



The countryside charity
Dorset

Dorset CPRE

25th March 2022

**Dorset CPRE Response to
A new Local Plan for Bournemouth, Christchurch and Poole (BCP)
Issues and options consultation**

We believe BCP Council appear to be giving far more details than Dorset Council to allow the public to see what is being envisaged and to comment accordingly. The Issues and Options Consultation appears to be well designed to facilitate public comments. We have focused on the survey questions that are pan Dorset related.

Q9 New market and affordable homes

BCP is showing strong leadership and courage in challenging its target and exposing the weakness of the Standard Method used to calculate targets.

Dorset CPRE does not support **Option 1**, building 2700 homes per annum based on the government's Standard Method (SM) for the following reason:

- The SM vastly over-estimates any objective measure of future need and lacks any evidential support for its affordability uplift.
- The Icen's [*Joint Housing Needs Assessment*](#) published in January 2022, admits that current population projections, even with younger households restored back to 2001 formation rates, are insufficient to supply buyers for the housing being planned, so homes may have to remain empty or not be built at all, since developers will only build homes they can actually sell.
- For rural Dorset, housing market demand is determined by in-migration since there is negative natural population growth (i.e. deaths exceed births). There are substantial risks in proposing high housing numbers that cannot be justified on the basis of past or forecast demand.
- National policy is in flux so the future of the unpopular Standard Method is uncertain.

Option 2, building 1600 homes per annum, puts across arguments for exceptional circumstances and is seeking a more realistic target that will better meet local need. Option 2 also over-estimates likely household growth, so any new houses will need to be sold mainly to incomers. However, we believe **Option 2** is preferable on grounds of sustainability without inflicting irreparable damage on Dorset's Green Belt Land, outstanding landscape, environment and heritage.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

Dorset CPRE would like to see BCP championing a 'brownfield first' approach to housing within the future local plan to re-use existing sites, to re-purpose redundant land, whilst retaining green space.

Dorset CPRE also contends that the importance of the Stour Valley Park project to the whole of Dorset should preclude any more development adjacent to the river. Instead it should be seen as an asset for future generations and enriched as a natural asset in every way possible.

Q10 A prosperous economy

When planning strategic sites for employment, BCP need to consider where the workforces will live and how they will reach their place of work, with the aim of reducing commuting by car from across wider Dorset. Greater consideration should be given to the type of housing that employees at all levels would require, near enough to employment sites to make alternative modes of transport not only feasible but attractive. Prestigious companies with high-earning workforces will have very different housing needs from blue-collar companies, so careful thought should be given to building the right mix of housing and tenures for each site. Getting this balance right would reduce commuting and car use, along with the associated congestion and pollution, build stronger communities locally around workplaces and improve quality of life, especially family life.

Q12 Providing a safe, sustainable and convenient transport network

A "substantial" improvement is required in bus and rail coverage, frequency and usefulness, not just a marginal improvement from an inadequate base.

A Dorset-wide strategy is required. It can prove hard for rural residents and visitors to decrease their transport carbon footprint.

- Travel by train needs to be affordable to encourage residents to make the step and behaviour change.
- There is a need to stop major road improvements and focus on improving rail services with a proper East to West connection in Dorset to ease pressure on roads and need for a second car.
- Look at rethinking bus usage and offering e.g. comfortable work environment while travelling, with WiFi access.
- Any new housing developments will also need to be able to accommodate access by larger buses.

There's no mention of working with bus service providers to resolve problems.

- They are commercial businesses that need to make profit, but most regular bus users are currently subsidised.
- National service routes are linear, which isn't much use to most villages.
- A business case needs to be made for the provision of short, circular routes with frequent service.
- Buses must be clean, attractive and suitable for modern commuters.

Air quality

Improvements to air quality are already overdue if pollution levels are to be reduced to levels that will be satisfactory for inhibiting Chronic obstructive pulmonary disease (COPD).

“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.

Q13 Natural environment

The enhancement of protected areas is particularly welcome. 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.

The Glover Review of Landscapes (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.

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.

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.

SANGs (Suitable Alternative Natural Greenspaces)

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. 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.

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.

We hope 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.

Air quality

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.

We trust 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.

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”.

Q14 Our built environment

Good design tends to stand the 'test of time' which hopefully will be embodied by national guidance. A development isn't just about numbers but quality of design and a sense of place too. In 2019, CPRE worked with Place Alliance, based at UCL, to audit over 140 residential developments built between 2014 and 2019. [The report](#), published in January 2020, reflects on where changes in the quality of housing design have occurred – and found a worrying proportion of developments that should never have gone ahead.

The provision of adequate space around tall buildings needs to be addressed. Many of us notice the difference when we've been able to spend time in green spaces.

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.

Reference is made to 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. Dorset CPRE is encouraging residents to participate and nominate and bring to attention all locally important buildings, structures, designed landscapes, sites and places to be considered on a new BCP and Dorset Council Local Heritage Lists Campaign.

Q15 Promoting health and wellbeing

The objective of improving health and wellbeing and reducing inequalities is supported.

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 is understood that nationally described standards may lag behind what a prudent Local Plan requires.

Q16 Tackling climate change

Dorset CPRE is fully supportive of renewable energy development in Dorset but not at any price. It is opposed to proposals that would do anything other than minimal harm to Dorset's exceptional and highly valued landscape, heritage, agricultural and amenity assets.

In this connection we believe the three towns have approximately 206,000 roofs with about 6,000 of them with solar panel installations – 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 green fields to be kept for carbon capture, food and general health benefits: promoting health and wellbeing.

Property owners within the three towns should be encouraged to have solar panels on roofs of most buildings by promoting suitable group purchase schemes. Power is best generated where it is to be used; to limit transmission costs. Option 1 (on page 56) is preferred if the specific areas are to be "roofs of suitable buildings".

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.

Reducing overall demand for energy through efficiency measures in buildings, industry and transport, should be a priority, and is crucial to tackling fuel poverty and creating green jobs.

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.

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.

Dorset CPRE would like a just transition to a decentralised, zero-carbon energy system that empowers and benefits local communities and is delivered in harmony with our natural environment and landscapes. We recognise the role that renewable energy, including onshore wind and solar, needs to play in getting us to net zero as soon as possible.

However, there is no need to industrialise the countryside in the process. There are workable solutions to both protect and enhance the countryside at the same time as upgrading our electricity network.

Q17 Providing infrastructure that supports development

The 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.

To secure sufficient and appropriate infrastructure many of the responses require definite resolution. We appreciate 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.

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, “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.

The issue (on page 60) relating to the use of “Economic Viability Assessments” (EVAs) is a source of concern, it seems to promote ‘theory’ over ‘reality’ and is conducted on a ‘confidential basis’. In this connection the District Valuer uses 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. As per a recent example in Swanage, affordable housing is being argued downwards repeatedly by developers – a developer won a case to drop provision of affordable houses as the profit margin would be just below 10%.

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Thank you for giving us the opportunity to comment on the Issues and Options before finalising the BCP Council Local Plan.

Yours sincerely,

Peter Bowyer
Chair of Trustees