

Wessex Water

Statement in Respect of Matters and Issues

1 Overall Strategy

Christchurch and East Dorset Core Strategy
Examination in Public

August 2013

Representors Name: Wessex Water

Representors Ref: 524080

Examination Matter No: 1

Our ref: JC/1222

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1.0 Introduction

- 1.1 This Statement has been prepared on behalf of Wessex Water. It relates to the matters and issues listed in the first version of the Hearing Programme for the Christchurch and East Dorset Core Strategy Examination.
- 1.2 The next section of the Statement addresses the questions listed for Matters and Issues session 1 – Overall Strategy which is to take place on 10 September 2013.
- 1.3 Wessex Water is the regional water and sewage treatment business which serves most of the South West of England including Dorset, Somerset, Bristol, most of Wiltshire and parts of Gloucestershire and Hampshire. It has a long term commitment to providing stability and certainty in terms of service supply throughout the region. Wessex Water is committed to giving all customers excellent standards of service that take into account the need to protect health, improve the environment and give customers good value for money. The company is recognized by the water industry regulator, Ofwat, as one of the most efficient water and sewerage companies in England and Wales.
- 1.4 The company provides sewerage services to the whole of the East Dorset District, Christchurch Borough and most adjoining Districts in Dorset including the Bournemouth and Poole conurbation. It has significant property holdings in the region which include the main depot at Little Canford which lies close to the B3073 near to its junction with the A31(T) just east of Wimborne.
- 1.5 The depot is an extensive mixed use brownfield site between the River Stour to the west and the B3073 to the east. It is currently in use but the company's preference is to vacate and relocate to purpose built premises elsewhere in the sub-region. For this reason there is need for future clarity on the site. Further information in relation to operational requirements, the characteristics of the depot and related issues are contained in other Hearing Statements on behalf of Wessex Water and in particular the Statement for Matter 8 – Economic Development / Employment for the session which is to take place on Tuesday 24 September 2013.
- 1.6 Wessex Water has participated in the CS preparation process since Options stage and representations in respect of the emerging CS were submitted in January 2011 (at Options stage), November 2011 (at Preferred Options stage) and in December 2012 (in response to the Proposed Changes to the Resubmission Document). The matters covered in the statement which follows should be read in conjunction with these earlier representations and in particular the representations submitted in December 2012.

2.0 Matters and Issues 1 – Overall Strategy : Key Question Responses

Q1 Does the CS Vision and Objectives set out a robust basis for tackling the key issues that have been identified?

- 2.1 In short we do not consider that the CS Vision and Objectives set out a robust basis for tackling the key issues that have been identified. They do not reflect an objective assessment of alternatives and the Vision should refer to meeting housing needs, rather than reducing unmet need in order for it to be compliant with current National guidance in the NPPF. Our reasons for these answers are set out below.
- 2.2 To a degree, the Councils acknowledge their predicament. The population in each District is projected to grow significantly and there will be an increase in households due to the trends towards smaller households, fewer children per family, separations, older parents, more people living alone and people living longer (CS paras 2.21 and 2.23). The demand for housing is high, there is a significant problem of affordability, house price to income ratios are among the highest in the country, there is an almost limitless housing demand given the popularity of the area to live in (paras 2.26 and 3.1).
- 2.3 In addition, the Councils acknowledge the need for development in sustainable locations, the need to attach weight to flood risk, nature conservation, Green Belt, landscape and other environmental designations whilst also addressing the need for economic growth by *"developing new sectors of the economy and improving knowledge and skills."*(para 3.1)
- 2.4 There is in our view a disconnect between the acceptance of these issues and the Core Strategy Vision. The need to acknowledge environmental and other constraints is accepted. However, the Vision insofar as it seeks to address housing needs, the policy for the Green Belt and economic development taking into account existing and planned transport development is questionable. The government has made it clear that there is a need for a step change and in particular a need to *"Boost significantly the supply of housing"* and for local authorities to *"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the market area ..."*(NPPF para 47).
- 2.5 As outlined in our submitted representations (December 2012) the Plan as it stands is not consistent with National Policy. The Vision is insufficient to achieve the necessary step change and whilst the Plan acknowledges the need for greenfield development and the development of brownfield sites within Green Belt it fails to fully exploit all available opportunities.
- 2.6 The Core Strategy must be consistent with National Policy to be sound as stated in para 182 of the NPPF. At the present time it is not. The Vision seeks only incremental change with hope for longer term improvements to a situation which is unacceptable. It is potentially getting worse before it gets better even with the Core Strategy proposals as they stand. The gravity of the position is demonstrated by the Council's own housing trajectory (March 2013). Further evidence of the need for a more radical vision for new development includes the figures which show a very low

level of affordable housing completed over recent years with no affordable housing units being completed in the Christchurch Borough during 2011 / 12 (AMR) and acknowledgement that the number of statutory homelessness cases is worsening and that this trend is anticipated to continue (Christchurch and East Dorset's Corporate Plan 2012 – 2016, Progress Report July 2013).

