



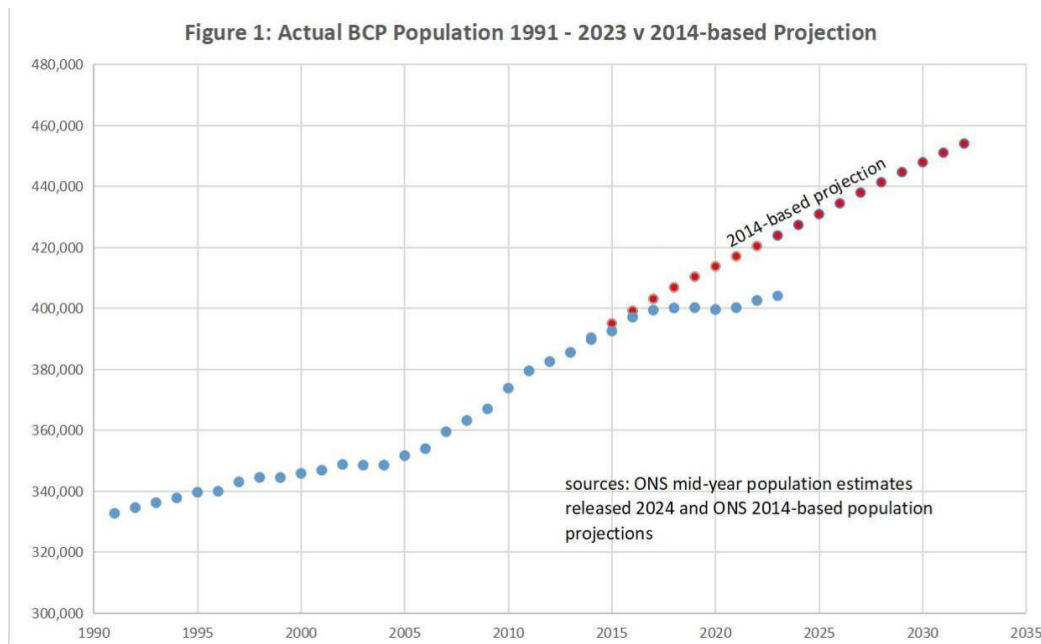
**Written Statement submitted by Dorset CPRE : Poole and Purbeck Group
in response to the Examination of
The Bournemouth, Poole and Christchurch (BCP) Local Plan
Part 1 Matters, Issues and Questions.**

Our statement focuses on Matter 2, Housing Need and the Housing Requirement, Question 26 - *Are there any 'exceptional circumstances' that justify an alternative approach to the standard method in assessing housing need, as per paragraph 61 of the Framework ? Is a constraints-based approach justified in this case ?*

In our opinion **Yes** there are Exceptional Circumstances that justify an alternative approach to the Standard Method in assessing housing need as per paragraph 61 of the Framework and **Yes** a constraints based approach is justified. The basis of our response is set out below:-

Exceptional Circumstances justifying an alternative approach to the Standard Method in assessing housing need, as per paragraph 61 of the Framework:-

1. The Ministerial Statement of July 30th 2024 acknowledges that the existing Standard Method (SM) is “not up to the job” in regard to reliance on “decade-old population projections”. Plainly the population of BCP has not grown at the rate assumed by the SM (see Figure 1). The error is exceptional in our judgement.





2. The Housing Needs Assessment (HNA) work by IcenI offered a route towards an alternative approach to measuring housing need in BCP, and we commend that work to the Inspectorate as an exercise in trying to impose common sense within the constraints of the existing NPPF (National Planning Policy Framework) and PPG (Planning Policy Guidance). However, we would prefer the Local Plan to argue that the actual trend in population growth in BCP is so different, from that assumed by the SM, that an alternative approach is justified in this instance and is an Exceptional Circumstance.

Justification for a constraints based approach to housing development in BCP.

3. Ambition to grow the housing numbers in BCP is constrained necessarily by several factors :
 - BCP area's nationally significant environment
 - Protected Poole Harbour
 - Protected Heathlands
 - The Rivers Stour and Avon
 - Low-lying coastal land
 - The Sea
 - Local Road Network
 - Shortage of sustainable sites
 - Ineffectiveness of Completion Notices
 - Carbon Footprint
 - Impact of Local Amenity Values
 - A sustainable and balanced Local Plan must take account of these factors, in our judgement.

