

Part B - Please use a separate Part B Form for each comment

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the BCP Local Plan does this representation relate?

Policy no:	S2: Spatial strategy and levels of Growth
Paragraph no:	1,2
Table no:	
Figure no:	
Site no:	
Or other	

4. Do you consider the BCP Local Plan is:

Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

5. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?

Not positively prepared	<input type="checkbox"/>
Not justified	<input type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input type="checkbox"/>

5. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

BCP Local Plan 2024 - Policy S2 (p15)

The Spatial Strategy in the BCP Local Plan (2024) provides for an average target of 1,600 new homes per annum, well short of the notional need suggested by the Standard Method of the NPPF which requires the starting point for assessing housing need to be 2,806 homes pa.

Inevitably, those with an interest in saddling BCP planners with an excessively-high calculation of housing need will be lobbying the independent inspector for a much higher housing target, looking particularly for the exceptional circumstances necessitating Green Belt release. This short note is intended to illustrate how sensible BCPC has been in choosing a lower housing target.

****What governs household growth?***

The Standard Method is based upon household and population projections which were 2014-based. In order to project household numbers, those population projections were combined with projected propensities of individuals to form future households.

For projected household growth actually to occur:

- new homes must be supplied in sufficient quantity
- people must form households at the rates expected or higher
- people must be present in sufficient numbers.

****Household growth in BCP is not constrained by supply****

New homes are provided mainly by private developers in a market motivated by profit. Homes are built at a rate at which they can be sold most profitably. The Local Plan points to 9,110 plots in BCP having permission already but not built-out: that's about 9 years' worth of average completions(see note 3 below), compared with 6 years in England overall(see note 4 below). So evidently the market for new homes in BCP is not being constrained by lack of permissioned land but by absorption rates. People and household formation rates are the constraints, not the supply of homes.

****Household growth in BCP is not constrained significantly by suppression****

Research submitted to the HoL Built Environment Committee's enquiry into "Meeting the UK's housing demand" shows that high prices (see note 1) may depress absorption rates by suppressing rates of household formation, as shown by Figures 1 and 2 in the Appendix (see note 2) . Females are slightly less likely to form households as the affordability rises, but males show no significant adjustment at all, presumably because the market simply adjusts to the imperative of household formation.

Overall, the analysis suggests a huge 40% improvement in affordability (equivalent to a 40% fall in house prices) would result perhaps in a 2 or 3% increase in household formation overall. The effect is remarkably small. So household growth in BCP is not particularly constrained by supply of homes, nor by affordability and household formation rates. What remains is the supply of people.

****Household growth in BCP is constrained by slow population growth****

BCP planners are wise to reject the Standard Method as a future housing target because a large disparity, too large to neglect, has developed between the 2014-based population projection and ONS actual population estimates, as illustrated by Figure 3 in the Appendix. If the gap continues to widen, BCP planners will be trying to plan more houses than the market can possibly find to fill them. As demonstrated already, prices won't fall enough to increase household formation to compensate. Without any underlying reasons for changes in migration patterns between LPAs, extra net in-migration cannot be relied upon either.

A cautious approach is justified, subject to review in future years. Indeed, given recent levels of population growth in BCP, even the cautious Local Plan housing target may prove to be unsustainable.

Assuming an average of over 2 occupants per new home, 1200 new homes per annum will require annual growth of about 2,500 people, above recent levels, but not unknown in the past. However, an annual supply of 2,806 new homes, as per the Standard Method, would require perhaps 5,900 new occupants each year, a growth so far above historical levels as to appear ridiculous.

****Conclusion****

Policy S2's cautious housing target of 1200 homes pa, only rising to 1800 later and subject to review, is fully justified by recent population evidence and will contribute to the local supply of homes in a sustainable manner. There is scant evidence that a higher target would be sustainable, and a plan based on the Standard Method without qualification would not be sound.