Q2 Is the CS supported by a robust Infrastructure Delivery Plan?

- 2.7 For the reasons set out below, in our earlier representations and elsewhere in statements on behalf of Wessex Water we consider that the Infrastructure Delivery Plan needs to be more explicit in its acknowledgement of the significance of the existing east-west corridor (A31 / M27) which links key settlements in the District and other parts of Dorset and Hampshire and the radial routes into the Bournemouth and Poole conurbation (A349, B3073 / A348 and A338) which link the main settlements in East Dorset to the higher order facilities and services to the south.
- 2.8 As outlined elsewhere in our representations the proposed new neighbourhoods away from these key routes will inevitably give rise to traffic congestion in existing settlements and on local roads away from the main routes referred to above. There is scope to make use of capacity on strategic routes before aggravating the position in respect of local routes where investment in new infrastructure and related improvements has limited return on investment.

Q3 Is the settlement hierarchy (KS1) based on robust evidence?

- 2.9 There is clear evidence to suggest that Little Canford should be recognised in the settlement hierarchy. It is on par with Furze Hill and other settlements identified as villages where they may be potential for development. In addition, the existence of the Little Canford Depot site represents a particular opportunity for a sustainable development in line with the objectives of the NPPF.
- 2.10 Accessibility is a key factor of sustainability in respect of the choice of location for development. Locations for development need to be identified to enable travel by means other than the private motor vehicle. The evidence presented in our December 2012 representations on relative accessibility shows clearly that the Little Canford site is comparable in accessibility terms to a number of the settlements and locations identified for additional development when proximity to town centre, schools, shops, bus routes and employment opportunities are assessed. There is also evidence to suggest that it has better accessibility than some sites identified for development including proposed Green Belt land releases.
- 2.11 A full Sustainability Analysis has been undertaken and was referred to in representations submitted on behalf of Wessex Water in November 2011 and again in December 2012 (Section 3 of Representations to the Schedule of Proposed Changes). It is the view of Wessex Water that Little Canford should be recognised as a mixed use development opportunity and that at very least it should have the same status as Furze Hill where the Council's Offices site is now identified for mixed use development including housing.
- 2.12 Appendix A to this Statement is a Comparative Sustainability Assessment of the Little Canford Depot site and Furze Hill Offices and includes a plan which shows clearly the primary east-west A31 corridor, the Ham Lane link (both Primary Transport Corridors

in the Key Diagram) together with other relevant movement corridors and key destinations. The accompanying notes and table show clearly that there is evidence to support a mixed use development proposal at Little Canford where there is a significant brownfield development site opportunity.

Q4 Is the proposed quantum of housing development (KS3) justified by the evidence?

2.13 For the reasons already given in this Statement and in other representations submitted on behalf of Wessex Water it is the view of the company that the quantum of housing development should be increased. This is necessary to achieve a step change and to boost significantly the supply of housing in order to meet objectively assessed needs and not just reduce unmet needs.

Q5 Should the housing provision allow 10% for vacancy rates and second homes? And should it provide a separate target for each Council area?

2.14 The Districts both have a lower than average household occupancy together with a housing profile that is heavily weighted towards larger detached properties (CS and AMR). The Councils also acknowledge that almost 50% of homes are considered to be under occupied (CS para 10.17) There is a high proportion of second home ownership together with clear evidence for a proportion of elderly people that are in good health significantly higher than regional and national averages (CS para 2.33).

2.15 The Councils acknowledge "*a serious problem of access to affordable housing, and current planning policy is failing to deliver significant amounts of additional affordable housing to fill the gap.*" (para 1.3 of the East Dorset AMR). Hence there is clear evidence to support the need for an allowance for vacancy rates and second homes to ensure that problems are addressed and housing supply is boosted.

2.16 Wessex Water have previously confirmed that they are in support of a single housing target for Christchurch and East Dorset (para 2.5 of representations submitted in December 2012).

Q6 Is the proposed quantum of employment land (KS5) justified by the evidence?

2.17 It is the view of Wessex Water that the quantum of proposed employment land is justified by the evidence bearing in mind the need to enable a broadening of the local economy, facilitate an increase in employment opportunities and where possible to provide for the wider sub-region. There is also a clear need to identify new greenfield employment sites.

