistent with national guidance in the NPPF (para 47)***

1.6 We would argue the joint authority strategy does just that, reduces rather than meets objectively assessed housing need in accordance with NPPF paragraph 14, 47 and 182. In the absence of a robust assessment of housing need and alternative ways of meeting such needs, it is clear the authorities are not in a position yet to claim their strategy is sound.

1.7 We welcome the clarification in the August 2013 (Amended Version) of the Housing Supply, Housing Trajectory, Gypsy and Traveller Accommodation Paper which acknowledges that the phrase 'reducing local need' is not meant to be interpreted differently from meeting objectively assessed need. We recommend that the phrase meeting objectively assessed need is substituted in the CS Vision Statement. In acknowledging this, the LPA must then demonstrate how this is being achieved. On the basis of the evidence produced by the LPAs to date, we do not believe this claim can be substantiated.

**2. Is the CS supported by a robust Infrastructure Delivery Plan which:**

- **Identifies the essential infrastructure that is required to deliver the strategy;**
- **Sets out programmes and timescales for delivery, linked to the housing trajectory and timing of other development which is key to the strategy**
- **Identifies agency/ies responsible for bringing infrastructure forward;**
- **Identifies funding streams, risks to delivery and contingencies**

2.1 NPPF guidance (paragraph 177) demands that local planning authority's 'understand district wide development costs at the time Local Plans are drawn up' and they should ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. The draft Infrastructure Delivery Plan (SD11) lists numerous infrastructure projects essential to the implementation of the CS policies many of which have not even been costed. For the majority of infrastructure projects there is no indication of the funding secured or the funding gap and only very limited information regarding the delivery mechanism. In these circumstances the suggested timescales for delivering infrastructure programmes must be viewed with considerable caution. We cannot agree that the CS is supported by a robust IDP which fails on the grounds listed above.

2.2 We note that EDDC are relying on the strategic site developers to agree common ground with Natural England regarding the site specific SANG provision/mitigation with the Dorset Heathlands Planning Framework 2012-2014 SPD operating until CIL comes into force. In addition, a significant proportion of housing land supply is planned from urban sources of supply. We have not seen a SANG strategy to address the cumulative impact of such growth on the SPAs, particularly in relation to urban sites that exceed 50 dwellings. In the absence of this it is difficult to conclude whether this quantum of growth is in fact deliverable. We would refer the Inspector to the preliminary findings of the Inspector examining the adjacent LPA New Forest District Local Plan: Part II where both the above circumstances also apply. In summary, the Inspector found the plan unsound on these grounds and requested the LPA undertake further work to demonstrate the quantum of development proposed could be mitigated and hence have reasonable certainty of delivery within the plan period.

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

- **Does it take account of the needs of urban and rural areas and does it address local needs in the north of the area?**
- **Does the definition of hamlets provide sufficient flexibility to allow development?**
- **Are the following designations justified and appropriate:**
  - Furzehill**
  - Colehill**
  - Burton**

3.1 We note that the Consolidated Core Strategy (March 2013) (no. SD28) identifies Wimborne as a 'main settlement' which will provide the major focus for development and Colehill as a

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'suburban centre', ie a settlement with no existing centre that will provide for some residential development along with some facilities to meet day to day needs. This hierarchy informs the focus of the distribution of development across the area to settlements which provide the best access to services, facilities and employment.

