

Report subject	Levelling-up and Regeneration Bill: Reforms to National Planning Policy and Implications for the emerging Bournemouth, Christchurch and Poole Local Plan
Meeting date	8 February 2023
Status	Public Report
Executive summary	<p>Government is currently consulting on changes to national planning policy to incentivise the preparation of local plans as the means to deliver more homes to meet its national targets. Government is aware that local plans delayed by contentious issues such as housing targets and allocations within the Green Belt are delaying plan making and resulting in less homes being built.</p> <p>The implications for the emerging Bournemouth, Christchurch and Poole Local Plan are significant. The proposals strengthen the Council's position in demonstrating that the government's standard methodology figure of 2,800 homes per year is not achievable. The proposed changes to national policy suggest that a lower housing target can be found sound at examination, where local constraints and circumstances are considered. This allows the Council to prepare a draft plan without having to release Green Belt for housing development or plan for densities out of character with the current built environment.</p> <p>In accordance with the Local Development Scheme the intention remains to publish a draft local plan in Autumn 2023, test it through examination and adopt it in late 2024.</p> <p>There is new emphasis too on place making and protecting the character of places. An up-to-date local plan will provide greater protections to residential areas at risk from speculative high density flatted development as the Council will not be required to demonstrate a five-year land supply.</p>
Recommendations	<p>It is RECOMMENDED that:</p> <p>Cabinet supports the consultation response set out in Appendix 1 to this report and delegates authority to the Director of Planning to submit it to government subject to minor changes.</p>
Reason for	It is important the Council responds to the consultation. The constitution through the Scheme of Delegation to Officers,

recommendations	delegates to each Chief Officer authority "To determine whether and how to respond on behalf of the Council to any local, county, sub-regional, regional or national consultation on matters affecting the Council subject to prior consultation with an Executive Member where it relates to an Executive function". The Deputy Leader of the Council and Portfolio Holder for Development, Growth and Regeneration requested this consultation response be a matter for Cabinet approval.
Portfolio Holder(s):	Councillor Philip Broadhead - Deputy Leader of the Council and Portfolio Holder for Development, Growth and Regeneration
Corporate Director	Jess Gibbons, Chief Operations Officer
Report Authors	Steve Dring, Interim Planning Policy Manager
Wards	Council-wide
Classification	For Decision

Background

1. The Bournemouth, Christchurch and Poole Local Plan is being produced to set a new overarching and cohesive development strategy for the area. It will set out how much, where and what type of development will take place across the area, giving the Council control over development decisions. The Local Plan will be critical in helping to deliver the Council's Big Plan and will help raise the quality of development. In July 2022 Cabinet agreed the timetable for Local Plan preparation. Work is on target to meet this timetable and publish a draft of the local plan in Autumn 2023.
2. On 22 December 2022 the Department of Levelling Up, Housing and Communities (DHLUC) launched a consultation on its latest Planning Policy Reforms, which runs to 2 March 2023. The consultation seeks views on government's proposed approach to:
 - i. updating the National Planning Policy Framework (NPPF);
 - ii. preparation of National Development Management Policies;
 - iii. developing policy to support levelling up; and
 - iv. how national planning policy is currently accessed by users.
3. There are 58 questions in the consultation. The proposed BCP Council response is at Appendix 1. Officers recommend Cabinet supports most of the proposed changes, with some clarification sought on various technical aspects.
4. The government is clear that it intends to make the proposed changes to the NPPF in Spring 2023, almost immediately after the consultation ends, so there is a strong likelihood many of the current proposed changes will go ahead unaltered. Some of the other proposals such as the national set of development

management policies will take longer to materialise through changes to planning legislation in the Levelling Up and Regeneration Bill that is currently being considered by Parliament.

