



SOCG 02

Statement of Common Ground between
BCP Council and Historic England (0282)

BCP Local Plan Examination

14 November 2024

1. General

- 1.1 The Council has prepared this Statement of Common Ground (SOCG) to assist the Inspector at the BCP Local Plan Examination.
- 1.2 Historic England's response to the public consultation on the Draft BCP Local Plan (March 2024) identified some issues with the Draft Local Plan. The purpose of this SOCG is to set out the agreed position between BCP Council and Historic England (representor id 0282).

2. Declaration

Name	Organisation	Signature	Date
Laura Bright Development Plan Lead	BCP Council	Laura Bright	14/11/2024
Kim Miller Historic Environment Planning Adviser	Historic England	Kim Miller	07/11/2024

3. Agreed position

- 3.1 The summarised comments, officer response and agreed position is set out in the table below.
- 3.2 Boxes highlighted green are agreed positions, orange boxes are not yet agreed. Red text denotes possible modifications to text.

Plan ref	Full comment by Historic England	BCP officer summarised comment	BCP officer response and action	Historic England position
Whole plan	<p>Thank you for consulting Historic England on this Publication/Pre-submission Plan for BCP and associated Sustainability Appraisal. As the Government's adviser for the historic environment, we are keen to ensure that conservation and enhancement of the historic environment are taken into account at all stages in the preparation of Local Plans.</p> <p>Introductory comments BCP district incorporates three unique but complementary towns, each with their own distinct and valued heritage. We are largely supportive of the Plan and its approach to the historic environment. However, there are a number of areas in which we consider that the Plan ought to be adjusted to ensure that it reflects national policy and guidance for the historic environment, responds adequately to its evidence base, and meets the associated 'soundness tests' of being: positively prepared, justified, effective and consistent with national policy.</p> <p>Terminology In relation to heritage assets, the terminology 'preserve or enhance' is used regularly throughout the Plan. While we recognise this in relation to conservation areas, we consider that terminology more aligned with the broader policy requirements of the NPPF would be preferable. We suggest the following alternative wording: [development should] "Conserve and where possible enhance the significance of heritage assets including any contribution made by their settings." Or in shorthand: "Conserve and enhance heritage assets and their settings." In our detailed comments below, we have not included every incidence of this wording throughout the Plan. However, where we are making representations on a policy for other reasons, we have included this as part of the recommended alternative wording.</p> <p>Suggested modification Replace preserve or enhance with "Conserve and where possible enhance the significance of heritage assets including any contribution made by their settings." Or in shorthand: "Conserve and enhance heritage assets and their settings."</p>	Largely supportive but a number of adjustments sought. Suggest instead of preserve or enhance, conserve and enhance heritage assets and their settings is used.	Agree – Amend to use the conserve or enhance terminology as suggested throughout the plan.	Support with changes
Conservation Area Appraisals	<p>Conservation Area Appraisals The Heritage Impact Assessment (HIA) refers to potential/proposed extensions to conservation areas, which may influence a number of proposed site allocations. To ensure that designated and non-designated heritage assets are considered appropriately in the decision-making process for planning applications, we consider that completion and adoption of any conservation area reviews should be pursued as a high priority. This will ensure that appropriate weightings are given to conservation within these areas and their settings when development proposals come forward on site allocations, in local opportunity areas, or elsewhere.</p>	Completion and adoption of conservation areas should be undertaken as a high priority.	Agree but outside of the scope of the Local Plan process	Noted
SA	<p>Sustainability Appraisal We do not wish to comment in detail on the Sustainability Appraisal at this stage.</p>	Do not wish to comment in detail on the Sustainability Appraisal at this stage.	Noted	N/A
Vision	<p>While there is much to be welcomed in the Vision, it would be a major concern if BCP district - comprising three towns of distinctive character shaped by their heritage - failed to promote and capitalise on this. The Vision within the 2022 Issues and Options document recognised both culture and heritage. It is not clear why these important matters would no longer be included? NPPF paragraph 196 establishes that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. It goes on to explain what the strategy should take into account, including social, cultural, economic and environmental benefits; local character and distinctiveness. We therefore strongly suggest that the Council considers how the Vision can be adjusted to re-engage these important aspects, and drivers, of sustainable development in the district.</p> <p>Suggested modification The top line could be adjusted to say e.g. "Where people, nature, heritage, coast and towns come together..." Our Place and Environment could be amended as follows: "Vibrant places where people and nature flourish, with a thriving economy and healthy and valued natural, built and historic environment." With an additional aspiration e.g. "Value and capitalise on the unique culture and heritage of our areas."</p>	Vision should recognise heritage and culture	Vision and the elements listed below it within the our place and environment are taken from the the corporate vision. The vision has been subject to ongoing member engagement and members have agreed that the Local Plan vision should reflect the corporate wording.	Noted

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Objectives	We are pleased to note objectives for carbon neutrality, town centres and high streets. We particularly welcome the objective relating to heritage, and associated commitments on p9.	Particularly supportive of objective relating to heritage	Noted	Support
S2	<p>An adjustment to this policy would be beneficial to ensure that it is consistent with the NPPF. (Please note that any comments we have on sites and areas listed under part 3.b. are made against the specific ward policies for those sites/areas, later in this response).</p> <p>While paragraph 4.19 describes the key settlements in terms of their distinctive character, the policy itself fails to reflect this and we therefore believe that it is inconsistent with NPPF paragraph 196(c) which refers to:</p> <p>c) the desirability of new development making a positive contribution to local character and distinctiveness; and</p> <p>d) opportunities to draw on the contribution made by the historic environment to the character of a place.</p> <p>Suggested modification “4.c. Development must create high quality places that optimises the use of land, while sustaining local character and distinctiveness, and responding to the local context and heritage.”</p>	Policy does not reflect the distinctive character of the key settlements.	Agree - Amend 4c to read 'Development must create high quality places that optimises the use of land, while sustaining local distinctiveness, and responding to the local context and heritage. '	Agree proposed changes
C2	<p>Historic England recognises the urgent need for positive action in response to the global climate crisis and is committed to achieving net zero carbon emissions. We therefore largely welcome Policy C2.</p> <p>However, in relation to buildings of traditional construction (typically those built before 1919) there will sometimes be circumstances where measures to increase the energy efficiency of a building could result in damage to the fabric of the building and/or be harmful to its significance as a heritage asset, potentially also reducing its environmental performance. Further information can be found in our emerging guidance on Climate Change and Historic Building Adaptation and associated technical guidance.</p> <p>We therefore consider that an adjustment is required to part 1 of the policy to ensure that the Plan is both internally consistent and consistent with national policy and guidance for the conservation and adaptation of heritage assets. We propose an additional part 1.c.</p> <p>It would also be helpful for the supporting text to highlight that there are special considerations in applying Part L of the Building Regulations in relation to heritage assets. See: https://historicengland.org.uk/advice/technical-advice/building-regulations/</p> <p>Suggested modification 1.c. Alternative standards for residential or non-residential buildings may be agreed in certain cases involving change of use / conversion of a heritage asset or other building of traditional construction, if the measures required to achieve parts 1a or 1b would result in unacceptable harm to the fabric and/or significance of the building.”</p> <p>Include additional supporting text to highlight that there are special considerations in applying Part L of the Building Regulations in relation to certain heritage assets.</p>	Measures to increase energy efficiency in buildings of traditional construction need to be carefully considered to avoid harm to building fabric and significance. Suggest additional text	<p>Agree - amend supporting text inserting a new para after 5.15 to read 'There will sometimes be circumstances where measures to increase the energy efficiency of buildings of traditional construction (typically those built before 1919) could result in damage to the fabric of the building which could be harmful to the significance of heritage assets, potentially also reducing its environmental performance. There are special considerations in applying Part L of the Building Regulations in relation to heritage assets which need to be considered. Further information can be found on the Historic England website.'</p> <p>Insert part sentence under part b within the policy to read 'Alternative standards for residential or non-residential buildings may be agreed in certain cases involving change of use / conversion of a heritage asset or other building of traditional construction, if the measures required to achieve parts 1a or 1b would result in unacceptable harm to the fabric and/or significance of the building'</p>	Agree proposed changes