- 3.2 Whilst we acknowledge the individual roles of settlements across the District, we wish to highlight the mutual dependence of the economic, social and environmental roles set out by the presumption in favour of sustainable development set out in NPPF (paragraph 7-8, 152). This is of relevance as a core planning principle is to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable" (NPPF, paragraph 17).
- 3.3 Wimborne and Colehill clearly, like Ferndown and West Parley (which together are identified as a main settlement) have separate and individual identities but it should also be acknowledged that the settlements clearly have a close relationship both in geographical and functional terms. This is acknowledged by the Area Profile (October 2012) (no. CD5.7) which highlights the synergy between the two settlements. For example Wimborne is noted to have a range of sports facilities, whilst there are six schools within Colehill. In contrast with Corfe Mullen, Ferndown and West Parley, Verwood and West Moors, Wimborne (and by association Colehill) are at the top of the settlement hierarchy but are much less constrained by the South Dorset Heathland 400m residential development exclusion zones. The Wimborne/Colehill area has to deliver proportionally more housing than elsewhere and the Green Belt review should explore that potential to the full.
- 3.4 We therefore contend that Wimborne *and* Colehill should together be recognised as a spatial area suitable for the accommodation of growth. This is consistent with advice in the NPPF (paragraph 17) which indicates that housing should be located in sustainable locations and also the approach adopted in the East Dorset Housing Options Masterplan Report and the CS Chapter 8 – which acknowledges the functional relationship and Colehill's proximity to the Ferndown and Uddens Industrial Estates. Moreover, by including Colehill with Wimborne Minster the CS would acknowledge the potential for greenfield development. Greenfield housing releases will be determined through the emerging local plan process. We have promoted land north of Leigh Road as housing allocation to help meet the housing land supply shortfall and have sought to agree the on-site SANG provision with the Local Authority and Natural England.

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

- ***take account of unmet housing need in adjacent districts?***
- ***take account of up to date population data?***
- ***allow for inward migration?***
- ***take account of economic/employment growth?***

- 4.1 In short, no. We consider the available evidence base indicates the amount of housing being provided falls well short of meeting housing needs and will not deliver the CS objectives for economic growth.
- 4.2 For example, examinations of the latest demographic evidence shows the authority has seen over recent years an ageing population, with this projected to continue under trend based demographic projections.

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- 4.3 The Draft Core Strategy sets an objective to enable the economy of Christchurch and East Dorset to grow with significant new zones of employment development to be located at Bournemouth Airport and on key sites in East Dorset, serving the economy of the housing market area.
- 4.4 Examination of the evidence base underpinning the economic policy components of the Draft Core Strategy shows an assumed growth in employment opportunities (6,500 FTE jobs in East Dorset and 4,900 FTE jobs in Christchurch between 2011 and 2031) in the future and within the plan period. Consideration of the latest Experian (May 2013) forecasts shows a considerably more muted picture of growth but these do not appear to take account of investment plans (including Bournemouth Airport) and/or policy aspirations set out in the Draft Core Strategy.
- 4.5 It is evident that the effect of the ageing population will act as a constraint on the future resident labour force. This in turn will make it difficult to realise the full job potential within the area without an uplift in levels of net in-migration from those seen over recent years. Coupled with this the authority, as evidenced within the 2011 SHMA, has significant affordability issues which have continued to form a barrier to younger households forming and remaining within the authority. This represents a challenge for the creation of balanced communities and in retaining and attracting business and employment investment.
- 4.6 The SHMA underpinning the Councils' justifications for the proposed housing requirement fundamentally omits consideration of planned economic growth. The CS is not planning for zero growth or a retraction in the economy over the plan period, quite the opposite. There is no credible justification therefore for not planning for the housing required to facilitate this planned economic growth. Indeed, not to do so calls into question the plans ability to deliver its economic policies.
- 4.7 The Councils have not presented any update to the SHMA that factors in economic growth. To assist the Inspector, our client has therefore commissioned their own comprehensive assessment and demographic model using Edge Analytics to illustrate the discrepancies in the Councils evidence base (see appendix 1). We have limited our assessment to East Dorset to illustrate our points.
- 4.8 In summary, given the aspiration of the Draft Core Strategy to facilitate job growth it is considered that in order for the authority to accommodate a growth in its employment base and the associated expansion of its labour-force policy should plan for a requirement of between 6,000 – 7,000 units in East Dorset over the plan period. It is clear the revised Policy KS3 text is derived from the component parts of the Pre-submission version of KS3, ie 5,250 dwellings for East Dorset, 3,200 for Christchurch. This level of growth would enable a level of employment growth to occur over the plan period, the labour force to increase, the commuting rate out of the authority to reduce<sup>1</sup> and would also serve to make a greater contribution to addressing the significant affordable housing need in the authority. Planning for this level of housing supply would therefore be better aligned with the Council's economic ambitions. This requirement would need to be closely monitored. If the higher levels of job growth identified in the Councils' evidence base are realised this would serve to increase the requirement for new housing.