Notes

- (1) The Viability Assessment (para 6.75) estimates land in BCP is being valued at about £9 million per hectare, indicating that a surplus of 9,110 plots has not led to a reduction in land value, but only to speculation.
- (2) <https://committees.parliament.uk/work/1328/meeting-the-uks-housing-demand/publications/written-evidence/?page=4>
- (3) see p49 in the LP, using average completions over past 5 years of 1,055
- (4) see <https://www.local.gov.uk/about/news/over-1-million-homes-planning-permission-waiting-be-built-new-lga-analysis> using average completions over 5 yrs from 2015 to 2020

NB - graphs to support the argument set out above have been submitted as an additional attachment (Dorset CPRE - Consultation Response Appendix) to this representation as they could not be included in the text box provided.

6. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We wish to submit our evidence to the Inspector in support of this policy.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	S2: Spatial Strategy and levels of Growth
Paragraph no:	6 Office and employment
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

In our opinion Part 6 (Office and employment) of Strategic Policy S2 is not sound as the allocation of strategic employment sites at Talbot Village and Wessex fields is not an appropriate strategy for the BCP area. Retention of these sites as highly valuable greenspace would better serve the community.

N.B. The numbering of the separate elements of the whole of policy S2 needs to be contiguous

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

Re-allocation of the strategic employment sites at Talbot Village and Wessex Fields as Urban Greenspace would better serve the community of BCP.

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in hearing session(s)	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)
To make our case regarding the un-suitability of Talbot village and Wessex Fields as employment sites.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you have further comments please complete the additional Part B form(s) below.
If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.**

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	Strategic Policy C1: Addressing Climate Change
Paragraph no:	
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)
<p>Policy C1 is not sound as in our opinion it does not go far enough to address the impact of climate change on BCP. Therefore, it is neither positively prepared or justified. Neither does it fully meet the requirements in Chapter 14 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) paragraph 157 which calls on policies to contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience.</p> <p>Policy C1 should include measures to encourage installation of solar panels on both domestic, commercial property rooftops and car parks. All new buildings should be fitted with solar or thermal panels as standard.</p> <p>Figures from the MCS data dashboard (a UK wide database of Micro Energy Generation installations) showed that across the BCP Local Authority area by 2023 only 8977 households had installed solar panels. This represents approximately 4.5% of domestic dwellings in the local authority area. Installation of solar panels on both domestic and commercial of rooftops could make a significant contribution to the meeting our future energy requirements without the loss of valuable greenspace.</p>

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

Measures to encourage installation of solar panels on both domestic, commercial property rooftops and car parks. All new buildings should be fitted with solar or thermal panels as standard.

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We would like to have the opportunity to emphasise the important contribution that rooftop solar panels and emerging technologies can make in meeting the conurbation's energy needs and the contribution local plan policies can make in facilitating their use.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	5. Tackling Climate Change - Sustainable Construction Low Carbon Energy
Paragraph no:	5.8
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)	
<p>This policy is inconsistent with the NPPF on two fronts:-</p> <p>1) The wording, “energy performance needs to maximised” is ambiguous and should be amended to include specific targets to ensure that this ambition is deliverable. (NPPF Chapter 3,Plan Making, calls for plans to be prepared positively, in a way that is aspirational but deliverable) policies to be clearly written and unambiguous)</p> <p>2) This policy does not go far enough to meet the government’s aims as set out in Chapter 14 of the NPPF paragraph 160 to increase the use and supply of renewable and low carbon energy. To fully meet the requirements for policies to “identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems,” this policy should contain provision for mandatory rooftop solar and thermal panels on all new residential and commercial buildings.</p>	

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

The inclusion of specific targets in the policy coupled with a requirement for all new residential and commercial buildings to be fitted with rooftop solar and thermal panels is required to make it 'sound'.

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We wish to make the case in support of need for this policy to include specific targets and for all new residential and commercial buildings to be fitted with rooftop solar and thermal panels.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?

Policy no:	NE1: Natural Environment
Paragraph no:	
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:

Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?

Not positively prepared	<input type="checkbox"/>
Not justified	<input type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

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.

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in hearing session(s)	<input type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you have further comments please complete the additional Part B form(s) below.
If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.**

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	NE2: Habitats sites and wildlife sites
Paragraph no:	2 Poole Harbour
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

In our opinion the policies contained within part 2 of Strategic Policy NE2 relating to Poole Harbour are not sound as they do not meet BCP's needs or form an appropriate strategy for BCP.

