

## **BOURNEMOUTH, CHRISTCHURCH AND POOLE REGULATION 19 DRAFT LOCAL PLAN CONSULTATION**

### **1. RECOMMENDATIONS**

1.1 That the Cabinet agrees that:

- i. the draft response as set out in Appendix 1 to this report are the New Forest District Council's representations to the Bournemouth, Christchurch and Poole (BCP) Council's Regulation 19 Draft Local Plan consultation.

### **2. INTRODUCTION**

2.1 The purpose of this report is to agree New Forest District Council's (NFDC) response to Bournemouth, Christchurch and Poole (BCP) Council's Regulation 19 Local Plan Consultation, closing at 1pm on Friday 3 May 2024. The proposed response is set out in full in Appendix 1 of this report.

### **3. BACKGROUND**

3.1 The BCP Local Plan has been in preparation since 2019. NFDC has previously made representations on BCP's Regulation 18 Local Plan review consultation in 2022. This provided comment on: housing site options, mitigation measures to address the impact of development on the New Forest designated sites, air quality, water quality and the mitigation of nutrient enrichment on the River Avon, and transport infrastructure.

3.2 The current Regulation 19 Local Plan consultation is due to run until 1pm on 3 May 2024. Following the Regulation 19 consultation, BCP Council currently intends to submit the Local Plan for examination to the Planning Inspectorate in June 2024.

3.3 The BCP Local Plan seeks to provide a framework of policies and site allocations to guide future development, and to seek to address needs for new homes, jobs, infrastructure and other supporting services within the Bournemouth, Christchurch and Poole area. The Plan seeks to achieve this whilst both respecting and protecting the local areas' features including the coast, internationally designated environments, Green Belt and areas at present and future risk of flooding. The BCP Local Plan will replace the current Local Plans adopted by the three preceding councils.

3.4 The BCP Local Plan does not propose any major new housing site allocations in areas adjoining the NFDC Local Plan Area (existing unimplemented housing site allocations at Roeshot Hill and land south of Burton are proposed to be rolled forward from the adopted Christchurch and East Dorset Core Strategy 2014).

### **4. SUMMARY OF NFDC'S PROPOSED RESPONSE**

4.1 New Forest District Council's proposed representations on the BCP Regulation 19 Local Plan focusses on the following key cross-boundary strategic matters:

- Addressing housing needs
- Addressing employment needs
- Mitigating impacts of development on the New Forest designated sites

- Strategic Transport Infrastructure

### **Addressing housing needs**

- 4.2 Using the Government's standard method for calculating housing need (as set out in national policy), there is a housing need in the BCP area of 2,806 dwellings per annum. BCP Council has undertaken and published as part of its evidence base a Housing Needs Sensitivity report (2021) which concluded a lower housing need compared to the standard method across the BCP area of 1,600 dwellings per annum. It is not currently clear whether BCP Council will use this report to formally challenge the need figure calculated by the standard method at their Local Plan examination.
- 4.3 The BCP Local Plan sets a housing requirement to deliver at least 24,000 net additional new dwellings between 2024 and 2039. This is equivalent to the delivery of an average of 1,600 new dwellings each year. Against the standard method, there will be a shortfall of circa. 1,200 dwellings per annum equating to a shortfall over the whole Plan period 2024-2039 of circa. 18,000 dwellings. BCP Council has also made the decision not to propose to release any land from the Green Belt to be allocated for development in seeking to address their objectively assessed housing need.
- 4.4 NFDC recognises that BCP is a constrained area, with geographical constraints and numerous national and international designations, and also recognises the challenge BCP faces in terms of meeting its housing need. The scale of the shortfall generated through the proposed housing target set out in the BCP Local Plan against the standard method is though very significant and has the potential to place further increased pressures on surrounding areas.
- 4.5 The NFDC Local Plan Area is also very highly constrained and the part of the Plan Area that adjoins BCP is also within the Green Belt. The December 2023 published PfSH (Partnership for South Hampshire) Spatial Position Statement<sup>1</sup> indicates a significant current housing supply shortfall in the PfSH area of circa. 11,770 dwellings, of which there is a housing supply shortfall, based on existing commitments, for NFDC against the standard method of circa. 5,650 dwellings in the period to 2036. It is in this context that NFDC has recently commenced a full Local Plan Review.
- 4.6 Paragraphs 11.20 of the Local Plan indicates that BCP Council will regularly monitor the policies in this Plan and sets out a range of actions that BCP Council will take where Local Plan targets are not being met which may include a partial/full review of the Local Plan. Paragraph 11.21 confirms that BCP Council will review the BCP Local Plan by 2030 to ensure that the overall strategy remains up to date.
- 4.7 Given the matters raised regarding housing need and the housing target, and the challenges that both BCP Council and NFDC face regarding addressing housing need, NFDC considers that paragraphs 11.20 and 11.21 should be strengthened and elevated to policy status. Such a policy should also require BCP Council to specifically consider the need to commence a review of its Local Plan if a quantified unmet need is established and confirmed through the New Forest District (outside the National Park) Local Plan Review. This will ensure that appropriate mechanisms are provided for within the Local Plan to enable BCP Council to respond positively to considering how unmet needs should be addressed.