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C4	<p>While we welcome the protections for heritage assets in parts c and h, we are uncertain how the policy relates to the NPPF requirement (footnote 58) that applications for wind energy development (other than repowering/life extension) should be “in an area identified as suitable for wind energy development in the development plan...”. According to Planning Practice Guidance for Renewable and Low Carbon Energy, when identifying these areas local planning authorities should consider the potential impacts on the local environment. We would expect this to include consideration of heritage impacts.</p> <p>Suggested modification Review/clarify approach to wind energy development to ensure that this is consistent with the NPPF.</p>	<p>Unclear how the policy relates to applications for wind energy, any potential areas should consider heritage impacts.</p>	<p>Agree - amend 5.19 and 5.20 to read 'Proposals will require careful consideration of their potential impacts, including cumulative impacts with other similar developments. We are preparing a Local Area Energy Plan which will set out opportunities for renewable energy and also areas that are sensitive and should be avoided. For the Christchurch area the Local Plan is supported by a Landscape Sensitivity Study for Wind and Solar Energy Development part 1 and part 2. It should be noted that no areas have been identified as suitable for wind energy development for this Local Plan'</p> <p>Schemes will need to be accompanied by a landscape sensitivity assessment, and where necessary a heritage impact assessment, supported by visualisations. and Schemes should provide an appraisal and rationale for the site selection.</p> <p>Amend Policy C4 1.c designated heritage assets and their setting are preserved conserved or enhanced, demonstrated through a Heritage Impact Assessment where necessary;</p> <p>Suggest that the rest of the policy remains unchanged as it reflects applications for onshore wind could come forward under the policy changes set out by government in July 2024. The policy includes reference to assessing impacts on heritage assets.</p>	<p>Agree proposed changes</p>
C5	<p>While we have no in principle objection to Policy C5, it is unclear why development in the Coastal Vulnerability Zone should be consistent with the SMP and FCERM (part 2a), while in CCMA proposals would be determined in accordance with national policies and guidance (part 1a)? We suggest that all of these should be considerations in determining any application for the coastline. Our particular interest in this matter relates to the fact that while the Rockley Park CCMA is close to grade II* listed Upton House and associated heritage assets, Hengistbury Head CCMA is largely made up of the highly significant “Multi-period landscape on Hengistbury Head” scheduled monument. Within the emerging FCERM Strategy and associated Strategic Environmental Assessment for Christchurch Harbour and Bay, Policy Units SMZ1 – ODU 1 (Hengistbury Head East) and SMZ 1 – ODU 2 (Mudford Sandbank) include frontages within the CCMA at Hengistbury Head. Importantly, potential for impacts on the significance of the scheduled monument are a consideration in determining an appropriate strategy for this unit and ensuring that appropriate mitigation (e.g. upfront archaeological monitoring) is put in place.</p> <p>The presence of Upton House and Hengistbury Head scheduled monument on CCMA frontages is also likely to influence the appropriateness of any new infrastructure proposed under 1c, d and e. It would therefore be beneficial if the supporting text could highlight the presence of these assets and the need for schemes to also accord with national and local policies relating to heritage assets and their settings.</p> <p>Suggested modification Clarify the role of national policies and guidance, SMPs and FCERM in determining applications on the coastline, including within Coastal Vulnerability Zones and CCMA. After paragraph 5.28 insert the text: “It is important to note that within or close to the Rockley Park and Hengistbury Head CCMA are Grade II* listed Upton House and the Multi-period landscape on Hengistbury Head scheduled monument. Elsewhere across the coastal frontage are a range of designated and non-designated heritage assets as well as potential for undiscovered archaeology. Any development would also therefore need to give appropriate consideration to national and local policies for heritage assets”.</p>	<p>Impacts on heritage assets, particularly Upton Country Park and Hengistbury head scheduled monument need to be considered in determining a strategy and ensuring mitigation is in place. These assets will impact appropriateness of new infrastructure</p>	<p>Agree - add new para at 5.28 to read 'It is important to note that the Grade II* Listed Upton House is close to the Holes Bay CCMA and the Hengistbury Head CCMA is a scheduled monument. Any development would need to give appropriate consideration to these for heritage assets'.</p> <p>The different text between 1a and 2a is due to the fact Coastal Change Management Areas are covered in national policy and therefore this is referenced whereas coastal vulnerability zones are a local designation and not referenced in national policy. The SMP and FCERM strategy set out the CCMA but does not include any other reference to them.</p>	<p>Welcome proposed changes, please refer to original comments regarding clarity around role of SMP, FCERM and national policy</p>

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NE5	<p>Where new of replacement jetties etc. are constructed, there is potential for impacts on coastal heritage including designated heritage assets, archaeology or buried peat deposits which may contain archaeological or paleoenvironmental material as well as stored carbon. The policy should therefore signal the need to consider these factors.</p> <p>Suggested modification “Any proposal for additional or replacement marina, jetty, slipway, boatyard or other boating or mooring facilities will be permitted provided that it does not: “d. result in unacceptable harm (including cumulative harm) to coastal heritage including designated heritage assets, archaeology, or buried peat deposits.”</p>	Policy should reference coastal heritage, heritage assets, archaeology and buried peat deposits.	Agree – amend criteria d to read ' proposal would not prejudice coastal protection works, the National Coast Path or result in unacceptable harm to coastal heritage including designated heritage assets, archaeology, or buried peat deposits'	Agree proposed changes
NE7	<p>A number of the open spaces in BCP are heritage assets in their own right (e.g. Registered Historic Parks and Gardens), or form part of the setting of heritage assets. It is therefore important that the policy signals that existing open space is also protected from development that could adversely affect the significance of heritage assets. We are therefore proposing an additional criterion 1.e. to ensure that the Plan is both internally consistent and consistent with national policy.</p> <p>Suggested modification To part 1 of the policy, add a new criterion e stating that: “it does not result in harm to the significance of designated heritage assets”</p>	Policy should signal that some open spaces are heritage assets and protected from development which would adversely impact the heritage asset.	The plan is to be read as a whole with specific policies protecting heritage assets, it is not considered necessary to repeat those requirements here as the policy is focused on protecting open space.	Officer response noted
BE1	Overall Historic England considers BE1 to be a sound policy and we welcome the references to the distinctiveness of the context, and to heritage assets and their settings.	Welcome policy	Support noted	Support
BE2	Historic England supports Policy BE2 in that it will ensure that proposals give robust consideration to the context including skyline, building heights, local topography, streetscene and existing well-designed buildings which at some locations will include heritage assets.	Welcome policy	Support noted	Support
BE4	<p>While we have no in principal objection to this policy, we are concerned that in various places it lacks sufficient clarity, which may lead to issues of interpretation when drawing up or determining applications. We therefore believe that a number of adjustments are needed to ensure that the policy is justified and effective.</p> <p>Supporting text While the Plan refers to the “Building Heights Study”, the document itself is presented as a Strategy. We believe that the status of the document (a piece of evidence base?) should be explicitly clarified in the Plan, ensuring that the primacy of the Plan is made clear.</p> <p>Paragraph 7.39 of the Local Plan sets out a simple definition of tall buildings that is not the same as the more complex range of definitions (e.g. distinguishing local, district and metropolitan scale tall buildings) contained in the Building Heights Study. We suggest that this difference should be acknowledged in the Plan, while making clear that in all cases the Local Plan definition will be applied to proposals. This should include proposals subject to part 2B of the policy which requires regard to be had to the Building Heights Study. Paragraph 7.42 refers to the need for a tall building statement but this is not carried forward into the policy itself. We suggest that Part 3.k. of Policy BE4 is adjusted to provide clarification.</p> <p>Policy BE4 Proposals for site allocations and local opportunity areas provide indicative heights for development. The impacts of those heights on e.g. views and heritage settings have not been fully tested at Local Plan stage and it is important that this is acknowledged, to ensure that the Plan is justified, effective and consistent with national policy. Similarly, where maximum heights are provided our understanding is that these should be treated as just that and not a target height. This could be resolved through adjustments to the policy, potentially at part 1.a.</p> <p>At Part 2.a. we request clarification that building heights should step down ‘significantly’ towards adjacent areas, and for additional text to be added to make clear that taller buildings towards the edge of the cluster will not be acceptable unless indicated by site-specific policies (i.e. at the northern end of Lansdowne). This is both to align with the recommendations of the Building Heights Study and to mitigate against the risk of the design vision for the cluster not being applied by developers (as in a recent appeal case in Reading), which may in turn result in impacts on the historic environment.</p> <p>The statement that proposals subject to part 2.b. should “have regard to the BCP Building Heights Study” would benefit from clarification. The study contains a significant amount of guidance and it is unclear whether</p>	Policy lacks sufficient clarity. Status of building heights study needs to be clarified as does its role within the policy. Definition of tall building differs between the Plan and the study and within the policy and the text, clarification needed. Reference in supporting text to tall building statement not carried forward within the policy. Clarification required surrounding status of heights set out in the plan. Further wording required to ensure building heights step down to adjacent areas. The status of views identified need to be clarified. Adjustments are required to move forward outputs of the tall buildings study into policy.	Agree - See track changed version of building heights text below.	Agree proposed changes

