

Report subject	<b>BCP Local Plan Issues and Options Consultation</b>
Meeting date	28 July 2021
Status	Public Report
Executive summary	<p>The report seeks approval to undertake public consultation on the BCP Local Plan Issues and Options Draft.</p> <p>An Initial Local Plan Issues and Call for site's consultation was undertaken in late 2019, this draft now identifies particular planning issues that need considering and suggests options to address those issues.</p> <p>The consultation will seek the public and other stakeholders views on regenerating our town centres, meeting our housing and employment needs, managing the natural and built environment, promoting health and well-being, tackling climate change, reducing the need to travel and infrastructure provision. However, at this stage in the plan making process no decision is being made on detailed policy wording or development site allocations.</p> <p>Following receipt of stakeholder representations the plan will be refined to form the Regulation 19 'local plan submission draft' that will be submitted to the Planning Inspectorate for public examination during 2022.</p> <p>This consultation will take place under Regulation 18 of the Planning and Compulsory Purchase Act 2004 (as amended) and Town and Country Planning Regulations (Local Planning) 2012 (as amended).</p> <p>The Local Plan once formally adopted will form the statutory development plan (along with neighbourhood plans) for BCP and will be used to determine planning applications.</p>

<b>Recommendations</b>	<p><b>It is RECOMMENDED that:</b></p> <p><b>(a) Cabinet approves the BCP Local Plan Issues and Options Consultation Draft for a minimum of 8 weeks public consultation in accordance with Regulation 18 of the Local Planning Regulations.</b></p> <p><b>(b) Cabinet delegate authority to the Head of Planning in consultation with the Portfolio Holder for Regeneration, Economy and Strategic Planning to make minor changes necessary to the plan prior to release for public consultation.</b></p>
Reason for recommendations	<p>An up to date local plan will be essential for BCP in planning for future growth in a sustainable manner. Having an up to date planning framework reflecting current national policy will be more robust in determining planning applications and more efficient in terms of implementation through decisions on planning applications.</p> <p>Public consultation is a key part of local plan preparation, feedback from the public and stakeholders will be considered in preparing the more formal regulation 19 submission local plan.</p>
Portfolio Holder(s)	Councillor Philip Broadhead Deputy Leader & Cabinet Member for Regeneration, Economy and Strategic Planning
Corporate Director	Kate Ryan Corporate Director Community and Environment
Report Authors	Mark Axford Planning Policy Manager
Wards	Council-wide
Classification	For Decision

## Background

1. Currently BCP Council is operating 3 separate legacy area local plans that need to be updated and combined into a BCP wide local plan. In addition to the local plans needing revision to reflect up to date government policy such a requirement is also established in the transitional arrangements agreed between the legacy councils and the government when forming BCP Council, this required a BCP Local Plan be adopted by 2024.
2. The Council has agreed to prepare a BCP local plan through the Local Development Scheme that sets out the process and timeline for preparing the local plan. An up to date local plan will be essential for BCP in planning for future development in a sustainable manner. Having an up to date planning framework that reflects national policy will be more robust in determining planning applications and defending appeals. An up to date plan gives more certainty to the development industry and local community on where development will be allowed. The local plan will also assist in the delivery of the BCP Council 'Big Plan' through setting a policy framework that enables the delivery of anticipated housing and job opportunities.