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<sup>1</sup> Note: It is not assumed that existing residents commuting choices can be altered by policy but that new jobs do not require additional commuting trips from outside of the authority

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- 4.9 We would urge the joint authorities and Inspector to review this evidence, as it clearly shows fundamental discrepancies in the evidence base being used to underpin the JCS before the Inspector. In addition, we do not consider the joint authorities have adequately discharged their 'Duty to Co-operate' under NPPF. We see little evidence to suggest current housing needs from adjoining LPAs have been calculated and addressed. Nor are we aware of evidence to suggest how unmet needs from the JCS are projected to be addressed by adjoining authorities. This potentially leaves a significant number of households in need with no option but to leave the HMA. We are therefore surprised the JCS makes little or no mention of the implications of this for the area.
- 4.10 We conclude policy KS3 does not satisfy the 'positively prepared' or 'justified' tests of soundness in NPPF. Further assessment and consultations on options to accommodate more of the areas objectively assessed needs is required if the JCS is to satisfy the tests of soundness.

**5. Should the housing provision:**

- ***provide a separate target for each Council area?***

- 5.1 We consider the failure to provide a separate target for each Council area represents an issue for the soundness of the Plan. Prior to the latest iteration of the Draft Core Strategy a distinction had been incorporated within the policy as to the level of housing to be planned for in Christchurch and in East Dorset. This is common with the approach taken by all of the other authorities within the wider Housing Market Area (HMA).
- 5.2 Examination of research undertaken on behalf of the CLG to define sub-regional housing market areas across England provides an important insight into the operation of the different market geographies in this wider HMA.
- 5.3 This research defined a two-tier structure of 'strategic' and 'local' housing market areas. The HMA area was identified as falling within a wider strategic Bournemouth HMA (upper tier) housing market area. In turn this was split into two lower-tier markets: Poole and Bournemouth.
- 5.4 Significantly the research, which considered migration and travel to work dynamics, identified East Dorset as predominantly falling within the Poole local housing market area and Christchurch as falling within the Bournemouth local housing market area.
- 5.5 This suggests the operation of two distinct market relationships within the Draft Core Strategy geographical area which therefore justify the need for distinct policy responses. This also aligns with the findings of the 2011 SHMA and in particular the reported views of the stakeholders consulted as part of this piece of research.
- 5.6 The evidence base prepared to date recognises these distinctions with the 2011 SHMA and the Workspaces study providing evidenced based assessments distinct to each authority. The population and household modelling undertaken by Turley Associates and Edge Analytics (see appendix 1) also highlights the importance of understanding the local interplay between employment and housing as well as the wider strategic dynamics in operation. In order to successfully undertake a plan, monitor and manage approach a distinction is required reflecting authority geographies which represent the basis for available official data and modelling outputs.

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

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- 6.1 We consider that the scale of employment land required is justified on the basis of the Workspace Strategy (2012) and the underpinning SWO forecasts used within the modelling approach to calculating demand. These forecasts are considered in the context of more recently published forecasts by Experian (see appendix 1) to represent an aspirational and positive perspective of the future growth of the economy and therefore represent a positive planning stance as required by the NPPF.