### **Addressing employment needs**

- 4.8 The Employment Land Study (2023) informing the BCP Local Plan identifies a need of between 66.4 and 97.4 hectares of employment land over the period 2021 to 2039.

---

<sup>1</sup> <https://www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/>

The study recommends a target within a range of 66.4 to 97.4ha. The BCP Local Plan (Figure 9.1) identifies a supply of 79 to 92 hectares of available employment land over the period 2021-2039. Policy E2: Employment supply makes provision for around 72ha of employment land over the Local Plan period 2024-2039. This would appear to address the quantitative need for employment land identified by the 2023 Employment Land Study and NFDC welcomes that BCP Council is planning to meet this need in full within its Plan Area.

### **Mitigating impacts of development on the New Forest designated sites**

- 4.9 The section on protecting habitats sites is detailed and is welcome. The Local Plan addresses the impacts on New Forest habitats providing an accurate commentary on the situation in relation to the zone of influence. The reference to Strategic Access Management and Monitoring (SAMM) and the related payments from developers is also welcomed. NFDC officers are satisfied that the requisite work is being carried out and that, providing the cross boundary work continues, are content with the approach in the Local Plan. Policy NE2 (Section A) is especially positive and sets out a clear need to mitigate recreational impacts on internationally protected sites including on the New Forest designated sites.

### **Air Quality**

- 4.10 The section relating to air pollution explains the situation sufficiently, but NFDC officers question why Natural England is not requiring BCP to undertake specific air quality and habitat monitoring as NFDC has been required to through its adopted Local Plan. Taking the strategic transport assessment as the basis for gauging impacts on the integrity of the Dorset heathlands is probably insufficient – the modelling of vehicle movement data will not tell us whether vehicle emissions are specifically having direct adverse effects on the protected habitats. The Dorset Heaths Air Quality Interim Strategy suggests that a monitoring programme will be implemented, and as the protected habitats in both authorities are similar it would make sense for them to look at what NFDC/NPA are doing and replicate it across the border. NFDC officers can liaise with BCP to share data on what NFDC is doing so that it has a starting point which is consistent with what other Local Planning Authorities are doing. Policy NE2 (5a) sets out that BCP will work with neighbouring councils to ensure mitigation measures are implemented and monitored – NFDC officers would be well placed to offer particular support on this issue and reiterate this Council's willingness to engage with BCP on this.

### **Nitrates**

- 4.11 The BCP Plan addresses issues relating to water quality and in particular the issue of raised levels of phosphates in the River Avon. The Local Plan provides an accurate commentary on the issue, and will need to be updated once the secondary legislation this April (2024) provides clarity on whether the Christchurch treatment works are named in the latest nutrient calculator updates/guidance. Policy NE2 section 5 gives sets out clear criteria (5a) that dwelling occupation cannot take place until nutrient mitigation is in place, and this is consistent with the approach that the legislation requires and the practice of other Local Authorities.

### **Strategic Transport Infrastructure**

- 4.12 Strategic Policy T1 sets out the aim of reducing carbon emissions and congestion, promote health, and the safe and efficient movement of people and goods by supporting the delivery of relevant infrastructure. This is supported and continued engagement between NFDC and BCP is welcomed on such proposals as they progress that adjoin or relate to NFDC's own Plan Area, to ensure there is effective

connectivity between respective areas. This includes the primary and secondary cycle network shown in the Local Cycling & Walking Infrastructure Plan (LCWIP), for which NFDC are preparing their own 'New Forest LCWIP'.

## **5. CONCLUSIONS**

- 5.1 For the reasons as discussed above, the representations as set out in Appendix 1 are recommended for approval for submission to the consultation on BCP's Local Plan.

## **6. FINANCIAL IMPLICATIONS**

- 6.1 There are none.

## **7. CRIME & DISORDER IMPLICATIONS**

- 7.1 There are none.

## **8. ENVIRONMENTAL IMPLICATIONS**

- 8.1 Environmental implications include; the potential environmental impact of the plan on the internationally designated New Forest sites (SPA and SAC and Ramsar sites) and the Avon Valley (SPA and SAC and Ramsar sites).

## **9. EQUALITY & DIVERSITY IMPLICATIONS**

- 9.1 There are none.

## **10. DATA PROTECTION IMPLICATIONS**

- 11.1 There are none.

## **11. PORTFOLIO HOLDER COMMENTS**

- 11.1 I recommend supporting this response which identifies the impact of the BCP Plan on the NFDC district. We recognise and sympathise with the constraints affecting BCP as many of them are the same as our own. We are asking BCP to include a new policy that requires consideration of an early review of their Local Plan should unmet housing needs be identified in a neighbouring authority's Local Plan, including any that may be identified from our own district as we progress the Local Plan review.

### **For further information contact:**

Tim Guymer  
Acting Assistant Director for Place  
Development  
02380 285987  
[Tim.Guymer@nfdc.gov.uk](mailto:Tim.Guymer@nfdc.gov.uk)

### **Background Papers:**

None.