3. The Local Plan will cover the period 2022-2038, reflecting government guidance that a plan should look 15 years into the future, whilst being reviewed regularly every 5 years. Once adopted it will provide a strategic approach to the delivery of a range of development including market and affordable housing, employment, tourism, community facilities and supporting hard and soft infrastructure. Such development requirements will be balanced against the need to protect the built and natural environment, whilst also furthering the Councils response to the declared climate and ecological emergency.
4. An initial regulation 18 Local Plan Issues and Call for site's consultation was undertaken in late 2019. This included a 'light touch' summary of the main issues effecting BCP, it sought comments on those issues and any others that the community considered need addressing and offered those with an interest in allocating a development site to submit it for consideration through the plan process.
5. This iteration of the local plan will form part of the regulation 18 issues consultation. This stage does not commit the Council to allocate land for development or include detailed land use policy wording. Rather its purpose is to highlight, and consult on, the planning issues across BCP that need addressing and offer options to address the issues identified. Following receipt of stakeholder representations the local plan will be refined to form the Regulation 19 'local plan submission draft' that, following Cabinet approval, will be submitted to the Planning Inspectorate for public examination.
6. The national planning system has recently been the subject of proposed changes. The government has set out in the 'Planning for the Future' White Paper radical changes to the way plan making and decision-making take place. However until clarity emerges the local plan is being drafted under current national guidance and legislation. In addition, the government has consulted on a change to the way the standard method for calculating an areas housing need is operated, concluding that the method should remain as already established. This has had significant consequences for the BCP area as accommodating the housing need identified through the standard method continues to be challenging without considering the release of significant land for development.
7. In accordance with government policy the Council has responsibility to ensure a 5 year supply of housing land. Currently the legacy areas of Bournemouth and Christchurch cannot demonstrate a 5 year supply and Poole has recently failed the governments housing delivery test. This means that across BCP some policies for determining planning applications may carry less weight further highlighting the need to move forward with the Local Plan. An updated local plan will aim to provide a strong supply of housing sites in order to meet the areas housing needs.

#### **Content of the Local Plan Issues and Options Draft**

8. The Local Plan Issues and Options consultation draft is attached as Appendix 1. To date in drafting the consultation document officers have engaged with members through the Overview and Scrutiny Local Plan Working Group. The working group has met to consider and scrutinise the plan's emerging overarching approach and scrutiny of the draft plan text. In addition, member seminars have been held informing members of the stakeholder feedback from the initial issues and call for sites consultation and explaining the content of the joint BCP and Dorset Council Green Belt Study.
9. At this stage in drafting the plan various pieces of key evidence continue to be worked on. However, prior to their completion it is considered prudent to consult on

a higher level, less definitive set of possible approaches and broad policy options so that stakeholders have the opportunity to make their views known on key issues prior to drafting the plans next iteration that will be formally submitted and subject to examination.

10. Officers have commissioned and continue to prepare evidence across a range of topics namely a Retail and Leisure Study, a Housing Needs Study, a Habitats Regulations Assessment, Strategic Flood Risk Assessment Scoping Report and a Gypsy and a Traveller Accommodation Needs Assessment. A joint Green Belt Study has been prepared to inform both the BCP and Dorset Council local plans. The Parks Team are preparing a Green Infrastructure Strategy and a Stour Valley Park Strategy that will inform the plan. The Destination and Culture Team are currently working on a BCP Hotel & Visitor Accommodation Report. Further specialist work will be commissioned later in the year namely a Workspace Strategy and a Development Viability Assessment to ensure the plan is deliverable and to inform a revision of legacy council Community Infrastructure Levy Charging Schedules and approaches to seeking section 106 developer contributions. Documents will be available online as they are completed.
11. A Sustainability Appraisal Scoping Report has been prepared to accompany this consultation and will form part of the consultation package of documents. It sets out a broad range of sustainability objectives that will be used to test the environmental, social and economic impacts of policy wording and site allocations as they emerge following consultation.
12. At this stage the plan is drafted to encourage wide stakeholder engagement, enabling the use of more innovative digital engagement methods across a range of media, for example interactive mapping, online Storey Board and the use of the Councils digital Consultation Hub. The use of such promotes an online approach to engagement partly due to the uncertainties that the Covid pandemic social restrictions have placed on more traditional face to face engagement methods. However, as it becomes clearer how social restrictions are to be lifted the appropriateness of using a range of traditional consultation techniques including public exhibitions will be considered. Should stakeholders wish to engage with the consultation in paper format officers will on reasonable request supply hard copies. Consultation will take place in accordance with the Councils adopted Statement of Community Involvement, this is attached as a background paper. Officers are engaged with the BCP Comms and Consultation team in developing the approach to public consultation.
13. The plan is structured around a series of chapters namely:
  - Vision and Objectives
  - Regenerating our town centres
  - New market and affordable homes
  - A prosperous economy
  - Adapting our high streets and retail areas
  - Provide a safe, sustainable and convenient transport network
  - Our natural environment
  - Our built environment
  - Promoting Health and well being