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	<p>the intension of 2.b. is mainly (or specifically) to direct any tall buildings outside of Lansdowne and Poole Town Centre North to the “areas of search” within the study. This would reflect the high level testing of locations and sensitivities that has been carried out. Clarification is needed.</p> <p>Part 3 contains a definition of a tall building which includes buildings over 6 storeys/18m but does not refer to buildings over three times greater than the context height as mentioned at paragraph 7.39.</p> <p>We request the following adjustment to part 3.h. to ensure a positive response to context, while ensuring that heritage assets are not viewed only as a constraint.</p> <p>We note that Part 3.i. seeks to avoid adverse impacts on ‘important views’. While we welcome this, we are concerned that the ‘key views’ identified in the Building Heights Study are not supported by a definition or a methodology. Nor do they include all ‘views’, ‘vistas’ and ‘landmarks’ identified by earlier work such as the Bournemouth Town Centre Building Heights Study 2011 and Poole Town Centre SPD 2015 or e.g. conservation area character appraisals. Given the fact that views in the Building Heights Study are not comprehensive, we consider that this needs to be acknowledged in the Plan.</p> <p>Finally, in relation to Part 3.k. and paragraph 7.42, clarification is needed as to the submission requirements. We also recommend adjustments in order to carry forward more of the outputs of the Tall Buildings Study into policy, ensuring appropriate protections for townscape and heritage. Alternative wording is suggested.</p> <p>Suggested modification Clarify status of document in Local Plan and if possible amend the document title to reflect this. Modify paragraph 7.39 to acknowledge that the study contains a range of definitions and make clear that the Local Plan definition of tall buildings will be used in all cases to determine whether Policy BE4 applies to proposals. Adjust paragraph 7.42 or Part 3.k. to clarify which document should include the justification (see comments on Part 3.k. below) “a. Increases in building height greater than the prevailing heights within an area will be focused within Bournemouth and Poole town centres, site allocations, local opportunity areas and on local opportunity streets... Where site-specific policies contain indicative building heights these are subject to detailed design and assessment of impacts at planning application stage. Where maximum heights are provided these are not intended as a target height.” “2.a... Building heights within a cluster should vary and step down significantly in height towards the adjacent lower scale areas. To maintain the shape of a cluster, contextually taller buildings at the edges of the cluster will not be appropriate, unless specified by a site-specific policy.” “b. Elsewhere within the two town centres, proposals for tall buildings should have regard to the BCP Buildings Heights Study, which identifies the ‘areas of search’ for tall buildings. Proposals should and clearly demonstrate a townscape rationale for the siting of the building.” Clarify definition of a tall building for the purpose of the Local Plan and ensure that any inconsistencies within the Plan are avoided or explained. “3.h. Respond positively to the local context, conserving and where possible enhancing heritage assets and their settings.” i. not adversely affect important views including views of church spires and the sea (For the avoidance of doubt – important views are not limited to those views identified in the Building Heights Study); “k. provide justification for the proposal in the form of a tall buildings statement within the Design and Access Statement, including an explanation of how the proposal will contribute to the vision for the tall building cluster, if relevant.” “l. include a Landscape and Visual Impact Assessment, including modelling to allow a 3D understanding of the proposals, and visualisations to illustrate the impact of the proposals in key views to be agreed by the council.”</p>			
BE6	<p>We are very supportive of Policy BE6 and its supporting text. To be consistent with paragraph 20(d) of the NPPF, Policy BE6 should be a strategic policy.</p> <p>Suggested modification Make Policy BE6 “Strategic Policy BE6”</p>	BE6 should be a strategic policy	Agree - amend BE6 to Strategic Policy BE6	Support with changes

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BE6	<p>Paragraph 7.73 states that 'Where there are known archaeological assets that will be impacted by development we have referenced these in the ward policies in part 2 of the plan'. However, while reviewing the plan we have found that this is only the case by exception, with archaeological interest sometimes only being highlighted in supporting text or in the HIA. It is therefore important that this paragraph is adjusted so that developers cannot misinterpret it as meaning that for site policies which lack a specific criterion relating to archaeology, this means that there is no known archaeological potential.</p> <p>Suggested modification Remove the following text from paragraph 7.73: Where there are known archaeological assets that will be impacted by development we have referenced these in the ward policies in part 2 of the plan. Replace with text indicating how the archaeological potential of a site should be identified.</p>	Amend wording to avoid misinterpretation in relation to archaeological assets.	Agree - remove the following text from paragraph 7.73 'Where there are known archaeological assets that will be impacted by development we have referenced these in the ward policies in part 2 of the plan' .	Agree proposed changes
BE6	<p>In relation to less than substantial harm, could part 3.c.i of Policy BE6 be considered onerous in comparison to NPPF paragraph 208?</p> <p>Suggested modification Review 3.c.i in relation to NPPF paragraph 208</p>	Review wording surrounding less than substantial harm.	Agree – amend 3c to read: c. ensure any harm which cannot be avoided, including less than substantial harm, is clearly and convincingly justified demonstrating that: alternative i. all options have been explored and there is no alternative the harm is outweighed by; and there will be an overriding the public benefits of the proposal;	Agree proposed changes
H3	<p>To ensure consistency with national policy, part a would benefit from an adjustment to reflect the fact that if there are existing historic buildings on site their particular characteristics and constraints will also need to be taken into account with the aim of conserving their historic significance.</p> <p>Suggested modification "a... dependent upon the context of the site and character of the area and the characteristics and historic significance of any existing buildings"</p>	Make explicit reference to historic significance.	Amend a to read '...dependent upon the context of the site and character of the area, including the historic significance of any existing buildings; '	Agree proposed changes
E2	Please note that our comments in relation to Em.7 Lansdowne and Em.8 Poole Town Centre are provided against the ward policies for those areas.	Specific comments relating to the Lansdowne and Poole town centre provided elsewhere.	NA	Comment
E4	<p>While we have no in principle objection to this policy, bearing in mind the sensitivity of the wider area relating to its conservation areas and listed buildings, we note that the Heritage Impact Assessment includes several site-specific recommendations. In order to ensure that the Plan is consistent with NPPF paragraph 16(d) which states that plans should: 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals', we consider that these recommendations should be reflected in policy. These criteria will in turn help to ensure that any proposed development is consistent with policies for the conservation and enhancement of heritage assets.</p> <p>Suggested modification Incorporate additional site-specific criteria into policy as follows: "1.d. retain and enhance the existing border of trees on the northern boundary of the site where appropriate." "2.e. a design that mitigates impacts on the setting of the scheduled monument to the south, giving careful consideration to building heights and landscaping on the southern boundary."</p>	Recommendations from HIA should be incorporated into the policy.	<p>Add criteria to 2 to read 'Mitigate any impacts on the setting of the scheduled monument, giving careful consideration to building heights and landscaping on the southern boundary'</p> <p>Add new para after 9.24 to read 'A range of transport improvements have taken place to enhance access to the universities. Further development at Talbot Village is likely to require additional improvements to surrounding transport routes. Where these improvements impact on Wallisdown Road every effort should be made to retain the mature trees adjacent to the road as these are an important part of the setting to the Talbot Village conservation area'.</p>	Agree proposed changes
E5	<p>As with Policy E4, the Heritage Impact Assessment includes a site specific recommendation that we consider should be incorporated into the policy having regard to NPPF paragraph 16(d) and policies for the conservation of heritage assets.</p> <p>Suggested modification Suggested additional site-specific criteria signalling that efforts should be made to conserve the non-designated assets e.g. "2.h. seek to retain the original Art Deco/ Art Moderne nurses home and chapel, and be sympathetic to their significance and settings."</p>	Include site specific recommendation from HIA within the policy regarding the Art Deco nurses home.	<p>The site forms part of Wessex Fields strategic employment allocation, needed to deliver our strategic employment needs. The policy does not prevent the retention of the nursing home but its relocation may better enable the strategic economic regeneration plans.</p> <p>9.29 An existing nurses home is located in the north part of the development site (Site Em.3). The building is a non-designated heritage asset. ThisThe nurses home could remain in situ however, locating this to another part of the site would provide a more cohesive area for development and</p>	Note officer response and welcome additional supporting text

