



The countryside charity
Dorset

**RESPONSE to “ISSUES & OPTIONS” CONSULTATION initiated by BCP COUNCIL
from THE POOLE & PURBECK GROUP of DORSET CPRE
c/o 9 Sundew Road, Broadstone, BH18 9NX**

A : Generally

1 : We welcome the opportunity to express some preliminary views about the current thinking in respect of the eventual required Local Plan : a plan that should be compatible with the needs of adjoining authorities and their various communities.

2 : It is noted that collaboration with neighbouring Councils is required that will take account of Climate Change targets set by the government, amongst other issues. It is noted that the other Unitary Authority in Dorset is seeking (from government) an alternative way of developing a Local Plan which may affect this use of the consultation. It is also unclear how the other planning authorities (local government or otherwise) will be trying to collaborate with BCP Council.

3 : It is trusted that the declared objective (of addressing key planning issues strategically) is to ensure mutual support from all authorities responsible for planning and controlling investments in Dorset. In this connection, there is particular concern over the challenges created by a Local Enterprise Partnership (planning to support growth) and a Clinical Commissioning Group (planning the pursuit of excellence whilst reducing access and costs) plus a water authority (with outstanding plans to reduce pollution).

4 : Every “sound” plan (spanning a number of years) should include intermediate ‘milestones’ to enable monitoring of performance and these may be a means by which practical prioritisation of issues and options may be secured. Such ‘milestones’ would be particularly valuable in ensuring adequate planning for climate change, let alone harmonizing the budgets of all stakeholders.

5 : It is noted that the other Unitary Council in Dorset (having lost its District Councils) still has the comprehensive layer of its parish and town councils to be harnessed in ensuring ‘sound’ monitoring of the use and relevance of their Local Plan. It will be important to see how BCP Council plan to ensure the adequate use and relevance of the eventual Local Plan, given the limited coverage of current parish councils. Perhaps neighbourhood forums, charter trusts and civic societies will be expected to contribute more strongly to ensuring delivery of the true intentions of any adopted Local Plan.

6 : It is noted that ‘landowners or developers’ are invited to suggest extra sites for development. In this connection owners of bungalow sites are already tending to suggest that their site should be redeveloped and since the conurbation has so many bungalows this tendency could be suitably fostered (no doubt in suitable locations) to local advantage and without too much strain on infrastructure services and facilities. It may be that other owners of derelict, misused or under-used urban land could be encouraged to suggest their sites for redevelopment, rather than have to consider using greener land that should have real contributions to make in respect of carbon capture, food production and the life enhancing appreciation of nature.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

A : Generally (cont’d)

7 : Many authorities have failed to ensure that derelict, underused or misused brownfield sites are recycled (to protect greener sites). This may have something to do with adopting policies that neither encourage smaller projects (that could sustain smaller local firms) nor prioritise relevant recycling of urban land. Obviously any developer, given the unconditional opportunity of choosing to develop easier sites or more difficult sites, will seek to maximise profits. Consequently an effective “staged” policy is required to prevent urban dereliction : a matter which creates a public desire to escape dereliction, when contentment with and attraction to a desirable urban environment would be a preferable policy.

8 : It is appreciated that initial work has been undertaken in gathering evidence about available opinions but it is hoped that such opinions are not necessarily accepted as “robust evidence” since other factors (eg context, practicality and acceptability) must be applied before any such opinions can be considered as “robust evidence”.

9 : In preparing a suitable plan “avoidance” of unacceptable effects must have priority over “mitigation” of unacceptable effects. It is understood that illegality must be avoided since mitigation of illegality is not allowable.

B : The BCP Council area – *page 3 of the consultation document*

1 : The current population data is stated but the relevant projected population data is not, yet.

2 : 61% of the current population is of working age but the relevant projected percentage is not, as yet. No doubt this is a matter for clarification with the Dorset Local Enterprise Partnership.

3 : It is noted that ‘homes’ currently cost more than nine times average earnings. It would helpful to know how the plan will be expected to improve upon the current situation – especially with reference to current and projected median annual full-time pay.