BCP area's nationally significant environment

4. We welcome BCP's recognition of the importance of its local environment including the South East Dorset/ South West Hampshire Green Belt and lowland heaths. Recent years have seen growing understanding, and national and local appreciation, of the value of these green spaces for nature and people, and their role in addressing the climate and ecological crises and in promoting community health and wellbeing.
5. Examples of significant initiatives to protect and enhance BCP's local environment, with national and local engagement and support, include:
 - The Great Heath Project: supported by both BCP and Dorset Councils and a wide range of national and local agencies and societies, this project aims to protect and enhance BCP's remaining areas of internationally important lowland heaths. Lowland heath is one of the world's rarest ecosystems and survives chiefly in England. Over 80% of England's lowland heath has been lost to agricultural intensification and



development in the last 200 years. Most of what remains is in Dorset and BCP.

- The Stour Valley Partnership: the River Stour, along with its surrounding ecosystems and amenities, has become seriously polluted and degraded over many years. This partnership project, with the participation and support of BCP, Dorset Council, agencies, landowners, farmers and many societies including the National Trust, aims to arrest that decline, to restore the river, its surrounding area and wildlife to better health, and to enable communities to benefit from the area's amenities.
6. The approach of the BCP Local Plan is consistent with these nationally, as well as locally, important projects. The purposes of these partnership projects, which engage large numbers of national and local players, in turn support the direction and priorities of the proposed Local Plan.

Protected Poole Harbour

7. It is not clear to us that sufficient regard is paid in the Local Plan and Sustainability Appraisal to the direct pollution of Poole Harbour by nitrates, phosphates, pharmaceutical residues (plus 'forever chemicals') exacerbated by extra housing. While mitigation is required via credits (effective relevance unknown) by changing farm methods, even on organic farms, in particular, the urgency for reducing the problem and its effect on the plants and wildlife in and around Poole Harbour is absent. Poole harbour (of RAMSAR status) is large and shallow which ensures tidal flushing actions are poor. Currently the deoxygenating algal mats, in the harbour, continue to grow demonstrating that pollution is increasing. It may be that the pollution arising from the catchment areas of the rivers draining into the harbour is supplemented by the pollution from the rivers draining into Christchurch harbour as a result of the tidal flows along the coast. Subjecting those rivers to the extra effluent from the 24,000 homes proposed in the draft Local Plan, let alone the $15 \times 2958 = 44,370$ homes proposed by the consequences of the new Standard Method, is problematic for the Harbour and its immediate hinterland. To that must be added the prospect of pollution from a potential Dorset target of $3219 \times 15 = 48,285$ homes. The idea that permanent rewilding alone, beyond the boundaries of BCP, is sufficient to address this issue, is unproven.

Protected Heathlands

8. The presence of Dorset Heathland imposes significant constraints on development around Bournemouth, Christchurch, and Poole (BCP), playing a critical role in shaping the sound development of a new Local Plan. These protected habitats, designated as Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs), demand strict compliance with environmental regulations to prevent harm to their unique biodiversity. The 400-



metre buffer zones and requirements for Suitable Alternative Natural Green-spaces (SANGs) effectively limit the scope and density of new housing and infrastructure projects. These constraints necessitate a strategic, sustainable approach to development that balances growth with the preservation of the region's natural heritage.

The Rivers Stour and Avon

9. High housing targets risk driving planners to allocate inappropriate sites for development, for example in the Green Belt around the Stour. Paragraph 5 above mentions the Stour Valley Partnership which works to enhance the river system for nature and the health and wellbeing of communities. The need to enhance the quality of these rivers is strongly supported, in addition to those draining into Poole Harbour.

Low-lying coastal land

10. Areas of the coastline (from Mudeford Sandbank in Southbourne to areas of Christchurch Priory) are already below water level and other areas are in flood danger, particularly areas of Poole's quayside, Hamworthy Park, Baiter Park and parts of Upton Country Park. This imposes constraints for providing sustainable development. Also, experience during recent years of very wet weather has demonstrated that the locality has low lying land vulnerable to flooding and that the provision of sustainable housing in such locations (often previously used as water meadows) requires investment of greater care in design. It would be unsound to allocate such locations for housing whilst urban brownfield sites are not being developed.

The Sea

11. The proximity of the sea presents a geographical and environmental challenge for the sustainable expansion of BCP. The coast and sea represent an obvious boundary. Rising sea levels, coastal erosion, and flood risks exacerbate constraints on available land for housing and infrastructure, particularly along low-lying coastal areas such as Poole Quay, Christchurch Harbour, and Mudeford Sandbank. Additionally, the limited capacity of tidal flushing in Poole Harbour has heightened vulnerability to pollution from urban runoff and housing developments. These constraints necessitate a cautious approach to planning, ensuring that coastal defences are bolstered, pollution is minimized, and new developments are resilient to the impacts of climate change. BCP's coastal and marine environment also plays an important role in the conurbation's economy, for example in the tourism and educational sectors. These considerations make sustainable development in BCP contingent not only on inland considerations but also on the effective management of its coastal environment.



