

**Appendix 2:** Response submitted in March 2022 to the earlier Regulation 18 consultation on the BCP Council Local Plan.

## **Response to the Bournemouth, Christchurch and Poole Council Local Plan Issues and Options Consultation**

Dorset Council welcome this opportunity to respond to the Issues and Options Consultation on the emerging Bournemouth, Christchurch and Poole (BCP) Council Local Plan. The comments included below build on the on-going discussions between BCP Council and Dorset Council under the Duty-to-Cooperate that are informing both council's local plans.

Dorset Council consider that the Bournemouth - Christchurch - Poole conurbation is a sustainable location within which to locate growth. It offers opportunities to meet the future need for housing close to where people work and where the necessary supporting infrastructure is and can be expanded therefore reducing the distance people travel to access these facilities. Focusing development close to these destinations enables active travel and less polluting alternatives to car travel. The strategy of intensifying within the urban area is therefore supported as being the best location for meeting the majority of the growth needs of the wider area.

Having worked closely with BCP Council in understanding the housing needs of the area, Dorset Council is of the opinion that the characteristics of population growth in the BCP area are likely to give rise to the exceptional circumstances required to enable a departure from the Standard Methodology. Ultimately, it will be a decision for BCP to make as to what housing target is included in the BCP Local Plan as it progresses towards submission however there is a need to make efforts to meet the needs of the range of households that may wish to live in BCP including the elderly, families and those who are unable to afford to compete in the housing market.

The overall level of housing growth should be objectively assessed giving consideration to the local demographics and market signals. Regard should then be had to any economic growth strategies and infrastructure investments that are planned in the area. Decisions on how this need can be met should be separated from the overall calculated need.

It is noted that BCP Council estimate that there is capacity within the urban area to deliver up to 39,000 homes including through taller buildings and increased density within conservation areas. This detailed work to estimate the capacity of the BCP area to deliver new homes is supported, however any estimates of capacity and any unmet need arising from a shortfall in supply, will need to be justified by robust evidence. Dorset Council is keen to work with BCP Council as this work progresses.

In addition to the estimates of capacity, intensification through the development of some identified areas is likely to have a detrimental impact on local character and have the potential to be misaligned with the stated objective of protecting existing open spaces.

There are a number of minerals and waste sites in close proximity to some intensification areas which would have the potential to restrict residential uses. There are also several sites affected by minerals safeguarding which could lead to delays whilst minerals deposits are assessed, and prior extraction considered. Dorset Council are willing to continue work closely with BCP in identifying and mitigating any impact on these strategically important minerals and waste sites and ensure appropriate safeguarding of the mineral resource.

Within the consultation document, there is a suggestion that *"It may be possible that Dorset could accommodate some of our unmet housing need"*. The recent consultation document produced by Dorset Council explored options for meeting the growth needs of the Dorset Council area and to give some flexibility in meeting the overall supply. It included a number of sites, the delivery of which will be tested through the development of the Dorset Council Local Plan with a final suite of sites being proposed in the publication version of the Plan. Before Dorset Council will consider whether there it could meet any unmet need from the BCP area, it will need to be convinced that BCP council have explored all possible options including the release of Green Belt sites, for meeting its own need. It is BCP Council's responsibility to robustly demonstrate that it cannot meet its own housing need before a request is made to Dorset Council to consider meeting any unmet need.

In order to meet the growth needs of the area, Dorset Council is exploring opportunities for releasing Green Belt for development with a strategic review of the Green Belt jointly produced with BCP Council. Due to their location, the sites identified for possible release within the Dorset Council area will primarily meet the needs of those who live and work close to the BCP Conurbation. In accordance with National Policy, all other options should be considered before releasing Green Belt with release only being considered in exceptional circumstances. When considering options, it is also important to have regard to the need to promote sustainable patterns of development. Without Green Belt release in the BCP area, it becomes very difficult to demonstrate the exceptional circumstances required to justify Green Belt release in the Dorset area which in turn restricts the ability of Dorset Council to meet any unmet need from BCP. Therefore, it is important that BCP consider Green Belt release as a failure to do so would limit Dorset Council's ability to meet its own needs and would therefore remove its ability to meet unmet need from elsewhere.