- Tackling climate change
  - Providing supporting infrastructure
14. Each chapter highlights particular key planning issues and offers options to plan for such issues. At the core of plan making is the principle of achieving sustainable development. The plan is therefore drafted, in accordance with the NPPF, having regard to economic, social and environmental objectives. The NPPF recognises these objectives as interdependent and need to be pursued in mutually supportive ways. For example, as with other parts of the country, whilst there is a need to plan for climate change mitigation and adaptation and for ecological improvements it is apparent that the area will continue to be under pressure to deliver significant housing growth and associated infrastructure. The policy approach adopted in the local plan will have to balance these sometimes competing demands.
  15. The government's standard housing method equates to a need to plan for 2,667 dwellings per annum or 42,672 dwellings over the plan period 2022-2038, this being nearly double the number of dwellings delivered annually in recent years across BCP. There is some concern nationally that the standard method is reliant on outdated 2014 ONS household projections. Later projections are indicating a slowing down of household growth, however the government is clear that that the 2014 projections should be used to plan for a step change in housing delivery nationally to address historic under supply and affordability issues.
  16. Government policy and guidance explain that such a housing need is a minimum. The government stress that any other method for calculating housing need should only be used in exceptional circumstances and should a planning authority adopt a different approach from the standard method this will be subject to greater scrutiny at examination. A different approach from the standard method would need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviation. Officers are currently analysing demographic assumptions embedded in the government standard method, particularly the 2014 projections, and as the plan evidence base progresses a more detailed understanding will emerge of a potential alternative local housing need figure that may justify exceptional local circumstances.
  17. Initial urban potential work is concluding that the urban area alone cannot accommodate our housing needs required by the Government's standard method. The consultation document highlights this and provides options for how the shortfall might be met including the appropriateness of releasing some land from the green belt for development. Urban and green belt sites that have been submitted by site promoters through the earlier call for sites exercise, or identified in the urban potential study, are highlighted in the consultation document to encourage public feedback. It is stressed however that the Council has made no decision on the appropriateness of sites being allocated for development.
  18. The plan also needs to consider whether new employment land should be allocated and whether existing employment sites should be protected to enable local businesses to expand and to encourage inward investment. Furthermore, the plan considers the role of Town and District Centres and future commercial needs, for example visitor accommodation. The Covid pandemic has clearly impacted on commercial activity, be that in our town centres or office market and evidence being prepared will need to consider these impacts and recommend a policy response. Other issues include for example the need to provide for affordable housing across a

range of tenures and the need to provide for potentially significant habitat mitigation as a result of development impacts on our sensitive habitats, for example Poole Harbour and Dorset Heathland.

### **Options Appraisal**

19. The Local Plan Issues and Options Consultation Draft includes a range of land use issues and planning policy options where they may exist for addressing them. In some instances more than one option on a policy approach may not be possible, for example due to clear government planning policy or particular local circumstances. Members have the option of suggesting changes to the consultation document prior to consultation. An alternative option available to the report recommendation itself is to not publish the plan for consultation which will result in a delay to the plan process meaning that the area will continue to be reliant on existing out of date local plans and increase the risk of planning by appeal. Alternatively, a fully drafted local plan can be published under Regulation 19 and submitted without further issues and options consultation, however this is not recommended as it will not enable feedback from the community to inform the policy approach.

### **Summary of financial implications**

20. The cost of reviewing the Local Plan is budgeted for through the Local Plan Reserve in addition to the base cost of planning policy officer time. The Local Plan as it progresses will set the framework for an updated BCP Community Infrastructure Levy, which the Council can use to provide infrastructure and Section 106 agreements to deliver infrastructure and affordable housing.