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			allow the home to upgrade its offer. If the home is removed the public benefits of the proposal, such as the delivery of strategic employment opportunities, will need to demonstrably outweigh the harm of removing the non-designated heritage asset in accordance with Policy BE6.	
P4. BW.2	<p>The Heritage Impact Assessment includes the following two statements and we do think it is important that the consideration of building heights in relation to heritage assets is explicitly referenced in the policy:</p> <ul style="list-style-type: none"> - Any development needs to be of an appropriate scale so as not to dwarf the neighbouring heritage assets or be overbearing upon them. - Heights of 2 - 6 storeys are envisaged across the whole site allocation. Harm would be lessened if taller elements were located well away from the heritage assets with 2-2.5 storeys adjacent to the listed building. Drawing on the findings of the HIA, should 630-652 Christchurch Road also be highlighted as historic buildings of merit that should preferably be retained? More generally, we are concerned to secure a general reference to non-designated heritage, before the policy lists specific assets for retention. The NPPF is clear that weight should be placed on the conservation of all heritage assets, relative to their significance (paragraph 205). <p>Suggested modification Development proposals must:</p> <ul style="list-style-type: none"> v. Be predominantly between three and six storeys (approximately 9-21 metres) in height; vi. Ensure that heights do not have an overbearing impact on the surrounding residential streets or historic buildings within and around the site; vii. Be informed by a landscape and visual impact assessment; Viii Conserve and where possible enhance heritage assets and their settings, including the listed Royal Arcade, listed Hippodrome (O2 Academy) and other high quality historic buildings including those on Christchurch Road (southern side): 577-587, 599-607 (the art deco section), 609-615, 635-641, 657-659 and (northern side) 630-652, Boscombe Chambers 580-584 and 628-654; 	Historic buildings could be highlighted within the allocation, important that building heights in relation to heritage assets are explicitly referenced.	<p>Amend</p> <ul style="list-style-type: none"> vi. Ensure that heights do not have an overbearing impact on the surrounding residential streets or historic buildings within and around the site; viii to read 'Preserve or Conserve and where possible enhance heritage assets and their settings, including the listed Royal Arcade, listed Hippodrome (O2 Academy) and other the following high quality historic buildings including those on Christchurch Road (southern side): 577-587, 599-607 (the art deco section), 609-615, 635-641, 657-659 and (northern side) 630-652, Boscombe Chambers 580-584 and 628-654' 	Agree proposed changes
P5 BC.1	<p>While we welcome the commitment at part a.iv of the policy to 'Enhance the natural qualities of the area by retaining and providing high quality soft landscaping within sites, along with preserving or revealing public views of the sea', we consider that at present the lack of an explicit reference to the need to retain and improve the pedestrian link between the historic landscaped Pleasure Gardens, the Pier and seafront presents an issue.</p> <p>Suggested modification Suggested additional criterion: "Deliver high quality public realm improving the transition between the green landscape of the historic Pleasure Gardens, the seafront and Pier."</p>	Need to retain and improve link between the historic Gardens, Pier and seafront.	Agree - add criterion: "Deliver high quality public realm, where relevant improving the pedestrian connections between the historic Pleasure Gardens, the seafront and the Pier."	Agree proposed changes

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P5 BC.2	<p>The HIA contains an assessment of potential high level impacts on the many non-designated heritage assets within this area, as well as those which are designated by merit of being located in the conservation area. On this basis it includes the following statement: "There could be opportunities to sensitively convert the locally listed buildings and non designated heritage assets to residential use and to redevelop other parts of the site. If it is not possible to retain the buildings, the historic building facades should be retained to both Westover & Hinton Roads". However, the policy appears to prejudge the outcome of any detailed design and HIA, stating at criterion iii: "Ensure the historic building facades are retained and, where relevant, better revealed". While it is not clear whether this is intentional, the inference appears to be that demolition of all but the facades of these buildings is likely to be acceptable. This is not consistent with national planning policy for the conservation of heritage assets. It may also conflict with the Council's emerging Policy C1.a.iv in relation to embodied carbon.</p> <p>It is also not clear why this allocation should extend to properties on the northern side of Hinton Road, particularly Eilerslie Chambers which is located in the Old Christchurch Road conservation area. Would any proposals for redevelopment in this location be better dealt with through development management policies?</p> <p>Suggested modification Suggested additional text: "iii. Seek opportunities for refurbishment or adaptive re-use of historic buildings based on an understanding of their significance. Reconsider boundary of site allocation.</p>	Policy should seek to retain non designated heritage assets not just facades. Unclear why Hinton Road properties included.	<p>Agree - amend criteria c.iii Seek opportunities for refurbishment or adaptive re-use of historic buildings based on an understanding of their significance Ensure the historic building facades are retained and, where relevant, better revealed;</p> <p>The boundary includes Hinton Road as a number of developments have been proposed in that area, inclusion gives more certainty surrounding heights but criteria i to be amended to read 'Provide a mix of uses with active ground floor frontages and retail, commercial, leisure or cultural uses (Use Classes E, F1 and F2, theatres, venues for live music performance, concert halls and conferencing facilities) along Westover Road';</p>	Agree proposed change
P5 BC.3	<p>A key issue and opportunity for Avenue Road/Commercial Road is the physical and visual permeability through the site, including in relation to heritage assets. We consider it important that this site allocation signals this.</p> <p>Suggested modification "ii. Provide an active street frontage on Terrace Road and Avenue Road, seeking opportunities to increase the permeability of the site and capitalise on views of the townscape including heritage assets."</p>	Allocation should reference physical and visual permeability through the site.	Agree - criteria iv seeks to improve permeability requiring a route to be created, suggest amending iv to read to read 'Increase the permeability of the site, creating create an attractive, landscaped, public pedestrian route lined by building frontages connecting Commercial Road, Avenue Road and the Gardens';	Agree proposed change
P5 BC.4/Em.7	<p>To avoid any misinterpretation of the policy that stepping down of heights should only occur towards the specific locations mentioned in the policy, we recommend a minor adjustment by adding the word 'including'.</p> <p>Suggested modification Suggested change to policy: "... with heights dropping down significantly to lower scale townscape with buildings in the region of nine storeys (approximately 30 metres), including on the eastern edge of the area opposite 2-20 St Swithun's Road South..."</p>	Suggest wording change to be clear heights should step down.	Agree - amend iv to read '... with heights dropping down significantly to lower scale townscape with buildings in the region of nine storeys (approximately 30 metres), including on the eastern edge of the area opposite 2-20 St Swithun's Road South...'	Agree proposed change
P5 BC.6	<p>We acknowledge that there is an existing consent for four tall buildings to the northeast side of the carpark. Should this fail to be built out, it is not clear how the remainder of the site could contribute to accommodating 200 new homes while retaining the existing carpark and conserving the setting of Old Christchurch Road conservation area. Should the proposed site allocation be amended to more closely align with the constraints of the existing consent?</p> <p>Suggested modification The proposed boundary follows that of the existing consent.</p>	Potential to amend boundary to match consent.	The proposed boundary follows that of the existing consent.	Noted
P5 BC.7	<p>To accord with the HIA, and national policy for the conservation of heritage assets, the policy should require efforts to retain the auditorium for adaptive re-use if possible. The HIA identifies the buildings as a non-designated heritage asset.</p> <p>Suggested modification Adjust policy to require efforts to retain and convert auditorium</p>	HIA identifies auditorium as non designated heritage asset, policy should seek to retain and reuse if possible.	<p>Planning application under consideration. Given the housing needs, limited reuse interest and provision of town centre family housing the plan has already weighed the balance in favour of housing provision.</p> <p>Amend supporting text to read:</p> <p>Former Buzz Bingo, 13 Lansdowne House, Christchurch Road (BC.7); Brandon, Clifton and Streat Place, St Peters Road (BC.10); Former Belvedere Hotel and</p>	Note officer response and welcome additional supporting text

