

Appendix 1: Officer response to the BCP Council Local Plan Regulation 19 consultation submitted on 1 May 2024.

Dorset Council – response to the BCP Council Local Plan regulation 19 consultation

20 March to 1 May 2024

Dorset Council recognises the challenge of meeting the growth needs of the area whilst protecting the environment – an environment that is valued both locally and internationally for its wildlife interests. This challenge exists across both the BCP and Dorset areas and needs to be given significant weight when considering the approach to development. However, there are opportunities that exist within the BCP area that can offer significant benefits for both the urban and natural environment.

Dorset Council support efforts to intensify the urban areas as an approach to meeting housing needs but there is uncertainty exists as to whether this approach will enable the needs of the BCP area to be met and specifically the needs of families and those needing affordable homes. BCP Council will be aware that Green Belt is a national policy tool that can be reviewed through the plan-making process and through the release of Green Belt land for development, opportunities for more closely meeting the size and type of housing that are needed in the area can be realised.

Local Housing Need

Dorset Council agree that the Local Housing Need for BCP Council, calculated using the standard method, does not represent a realistic estimate of actual housing need in the BCP area. The work jointly produced by BCP Council and Dorset Council has explored the impact of the 2014 demographic baseline and found that the projected levels of in-migration into the BCP area adversely affected the result of the Local Housing Need calculation, overestimating the need for new housing. The same arguments do not however apply to the Dorset Council area as there are no significant attractors of people (e.g. universities) to the area beyond that typical of areas such as Dorset.

National policy states that the Local Housing Need calculated using the standard method, should be considered as “an advisory starting-point for establishing a housing requirement for the area.” It goes on to state that “There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals.” The recalculated Local Housing Need, using locally derived demographic projections results in a more achievable housing requirement for the BCP area more closely aligned to past rates of housing delivery. If the housing target were to be higher, this would necessitate a significant change

in the development strategy including significant urban intensification and the release of Green Belt sites, which is likely to be detrimental to the character of the area.

It is accepted that by virtue of the facilities, services and employment opportunities within the BCP area, development within the urban area would offer a sustainable approach to the distribution of development. Therefore the opportunities within the inner boundary of the Green Belt, adjacent to the built-up area of BCP, should be given consideration for development before considering areas beyond the outer edge of the Green Belt. The displacement of development to the outer edge of the Green Belt would increase the distance people travel to access the facilities and services within the BCP area. Dorset Council will only consider accommodating some of the unmet need from BCP if there is robust evidence that all opportunities for development within the BCP area are being maximised through the policies being put in place.

Dorset Council has not indicated that there are no opportunities to meet any unmet need from BCP as stated in paragraph 4.12 of the BCP Local Plan. Dorset Council is of the view that the housing needs of an area should be met as close to where they arise before they are displaced out to other locations. The Council's position is therefore that a full and thorough examination of all opportunities for BCP to meet its own housing need needs to be undertaken. If this assessment concludes that all realistic opportunities had been explored and the housing delivery maximised, Dorset will consider what opportunities exist to address any shortfall in a sustainable way. To date, BCP Council have not made a request to Dorset Council to meet its unmet need.

Spatial Strategy and the delivery of housing

The strategy within the BCP Local Plan suggests that approximately 57.4% of the housing need will be met at the strategic opportunity areas of the town centres. Only 9.3% of the housing need will be met through the existing greenfield urban extensions with the remaining 33.3% being met elsewhere within the BCP area. To date, Dorset Council has not seen a detailed analysis of the capacity within these areas. There is also a suggestion that, due to the sensitivity of some of these areas, design codes will need to be produced. These design codes would offer an opportunity to examine capacity more closely and consider the constraints (heritage constraints, character etc.) and therefore capacity within each. Without this information, there is a lack of certainty that the housing estimates can be achieved.

The Local Plan proposes a stepped housing target with an estimated 1,200 homes being delivered to 2028/29 and 1,800 homes being delivered for the remainder of the plan period. This initial lower rate is approximately equivalent to the amount of time an average large development site takes to deliver from the point of a plan allocation. This therefore gives time for the proposed policies to be implemented and to deliver. After this period, it will

become apparent whether the policy framework being put in place will deliver housing at the higher rate for the latter years of the plan.