Poole Harbour is in a fragile ecological state and measures to mitigate nutrient pollution from new housing, commercial developments or construction do not go far enough to protect this important marine environment. For this policy to meet BCP's needs it is essential that there is no additional pollution generated by the aforementioned development. This policy should be more ambitious and indeed seek to improve Poole Harbour's precious marine environment by including policies aimed at reducing all current water pollution levels in the Harbour.

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

As stated above the inclusion of policies aimed at reducing all current water pollutants would make the BCP Local Plan sound.

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

To stress the necessity for policy to seek to improve water quality in Poole Harbour

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	6. Our Natural Environment
Paragraph no:	6.18
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)	
<p>In our opinion the policies contained within paragraph 6.18 are not sound as they do not meet BCP's development needs, or, form an appropriate strategy for BCP.</p> <p>Poole Harbour is in a fragile ecological state and measures to mitigate nutrient pollution from new housing do not go far enough to protect this important marine environment. In order for this policy to meet BCP's needs it is essential that there is no additional waste water pollution generated by new housing developments.</p>	

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)	

In order for this policy to meet BCP's needs it is essential that there is no additional waste water pollution generated by new housing developments

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We wish to provide evidence that it is important that this policy includes measures to ensure that not additional waste water pollution is generated by new housing developments.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?

Policy no:	Strategic Policy H1
Paragraph no:	
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:

Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?

Not positively prepared	<input type="checkbox"/>
Not justified	<input type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

Overall we support Strategic Policy H1.

The housing targets set out in part a will deliver an average of 1600 homes per annum. Given the current constraints on housing delivery resulting from a lack of supply of suitable sites the targets contained within this policy are sustainable for the BCP area and this policy fully meets the tests of soundness.

BCP is showing strong leadership in challenging the original Standard Method target which vastly over-estimates any objective measure of future need and lacks any evidential support for its affordability uplift.

1600 homes per annum is more than the number of homes needed to meet likely local household growth over the plan period, with an average of 1,111 extra households per annum projected by the 2018-based ONS household figures (the 10-year migration variant projection*). Any surplus homes will need to be sold to people from outside the local authority area.

We would like to see BCP championing a 'brownfield first', where development occurs firstly and foremostly on previously developed sites.

(*The 10-year migration variant is the highest variant for BCP; the principle projection gives a much lower average annual growth of 693 households over the 15year plan period 2024-39)

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We wish to attend the hearing to provide our own evidence in support of this important policy.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	Strategic Policy H2: Affordable Housing
Paragraph no:	1.
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)
<p>The NPPF calls for policies to be clearly written and unambiguous (NPPF, para 16). The wording of Part 1 of Strategic Policy H2 is poorly worded and open to mis-interpretation.</p> <p>To fully meet BCP's need for homes that people can afford to live in, in our view the remainder (75%) affordable/social rent housing on development sites should be specified at 35 % being available at an affordable rent at less than 80% market rent, and 40% being available for social rent at less than 60% market rent.</p>

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)
<p>Suggested revised wording</p> <p>Development on greenfield sites must</p> <p>a) Deliver 40% dwellings as affordable housing on site providing:</p> <ul style="list-style-type: none"> -10% of the total housing provision for affordable home ownership

- 25% of the affordable housing provision shall be First Homes
 - the remainder (75%) of the affordable housing provision shall comprise of affordable/social rent
- (explanation of this policy may be assisted by use of a pie chart or similar)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We would like the opportunity to explain the importance of re-wording this element of policy H2.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.
If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	Strategic Policy H2: Affordable Housing
Paragraph no:	2
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)
In order to be the most appropriate strategy going forwards for BCP affordable housing provision on brownfield sites should clearly include enough homes for affordable/social rent.

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)
Inclusion of a requirement for housing developments on brownfield sites to include homes for affordable/social rent.

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be**

made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We wish to provide evidence of the need for the inclusion of homes for affordable/social rent.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?

Policy no:	8. Homes - Affordable Housing
Paragraph no:	8.15
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:

Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?

Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

- In our opinion non-strategic policy 8.15 is not sound as:-
 - i) There is in-sufficient evidence provided in the evidence base to support the claim that affordable housing cannot viably be provided in Bournemouth or Poole Town Centres. (paragraph 30 of the NPPF calls for policies to be underpinned by relevant and up to date evidence)
 - ii) This strategy does not meet BCP's development needs or support earlier policies which call for major developments to demonstrate that they contribute social value. (4.23 Town Centres)
- We believe that affordable housing can viably be delivered in the town centres, as higher density schemes can be achieved with density projections of up to 300 dph compared to 30 dph on greenfield sites. The effect of this is that town centre schemes will be more viable than those in suburban areas, reflected in higher Gross Development Values for town centre schemes. This is due to a tenfold increase in the quantum of development and the consequential increased in headroom of GDV over construction cost, finance and profit and base land value of EUV +.
- Planning obligations including affordable housing should be fairly set out in the plan and only varied in exceptional circumstances based on an open book viability assessment carried out by the District Valuer.

- A Supplementary Planning Document containing a Viability Assessment Code of Practice similar to that prepared by the independent economist Professor Stephen Walker for Rotherham Metropolitan Borough Council would provide much clarity.
- We are of the opinion that a 40% affordable housing provision should apply to all housing schemes including those in town centres.

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in hearing session(s)	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We wish to put forward our case that affordable housing can viably be delivered in the urban centres of BCP.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you have further comments please complete the additional Part B form(s) below.
If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.**

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	E4: Talbot Village
Paragraph no:	
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)
<p>The proposed development at Talbot village on the scale suggested does not meet the requirements for Sustainable Development as set out NPPF paragraph 8 and is not justified.</p> <p>Creation of an innovation quarter on TV2 will result in the loss of greenspace (Highmoor Farm) which is highly valued by the community as evidenced by recent community petitions opposing development of Highmoor Farm. This area not only forms an important buffer for the Talbot Heath SSI but is also ecologically important in its own right.</p> <p>We understand that there is sufficient employment land contained within the local plan without further allocations at Talbot Heath to meet the conurbation's needs over the plan period.</p>

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in hearing session(s)	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)	
We wish to give evidence to support the case that the development proposals at Talbot village are not sustainable.	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete another representation form (including Part A). If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the BCP Local Plan does this representation relate?

Policy no:	Strategic Policy T1
Paragraph no:	
Table no:	
Figure no:	
Site no:	
Or other	

4. Do you consider the BCP Local Plan is:

Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

5. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?

Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

5. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

In our opinion this policy is not sound as it does not form a strategy that will meet BCP's needs over the 15 year plan period. Chapter 14 of the NPPF calls for plans to shape places in ways that contribute to radical reductions in greenhouse gas emissions. According to the World Economic Forum transport is responsible for around 25% of carbon emissions. By 2030, the UK has signed up to reduce emissions by 68% relative to the 1990 level (Climate Change Committee, October 2023). This policy does not go far enough to make the significant changes required in transport use to meet climate change targets and meet the public's needs.

To drive the change required to meet the requirements of the conurbation over the plan period goals need to be set.

6. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

Yes we wish to provide evidence of the need for a transport strategy that is goal orientated to meet the conurbations future needs over the plan period.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	11. Infrastructure and Delivery
Paragraph no:	11.15 Viability Assessment
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input type="checkbox"/>
Not effective	<input checked="" type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)	
<p>The decision to not require affordable housing on the majority of schemes in a bid to speed up decision making cannot possibly represent a policy that meets BCP's development needs particularly given that the Local Housing needs assessment (paragraph 8.13) suggests a need for 1653 social/ affordable home per annum.</p>	

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)	

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be**

made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in hearing session(s)	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)	
To put forward the case that affordable homes can viably be delivered on sites in the urban centres.	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you have further comments please complete the additional Part B form(s) below.
If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.**

Part B - Please use a separate Part B Form for each comment

6. To which part of the BCP Local Plan does this representation relate?	
Policy no:	11. Infrastructure and delivery
Paragraph no:	11.8 Viability
Table no:	
Figure no:	
Site no:	
Or other	

7. Do you consider the BCP Local Plan is:	
Legally compliant?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Sound?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Complies with the duty to co-operate?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>

8. If you think the BCP Local Plan is not sound, please indicate the reason(s) why by checking the box?	
Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

9. Please give details of why you consider the BCP Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the BCP Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. (The box will expand)

The NPPF calls for policies to be underpinned by relevant and up to date evidence. (Paragraph 31) In our opinion the approach used for assessing viability in the evidence base (Porter Planning Economics report 2024) does not provide a true assessment of urban centre development site viability.