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			surrounds (BC.11) and Town Hall Annexe (BC.16) are smaller sites located within the town centre. They provide opportunities for development that enhances the character of the areas they fall within. The Former Buzz Bingo Hall is located behind a distinctive mixed-use parade of shops to the south of the Lansdowne area that is to be retained. The bingo hall is a non-designated heritage asset. If the hall is removed the public benefits of the proposal, such as the delivery of affordable or town centre family housing, will need to demonstrably outweigh the harm of removing the non-designated heritage asset in accordance with Policy BE6.	
P5 BC.9	To accord with the HIA, and national policy for the conservation of heritage assets, the policy should require efforts to retain the building for adaptive re-use if possible. The HIA identifies the buildings as a positive building within the conservation area. The site is also immediately adjacent to Grade I St Peter's Church and we are therefore concerned that there is no height guide as for other site allocations. Suggested modification Adjust policy to require efforts to retain and convert Beales buildings. Provide indicative building heights for consistency with other site proposals and to avoid impacts on heritage assets?	Positive building with the CA that should be retained if possible. Sensitive location that would benefit from height guidance.	Agree – insert criteria to read: 'Explore the retention and conversion of the existing structure which makes a positive contribution to the Old Christchurch Road Conservation Area';	Agree proposed changes
P5 BC.12	The HIA identifies the particular importance of trees “in St Peters Cemetery and on the Central Car Park site, to provide verdant setting which relieves scale and softens impact of built form. The trees provide a key contribution to townscape in close and wider views.” As a site-specific policy requirement, consistent with NPPF 16(d), we consider that this should be reflected within the policy itself. Suggested modification Suggested additional criterion: “iv. retain existing buffer planting within the site for its contribution to townscape and setting.”	The existing tree planting within St Peters Cemetery should be specifically mentioned in the policy.	Agree - insert criteria to read: 'retain existing trees and soft landscaping within the site.'	Agree proposed change
P5 BC.14	To accord with the HIA, and national policy for the conservation of heritage assets, the policy should require efforts to retain the building for adaptive re-use if possible. The HIA identifies the building as a non designated heritage asset. Suggested modification Adjust policy to require efforts to retain and convert the 1 Park Road.	HIA identifies the building onsite as a non designated heritage asset which should be retained if possible.	Agree – add criteria to read 'Explore any opportunities that exist to retain and convert non-designated heritage assets within the site'	Agree proposed change
P5 BC.17	To accord with the HIA, the policy should require efforts to retain the frontage building for adaptive re-use if possible. The HIA identifies the building as 'positive' though it is not located in the conservation area. Suggested modification Adjust policy to make clear that retention and conversion of the frontage building (not just the brick mural) is an option for consideration.	The policy should require efforts to retain the frontage building as a non-designated heritage asset.	Suggesting this allocation is now deleted as the site does not feature on Open Reach's exchange closure project list.	Noted
P10	Minor typographic error in the section on town centre archaeology – should this say 'expert investigation'?	Typo	Agree - amend typo	Agree proposed change
P10 CT.2	Within and adjacent to the southern area of this site is a Scheduled Monument titled “World War II pillbox and tank traps in former railway yard N of town”. The HIA is clear that development should keep clear of the scheduled monument and that there is an opportunity for enhancement by providing public access and interpretation. For consistency with the NPPF and HIA, and we therefore request an additional policy criterion. Suggested modification Suggested additional criterion: iii. conserve and enhance the scheduled monument and its setting, keeping clear of its physical footprint and seeking opportunities to provide public access and interpretation.	Site contains Scheduled Monument (pillbox and tank traps), policy should reflect this.	Agree - insert criteria to read Conserve and enhance the scheduled monument and its setting, keeping clear of its physical footprint and seeking opportunities to provide public access and interpretation.	Agree proposed changes

Plan ref	Full comment by Historic England	BCP officer summarised comment	BCP officer response and action	Historic England position
P10 CT.5	<p>Site CT.5 contains several locally listed buildings on the Bridge Street frontage. To accord with the HIA, the policy should require efforts to retain and enhance these building for adaptive re-use if possible. The HIA also states that proposals could improve the heritage setting by providing an appropriate sense of enclosure on Bridge Street and retaining and enhancing landscaping.</p> <p>Suggested modification Adjust policy to require efforts to retain non-designated heritage assets on the Bridge Street frontage. Consider additional text to promote a better sense of enclosure on this frontage to enhance the heritage setting.</p>	Policy should require efforts to retain non-designated heritage assets and reflect HIA.	Agree – amend vi to read: Preserve-Conserve or enhance heritage assets and their settings including the Christchurch Central Conservation Area, Purewell Conservation Area and the listed and locally listed buildings on Bridge Street and Purewell;	Agree proposed changes
P15 H.2	<p>While we recognise that there is an existing planning consent for this site, consistent with other policies for sites adjacent to Poole Harbour, we consider that part ii of the policy should specify that building heights should step down towards the adjacent lower rise listed buildings.</p> <p>Suggested modification ii. Be predominantly between three and seven storeys (approximately 9-24 metres) in height, stepping down towards the adjacent listed buildings;</p>	Policy should require stepping down in height towards adjacent low rise buildings.	Agree - amend criteria ii to read 'Be predominantly between three and seven storeys (approximately 9-24 metres) in height, stepping down towards the adjacent listed buildings ';	Agree proposed changes
P15 H.4	<p>As there are no listed buildings opposite site H.4, we consider that an adjustment to part iv is needed.</p> <p>Suggested modification Conserve and enhance the character and appearance of heritage assets and their settings</p>	Adjust wording as no listed buildings opposite the site	Agree - amend iv to remove reference to Listed Buildings opposite the site. Conserve or enhance the character and appearance of heritage assets and their settings including of the listed buildings opposite the site and the Town Centre Heritage Conservation Area	Agree proposed changes
P18	<p>Bearing in mind that the HIA identifies the hospital itself as containing several non-designated heritage assets, we consider that the policy should require efforts to retain the buildings for adaptive re-use if possible, consistent with the HIA and policies in the NPPF.</p> <p>Suggested modification Adjust policy to require efforts to retain and convert non-designated heritage assets within the site, and to respond sympathetically to their character in terms of design.</p>	Policy should require efforts to retain non-designated heritage assets.	Agree - amend iii to read ' Preserve-Conserve or enhance heritage assets and their settings including the listed Bournemouth East Cemetery Chapels and any opportunities that exist to retain and convert non-designated heritage assets within the site '	Agree proposed changes
P20 MSWH.3	<p>A significant part of the site is within the Verno Lane conservation area and the HIA identified the well treed character of this area which also forms the setting for grade II The Thatch. While it may nevertheless be possible to accommodate 80 homes on the site this will be subject to careful design and to retention of trees. We therefore suggest an adjustment to this site allocation to ensure that it is justified and consistent with national policy.</p> <p>Suggested modification The site is allocated for residential development to deliver up to 80 homes. iii. Preserve or enhance heritage assets and their settings, including the listed building at Little Thatch and the Verno Lane Conservation Area in which trees make an important contribution to character;</p>	Part of the site a conservation area, careful design and retention of trees needed.	<p>Agree - amend ii to read 'Preserve-Conserve or enhance heritage assets and their settings, including the listed building at Little Thatch and the Verno Lane Conservation Area in which trees make an important contribution to character'</p> <p>In the region of 80 homes is considered a suitable quantum considering the current application for 110 homes.</p>	Agree proposed changes