### **Summary of legal implications**

21. The Issues and Options consultation is being undertaken in accordance with Regulation 18 of the Town and Country Planning Regulations (Local Planning) 2012. The production of a Local Plan has to comply various legislation including Strategic Environmental Assessment and Habitats Regulation Assessment provisions as well as having regard to a range of relevant government policy and guidance.

### **Summary of human resources implications**

22. The Planning Policy team has sufficient staff resource to prepare and undertake this particular local plan consultation. It is anticipated that through the ongoing transformation of services the staff resource to prepare the local plan submission draft and undertake the examination process will be in place. Support will be needed from other teams across the council, for example GIS, transport team, and the corporate communications and insight consultation teams which has been confirmed as available.

### **Summary of sustainability impact**

23. A local plan must be subject to a formal Sustainability Appraisal process that assesses the impacts of policy across a range of environmental, social and economic objectives. The Sustainability Appraisal is an iterative process and will be used to inform detailed policy choices following consultation as the submission draft of the local plan is prepared. A Sustainability Appraisal Scoping Report has been prepared following consultation with statutory bodies, this is attached as a background document. The report establishes a detailed framework of sustainability

objectives and more detailed criteria against which policies and site allocations will be tested.

### **Summary of public health implications**

24. A Local Plan once adopted will set out strategy and policy to address a range of community needs that can have implications for human health, for example, providing homes, employment prospects, and access to nature and open space. One of the key themes that the Local Plan will be focusing on is the health and well being agenda. Whilst there are no direct public health implications at this stage of the local plan process, adopted policies will have implications for public health. Detailed policy wording and site allocations will be assessed against the impact on public health as the submission draft is prepared. Improving public health is an identified main objective of the Sustainability Appraisal and a range of detailed health focused sub objectives are embedded in the sustainability appraisal scoring matrix.

### **Summary of equality implications**

25. The consultation will take place in accordance with the methods set out in the adopted Statement of Community Involvement, itself subject to equalities impact assessment prior to adoption. Although encouragement is given to responding by digital means to the consultation, on request officers will make hard copies of documents available for those who may not be able to engage online. The consultation will be aimed at reaching diverse groups across BCP, varied groups are included on the consultation database. Equality objectives are embedded in the Sustainability Appraisal Scoping Report which includes an equalities impact assessment template and this will be used to inform the detailed wording of policies and site allocations in the local plan prior to submission to examination. An initial EIA conversation screening tool has been prepared and the EIA approach adopted has been reported to Councils Equalities Panel.

### **Summary of risk assessment**

26. The main risk relates to the impact on the local plan timetable if this consultation is not undertaken at this stage. There has been some slippage in preparing the plan compared to the Local Development Scheme milestones. However, it is considered prudent to undertake this consultation under regulation 18 in order to engage and inform interested parties on key land use issues. The alternative would be to proceed to the regulation 19 stage drafting of the submission plan, with fully worded policies and preferred sites proposed for allocation, this however would not enable the council to consider public feedback as the plan would be submitted for examination as drafted.
27. There may be a risk that the consultation generates negative comments from residents and community groups when raising issues around development needs and future locations. This is however part of the local plan process and commonly planning issues can be contentious. However, it is stressed, and will be communicated, that no Council decisions on site allocations or policy wording have been made at this stage.

## **Background papers**

BCP Local Plan Sustainability Appraisal Scoping Report June 2021 'Published works'  
<https://www.bcpCouncil.gov.uk/Planning-and-building-control/Planning-policy/BCP-Local-Plan/Evidence-base-studies/Sustainability-appraisal/Sustainability-appraisal.aspx>

BCP Council Statement of Community Involvement 2020 'Published works'  
<https://www.bcpCouncil.gov.uk/Planning-and-building-control/Planning-policy/BCP-Local-Plan/271120-BCP-Statement-of-Community-Involvement-2020.pdf>

## **Appendices**

Appendix 1: BCP Local Plan Issues and Options Consultation Draft (including appendices 1 to 4 to the plan) and link to interactive map  
<https://bcpcouncil.maps.arcgis.com/apps/webappviewer/index.html?id=5eb23119112d4b3aa09b21e317f0f265>