C : Vision and objectives – *pages 4 & 5 of the consultation document*

1 : In view of the origins of Bournemouth it is trusted that ‘natural assets’ will be enhanced across the three towns. It is noted that Bournemouth was once prized because of the beneficial effects of so many pine trees, which seems to have been a feature that has been lost and which could be restored as a supplementary aim to ‘prospects, positivity and pride’.

2 : We note the aim for the three towns to be a place where people and businesses want to be. The quality of the full range of infrastructure services and facilities will need a lot of attention to secure that aim – see following comments on identified issues and options.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

C : Vision and objectives – pages 4 & 5 of the consultation document (cont’d)

3 : It is noted that the seafront will see significant investment. Such investments, to retain existing visitors and their contacts, should be made without prejudice to the existing natural assets that have attracted so many visitors for so long, where summer lingers longer.

4 : Mention is made of ‘affordable’ homes. Notwithstanding any governmental definition of the term ‘affordable’, it is expected that, to be practical, such dwellings would be affordable by local working families on median annual full-time pay and readily available to them, in the face of competition from others.

D : Regenerating our town centres – pages 6 to 10 of the consultation document

1 : It is good to see that the distinctive nature of the three towns and associated communities is to be respected.

2 : Public transport is most definitely needed to wean people from reliance upon cars. Such public transport needs to address urban transport deserts created by irrelevant timings for users as well as by inadequate routes. It is appreciated that routes are difficult to vary (since no circular road is feasible) and the matter is exacerbated by the fact that routes could be longer than in some places (the diameter of a semi-circle is 45% longer than the diameter of a circle of identical area) which means that transport / congestion should receive particular attention.

3 : It is noted that many inhabitants of Poole would like to see the train service between Poole and Swanage restored. Perhaps the three towns will see benefits in linking the Cross-Country rail services with Swanage : ie from Bournemouth obviously including stops at Poole. The potential reduction in car journeys would obviously help in tackling climate change, benefit road maintenance costs and alleviate traffic congestion.

4 : The benefits of Park and Ride do take time for the public to accept them and more needs to be done to secure such benefits to local planning.

5 : It is agreed that Poole has a rich maritime history that could be more positively harnessed for sea-water based activities but it is surprising that the authors of the consultation document have not stressed the seafront possibilities of the Poole beaches which, from our perspective, tend to be less commercialised and therefore more attractive to so many residents and visitors alike. In this connection it is stressed that reductions in the variety and quantity of hotels at Sandbanks would not be in the public interest that appreciates the need for relevant tourism : so many visitors appreciate Poole as a ‘gateway’ to Purbeck and also to the other Dorset areas that are unsuitable for hotels.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

D : Regenerating our town centres – *pages 6 to 10 of the consultation document (cont’d)*

6 : It is noted that the proposed strategy for Poole town centre could involve a number of matters : matters that have already been discussed for decades and it is hoped that something definite will emerge for the imminent Local Plan : response ‘A9’ above refers. It is essential to ease the pressure on the Green Belt and villages beyond.

7 : The document recommends supporting local communities by a number of methods and enhancement of the public realm is fully endorsed, provided that over-commercialisation of natural spaces does not impair the naturalness. Dog walking areas within the public realm of the three towns would reduce the need to visit greener areas elsewhere and thereby avoid local extinctions of valued wildlife.

8 : It is stressed that enforcement of Green Belt protection will reduce the tendency to hoard derelict, misused and underused urban land. As an illustration, the chimneys of Poole power station were demolished in 1993 – a generation of wasted use of that site ensued whilst areas of Green Belt were lost by relevant misjudgements : misjudgements that should now be corrected – response ‘J1’ refers.