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P23 O.1	<p>It is not currently clear whether site allocation policy 3.a. would retain the former Oakdale Centre, or otherwise seeks its redevelopment? The building is identified on the policies map as a locally listed building and we would therefore expect efforts to retain and convert this building. The site has not been subject to assessment in the HIA.</p> <p>Suggested modification Adjust policy to require efforts to retain and convert the locally listed building.</p>	Building is locally listed and efforts should be made to retain and convert the building.	<p>As set out in the supporting text a balanced judgment has been made regarding the allocation of the site which will see the total loss of the heritage asset. This has considered the significance of the asset, its state of repair and viability of bringing the building back into use.</p> <p>Amend supporting text to read: The former school building is a non-designated heritage asset, and the redevelopment of the site will result in total loss of the heritage asset. A balanced judgement has been made as part of the Local Plan process regarding the allocation of the site. This has considered the significance of the asset, its state of repair and the viability of bringing the building back into use. As part of a future application these issues and the public benefits of the proposal, such as the delivery of extra care accommodation, will need to demonstrably outweigh the harm of removing the non designated heritage asset in accordance with Policy BE6.</p>	Note officer response and welcome additional supporting text
P24 P.1	<p>As well as the listed Civic Centre, the site contains the locally listed Civic Centre Annexe, while the locally listed Law Courts are also adjacent. Consistent with the NPPF, Policy BE6 and other site allocations, we therefore consider that the policy should require efforts to retain/convert this building. Proposals relating to the Civic Centre itself should be informed by an understanding of the significance of the whole building and we are concerned that the reference to only the 'highest' significance should not prejudice this exercise. We have suggested adjustments to address these issues.</p> <p>Suggested modification Conserve and enhance the significance of heritage assets and their settings, including the listed civic building and boundary walls, locally listed buildings and the Poole Park Conservation Area. Proposals should retain the rooms and features within the former Civic Centre according to their heritage significance for communal uses and retain key views of the building;</p>	Proposals relating to the civic should be informed by understanding of the building as a whole. Annexe and Law courts are also Locally Listed and should be retained/converted.	Amend I to read ' Preserve Conserve and enhance the significance character and appearance of heritage assets and their settings, including the listed civic building and boundary walls, locally listed buildings and the Poole Park Conservation Area. Proposals should retain the rooms and features within the former Civic Centre according to their heritage significance for communal uses and retain key views of the building'	Agree proposed changes
P24 NH.A	<p>This opportunity area includes the grade II listed Parkstone Water Tower and supporting text on page 174 appears to signal that this may be a specific development site. Would the water tower site therefore benefit from a site allocation policy that draws on the specific requirements contained in supporting text, i.e. 'Any development on the Parkstone Tower Practice and water tower sites should be sympathetically designed to better reveal and integrate with the character of the grade II listed Water Tower, including through integration with its finishes and form, while making effective use of land'?</p> <p>Suggested modification Consider a specific site allocation for the water tower site and/or move site-specific requirements into policy.</p>	Water Tower site could benefit from a site allocation.	The water tower site had a historic consent for 17 homes which has not been implemented. The site has not been promoted to us and we do not have the ability to add new sites at this stage.	Officer response noted, policy considered acceptable on balance due to criterion 4.b.ii and supporting text
P26	<p>Minor typographic error in the section on town centre archaeology – should this say 'expert investigation'?</p> <p>Suggested modification Update text</p>	Typo	Agree - amend typo	Agree proposed change
P26 PT.1	<p>While Town Centre North does not contain any designated heritage assets, it is very close to the Town Centre Heritage Conservation Area, with the Dolphin Centre and Barclays House being located at the focal point of the view up the High Street. Nearby to the east is Poole Park Historic Park and Gardens and the associated Conservation Area. To ensure the policy is justified, having regard to the Building Heights Study and part vi of the policy, we consider it important that the need for stepping down towards adjacent conservation areas is emphasised. This could be achieved by stating maximum/indicative building heights in these locations in a similar way to the Lansdowne policy.</p> <p>Having regard to the findings of the HIA, and in the context of national policy for heritage assets, we recommend that both Poole Park Registered Historic Park and Gardens and non-designated heritage assets should be referred to in part viii as assets that merit conservation. The HIA identifies Barclays House as a</p>	Stepping down to adjacent conservation areas should be emphasised. Heritage assets should be referenced. Area would benefit from a Design Code SPD.	<p>Agree - amend introductory sentence to read 'The development of sites within the area must be completed in accordance with any guidance, design code or an overall masterplan or Design Code agreed by the Council Local Planning Authority. The masterplan The Council plan to undertake a masterplan exercise which or Design Code will explore options to..'</p> <p>Amend vi to read '</p>	Agree proposed changes

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	<p>non-designated heritage asset and this is a landmark building in its own right. We note that a masterplan to be agreed by the Council is required for the area. However, this policy may not be effective bearing in mind that there are likely to be many landowners and interests operating across this large area. Consequently, and bearing in mind the strategic importance of this site allocation, we believe that it would benefit from a Design Code SPD, similar to that being prepared for the Lansdowne in Bournemouth. This could help to ensure a strategic steer for building heights and other key design parameters across the area.</p> <p>Suggested modification vi... with buildings stepping down significantly towards the areas of lower scale at the edges of the area, including development of no more than four storeys adjacent to the Conservation Areas; viii. Conserve and enhance heritage assets and their settings including the Town Centre Heritage Conservation Area, Poole Park Registered Historic Park and Gardens, listed buildings and non-designated heritage assets; Consider a policy commitment for the Council to prepare a Design Code for Poole Town Centre North as a strategic priority.</p>		<p>Be predominantly between four and fifteen storeys (approximately 18-48 metres) in height with buildings stepping down significantly towards the areas of lower scale at the edges of the area, with development of no more than four storey adjacent to neighbouring conservation areas;</p> <p>Amend viii to read 'Preserve Conserve and enhance heritage assets and their settings including the Town Centre Heritage Conservation Area, Poole Park Registered Historic Park and Gardens, listed buildings and non-designated heritage assets';</p>	
P26 PT.3	<p>While we welcome parts vi and vii of the policy, it is unclear at present to what extent the proposed building heights may obscure views of Grade II* Church of St James which are highlighted in the Building Heights Study (p120) and HIA. We therefore recommend that the policy includes a specific aspiration to retain/create a view/views of this asset through the site.</p> <p>Suggested modification Conserve and enhance heritage assets and their settings, seeking opportunities to retain or create framed views of St James Church through careful layout and design;</p>	Recommend specific criteria included to retain/create a view to the Church of St James.	Agree – amend vii to read ' preserve Conserve or enhance heritage assets and their settings, exploring opportunities to retain/create a view to the Church of St James from the proposed public waterfront on the Former Power Station site (H.1) '	Agree proposed change
P26 PT.4	<p>To conserve the setting, character and appearance of the adjacent conservation area, while also responding to the HIA, it will be important that development responds to context and building heights step down towards the lower rise conservation area and heritage assets that it contains. We recommend adjustments to the policy.</p> <p>Suggested modification Replicate the requirement for site c (PT.3) to emulate the vertical; rhythm and variety of plots on the historic quay, and in relation to building heights require stepping down towards the adjacent conservation area.</p>	Development should step down towards the lower rise conservation area.	<p>The site is visually and physically removed from the historic quay and therefore too emulate the vertical rhythm and plots of the quay is difficult to justify.</p> <p>Amend iii to read 'Be predominantly between three and seven storeys (approximately 9-24 metres) in height with proposals stepping down to the adjacent conservation area'.</p>	Agree proposed change
P26 PT.6	<p>We are concerned that development of up to 5 storeys on this site would be overbearing in relation to the adjacent heritage assets and undermine the prominence of the spire of the Methodist Chapel (non-designated heritage asset). This is consistent with the findings of the HIA which recommends no more than 2-3 storeys. We therefore also question the ability of this site to accommodate 25 residential units. Would the site be best suited to terraced housing?</p> <p>Suggested modification Amend site allocation policy to ensure that it is justified and consistent with national policy and the HIA, with building heights being maximum 2-3 storeys.</p>	Concerned about the scale and quantum of development in relation to adjacent heritage assets.	More detailed feasibility studies have been undertaken on the site to inform development quantum's and heights, these are set out in HOM13 Urban capacity testing of allocated sites.	Officer response noted; additional evidence of potential impacts would be desirable to ensure policies is justified and consistent with national policy
P26 PT.8	<p>Should the remaining infirmary building (associated with the Poole Union Workhouse) within this site be identified as a non-designated heritage asset such that consideration should be given to its retention and conversion as part of the scheme?</p> <p>Suggested modification Review level of survival of historic buildings and adjust policy if appropriate.</p>	Potential to reference remaining infirmary building (non designated heritage asset) within the site	Agree amend iii to read ' Preserve Conserve and enhance heritage assets and their settings including the Heckford Park conservation area and the non-designated infirmary building '.	Agree proposed change