5. The proposed changes to the NPPF are aimed at encouraging local authorities to prepare a local plan. Government analysis has showed an up-to-date local plan coincides with higher housing delivery, and that too many local authorities are underdelivering housing due to difficulties in preparing local plans. Government therefore have proposed a series of changes to smooth the way to prepare and submit plans for examination under the current planning system by June 2025. Even the examination process will be less rigorous.
6. The proposed changes also place a greater emphasis on the quality of development giving local authorities more power to refuse development. There are new rewards in the housing delivery test for local authorities that grant many permissions, such as BCP Council, but where the market has failed to deliver. There are also penalties for developers who do not have a good track record of building out planning permissions. For example, on 1 April 2021 there were 6,991 homes (net) with planning permission but not yet built in the BCP Council area. Of these 1,658 homes were under construction. However, by 1 April 2022 only 696 homes were completed against a combined current local plan target of 1,689 homes for 2021/22. There was a similar position in the previous year. Whilst the Council continues to grant permissions, delivery from the private sector lags behind. The role of BCP Future Places will be important in improving delivery of homes on some major sites over the next few years.
7. The consultation also proposes that local authorities will no longer have to demonstrate a five-year supply of deliverable housing sites provided there is an up-to-date local plan (less than 5 years old). This is an important change as it will give the public greater confidence that new development will be plan led and remove the speculative nature of development proposals seen in recent times. More support is also proposed to communities preparing neighbourhood plans so that these plans will provide greater protections from speculative development for longer.
8. With such a strong emphasis on plan making, the proposals have some significant positive implications for the emerging Bournemouth, Christchurch and Poole Local Plan.

Implications for the Bournemouth, Christchurch and Poole Local Plan

9. The amended NPPF will come into place in Spring 2023, and this will not cause delay to the timetable for the Bournemouth, Christchurch and Poole Local Plan. The next stage in the Local Plan process is to publish the publication version (draft plan) in Autumn 2023. Following this we plan to submit the local plan for examination throughout 2024 and adopt the plan at the end of 2024.
10. There are three proposed changes that provide officers greater confidence to prepare, publish and submit the Bournemouth, Christchurch and Poole Local Plan for examination. Firstly, is greater clarification that the standard methodology for identifying housing need is only the starting point for setting a housing target, and more detail will be provided as to the circumstance where a locally derived housing target will be accepted. Secondly, the government proposes that local authorities do not have to review Green Belt boundaries to release land to meet housing or other development need. Thirdly, it will no longer be necessary to plan

to meet housing needs by building at densities which would be significantly out-of-character with the existing area.

11. As set out in the response to Question 7 of the consultation, the standard methodology which is used to calculate housing needs sets a figure of 2,800 homes per annum for the Bournemouth, Christchurch and Poole area. This is extremely challenging to meet given the land available. Officers also remain concerned that the methodology used to calculate the figure for our area is based on historic data when abnormally high international migration levels were apparent in the Bournemouth, Christchurch and Poole area. The Office of National Statistics (ONS) have subsequently amended predictions related to migration data, but this is not reflected in the standard method calculation.
12. Whilst waiting for the government announcements the Planning Policy Team spent the autumn reviewing available sites and preparing three development options to address the areas housing needs. These options are:
 - Option 1 Urban intensification
 - Option 2 Urban intensification with some settlement extensions
 - Option 3 Urban intensification with extensive settlement extensions
13. Through the internal governance arrangements, the Local Plan Advisory Group and the Local Plan Delivery Board have provided a clear direction of travel for officers preparing the draft local plan. In light of these government proposals both groups have advised officers to focus the Bournemouth, Christchurch and Poole Local Plan on Option 1 and not consider the release of Green Belt to meet housing needs.
14. With an urban focus and protection of the Green Belt, the challenge for the local plan will be to set policy that protects existing family homes within the urban area and provides new family homes or family friendly apartments. The government consultation provides greater emphasis on placemaking and protecting the existing character of the urban area. This will provide the Council with greater flexibility to protect streets of family houses with a strong character, and to focus higher density flats in potential areas of change where the urban form has a less strong character.
15. Officers will continue to prepare the plan to timetable. This will include continuing with some informal public engagement during 2023 to ensure the draft plan has community support.

Options Appraisal

16. There are no options to discuss, this is a consultation response.

Summary of financial implications

17. There are no financial implications.

Summary of legal implications

18. There are no legal implications.

Summary of human resources implications

19. There are no human resource implications.

Summary of sustainability impact

20. There is no sustainability impact of this consultation response. The Bournemouth, Christchurch and Poole Local Plan will be assessed for its sustainability impact when it comes before Cabinet.

Summary of public health implications

21. There are no public health implications.

Summary of equality implications

22. There are no equality implications.

Summary of risk assessment

23. There are no risks associated with a consultation response.

Background papers

The government consultation paper that the consultation response is based upon is at <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

Appendices

Appendix 1: BCP Council Consultation Response