E : New market and affordable homes -- *pages 11 to 20 of the consultation document*

1 : The document refers to “exceptional circumstances”. It would be useful to draw a distinction between ‘exceptional circumstance’ and “usual consequences”. Anyone expecting to put a quart into a pint pot will experience the usual consequences – there would be nothing exceptional about the overflow. Similarly an intention to provide more dwellings than the area can accommodate (and adequately support with infrastructure services and facilities) will not experience anything that could be considered exceptional – just the usual consequences.

2 : The many and various surrounding constraints are however ‘exceptional’ (when compared with most areas across England) and can therefore be recognised as important constraints that justify enhanced respect and protection from any generally applicable (national) formula affecting the provision of extra dwellings - the more so when any formula concerned does not use the best data.

3a : Responses ‘E1 &2’ above, reinforce the need to ensure that future housing ‘need’ for the three towns is realistic and soundly evidenced. It is noted that a locally derived figure has been suggested and that it is lower than that suggested by a ‘standard’ method of calculating requirements. We strongly support the move to a lower figure.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

E : New market and affordable homes -- *pages 11 to 20 of the consultation document cont’d*

3b : The types of required accommodation must also be known, including the amount of housing that would be affordable to local working families on median annual full-time pay at the relevant time of delivery. The practicality and reality of the housing target seems very important since a higher than needed target would generate difficulties from the Housing Delivery Test as well as otherwise avoidable damage to the urban area and its facilities. In this connection it is stressed that an even lower target number is considered to be feasible for the three towns (with beneficial effects on collaborating planning authorities), particularly if due account is taken of recent ONS (Office of National Statistics) data – relevant details have previously been provided to BCP Council by Dorset CPRE in the report “**Dorset Housing Needs Evidence 2020**”, dated June 2020 and can be found on www.dorset-cpre.org.uk.

4 : The document does refer to a ‘significant affordable housing need’ and states that it will be examined as the preparation of the Local Plan progresses. To measure the success rate of the Local Plan it would be useful to have the target numbers of such dwellings to be delivered by each of the ‘milestones’ set by the eventual plan.

5 : Option 2 (on page 13) is supported, rather than Option 1, but in view of Response ‘A6’ above we are somewhat hesitant about the need for ‘tall’ buildings.

6 : The document does refer to the costs associated with developing brownfield land but the relevant use of Economic Viability Assessments (EVAs) does tend to ignore the effects of landowners buying land (with intrinsic development costs) at what turns out to be the wrong price level. EVAs also ignore the fact that many companies operate at profit margins nearer 10% rather than 20%. It is relevant to note that a developer at St Mary’s School (in Swanage) won a recent case (*to drop a previous condition about delivering ‘affordable housing’*) because the notional profit margin was just below 10% - not in excess of a 17.50%.

7 : It is noted that the other Unitary Council in Dorset (with which collaboration is particularly expected) is seeking to change aspects of planning law and guidance. In this connection controlling the legitimate life of a planning approval by reference to a delivery date, rather than a start date, would benefit local planning by all stakeholders, public and private. It is recalled that tall buildings have been approved for Poole (eg The Veneti Apartments on the site of the St John’s House office block) with no commitment to delivery and consequently, in some cases, apparently financially sterilizing an otherwise useful urban site – response ‘K1’ refers.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

E : New market and affordable homes -- *pages 11 to 20 of the consultation document cont’d*

8 : It is noted that the government does not require small sites (for less than 10 dwellings) to provide affordable housing. What will a sound Local Plan for the three towns try to secure - ? small sites shall be for affordable dwellings / prioritised to Community Land Trusts ? It is unlikely that only larger sites can be relied upon to deliver affordable housing : recent experience of any commitment to such delivery refers. The difficulties encountered by Community Land Trusts (in delivering actual dwellings) need to be addressed.

9 : With regard to pitches for travellers, it is surprising that doubt still seems to exist about whether there is an identified need to provide any. None of the options (on page 20) indicate anything other than further ‘considerings’ that are likely to maintain the current unsatisfactory situation.