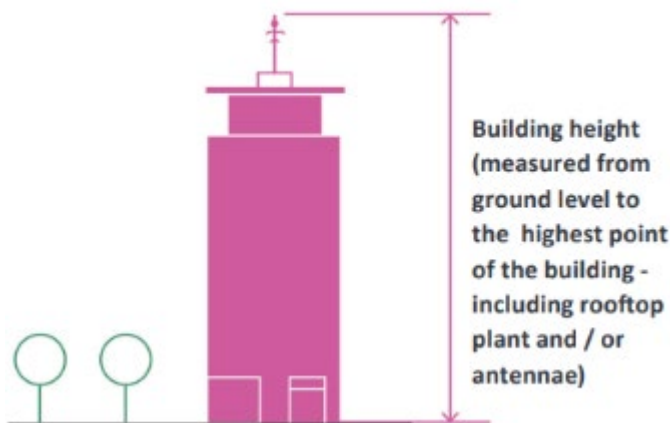
Plan ref	Full comment by Historic England	BCP officer summarised comment	BCP officer response and action	Historic England position
P26 PT.A	<p>Bearing in mind that there are heritage assets within the opportunity and the policy signals potential for estate regeneration; to be consistent with site allocation policies we consider that 6.a. should signal the need to conserve and enhance designated and non-designated heritage assets. Should this opportunity area policy include a steer as to appropriate building heights?</p> <p>Suggested modification i. Provide a fine-grained character that integrates with the historic urban fabric, conserving and enhancing designated and non-designated heritage assets;</p>	Potential to give a steer on building heights and to refer to heritage assets	<p>Agree amend to insert criteria to read</p> <ul style="list-style-type: none"> i. Be predominantly between two and five storeys (6-16 metres) in height. ii. Provide a fine-grained character that integrates with the historic urban fabric, conserving and enhancing designated and non-designated heritage assets; 	Agree proposed changes
P26 PT.B	<p>The PT.B opportunity area focuses on the high street where there are many designated and non-designated heritage assets. While we recognise that the plan will need to be read as a whole, due to the particularly sensitive context for this opportunity area we think it is important to signal the need for their conservation.</p> <p>Suggested modification ii. Provide a fine-grained character that integrates with the historic urban fabric, conserving and enhancing designated and non-designated heritage assets;</p>	Important to reference the heritage assets within this area	Agree amend ii to read 'Provide a fine-grained character that integrates with the historic urban fabric, conserving and enhancing designated and non-designated heritage assets ';	Agree proposed change
P29 TBW.3	<p>We note the presence of a locally listed pillbox within the site, which should be retained and conserved within the proposed future use. It would be helpful if this could be signalled within the policy.</p> <p>Suggested modification Note the need to conserve and enhance the locally listed WWII pillbox within the site.</p>	Locally Listed within the site should be retained and conserved.	Agree - add criteria to read Conserve or enhance the locally listed WWII pill box on site;	Agree proposed change
P30 WWW.1	<p>We consider that this policy is currently unsound as it is not consistent with national policy in relation to enabling development, which is expanded upon in Historic England's Good Practice Advice in Planning Note 4. By definition, enabling development is development that would not be in compliance with local and/or national policies and would not normally be given permission, except for the fact that it would secure the future conservation of a heritage asset. By contrast, we consider it important that any development at Talbot Village is delivered in a way that conserves and enhances the significance of heritage assets. In addition to this, enabling development is only applicable in certain circumstances, including that there are no alternative means of delivering the same outcome, such as other sources of public or private investment, and that the amount of enabling development is the minimum amount necessary. Consequently, the principle of enabling development cannot be established through a site allocation policy. It may however be possible to establish a mechanism (such as developer contributions) to secure enhancements to the conservation area. Clarification is also required around whether the quantum of development referred to at part iv of the policy is the means of delivering the 'sensitive infilling' referred to? We would be concerned if there were additional scope for infilling due to the increased potential for heritage impacts. We have suggested alternative text based on our current interpretation of the policy. It may be helpful if the specific development sites proposed in the conservation management plan were also be included in the plan for clarity.</p> <p>Suggested modification The Talbot Village area (North of Wallisdown Road) offers potential for in the region of 15 homes through sensitive infilling on plots as set out in the conservation area management plan, where new homes will provide contributions for enhancement of the conservation area. Development proposals must:</p> <ul style="list-style-type: none"> i. Conserve and enhance listed buildings and their settings, and Preserve or enhance the character and appearance of the conservation area; ii. Be of a similar size, scale and character to the listed buildings; iii. Be no greater than two storeys (approximately 6-9 metres) in height; and iv. Provide in the region of 15 homes with scope for up to two homes by Alton Road, one home by Wallisdown Road, in the region of ten specialist homes at White Farm and in the region of five homes on land adjacent to White Farm Close. 	Development at Talbot Village must conserve and enhance heritage assets. Enabling development not suitable terminology and cannot be established through allocation. Clarification required surrounding quantum of development, infilling could result in heritage impacts.	<p>Amend to read: The Talbot Village area (North of Wallisdown Road) offers potential infilling on plots where new homes will act as enabling development to enhance the conservation area for in the region of 15 homes through sensitive infilling on plots as set out in the conservation area management plan. Development proposals must:</p> <ul style="list-style-type: none"> i. Preserve Conserve and enhance listed buildings and their settings, and preserve or enhance the character and appearance of the conservation area; ii. Be of a similar size, scale and character to the listed buildings; iii. Be no greater than two storeys (approximately 6-9 metres) in height; and iv. Provide in the region of 15 homes with scope for up to two homes by Alton Road, one home by Wallisdown Road, in the region of ten specialist homes at White Farm and in the region of five homes on land adjacent to White Farm Close. 	Agree proposed changes

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P30 WWW.2	<p>Consistent with the NPPF and HIA, we consider that this site allocation should signal the need to conserve and enhance heritage assets and their settings including the Talbot Village Conservation Area. We note that the proposed 3-4 storeys exceeds the maximum 3 storeys recommended by the HIA. Bearing this in mind we consider that taller elements should be set back from the road frontage, that a tree screen should be retained and that appropriate materials should be chosen to minimise visual impacts.</p> <p>Suggested modification Consistent with other policies, incorporate wording relating to the conservation and enhancement of heritage assets, and efforts to retain the non-designated heritage asset. Along with the following adjustments: “Development proposals must be predominantly three and four storeys (approximately 9-15 metres) in height with a maximum of three storeys close to the road frontage. A tree screen should be retained on the site boundary and materials should be sympathetic to the adjacent conservation area.”</p>	HIA recommends maximum of 3 storeys, taller elements should be set back from the road frontage and a tree screen retained.	Agree amend to read 'Development proposals must be predominantly three and four storeys (approximately 9-15 metres) in height with a maximum of three storeys close to the road frontage. A tree screen should be retained on the site boundary.	Agree proposed changes
P32 WWC.3	<p>The HIA indicates that there is potential for development of these sites to enhance the character of the area, but that building heights should be limited to up to 3 storeys.</p> <p>Suggested modification Incorporate policy criterion relating to building heights, consistent with other site allocations.</p>	HIA sets out building heights should be limited to 3 storeys	Appropriate building heights would depend on which car park or parts of a car park are released. Could be potential for buildings taller than three storeys on the northern car park adjacent to the Wessex Way.	Officer response noted
P32 WWC.5	<p>Note that according to the HIA, number 137 rather than 135 is a positive building within the conservation area. Nevertheless, we welcome the policy requirement to seek to convert both buildings.</p> <p>Suggested modification ii. Seek to convert the existing buildings, ensuring number 1375 West Hill Road is retained as a positive building within the conservation area;</p>	Number 137 is the positive building, welcome policy to convert both buildings	Agree amend ii to read 'Seek to convert the existing buildings, ensuring number 137 135 West Hill Road is retained as a positive building within the conservation area';	Agree proposed changes
Monitoring	<p>Policy BE6: Heritage assets We recommend indicators are included as measures of success in relation to the historic environment. As we mentioned in the introduction to this response, there is an imperative to ensure that conservation area reviews are completed and adopted. The supporting text to Policy BE6 (paragraph 7.55) commits to preparing and updating conservation area appraisals and management plans, particularly for those conservation areas that face the greatest pressure for development. We therefore recommend an indicator relating to number of appraisals/reviews completed and adopted. The supporting text to Policy BE6 (paragraph 7.60) also commits to seeking to secure restoration projects for heritage assets at risk, while paragraph 7.56 commits to removing Poole High Street Conservation Area from the Heritage at Risk Register. We therefore also recommend an indicator around reduction in the number of assets that are classified as heritage at risk.</p> <p>Suggested modification Include indicators to measure aspects of the success of the plan in relation to the historic environment, e.g. progress with: - Preparation/review and adoption of conservation area reviews, appraisals and management plans - reduction in the number of assets that are classified as heritage at risk</p>	Include historic environment in monitoring indicators e.g. conservation area appraisals and management plans, reduction in assets at risk	Agree – monitoring criteria to be added to consider the number of conservation area reviews and management plans completed and the number of heritage assets at risk	Welcome proposed changes
Monitoring	<p>Policy BE4 is a new approach to building heights in BCP district about which we have raised a number of comments and concerns. To ensure that the approach is delivering successful outcomes, we consider that it would be beneficial for the Council to devise an indicator relating to planning approvals that are compliant / not compliant with the building heights policy, particularly where non-compliance results in heritage or other impacts.</p> <p>Suggested modification An indicator relating to the building heights policy could assist the Council in monitoring the success of this policy and inform any revisions needed through future reviews of the plan.</p>	Include building heights monitoring indicator.	A building heights indicator will be too onerous to monitor	Noted

