

RESPONSE TO CHRISTCHURCH LOCAL PLAN REVIEW OPTIONS CONSULTATION

1. PURPOSE OF REPORT

- 1.1. The purpose of this report is to agree the Council's response to Christchurch Borough Council's Local Plan Review Options Consultation, closing on 3 September 2018.

2. BACKGROUND

- 2.1. Christchurch Borough Council (CBC) is undertaking a review of its Local Plan, to replace the Christchurch and East Dorset Core Strategy adopted in 2014. Simultaneously, a local plan review is being undertaken by East Dorset District Council. This will be subject to a separate report. The work for both plans has been undertaken jointly by Christchurch and East Dorset Councils.
- 2.2. The document currently being consulted on is an options document which sets out the major policy issues and a range of possible policy options for addressing them. It follows on from earlier consultations on the scope of the Local Plan review and a "call for sites" to ascertain developer and landowner interest in the area's future development. Significant work has already been done to provide an evidence base for the plan review. This includes a strategic Green Belt study, undertaken by Land Use Consultants.
- 2.3. The Christchurch Plan states objectively assessed housing need for the area is 7,040 dwellings. The options document plans to provide for about 5,270 new homes between 2013 and 2033. Taking into account completions, urban potential and existing commitments, there is a need to find sites for an additional 2,795 dwellings. The Plan identifies sites for a further 1026 dwellings, including on green belt land on the edge of Bransgore (See section 3). Overall, the Plan has a shortfall of some 1770 dwellings compared with the stated objectively assessed housing need of 7,040 dwellings. The document states that: "As part of the Duty to Co-operate process the Council is engaging with neighbouring authorities regarding options for the delivery of further housing options to address the full objectively assessed housing need for Christchurch based on the Government's latest methodology."(Para. 3.2.14)

3. ISSUES FOR NEW FOREST DISTRICT COUNCIL

Identification of land west of Bransgore as housing option

- 3.1 The Christchurch Local Plan Options document contains the following draft policy:

Draft Policy 5.6
Housing options – East and North of Christchurch

Land at Hoburne and adjoining Bransgore village will be allocated for housing development to provide a minimum of 190 dwellings.

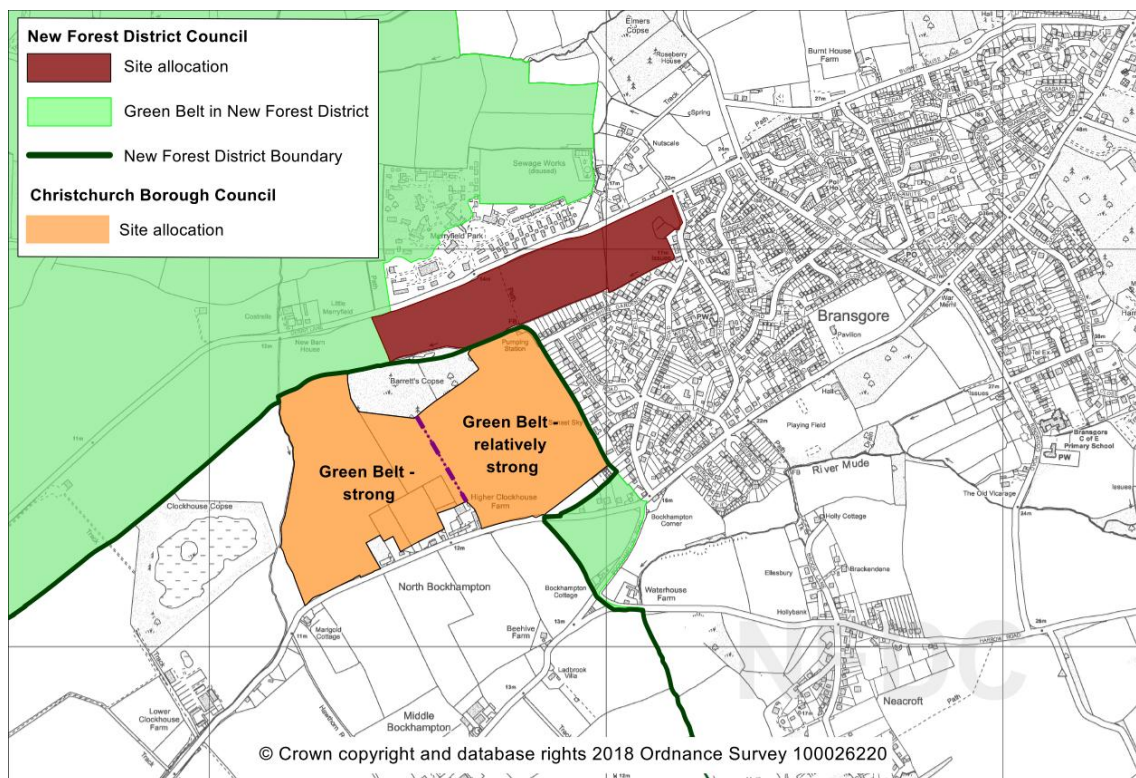
Development of land in this area will include the sites:

- Land south of Lyndhurst Road, Hinton
- Land north of Burley Road, to the west of Bransgore village

Development of the site is likely to be subject to the following criteria:

- Creation of high quality residential development, of a density and design appropriate to a more rural location;
- Up to 50% affordable housing in line with Policy 4.16;
- Contributions toward heathland mitigation in accordance with Policy 4.2 and Appendix B;
- Development of a flood mitigation strategy as appropriate;
- Contributions towards site drainage and a new pumping station for the Bransgore area;
- Contributions toward transport infrastructure in line with Policy 3.12;
- Approval of a design brief for the Bransgore site, reflecting its proximity to open countryside and to the New Forest National Park.

3.2 The area of land west of Bransgore identified for potential development is shown on the plan below. In total it is 30.65 hectares of land. The Christchurch document (on Map 5.1.14) states it would provide 100 dwellings, and 90 dwellings would be provided on a significantly smaller parcel of land south of Lyndhurst Road, Hinton. It is likely that the area of land identified at Bransgore for development would have capacity for significantly more than the 100 dwellings indicated.



3.3 There are very significant concerns relating to the identification to the land north of Burley Road, Bransgore as an area for potential housing development.

- 3.4 The site is in the Green Belt. In the Christchurch and East Dorset Joint Strategic Green Belt Study the site has been assessed as making a “strong” and “relatively strong” contribution to the Green Belt. The study was undertaken by the same consultants that prepared the Green Belt Study for our own Local Plan Review, using the same methodology. In our own Local Plan Review work, this Council has taken the view that land which makes a “strong” or “relatively strong” contribution to the Green Belt should not be considered for release from the Green Belt.
- 3.5 The decision to consider the land west of Bransgore for development appears to be in conflict with the Christchurch ‘vision’ for the Green Belt, which states:

“The Green Belt will be protected, subject to limited alterations required to enable housing to meet the needs of local communities.” (Re-iterated in paragraph 3.2.8).

Draft Policy 3.3 Green Belt states:

“Development in Christchurch Borough will be contained by the South East Dorset Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence. Limited changes to the existing boundaries are proposed to enable some new housing to meet local needs and to correct local anomalies.”

Again, there appears to be inconsistency with this statement and the inclusion of the land west of Bransgore in Draft Policy 5.6. The Green Belt study identifies the parcels of land making up the Bransgore ‘allocation’ as strong or relatively strong in the Green Belt purpose of “assisting safeguarding the countryside from encroachment”. The western part of the site is also identified as having a ‘strong’ contribution in checking the unrestricted sprawl of large built-up areas. Accordingly, release of this land for development would cause harm to the Green Belt and would be contrary to policies of the National Planning Policy Framework (NPPF).

- 3.6 Given the harm to the Green Belt that will be caused by development proposed in Draft Policy 5.6, do exceptional circumstances exist to justify the release of this site for development?
- 3.7 The housing needs of Bransgore are met by the policies and proposals contained in New Forest District Council’s the Local Plan Review 2016-2036 Part 1. This Council’s position is that the Plan it will be submitting to the Secretary of State this autumn addresses the ‘objectively assessed need’ of our plan area. This Council has not formally asked Christchurch Borough Council to address any shortfall of housing provision arising from our Plan Area. The potential allocation at Bransgore is not required to meet the needs of the community of Bransgore, whose needs are already addressed in this Council’s own Local Plan for the area. (Paragraph 5.1.42 of the Christchurch document, which seeks to justify the allocation is factually incorrect.) The need being addressed is one arising from the community in Christchurch and further consideration should be given to opportunities to address that need within that community.
- 3.8 In addition to the above, there are concerns about the poor relationship between the identified land and the village. There would be poor connections between a development in this location and the village. This site is not an obvious ‘rounding-off’ of the settlement, but a very obvious encroachment of urbanisation into the green belt/countryside.