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

- 7.1 We do not consider that the Draft Core Strategy takes any account of the balance and linkages between workforce projections and housing growth within its setting of a housing requirement at policy KS4.
- 7.2 Examination of the evidence base underpinning the economic policy components of the Draft Core Strategy (Appendix 1) shows an assumed growth in employment opportunities (6,500 FTE jobs in East Dorset and 4,900 FTE jobs in Christchurch between 2011 and 2031) in the future and within the plan period. Consideration of the latest Experian (May 2013) forecasts shows a considerably more muted picture of growth but these do not appear to take account of known investment plans (including Bournemouth Airport) and/or policy aspirations set out in the Draft Core Strategy.
- 7.3 It is evident from the modelling undertaken (appendix 1) that the effect of the ageing population will act as a constraint on the future level of the resident labour supply, an issue identified in the 2011 SHMA. This in turn will make it difficult to realise the full job potential within the area without an uplift in levels of net in-migration from those seen over recent years. Coupled with this the authority, again as evidenced within the 2011 SHMA, has significant affordability issues which have continued to form a barrier to younger households forming and remaining within the authority. This represents a further challenge for the creation of balanced communities and in retaining and attracting business and employment investment.
- 7.4 The two employment-led scenarios modelled by Turley Associates/Edge Analytics (see appendix 1) provide a range of between 340 and 615 dwellings required per annum within East Dorset. This translates into a requirement of between 5,100 and 9,225 houses over the plan period with the lower end of this range essentially equating to a stagnation of employment levels over (or zero employment growth) over the full plan period and the latter associated with the delivery of 4,875 FTE jobs over the plan period (in line with the annual level of job growth implied through the Workspace Study).
- 7.5 Given the aspiration of the Draft Core Strategy to facilitate job growth it is considered that in order for the authority to accommodate a growth in its employment base and the associated expansion of its labour-force policy should plan for a requirement of between 6,000 – 7,000 homes in East Dorset over the plan period. This level of growth would enable a modest level of employment growth and serve to make a greater contribution to addressing the significant affordable housing need in the authority. Based on the economic growth ambitions of the authority this requirement would need to be closely monitored. If the higher levels of job growth identified in the Councils' evidence base are realised this would serve to increase the requirement for new housing.

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

- 8.1 We consider there is compelling evidence for the need for additional housing growth on greenfield sites, requiring green belt release in the District. A review of the SHLAA (March 2013), particularly Appendix C confirms the large number and significant proportion (almost 50%) of the housing land supply within the urban areas which the Council allege will be delivered within the period 2012-2017. Many of these sites are in multiple ownership, have been identified by officers and are yet to be confirmed as being deliverable. Moreover overoptimistic reliance is placed on the early delivery on strategic sites identified in the FD1 Chart 1. The early years housing delivery at the Christchurch urban extension is very uncertain given the range of pre delivery infrastructure requirements (access, flood risk measures etc.). In EDDC early year's delivery is equally uncertain at a number of the strategic sites for a variety of reasons (e.g. relocation of allotments and Football Club at Cuthbury Allotments, the pre delivery infrastructure requirements at Cranborne Road, Wimborne and relocation of a school and compensatory open space provision at Lockyer's School site, Corfe Mullen).
- 8.2 The Consolidated Core Strategy identifies a number of strategic sites to meet housing need over the Plan period. However, the District's housing land supply is considered to be significantly weaker than alleged. The Council has carried out analysis of the likely risks associated with the delivery of the strategic sites in the East Dorset New Neighbourhoods Delivery Risk Assessment (no. FD5). Whilst this document suggests that a number of risks to delivery can be mitigated through the Core Strategy, it is unclear whether the risk to delivery is reduced as a result. The Council therefore needs to produce compelling evidence in order to demonstrate the deliverability of the strategic housing sites.
- 8.3 Add to this our contention that the JCS quantum of housing provided in the JCS should rise to 6,000-7,000 homes in East Dorset alone, the justification increases, as does the need to plan for this proactively alongside an up to date IDP. Given the need for additional housing land identification with certainty of delivery in 2014-2019, we wish to highlight the merits of the land north of Leigh Road where commencement could start in 2014 and 50 dwellings be delivered in 2015 and 2016 (especially with a 40% affordable housing requirement).
- 8.4 We therefore conclude there is significant justification for greenfield release including within the Green Belt. The deliverability of a significant proportion of the sites included within the Council's housing land supply is questionable, and should not be included within the Council's land supply calculations. Serious consideration should therefore be given to bringing forward additional 'New Neighbourhoods' in the first five years of the Plan in order to provide sufficient choice and competition in the market for land and to meet the 5 year housing land supply shortfall.
- 8.5