Building heights

7.35 Building heights are one of several factors of development that can strongly influence the character of a place. We are taking a more proactive approach to managing heights to direct the tallest buildings into the most sustainable locations and respect areas of consistent character. Whilst building heights are often described in terms of storeys this can be misleading as floor to ceiling heights vary between residential and non-residential uses. The height of a building is therefore measured in metres from the highest point of the building to where it meets the ground, at the main pedestrian entrance, figure 7.2. A typical residential storey is often just over 3 metres.

Figure 7.2 The height of a building



7.36 High land values ~~cause~~ result in pressure for taller buildings that are needed in order for development to be viable, particularly in Bournemouth and Poole town centres. Well-designed taller buildings can be appropriate, and can have a positive impact on places while helping to meet needs for new homes and employment space. However, they can have a detrimental impact on townscape character and the historic environment. They can also result in negative impacts on amenity, such as through increased downdraughts.

7.37 The BCP Buildings Heights Study (2023) examined the prevailing height of existing buildings across the BCP area, sets out principles for taller buildings and considers locations within town centres where taller buildings may be appropriate. The findings of the Study have informed the Local Plan and will be taken forward as a Supplementary Planning Document to support the Buildings Heights policy.

The Building Heights Study has identified the prevailing base height across the BCP area, referred to as the context height. Where a building is over three times greater than the context height it will be considered a tall building. Given the prevailing context heights, in the BCP area, which are typically two storey or lower, all buildings above six storey (over 18 metres) will be considered tall buildings. Where buildings are one storey greater than the context height this will be considered as a gentle increase in height, in some cases this can be undertaken as permitted development.

~~The Lansdowne area in Bournemouth town centre and Poole town centre north are identified as being suitable locations for taller buildings.~~

7.38 The Lansdowne area in Bournemouth town centre and Poole town centre north are identified as being suitable locations for taller buildings. Outside the town centres the prevailing building heights are lower and in most cases the height of new development

should be consistent with other development in the immediate vicinity. There are some locations where ~~gentle~~ increases in height would not only help meet developments needs in sustainable locations but would also improve townscape quality. These locations are set out as site allocations, local opportunity areas and local opportunity streets in Part 2. Further locations that are suitable for gentle increases in height may be identified within design codes. Where site-specific policies contain indicative building heights these are subject to detailed design and assessment of impacts at planning application stage. Where maximum heights are provided these are a maximum and are not intended as a target height.

~~7.39 The Building Heights Study has identified the prevailing base height across the BCP area, referred to as the context height. Where buildings are one storey greater than the context height this is described as a gentle increase in height. Where a building is over three times greater than the context height it can be considered a tall building. All buildings above six storey (over 18 metres) will be considered tall buildings.~~

7.40 All development involving proposals for tall buildings need to be designed with care to ensure adverse impacts that can arise from this form of development are avoided. In all cases proposals for ~~the tallest~~ buildings should demonstrate they are in a suitable sustainable location in relation to railway stations, high frequency bus services and close proximity to a range of facilities, services and public open space. Proposals must also consider potential impacts on heritage assets, views, townscape character and green infrastructure. In Poole town centre due to the proximity of Poole Harbour SPA/RAMSAR site this should include avoiding large reflective areas that can increase the risk of bird collision, disturbance and mortality.

7.41 Where consideration of the suitability and sensitivity of a site suggests that a tall building may be justified, proposals will need to demonstrate how they will deliver outstanding design quality (making use of design review if necessary), high quality living environments and public benefits. Proposals should be able to demonstrate that the public benefits clearly exceed those that could be achieved for a building that would be ~~lower than~~ consistent with the prevailing context height for the area. These benefits should include but may not be limited to enhanced provision of affordable housing, public transport, cycling and walking infrastructure, social infrastructure or improved public realm.

7.42 Where proposals include a tall building this should be justified in the Design and Access Statement with consideration of the impact of the proposal; ~~a tall building statement will be required as part of the application. This should include justification for the proposal and an analysis of the proposal~~ from key viewpoints to be agreed by the council. This should include any important views identified in the Buildings Heights Strategy (2023), Neighbourhood Plans, Conservation Area Appraisals or from public locations relevant to the application.

19B Policy BE4: Building heights

1. Appropriate building heights

- a. Increases in building height greater than the prevailing heights within an area, will be focused within Lansdowne (BC.4) Bournemouth and Poole town centre north (PT.1) centres, increased heights will also be acceptable where these are identified within site allocations, local opportunity areas and on local opportunity streets, or where identified within any neighbourhood plans or by any design code(s) adopted by the council.

- b. Outside of these areas, building heights of new development ~~should are to~~ be consistent with the prevailing building height in the local context.

2. Bournemouth and Poole town centres

- a. Within the Bournemouth and Poole town centres the Lansdowne area and the Poole town centre north are appropriate for clusters of tall buildings. Building heights within a cluster should vary and step down in height towards the adjacent lower scale areas.
- b. Elsewhere within Bournemouth and Poole town centres many areas are sensitive to tall buildings and proposals for tall buildings should have regard to the surrounding context, heritage assets and the BCP Buildings Heights Study, and clearly demonstrate a townscape rationale for the siting of the building.
- c. Within Poole town centre proposals should avoid large areas reflective glass or reflective cladding/panels.

3. Tall buildings

All proposals for tall buildings six storeys (18 metres) or taller must:

- a. be sustainably located, deliver outstanding design quality and achieve public benefits;

b. clearly demonstrate a townscape rational for the siting of the building

~~b.c.~~ support a coherent streetscene, relating comfortably to adjoining buildings and those on the opposite side of the street;

~~e.d.~~ have a clearly defined base, middle and top;

~~d.e.~~ be designed to create a human scale at street level with the tallest parts of the building set back above a shoulder height of 6 storeys (18 metres);

~~e.f.~~ have a positive impact on the skyline with elegant proportions and an attractive silhouette;

~~f.g.~~ feature welcoming, active frontages with clearly legible entrances;

~~g.h.~~ overlook the public realm;

~~h.i.~~ respond positively to the local context, conserving preserve or and where possible enhance heritage assets and their settings;

~~i.j.~~ not adversely affect important views including views of church spires and the sea;

~~j.k.~~ be designed to avoid harmful impacts on wind conditions, over-heating, shading and microclimate, providing appropriate mitigation where required; and

~~k.l.~~ provide justification for the proposal within the Design and Access Statement. This must include a Landscape and Visual Impact Assessment to show the proposals in key views to be agreed by the council.