10 : It is appreciated that convincing evidence is required for any plan to increase the number of habitable dwellings (fully supported by appropriate infrastructure services and facilities). Obviously the work in appraising the need for extra household formations has to be suitably refined. So too has the evidence about a) the effects of existing empty dwellings (derelict or otherwise) and b) the extent to which the public interest is fostered by persisting with the current absence of any policy for avoiding waste by bringing any of such premises (and their infrastructure) back into use.

F : A prosperous economy -- *pages 21 to 29 of the consultation document*

1 : The local mix of earned incomes requires recognition and attention, since it probably has adversely affected the current median annual full-time pay that is so important for the provision of adequate dwellings for local working people : Response ‘E4’ above refers.

2 : Traffic congestion remains a current obstacle to improving anything, particularly in peripheral areas likely to impact upon formal protections and wildlife : all of which must be protected in the interests of our various communities. It is considered that, post the pandemic, nature and naturalness will increasingly be seen as of huge importance to the economic success of the three towns as ‘gateways’ to their exceptional hinterland.

3 : It is noted that the creation of a Suitable Alternative Natural Green-space (a SANG) often involves local extinctions of wildlife and that consequently the Public Realm in urban areas needs to cater for exercising dogs. The concept of a Strategic SANG (a SANG remote from a development) obviously conflicts with both The Habitat Regulations and The Climate Emergency, since extinctions are involved and vehicular travel promoted. No doubt the eventual Local Plan will not advocate Strategic SANGs and be very cautious in promoting new SANGs.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

F : A prosperous economy -- *pages 21 to 29 of the consultation document (cont’d)*

4 : With regard to the options on page 27, it is considered that isolated employment sites could help reduce the incidence of congestion obviously associated with the large employment sites occupied by several firms.

5 : It is considered that control of ‘Changes of Use’ is a crucial factor in local planning intended to serve the public interest, not just the landowner.

6 : In connection with the options (on page 28) and further to Responses ‘F4&5’ above, it is confirmed that the hotel provision at Sandbanks / Canford Cliffs needs to be maintained, as well as any in such other hotel areas that may be relevant. Should the quality of existing hotel stock at the Haven become relevant, no doubt the site could be secured by another hotel business (if the current owner is unwilling to maintain the existing use of the site) aware of the visitor interest in that location and able to restore / re-provide acceptable facilities that do not involve a change of use. It is recalled that the outlook from Purbeck towards Poole has effects on the public interest in the use of Purbeck countryside : a material issue.

7 : Page 29 refers to ‘visitor attractions’. Access to nature (and naturalness) is a prime attraction (whether landwards or seawards) and ensuring that the three towns create and maintain green corridors within their existing constraints would boost the attractiveness. It is confirmed that option 2 (on page 29) is preferable.

8 : The location of visitor attraction sites within the Green Belt may prove to be damaging to their vicinities and create congestion, since the location of transport hubs is elsewhere and creating public transport for visitors should not inhibit the provision of much better public transport for residents.

G : Adapting our high streets and retail areas -- *pages 30 to 35 of the consultation document*

1 : The impact of ‘on line’ shopping has yet to be fully digested. Consequently adapting the high streets and retail areas may prove to be difficult and will require considerable flexibility over the planning period.

H : Providing a safe, sustainable and convenient transport network -- *pages 36 to 38 of the consultation document*

1 : It is noted that the eventual Local Plan will include for providing improved bus and rail services. A “substantial” improvement is required in coverage, frequency and usefulness, not just a marginal improvement from an inadequate base.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

H : Providing a safe, sustainable and convenient transport network -- *pages 36 to 38 of the consultation document (cont’d)*

2 : The exploration of park and ride has been undertaken (many times, it is understood). Delivery is overdue and requires enough time for the public to accept that the service is relevant / usable. Park and ride is not known as a ‘quick fix’ but it is a ‘real fix’. Some towns have found that facilities migrate to the parking area : consequently peripheral retail outlets (with large car parks) might wish to become involved.