The need for Green Belt release goes beyond simply meeting housing targets. There is a need to meet the needs of the different groups that may wish to live in BCP and Dorset including meeting the needs of families and those who cannot afford to live in market homes. Larger sites, such as those being considered in the Green Belt, will offer more opportunities to deliver housing to meet the needs of these groups than intensification sites within the urban area. The urban intensification sites are, by their very nature, more likely to deliver flatted housing which are less likely to meet the needs of families. They also are likely to have higher site development costs and therefore are unlikely to deliver a significant number of affordable homes.

At the earliest opportunity, some certainty around the approach BCP are looking to take around Green Belt release and any unmet need arising from the BCP area, would be welcomed.

The need for pitches for gypsies, travellers and travelling show people will be evidenced by the emerging joint Needs Assessment being prepared for both Dorset and BCP councils. It is important that an appropriate supply of sites (including five years' worth of deliverable sites, 10 years for developable sites and broad locations for the longer term) are identified within the BCP Local Plan. Dorset Council support the use of a criteria-based policy to allow decisions to be made on site proposals.

The approach to managing town centre development needs to consider the implications for nearby town centres within the Dorset Council area. Town centres interact across an area and therefore sit within a hierarchy. Excessive change in one centre, or development outside of a centre, will have an impact on nearby centres and therefore it is important that the strategy for managing town centres is aligned across the two council areas. There will however be opportunities to increase the vibrancy of town centres through additional appropriately designed residential development.

Similarly, the approach taken to development to accommodate future jobs, will have implications for Dorset Council. Although there may be scope to release some employment areas for housing development, there is a need to maintain a sufficient and diverse mix of employment sites in the BCP area as these provide employment opportunities for the wider area. Employment sites should be in locations that allow for ease of access by non-car-based travel including active travel and public transport with connections being made to the wider south east Dorset area. This therefore needs to be planned at a strategic level across local authority boundaries.

Dorset Council strongly support the ambition to increase use of low carbon transport options and to promote active and non-car travel. Part of this will involve directing development to the most sustainable locations and this includes meeting as closely as possible the need for new homes in the location where the need arises. If development of new housing is not met, the result will be a displacement of this need to more remote and less sustainable locations.

Working with Dorset Council, additional connections between cycling and walking routes should be explored to enable greater permeability of the built area and connect outlying areas to the main economic and cultural centres. Park and Ride will be an important part of this overall strategy. The continued joint working on a revised Local Transport Plan will help to capitalise on opportunities that exist around improvements to the transport network.

Many issues associated with impacts on internationally protected wildlife sites are strategic and therefore require strategic solutions. Dorset Council is committed to working alongside

BCP Council to address these issues through the delivery of strategic mitigation where opportunities arise including the opportunities for a strategic approach at the Stour Valley Park.

Green Infrastructure is essential within urban areas and adds to the character of an area. The policy approach to existing open space and green infrastructure will need to be developed with careful consideration of the implications for the delivery of housing and intensification within the urban area. For example, it appears as though some of the areas identified on Figure 16 – 'BCP's network of open spaces' are also identified as areas for housing development.

Increasing density, by allowing tall buildings, will help with the delivery of housing targets. Design guidance and robust estimates of capacity will be necessary to demonstrate the deliverability of sites. We are supportive of the approach proposed by BCP to preserve and enhance the heritage of their area, and in particular the two options under consideration. We would be interested in discussing the results of the consultation regarding the options to introduce controls to prevent the demolition of locally important heritage assets, and the review of Conservation Area Appraisals.

Dorset Council welcomes the commitment to continued cooperation with Dorset Council and the recognition that it is essential that BCP explore all options for meeting its own housing need before asking Dorset Council to consider whether it is appropriate for it to meet some of BCP's unmet need. Dorset Council is committed to working closely with BCP Council during the production of both council's local plans to address these and other strategic cross-boundary issues.