Local Road Network

12. The Transport Background Paper (Nov 24) says that *"The South East Dorset area (which includes the BCP area) was ranked the 3rd most congested place in the UK and 56th most congested in the world in 2021"* (para 1.1.10). We suggest that this high level of congestion is an exceptional circumstance.
13. The same document tells us that the extra housing from the Local Plan is modelled to increase peak time traffic by between 5% and 7% (14.5% total when coupled with expected traffic growth aside from the Local Plan) (para 2.2.3).
14. We are concerned that a housing target of $2806 \times 15 = 42,090$, let alone a target of $2958 \times 15 = 44,370$ under the new SM, instead of 24,000 as proposed in the draft local plan would produce a pro rata LP traffic increase of 10% instead (18.5% total), resulting in severe congestion at the many overloaded junctions in the area and increased incidences of gridlock.
15. To this must be added the impact of extra homes in Dorset. Queues and delays at road junctions with high utilisations increase greatly and disproportionately with small increases in utilisation, like straws and camels' backs. Substantial public dis-benefits are bound to occur which should be enumerated by modelling and critically examined before a higher housing target could be thought to be potentially sound. The A31 trunk road along the northern edge of the area is a particular concern.
16. The cited document explains (para 1.2.35) that *"it is not possible to build out of congestion by just constructing new roads"* and that BCPC has opted therefore to increase the proportion of journeys undertaken using sustainable modes. This strategy would need to cause $18.5/118.5 = 15\%$ of journeys to switch to bus, train or cycling, winter and summer, to mitigate the extra traffic effect of growth and a higher housing target. We suspect that while such a change in transport mode may be possible in principle within the urban area, it would be problematic and unsustainable around the Green Belt and its arterial roads, particularly when additional homes from a new Dorset Local Plan are considered.

Shortage of sustainable sites

17. The emerging views of neighbouring LPAs suggest that they are not able to accept a significant proportion of BCP's unmet housing need, as measured by the SM. Given the shortage of sustainable sites available to BCP planners, and the constraints explored above, it is hard not to think that planners in 1980 were correct in establishing a Green Belt and restricting further geographical growth. Much of the heathland had been built over and lost and the character of the three BCP towns had diminished. We are of the view that modest development is still feasible and justified, and consistent



with low population growth, environmental protection and the limited appetite of the development industry to build new homes in BCP (despite the rhetoric). The 1600 homes target set by the LP is consistent with the baseline 0.8% of stock in the ministerial statement. But targeting much higher growth because of high local prices is unreasonable, when those high prices are driven largely by the high amenity of the coastal strip and the wealth of incomers rather than comparative shortage of supply.

18. In view of the shortage of available land, and the need for a more balanced housing market, we would prefer to use the limited supply of new homes to target the affordable end of the price spectrum more definitely with a concentration on social rent. The LP is knowingly weak at this level; a more definite strategy to use sites to provide the social rent homes that would really change lives may have to wait for emerging national policy and funding, but the Icenii HNA provides a snapshot of what is needed (1,150 pa from Table 7.30) and utilising the LP housing target more specifically is wholly consistent with the ministerial statement and its direction of travel.