3 : The timings for the completions of ‘investigations’, ‘maximising’, ‘identifications’ and ‘improvements’ mentioned in this draft ‘objective’ should be part of the eventual Local Plan, since it is assumed that such matters need to be clarified (and potential results of such exercises commenced ?) earlier than 2038. It is stressed that improvements to air quality are already overdue if pollution levels are to be reduced to levels that will be satisfactory for inhibiting COPD.

4 : Whilst ‘transport’ is part of a necessary Infrastructure Delivery Plan, infrastructure services and facilities include many other matters critical to life and living in the three towns.

5 : “Mitigation” is used in association with ‘air quality’. This may not mean removal of the pollution concerned (simply some alleviation of the pollution). “Avoidance” of any air pollution by developers is required and any reduction in such a required policy should not be accepted as applicable to ‘air quality’, if people are to thrive in the three towns.

J : Our natural environment -- *pages 39 to 46 of the consultation document*

1 : This objective, in post pandemic times, is very welcome. The enhancement of protected areas is particularly welcome if, as seems the case, earlier misjudgements in making earlier Local Plans are corrected. The Oakley Fields in Poole could be returned to their recent protected status within an enhanced Green Belt.

2 : It is stressed that any disturbance to some species is illegal and attempts to “minimise” any such disturbance also illegal : the degree of disturbance is understood to be irrelevant.

3 : It is good to see that conservation of watercourses is to be promoted which will require evidence that Wessex Water can limit pollution to the satisfaction of all stakeholders including the Marine Management Organisation.

4 : The aim to continue enhancing the area’s ecological network could be usefully accelerated by insisting on a 10% biodiversity net gain for all developments including the development of any SANGs : response ‘F3’ above refers.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

J : Our natural environment -- *pages 39 to 46 of the consultation document cont’d)*

5 : The Glover Report (and the associated moves to secure the long-awaited National Park in Dorset) suggest that enhancing the natural assets of the three towns would be particularly important for developing a ‘sense of place’ that is compatible with its surroundings.

6 : It is trusted that the development of policies to protect the Bournemouth cliffs will not exclude those on the Poole seafront.

7 : It is appreciated that some care homes are not so damaging to designated heathland but, notwithstanding ideas of possible governmental permission, such peripheral locations are understood to be not so effective for those receiving the care and who may have friends / relatives wishing to make visits. Consequently it would serve local public interests to maintain the Green Belt without any loss of openness.

8 : It is hoped that the financial contributions which fund SAMM (Strategic Access Management and Monitoring) will ensure that further extinctions of locally valued species are not aided by such a service. The damage being caused by SANGs (Strategic or otherwise) must not be overlooked by any organisation.

9 : The issue (on page 42) fails to recognise the concerns about the damage to habitats and species caused by SANGs (especially Strategic SANGs) and should be suitably adjusted. The suggestion that there is only one option (see page 42) is unlikely to be correct in the circumstances being outlined by these responses. Local evidence should not be overlooked when seeking to find an appropriate response to governmental influences : “we were only following orders” is not always an acceptable policy.

10 : It is noted that The Stour Valley Park Partnership is developing a strategy and plan which, like the plans of neighbourhood forums must be made to comply with the Local Plans of both the Unitary Authorities in Dorset : plans which must protect valued habitats and species and **secure at least a 10% biodiversity net gain.**

11 : With regard to improving the air quality on the Dorset Heathlands, it seems that a declaration that a relevant strategy and policy needs to be developed, without any mention of a timescale for delivery of such matters, is not a ‘sound’ plan – more of a fond hope.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

J : Our natural environment -- *pages 39 to 46 of the consultation document cont’d*)

12 : The issues about dealing with Poole Harbour recreational pressures and nitrate pollution fail to recognise the weakness of the ‘mitigation strategies’ being supported. Sewage discharges and existing pollution levels suggest that reducing existing pollution must be achieved, not just kept no worse than it is : neutrality for another generation is unacceptable. This has some significance since it is understood that some mitigation measures (associated with a desire to build more dwellings in the catchment area) can take up to 25 years before that take effect. Any policy that allows pollution levels in the harbour to ‘get worse before they get better’ is unacceptable.