In our opinion town centres with density projections of up to 300 dwellions per hectarre compared to 30 dwellings per hectare on greenfield should comparatively have a higher viability than suburban areas due to increase in Gross Development Value (GDV). This is due to a tenfold increase in the quantum of development and the consequential increased headroom of GDV over construction cost, finance and profit and base land value of EUV +. Planning obligations including affordable housing should be fairly set out and clearly defined in the plan and only varied in exceptional circumstances based on an open book viability assessment endorsed by the independent District Valuer.

The Harman Report points out the importance of minimising risk to the delivery of a plan. Risks can come from policy requirements that are either too high or too low. So, planning authorities must have regard for the risks of damaging plan delivery with excessive policy costs - but equally, they need to be aware of lowering standards to the point where the sustainable delivery of the plan is not possible. Good planning in this respect is about 'striking a balance' between the competing demands for policy and plan viability. We are of the opinion that the requirements of delivering affordable/social housing have been set at too low a bar and the result will be an unsustainable very small delivery which does little to satisfy the overriding need for this product. The reality of

brownfield is that there is a huge variety in the percentage degree of full site economic development. Many sites are relatively under-developed and it is these sites that have the potential for generating the headroom to be able to afford significant planning obligations. The broad-brush typology/viability which underpins this plan is in our view superficial and inaccurate. Using a figure of £3m p ha for benchmark land value across most brownfield is bound to guarantee non viability for planning obligations.

10. Please set out the modification(s) you consider necessary to make the BCP Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the BCP Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (The box will expand)

In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

11. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: (The box will expand)

We wish to provide evidence that the Porter Planning's Economics basedoes not provide a true assessment of urban centre viability.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

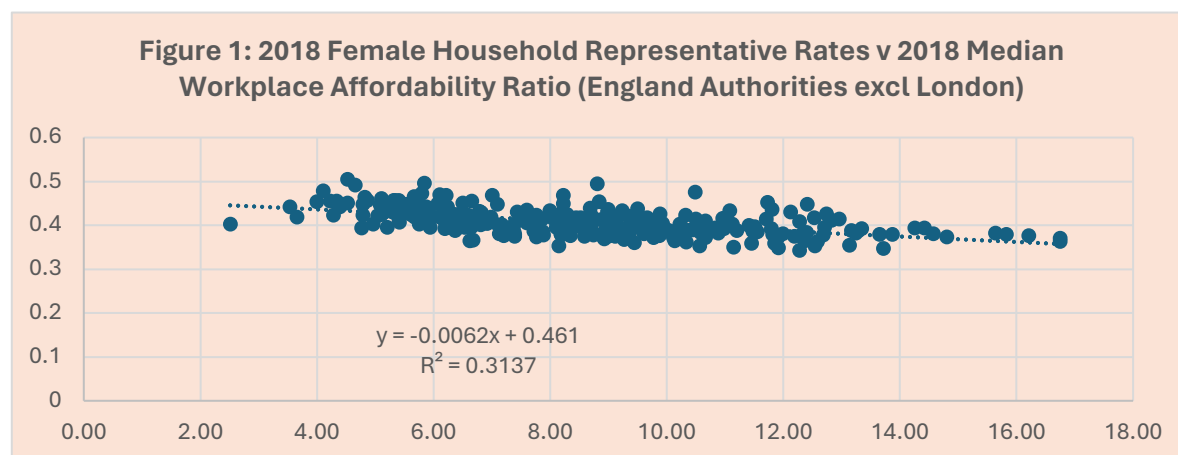
If you have further comments please complete the additional Part B form(s) below.

If not, email this document to bcplocalplan@bcpcouncil.gov.uk by 1pm on Friday 3 May 2024.

Appendix to Dorset CPRE BCP Local Plan 2024 - Policy S2 Response

Please read the comments on Policy S2 in conjunction with these illustrations.