Housing mix

The Local Plan acknowledges that evidence points towards a significant need for affordable homes within the BCP area but that the amount that can be delivered is limited by development viability. This is particularly true for brownfield redevelopment sites and for urban intensification sites where abnormal development costs often exist. The converse of this is that most greenfield sites are relatively uncomplicated to develop and do not involve abnormal costs. It is therefore often possible to deliver a greater number of affordable housing units via greenfield development than through urban intensification.

Similarly, the Local Plan acknowledges that urban intensification sites often deliver a larger proportion of smaller flats than family housing. The Plan highlights the reliance on a relatively small number of larger site allocations to deliver housing to meet the housing needs of families.

Dorset Council supports the measures to deliver balanced communities within the town centres and local opportunity areas. However, with few greenfield sites being allocated in the plan, and the knock-on effect on family and affordable housing delivery, there is likely to be displacement of housing demand outwards towards more remote locations outside of the BCP area. This is likely to undermine the policies that seek to deliver balanced communities and will potentially increase commuting distances for those who work within the BCP area resulting in increased traffic on the already congested roads.

The jointly produced a Gypsy and Traveller Accommodation Assessment which evaluates the need for additional gypsy and traveller accommodation across the BCP and Dorset areas. Dorset Council welcome the allocation of a site to meet the need for gypsies, travellers and travelling show people and the commitment to identify transit pitches.

Environment

The provision of nutrient mitigation within the Poole Harbour catchment is undertaken jointly with Dorset Council with the delivery of this mitigation keeping pace with the rate of development. The majority of the mitigation opportunities are within the Dorset Council area. Recent changes to the nutrient neutrality advice from Natural England have necessitated a change in approach to the calculation of nutrient loading from development. In addition, Dorset Council have been awarded funds from the DLUHC Local Nutrient Mitigation Fund to deliver nutrient mitigation across the Poole Harbour catchment. The approach that Dorset Council is seeking to implement will shift onus onto developers to secure mitigation rather than to rely on the councils to deliver. This will enable more opportunities for mitigation to be realised and will enable the councils to prioritise the

mitigation they deliver on those hard to deliver sites or sites that deliver a significant proportion of affordable housing.

It is likely that BNG delivery on urban intensification sites will be difficult to deliver. Provision is made in the Environment Act for BNG to be provided off site and it is likely that this will be necessary in many of the urban intensification schemes and other housing sites proposed in the BCP Council Local Plan. Dorset Council is working to put in place a mechanism to deliver BNG in Dorset and could offer opportunities for BNG to be delivered to serve developments in BCP.

Although Dorset Council are supportive of the Stour Valley Park project as a significant piece of green infrastructure to serve both BCP and Dorset residents, the boundaries of the park in Dorset have not been defined and agreed. As such Figure 6.6 and the boundary shown on the policies map should not be seen as definitive and some wording to this effect should be included in the Local Plan or the project boundary in Dorset should be removed.

Employment needs

Dorset Council welcome the aspirations of BCP to meet their employment needs as identified in the jointly produced Economic Needs Assessment. The recognition that the BCP Council area and the Dorset Council area are linked from an economic perspective highlights the importance of a coordinated economic strategy for Dorset and BCP councils.

The proposed Local Labour Agreements policy is supported and further highlights the need for joint working across the area. Many employees from Dorset work in BCP and vice-versa with high levels of commuting between the two areas especially in the parts of Dorset which are closer to the major employment areas within the BCP area than some parts of BCP. The Local Labour Agreements policy should therefore consider the labour supply that arises from the Dorset Council area alongside that from the BCP Council area for the purposes of this policy. Supporting and enabling the economy of BCP is therefore important to the prosperity of the wider area and will offer benefits to both councils.