2.18 The projected employment land requirements identified in the Workspace Study cannot be met on brownfield sites alone. The key concern of Wessex Water as identified elsewhere in Representations and Statements, is that the CS and relevant employment policies identify insufficient land to enable a broadening of activity by providing for the full range of use classes, a hierarchy of premises and premises requirements which range from low cost workspace and live / work units at one end of the spectrum to high quality corporate HQ and strategically located premises at the other end of the spectrum. The Little Canford Depot site provides an opportunity for mixed used development with high quality lakeside, campus style employment space.

2.19 Whilst Wessex Water does not object to the quantum of employment land proposed in the CS it does consider that there is an inconsistency in that 13.1ha of land from Green Belt adjacent to Wallsbridge Industrial Estate is to provide for employment whereas no clear strategy is developed for facilitating new employment development on the previous developed site at Little Canford. This is inconsistent with para 17 of the NPPF. Further, the retention of the existing employment site at Furze Hill and the redevelopment of Little Canford Depot for housing, employment and green infrastructure could reduce greenfield land take in accord with the NPPF.

Q7 Does the overall strategy take account of the balance and linkages between workforce projections and housing growth?

2.20 No Comment

Q8 Is the need for housing to be located outside the urban areas / in the Green Belt justified by the SHLAA and other evidence?

2.21 It is undoubtedly the case that the SHLAA and other evidence demonstrates a need for new housing to be located outside the urban areas and in Green Belt locations. This is accepted by the Council and is adequately evidenced in the wide range of documentation which backs up the Core Strategy.

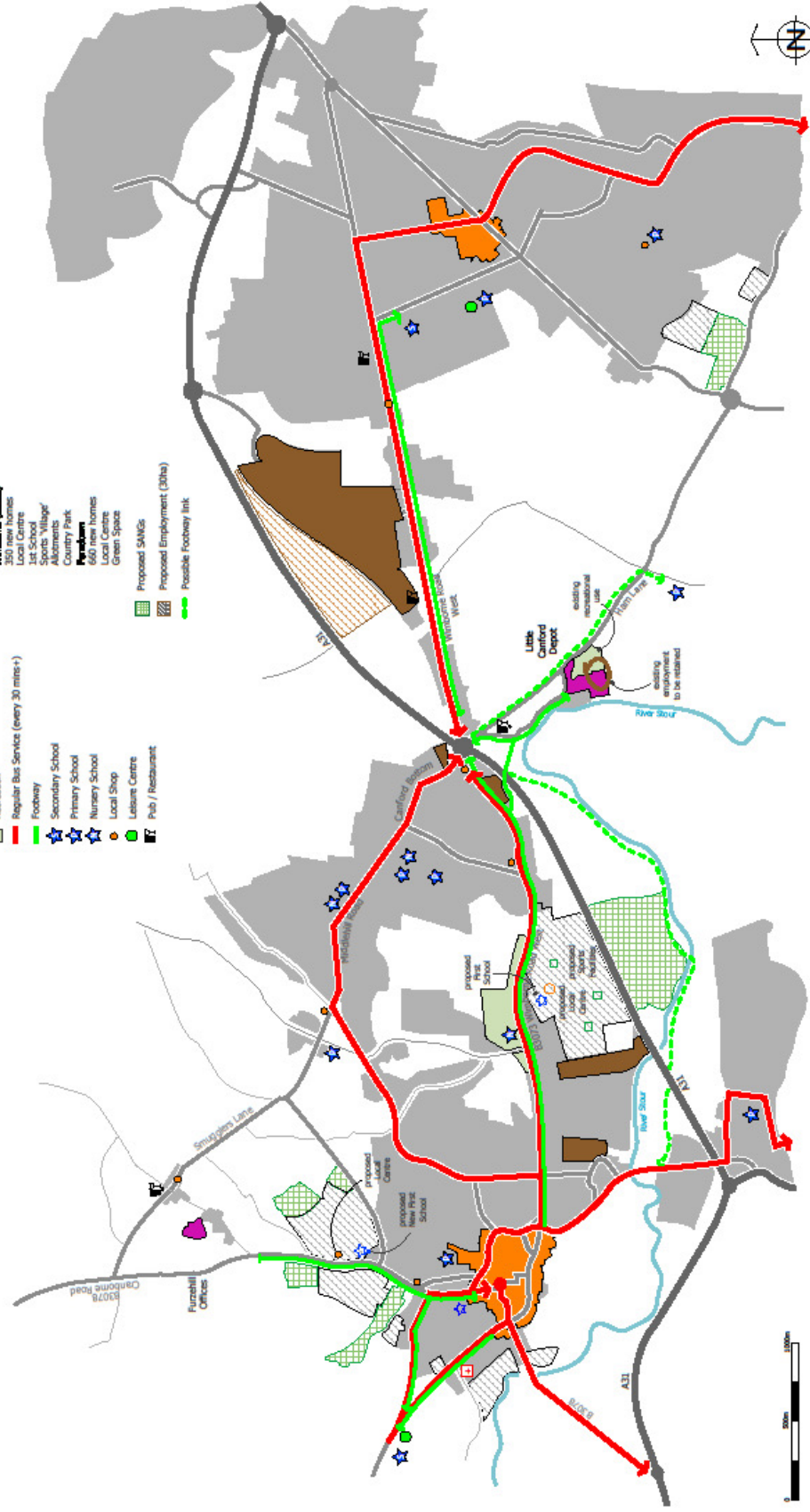
Q9 Is the need for employment land to be located on greenfield / Green Belt land justified by the evidence?