13 : The issue about supporting green infrastructure and open space (on page 45) does not yet include an option for requiring developments (especially those more than three storeys high) to allow more open space (to improve the public realm) around their buildings. Existing open spaces may not have visitors (if that is the definition of ‘under use’) but they do allow a sense of openness to be appreciated – too many developers seem to want to cover their entire site with buildings that ensure roads / pavements form the bases of soulless wind tunnels : not a matter to be fostered by the three towns. In this connection, none of the three proposed options (on page 45) seems to be particularly useful.

14 : It is trusted that in supporting green infrastructure that the plan will ensure the provision of more trees and, particularly along our coastline (including in our chines) also ensure that night-time (and out of season) commercial activities do not inhibit the normal recovery of our varied natural assets.

15 : It is agreed that trees play a crucial role in carbon sequestration and biodiversity (page 46 refers) and it is trusted that the advantages of “additional planting, green roofs and living walls” will not remain a possibility for encouragement but become a real objective to be positively fostered if the three towns are to maximise on the concept of being the “gateway to a wonderful experience of nature and naturalness, both on land and at sea”.

16 : It was not surprising that many of the offers of potential extra sites for development involved greener land (currently protected by the far-sighted legislation on Green Belts, or should be). No doubt, having experienced a pandemic disease and increasing climate volatility, such greener land will have increased respect / protection – perhaps even prized as the means of preventing urban areas from being ‘hollowed out’ by neglect and dereliction.

17 : No doubt the eventual Local Plan will respect the ‘bigger picture’ (involving both Unitary Authorities in Dorset) that will ensure the developments in both planning areas are symbiotic and not parasitic : both commuting and urban sprawl will not be deliberate features of any planning.



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**POOLE & PURBECK RESPONSE
to “ISSUES & OPTIONS” CONSULTATION (cont’d)**

J : Our natural environment -- *pages 39 to 46 of the consultation document cont’d*

18 : It appears that the policy for enforcement of Green Belt protection may need strengthening somehow, since it is noted that the schedule listing the sites being promoted (by their owners) refers to “The Oaks site” as a ‘garden centre’ when it is not and is, in fact, the focus of various attempts to restore the site (from a car sales lot) to its protected condition as part of the Green Belt that prevents urban sprawl.

K : Our built environment -- *pages 47 to 51 of the consultation document*

1 : The influences on the public realm are affected by the designs that are approved for delivery. The suspension of delivery (for whatever reason) has ensured that good placemaking became impossible on the Poole power station site. It would be useful to ascertain what methods could be devised to promote actual delivery of a development having an approved design. It is noted that failure to deliver an approved development within a reasonable (and agreed) time can currently sterilize the site (whilst someone somewhere waits for something to turn up) and does nothing for the public interest in securing effective local planning. Perhaps, because of the painful lessons experienced over recent years, attention should be given to attaching suitable conditions to future decisions and suitably incorporated in the eventual Local Plan.

2 : Good design tends to stand the ‘test of time’ which hopefully will be embodied by national guidance. It is recalled that Architects used to advise their Clients to adopt a “LL / LF / LE” policy which often ensured the relevant investments in the built environment were sound. A “Long Life / Loose Fit / Low Energy” policy could still serve the three towns for the foreseeable future.

3 : The issues of urban intensification and the use of tall buildings are closely related to the drivers of need - Responses ‘E1-8’ refer. It is noted that 1) dramatic intensification would occur if all bungalows were converted to houses and 2) houses are not ‘tall’ buildings.

4 : The provision of adequate space around tall buildings needs to be addressed.

5 : The issue of preserving and enhancing our heritage is described (on page 50) as a governmental requirement. We suggest that this issue is a matter of strong local public interest and the suggested option ‘2’ should have a priority timeslot in any adopted Local Plan, if the matter has been previously neglected within any of the three towns. Obviously ‘heritage’ includes natural assets and the extent to which the suggested exercise misses them (for incorporation in the relevant evidence for the proposed Local Plan) will be of interest.