Dorset council notice that Policy E7, E10 and E12 require commercial properties that are suggested to be surplus to requirements, need to be the subject of "full and proper marketing of the site for its existing use at a reasonable value" for a period of only 6 months. The industry standard appears to be closer to 12 months of marketing.

Transport Strategy

It is evident that transport has been considered during the formation of the Local Plan's development strategy and Dorset Council is supportive of the identification and delivery of sustainable transport corridors throughout the BCP area. Any enhancement of these corridors should connect through to parts of Dorset from where many people travel on a

regular basis for work and to access facilities and services. These flows are two-way with BCP residents travelling to Dorset and Dorset residents travelling to BCP.

Encouraging local trips to be undertaken through active travel and sustainable forms of transport through the integration of land use planning and transport planning, can produce healthier lifestyles and have positive impacts on traffic congestion and air quality.

Within Policy E3, the Northern Aviation Business Park site should prioritise the establishment of sustainable transport connections to Ferndown and West Parley. Ferndown and West Parley are areas that have the potential to accommodate additional growth over the medium and longer term and therefore it is important to support the delivery of sustainable travel connections to the business park.

The inclusion of a requirement for a high-frequency bus route to and from the Wessex Fields site is supported however it is suggested that additional connections should be made between this site and the neighbouring areas of Wimborne, Ferndown, and Trickett's Cross.

Freight routing from the A31 to the port of Poole is a concern. There are currently already high levels of Freight traffic travelling through Ferndown to join onto the A31. Policy E6 should consider the measures needed to support freight movement on the highway network to ensure the existing situation is not made worse with betterment being sought where possible.

Policy T2 states that "proposals which are likely to generate significant transport impacts must be supported by a transport assessment / statement and a travel plan (at the Council's request)" and this is supported. However, there is no suggestion of what constitutes "a development that generates a significant amount of traffic". Clarity on this is needed to enable the potential impacts on the Dorset Council area as well as the impacts on the BCP area to be understood.

The walking, wheeling, and cycling section of Policy T4 states that transport infrastructure should be designed to "be safe, attractive and accessible for all users". This statement should be included as a guiding principle for all transport related infrastructure.

The park and ride site, located north of the A35 at Creekmoor, is currently unused. Dorset Council would like to see a commitment to this site being safeguarded within the Local Plan and for it to be reopened as a park and ride site during the lifespan of the Plan.

Policy P12 outlines a minimum of 210 dwellings and associated development which will have an impact on the Upton Gateway Roundabout and A35 Upton bypass. These pieces of transport infrastructure are managed by Dorset Council and highway mitigation measures along this route will need to be considered to alleviate any impact.

Development of the land north of Merley (BM.1) needs to consider impacts on the A31 and provide appropriate mitigation to the road network. The planned improvements to the A31

Merley roundabout should ensure any additional traffic generated from development allocated in the Local Plan can be accommodated.

Development of land north of Bearwood (BM.2) needs to consider traffic impacts along the A348 and Longham bridge. Active travel connections will be needed along Ringwood Road towards Ferndown. This should be an outcome of the development of site BM.2 secured through the financial contribution that forms part of the policy. Sustainable transport connections towards Wimborne town centre should also be provided.

Transport Infrastructure Improvements

A338 Highway Improvements, including widening to three lanes and a new link road from A338 to the airport, will need to be considered against the priorities of the forthcoming Local Transport Plan and agreed between both BCP Council and Dorset Council as the route falls within both council areas. Agreement will also need to be secured from National Highways as the impact on the Strategic Road network will be a significant factor.

There are existing safety issues at the Ashley Heath roundabout therefore any scheme will need to mitigate these issues. Similarly, the transport modelling work undertaken to support the Local Plan indicates that the Ashley Heath roundabout will experience capacity issues over time.

As with many of the transport improvements outlined in the Local Plan, the impact on the Dorset Council highway network will need to be given careful consideration. The proposals will need to be considered strategically across the area so that appropriate connections are made, and traffic impacts are mitigated. Specific schemes that cause concern include the proposed upgrades to the Castleman Trailway and improvements to the B3073 corridor Hurn Roundabout to A338 Blackwater Junction.