2.22 There is a need for the quantum of employment land identified in the Core Strategy and it is the case that some of this employment land needs to be located either on greenfield or Green Belt land. Greenfield countryside can never be recovered once developed and sustainability objectives require the reuse of PDL sites unless there is clear evidence that these are not available. It is the view of Wessex Water that there is insufficient PDL to meet the total but that the Council have failed to identify all PDL opportunities that do exist to help contribute towards the supply of employment land.

2.23 For the reasons set out in earlier Representations and other Statements on behalf of Wessex Water there is a need to identify the Little Canford Depot site for mixed use development. This would include a valuable contribution towards new employment development.

Appendix A
Comparative Sustainability Assessment

- NOTATION**
- Little Canford Depot / Furzehill Offices
 - Urban Area
 - Defined Town Centre
 - Employment Land
 - Recreation
 - Regular Bus Services (every 30 mins+)
 - Footway
 - Secondary School
 - Primary School
 - Nursery School
 - Local Shop
 - Leisure Centre
 - Pub / Restaurant
- Proposed Urban Extensions
 - Winkarna (North)**
 - 150 new homes
 - 1st/2nd/3rd/4th/5th/6th/7th/8th/9th/10th/11th/12th School
 - Green Space
 - Winkarna (South)**
 - 250 new homes
 - 1st/2nd/3rd/4th/5th/6th/7th/8th/9th/10th/11th/12th School
 - Sports Village
 - Albion Park
 - Country Park
 - Winkarna**
 - 1st/2nd/3rd/4th/5th/6th/7th/8th/9th/10th/11th/12th School
 - Local Centres
 - Green Space
- Proposed SANGs
 - Proposed Employment (30ha)
 - Possible Footway Link



Comparative Sustainability Assessment of Little Canford Depot & Furzehill Offices

Ref: 1222 / SA 01
 Scale: 1/75000 @ A3
 Date: August 2013



- Little Canford Depot and Furzehill Offices are brownfield sites
- Little Canford Depot is located close to the strategic road network
- Redevelopment of Little Canford Depot will have no adverse impact on highways safety or the local transport network
- Furzehill Offices are accessed via a narrow country lane with no footway
- Redevelopment of Furzehill Offices will have an adverse impact on the surrounding road network including the safety of the junction at Cranborne Road / Furzehill
- Little Canford Depot is located in a valley and is screened by established vegetation and existing built form
- Furzehill Offices are located on a hill
- Redevelopment of Little Canford would remove an un-neighbourly use and will improve the amenity of adjacent properties
- Redevelopment of Little Canford would retain some compatible employment on site
- Redevelopment of Furzehill Offices would involve the loss of employment
- Redevelopment of Little Canford Depot would retain & enhance opportunities for open space & recreational provision
- Redevelopment of Furzehill Offices is less likely to provide open space benefits
- Little Canford Depot presents more sustainable transport options including safer and more convenient pedestrian/cycle links to:
 - Alternative employment opportunities
 - local shopping facilities
 - Nursery Schools/First Schools
- ...and better bus links to:
 - First/Middle/Secondary School
 - Town Centre shopping facilities
 - Sports & Leisure facilities

	Strong
	Good
	Neutral
	Poor
	Bad

	LCD before	LCD after	FO before	FO after
brownfield				
Local Shop				
Town Centre				
Employment				
First School				
Middle School				
Secondary School				
Open Space				
Sport & Recreation				
Pedestrian Links				
Bus Links				
Highways				
Landscape				
Ecology				