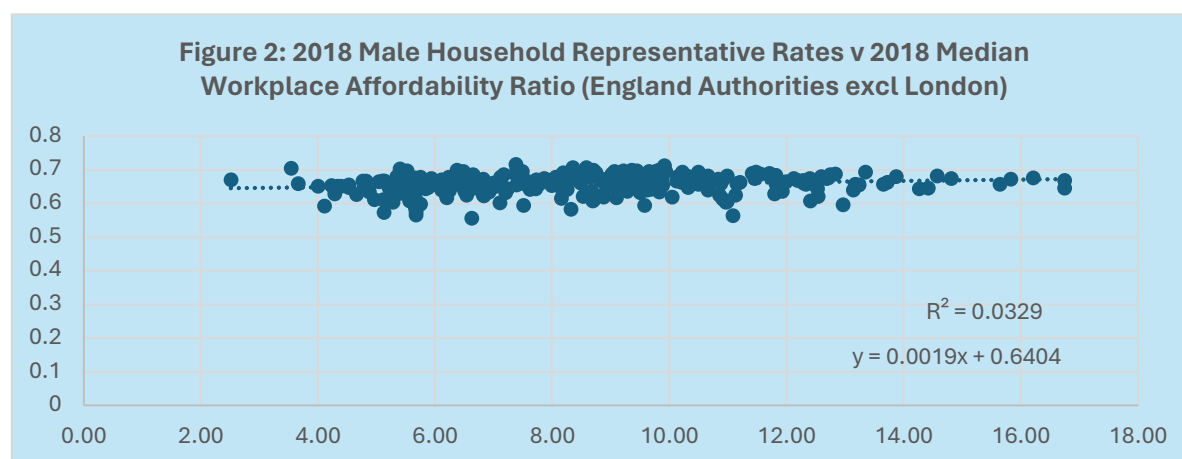
1. The relationship between affordability ratios and household suppression across LPAs in England



Source: <https://committees.parliament.uk/work/1328/meeting-the-uks-housing-demand/publications/written-evidence/?page=4>

Average rates of household formation by females (vertical) are plotted for LPAs against their affordability ratios (horizontal), using data sourced from the ONS 2018-based Household Projections. Clearly as the affordability ratio rises, making homes more expensive relative to wages, household formation by females declines, but not by much. For instance, a change in affordability ratio from 10 to 6, implying an improbable fall of 40% in house prices, would increase female-headed household formation by 6%.

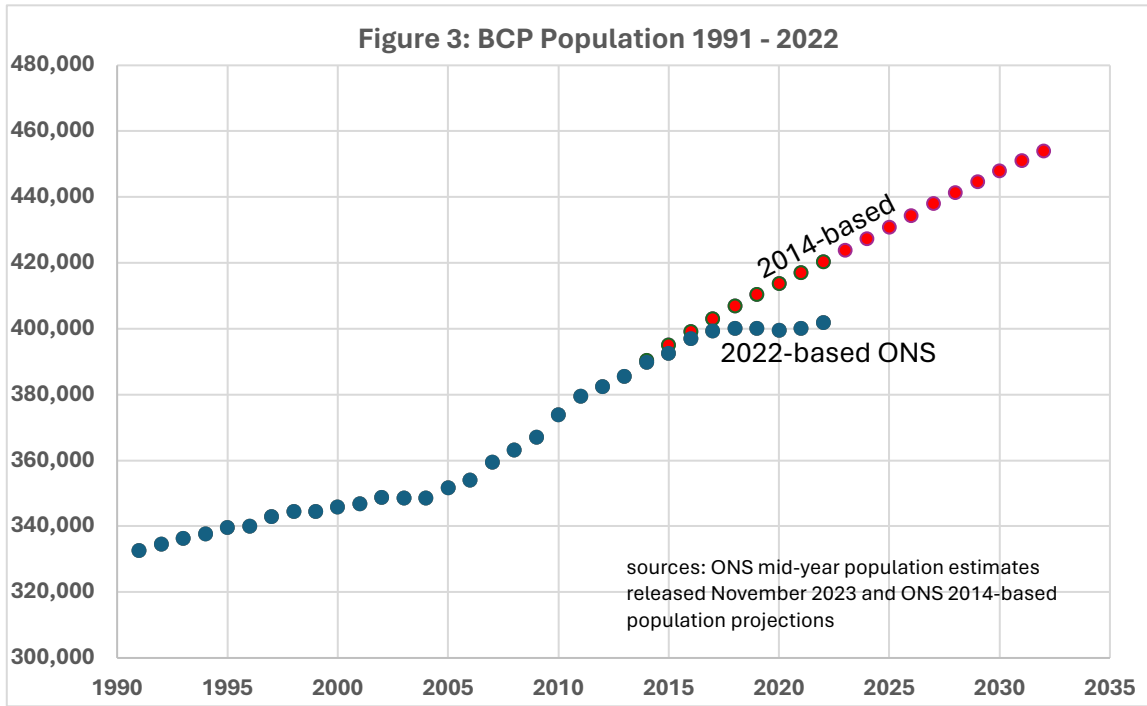
But for males, any corresponding change in household formation would be negligible, diluting the effect overall:



It appears that males form households irrespective of affordability: people must have homes and homes have to be sold for the market to continue, so the market adjusts.

2. Actual population change in BCP has not followed the 2014-based projection

The next graph shows how much the Standard Method has been out-dated by subsequent population change in BCP:

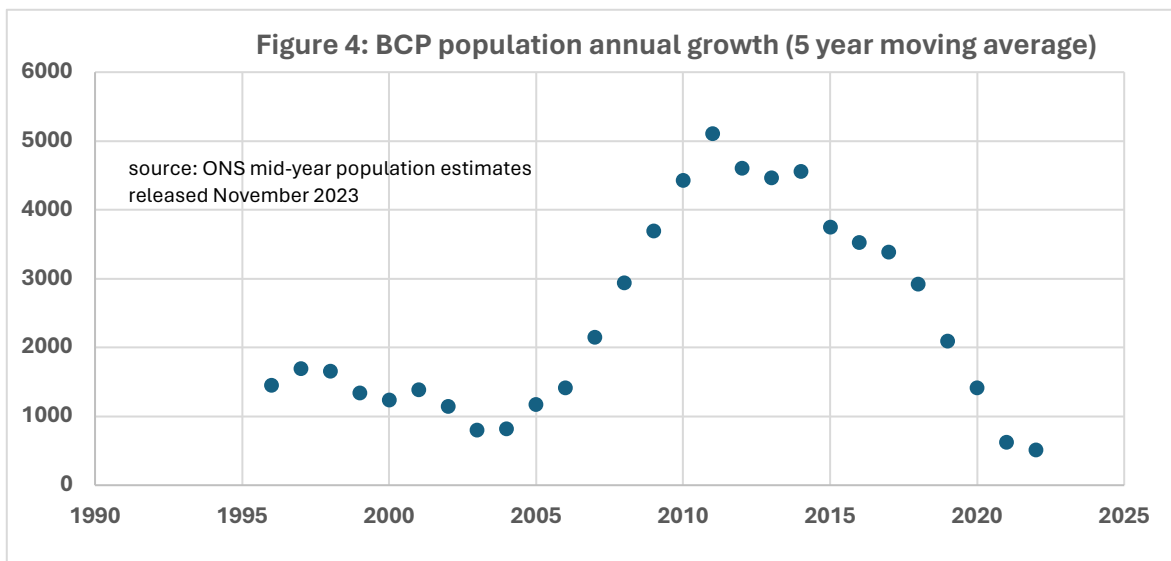


Clearly, the 2014-based population *projection* (red) was based on the *actual* growth (blue) seen in previous years. But that growth did not continue and in reality the population has stabilised in more recent years:

In the light of subsequent evidence the 2014-based projection would not be the same today. Continued use of the out-dated projection for BCP is statistical nonsense, not objective, and cannot be the basis for sound planning in BCP.

3. Population growth in BCP cannot sustain the huge demand for extra people implied by the Standard method

Assuming an average of over 2 occupants per new home, 1200 new homes per annum will require annual growth of about 2,500 people, above recent levels but not unknown in the past:



However, an annual supply of 2,806 new homes, as per the Standard Method, would require perhaps 5,900 new occupants each year, a growth so far above historical levels as to appear ridiculous.