6 : Mention is made of the fact that some heritage assets are ‘at risk’ and the suggestion that improvements may not occur is disappointing, particularly when heritage assets are a key element of visitor attraction.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

K : Our built environment -- *pages 47 to 51 of the consultation document (cont’d)*

7 : The single (Hobson’s Choice !) option on page 51 (relating to coastal and landscape character) needs to clarify the extent to which (if at all) commercial pressure should be allowed to adversely influence perception of our coastal and landscape character.

L : Promoting health and wellbeing -- *pages 52 to 54 of the consultation document*

1 : The objective of improving health and wellbeing and reducing inequalities is supported. Such an objective is hard to accept as being possible whilst the Dorset Clinical Commissioning Group (CCG) is implementing a plan that converts the Poole and Bournemouth hospitals into one hospital. In due course such a plan expects all planned procedures to involve everyone concerned travelling to Poole (longer journeys on congested roads for those in the East) and all severe trauma procedures (including those for very specialised and urgent early maternity cases) to involve everyone concerned having to be transported to Bournemouth (longer journeys on congested roads for those in Purbeck and further West). This suggests that the Dorset CCG policy of concentrating clinical excellence and facilities in the far East of the three towns requires the adopted Local Plan to substantially remove (very soon) the hazard of congested roads that would prevent reliant patients (say in Swanage) from potential delays beyond the recommended time, of the single ‘golden’ hour, for emergency treatments. It is also unclear the extent to which the reduction in beds and access points will serve the increased population (and its distribution) that any adopted Local Plan will be fostering : Response ‘A3’ refers.

2 : The concept of a Health Impact Assessment may be useful in determining whether the NHS has adequate facilities to support occupants of developments : the lack of clarity concerning the basis of the population being served by the Dorset CCG plans (referred to at ‘L1’ above) suggests more collaboration is required now. The single option (on page 53) appears to be a surprising attempt to reduce the legitimate pressure on Dorset CCG to secure enough funds to support the increase in the relevant population and needing such funding.

3 : The issue about ensuring a high standard of amenity should include fostering high standards of insulation, the use of solar panels on buildings and the opportunity to step outside or very good ventilation if no balcony is relevant. The options (on page 54) do not seem optional to us at this stage and need to result in a Local Plan that could be adopted eventually : it being understood that nationally described standards may lag behind what a prudent Local Plan requires. In this connection it is understood that the three towns have approximately 206,000 roofs with about 6,000 of them with reported solar panel installations – obviously an opportunity exists to generate electricity closer to where it is used (reducing transmission costs) on more urban roofs than the current reported 3% and thus allow fields to be kept for carbon capture, food and general health benefits : promoting health and wellbeing.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

L : Promoting health and wellbeing -- *pages 52 to 54 of the consultation document (cont’d)*

4 : The concept of spending Community Infrastructure Levy monies to help fund primary care seems odd when the operation of Economic Evaluation Assessments (EVAs) limits the availability of such monies : see Response ‘N4’ below. Perhaps, under certain circumstances, the adopted Local Plan will require such EVAs to be conducted in public.

M : Tackling climate change -- *pages 55 to 57 of the consultation document*

1 : In considering the options on page 55 it is confirmed that Responses ‘K2’ and ‘L4’ refer.

2 ; The roofs of most buildings within the three towns should be encouraged to have solar panels serving batteries. The adopted Local Plan could promote suitable group purchase schemes, since the number of roofs with solar panels is very small for the total number of buildings in the urban area and power is best generated where it is to be used; to limit transmission costs.

3 : As the summers get hotter it may also be useful to cover ground level parking areas with solar panels to provide suitable shading for the vehicles. However, covering greener areas with solar panels deprives such greener areas from being of use in their other beneficial functions.

4 : Large solar or wind farms in our locality are likely to damage the economy (based upon ‘naturalness’), let alone general safety as storms become more severe. The investigation into the recent case of a wind turbine tower succumbing to storm Eunice may have its implications.