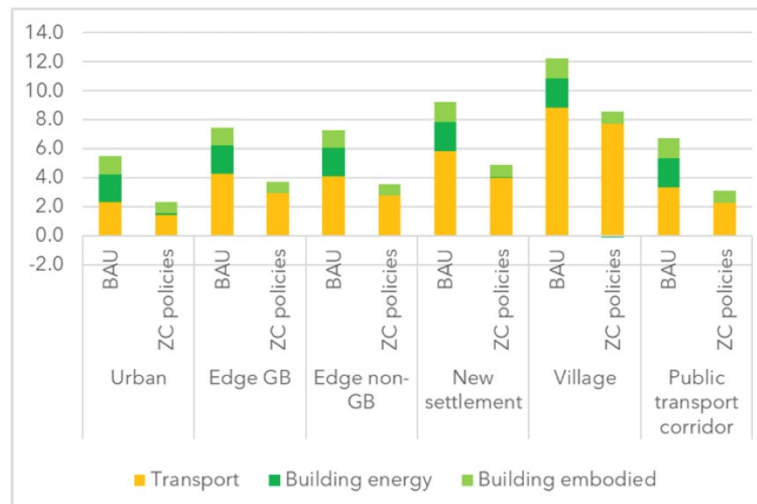
Ineffectiveness of Completion Notices

19. It is recognised that urban (including brownfield) land, having gained planning approval for housing, can be kept out of the market by 'starting' the proposal, but not progressing it beyond initial steps, so as to create pressure for releasing easier land for housing development – thus allowing urban sprawl and adversely impacting greenfield land, infrastructure, services and facilities. It appears to be the case that the Ministry of Housing, Communities and Local Government (MHCLG) consider that the power vested in Local Planning Authorities to issue "Completion Notices" is adequate to deal with 'stalled' developments. We note that such notices are rarely seen as practical and certainly Poole has accumulated, over decades, a number of such urban sites that are effectively excluded from the market, simply because there is no incentive to return them to the market. This regrettable situation is a constraint that has substantial adverse effects on the delivery of housing in the right places and supported by adequate infrastructure and facilities. This constraint is exacerbated by the absence of any requirement to substantially deliver significant proposed housing projects within a reasonable timetable.

Carbon Footprint

20. The chart below shows the annual carbon footprint for new houses built in a variety of different locations. For new houses in BCP in an urban or greenbelt location, the carbon footprint will be around 3-7tCO₂ per year. These are average numbers and, given BCP's transport infrastructure constraints, the transport element could be significantly higher. So, a housing target of 2,806 houses per year is expected to produce a carbon

footprint of 8-20ktCO₂ per year. BCP's current carbon footprint is about 1.9MtCO₂ per year (2022) so the additional footprint represents a 0.4-1.0% increase per year or 6-15% over the 15-year term of the Local Plan. Such a large increase in BCP's carbon footprint comes at a time when the council is struggling to reduce its footprint towards a target of zero by 2045. The numbers show the importance of ensuring all new-built houses are at net zero standards, are built in brownfield or urban settings and the number of new units is restricted to only those that are needed to serve the community.



(sourced from

https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/241113_newtownscallforevidence.pdf)

Impact of Local Amenity Values

21. Despite the rhetoric, the new SM does not respect the way the housing market operates in BCP. The new SM requires 0.8 pc of stock to be built annually, plus extra when the affordability exceeds 4. The 0.8 of stock is exceptionally crude but an acceptable baseline. The problem comes when a huge number of homes are heaped on top as a result only of a high Affordability Ratio (AR) in BCP.
22. The key question is whether that high AR is a measure of high demand? If it were, then a plan based on providing those extra homes could be sound, because demand could help ensure that the homes can be built and sold.
23. But if that high AR is caused by the high amenity value of BCP and local people (with lower incomes) are being out-bid by incomers with equity from the sale of valuable homes elsewhere, then demand may be no higher than current activity, especially if extra homes are being planned in all the rival markets elsewhere too.



24. Without firm evidence of true unmet demand, a plan based on a high annual housing target of 2,900 homes or more cannot be considered sound. Current market activity, despite a buffer of 8000 plots of permissioned land, is far lower. We see difficulties in reconciling the need for a 15-year plan to be sound with the setting of a target in excess of anything likely to be feasible or delivered. The BCP LP provides for a steady increase in activity and would be subject to regular review. We consider the BCP Local plan to be sound in the numbers it proposes.

Conclusion

25. The examination of the BCP Local Plan highlights the critical need to balance housing requirements with environmental sustainability, infrastructure capacity, and long-term regional viability. The constraints imposed by environmental factors—such as the protection of Poole Harbour, coastal and heathland ecosystems, and river corridors—underscore the necessity of a carefully calibrated housing target that avoids overburdening natural resources. We do not believe that a housing target of 2,806 homes per annum for BCP is sustainable let alone the Central Government's latest housing target of 2,958 per annum.
26. The findings of the BCP Sustainability Appraisal 2024 reinforce this need, demonstrating the potential for negative environmental impacts from over-development, particularly in sensitive areas. The assessment underscores the importance of aligning housing strategies with sustainable land use practices, robust mitigation measures, and an enhanced focus on social and affordable housing to address local needs effectively.
27. We would recommend a pragmatic and sustainable approach to housing targets, recognizing the exceptional circumstances posed by unrealistic central housing projections without regard to local sustainability and infrastructural constraints. The strategy should prioritize social rent and affordable housing while maintaining environmental integrity, thus supporting a sustainable and balanced development trajectory for the BCP area.
28. In our opinion the plan is sound, effective, and positively prepared including serious public consultation measures at various stages. Consistency with national policy is complex, not least as it can point in more than one direction. But the plan has addressed the questions raised by national policy and the Inspectors' further questions appear designed to clarify BCP's responses. Crucially, national policy does allow for exceptional circumstances as regards protection of the environment and departure from the SM.

Dorset CPRE : Poole & Purbeck Group

December 2024