Comments on details of Draft Policy 5.6

- 3.9 The draft Policy 5.6 makes no provision to address the impact of the proposed development on the designated New Forest European site. To comply with the Conservation of Habitats and Species Regulations 2017 appropriate mitigation must be provided by the proposed development to avoid adverse impacts. Attention is drawn to Policy 10 of this Council's Local Plan Review Submission document.
- 3.10 The identified site includes land in Flood Zone 3 and Flood Zone 2. It is noted that the proposed policy recognises the need for a flood mitigation strategy for the site and acknowledges the issue of lack of capacity at the pumping station. The need for any development to contribute towards funding of a new pumping station and site drainage schemes is recognised.
- 3.11 Draft Policy 5.6 states that a minimum of 190 dwellings will be provided by the policy with 100 dwellings on the Bransgore site, and 90 dwellings on the much smaller Hinton site. Clarification is needed of the potential capacity of the Bransgore site. The identified site is larger than required for the development of 100 new homes. There are concerns that the impact on the village may be greater than suggested in the options consultation document and that the scale of development arising from the draft proposal would be of an inappropriate and disproportionate scale for a village the size of Bransgore.

Addressing un-met housing need arising in Christchurch Local Plan area

- 3.12 It has already been noted that the Christchurch Local Plan has a shortfall in housing provision of some 1770 dwellings. It is also noted that this shortfall is not being addressed in the East Dorset Local Plan options document.
- 3.13 On 9th August this Council received a letter from Christchurch Borough Council requesting this Council's assistance in meeting a potential shortfall of housing land supply within the Christchurch Plan Area. (A similar letter was received regarding the East Dorset Local Plan, and this will be addressed in a separate report.) Christchurch ask whether this Authority have any non-Green Belt land within our administrative area which would be available and suitable to address unmet housing needs of Christchurch Borough as an alternative to the release of Green Belt land.
- 3.14 This Council is not in a position to assist the Dorset Councils in addressing housing shortfalls in neighbouring plan areas. In our Local Plan Review 2016-2036 Part One Planning Strategy, which will be submitted to the Secretary of State in the autumn, we include proposals to develop 1525 homes on Green Belt land within our district. In doing so this Council has not considered it appropriate to release 'strong' or 'relatively strong' land from the Green Belt. This Council is not in a position to make available non-Green Belt land to address shortfalls in provision in Christchurch Borough. This Council is likely to be in a similar position to Christchurch Borough, in not being able to meet in full objectively assessed housing needs under the Government's revised standard methodology, introduced in the National Planning Policy Framework of July 2018, as a starting point for calculating this requirement.

Other matters

- 3.13 **Transport.** Reference is made to improvements to major roads adjoining and within the New Forest plan area, namely the A35 and A31. Without further details of what is proposed it is not possible to identify the full impact on our plan area.
- 3.14 **Air Quality.** Traffic-based air quality assessment work for NFDC and the New Forest National Park Authority identified the potential for in-combination effects (background growth plus local plan) on European sites in our local plan areas; there is no indication in the Christchurch plan that similar assessments have been carried out to rule out such effects.

4. ENVIRONMENTAL IMPLICATIONS

- 4.1 Environmental implications include; the potential environmental impact of the plan on the internationally designated New Forest sites (SPA and SAC and Ramsar sites), and urbanisation of the countryside around Bransgore.

5. FINANCIAL, EQUALITY & DIVERSITY and CRIME & DISORDER IMPLICATIONS

- 5.1 None

6. RECOMMENDATIONS

- 6.1 It is recommended that New Forest District Council inform Christchurch Borough Council that:
- i. it objects to the identification of land north of Burley Road, to the west of Bransgore as a housing allocation, as set out in Draft Policy 3.4 and Draft Policy 5.6, for the reasons set out in paragraphs 3.1 to 3.12 of this report;
 - ii. it will continue to work co-operatively with Christchurch Borough Council on cross-boundary issues;
 - iii. in response to their letter of 9th August, Christchurch Borough Council be informed that the Council is not in a position to assist Christchurch Borough Council in addressing un-met housing need for Christchurch.

7. PORTFOLIO HOLDER ENDORSEMENT

I agree the recommendation set out in this report.

Signed: E J HERON

Date: 20 August 2018

Date notice of decision given: Monday, 20 August 2018

Last date for call-in: Tuesday, 28 August 2018

<p>For further information contact:</p> <p>Name: Louise Evans Title: Service Manager Policy and Strategy E-mail: louise.evans@nfdc.gov.uk Tel: 023 8028 5588</p>	<p>Background Papers: Published documents</p>
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