5 : No doubt because of the reliability of tidal flows (involving millions of tons of sea water moving regularly like clockwork) support will be considered for sub-surface tidal flow turbines (well below the influence of waves) to generate electricity. It may even be an area for local industrial development and future employment, in view of existing engineering strengths.

6 : It is noted that there is a move to obtain hydrogen by solar powered electrolysis of land-fill methane. This is supported upon the assumption that the consequential released carbon dioxide is captured.

7 : Option 1 (on page 56) is preferred if the specific areas are to be “roofs of suitable buildings”.

8 : The issue about flood risk alleviation measures (on page 57) should include collaborating with all Authorities in the catchment areas of all relevant rivers to ensure the function of water meadows is fully restored and enhanced.



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POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

M : Tackling climate change -- *pages 55 to 57 of the consultation document*

9 : Whilst tackling climate change, it is trusted that every effort will be used to ensure national ‘guidance’ is appropriate to the necessary balance of local needs. UK Unitary Councils should seek clarity in this matter since the nation is a 1% polluter and our weather is not generated within the UK. This is not intended to suggest that we do nothing locally but it is support for insisting upon a ‘sense of proportion’ and not chasing ‘Brownie points’.

N : Providing infrastructure that supports development -- *pages 58 to 61 of the consultation document*

1 : The expressed desire to ensure that there is sufficient and appropriate infrastructure in place to support any Local Plan proposed for adoption must be more than a “hope”, if life and living in the three towns is to flourish and thrive.

2 : To secure sufficient and appropriate infrastructure many of the responses expressed earlier in this document require definite resolution. It is appreciated that the fragmentation of responsible stakeholders is unhelpful in producing suitable evidence and that it must be hard for those Authorities dealing with old (inadequate) facilities, backlogs of various types and the pressure of new demands that may be wanted by the Local Plan of the three towns : demands that may have to be modified by the constraints that should be imposed by any of the stakeholders.

3 : The proposal to have an Infrastructure Delivery Plan (on page 59) is welcomed if it is produced as evidence that the proposed Local Plan should be adopted by the Council. In this connection and for clarity it is suggested that “funding” is a necessary element of infrastructure facilities and services. Consequently ‘growth’ (like inflation) needs to be controlled to levels that suit existing or expected constraints.

4 : The issue (on page 60) relating to the use of “Economic Viability Assessments” (EVAs) is a source of concern, since it seems to promote ‘theory’ over ‘reality’ and is conducted on a ‘confidential basis’. In this connection the District Valuer is understood to use the information provided by the applicant and to ensure that a substantial profit is secured by the developer. It is relevant to note that actual purchase (or option to purchase) arrangements are not involved, that significant contingencies for known risks can be included and that some businesses are content to work for a profit – not a substantial profit, protected by a process conducted in confidence.

5 : Scrutiny of EVAs is proposed but the criteria for any such scrutiny may not address the concerns expressed at ‘4’ above.



The countryside charity
Dorset

POOLE & PURBECK RESPONSE to “ISSUES & OPTIONS” CONSULTATION (cont’d)

P : Involvement issues – *page 62 of the document.*

1 : It is hoped that these responses will assist preparation of a suitable Local Plan for the three towns but we would be pleased to amplify any of them upon request.

2 : It seems that Local Planning Authorities are encountering difficulties in securing relevant advice about interpretation of planning requirements to suit local needs. Consequently it is suggested that prudence requires the eventual Local Plan for the three towns to be self-explanatory to facilitate relevant decision-making without requiring as much interpretation as has been the case to date. Naturally, in view of the fragmented decision-making machinery (requiring effective coordination by BCP Council, responsible for seeking and protecting the ‘public interest’), this suggestion also applies to any understandings with others who may implement their policies that revise the constraints that affect relevant plans of any stakeholder.

3 : It is confirmed that we would wish to be involved in all further periods of consultation concerning the preparation of the Local Plan.

March 2022