



SO CG 13

Statement of Common Ground between  
BCP Council and Go South Coast (0096)

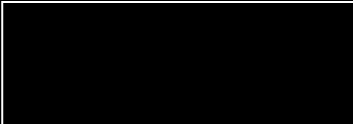

BCP Local Plan Examination

13 January 2025

## 1. General

- 1.1 The Council has prepared this Statement of Common Ground (SOCG) to assist the Inspectors at the BCP Local Plan Examination.
- 1.2 Go South Coast'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 Go South Coast (representor ID 0096).
- 1.3 This SOCG is split into two parts. Part 1 was agreed in January 2025 to support the Stage 1 Hearings taking place 21-23 January 2025. Part 2 will be agreed in Spring 2025 ahead of the Hearings that take place in Spring 2025.

## 2. Declaration

Name	Organisation	Signature	Date
Tamsin Brewer-Hughes Planning Policy Officer	BCP Council		13/01/25
Nick Small	Go South Coast (Morebus)		16/01/25

## 3. Agreed position

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

**Stage 1**

**The following representations have been discussed ahead of Stage1 of the Local Plan examination.**

Plan Ref	Full comment	Officer summarised comment	Support/ Object	Officer Response and action	Go South Coast Position
Duty to Cooperate	<p>This is addressed very briefly in the Plan at Paragraph 1.16. A Statement of Common Ground is published, made between the Council and Dorset Council. It has not been agreed nor endorsed by either Council but represents an “officer view”. We recognise that the Council continues to be bound by the provision set out in section 33A(1) of the Planning &amp; Compulsory Purchase Act 2004, to demonstrate how it has co-operated with other authorities and statutory agencies in relation to cross boundary strategic matters and priorities. We are well aware that judgments in case law have established that the ‘Duty’ is not a duty to agree, but every effort should be made to secure the necessary co-operation.</p> <p>NPPF paragraph 27 establishes that:            “In order to demonstrate effective and on-going joint working, strategic policy- making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.”</p> <p>NPPF devotes four paragraphs to the matter of cross-boundary co-operation, reflecting the statutory basis for this requirement and its salience in achieving a sustainable pattern of development. As NPPF para 26 says:            “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.” (our emphasis).</p> <p>The role of local communities and “relevant bodies” – including “infrastructure providers” in identifying these requirements is explicitly stated in paragraph 25. This wider cross-boundary strategic collaboration is plainly expected to be a more broadly collaborative effort, across a number of matters and themes.</p> <p>We note that a Statement of Common Ground (“SoCG”) (EiP Ref SD8a) has been published alongside this consultation between the Council and Dorset Council alone, at the very end of the plan preparation process. It has not been formally agreed or endorsed by the competent authorities, but represents “an officer view”. This being the case it is hard to avoid the conclusion that the document is a “place-holding exercise” undertaken at great speed to facilitate the sudden acceleration of the draft plan directly to submission.</p> <p>Despite what is said at NPPF paragraph 26, the SoCG principally covers housing requirements. It is plainly intended to act only to “shut the door” on any consideration of how housing needs might appropriately be met across the South East Dorset Housing Market Area. No other themes are covered, including “cross-boundary strategic infrastructure”, which is mentioned explicitly in NPPF and also in para 1.16. The evidence presented in the Statement of Common Ground Clearly does not sufficiently meet the statutory requirement or fulfil the expectations of NPPF set out at paragraphs 24-27. However, “The National Planning Policy Framework must be taken into account in preparing the development plan.” (NPPF paragraph 2).</p> <p>There is no similar Statement of Common Ground made with either New Forest District Council, Wiltshire Council, nor Hampshire County Councils as the respective planning, highways and transport authorities for adjoining areas, among other things. Nor is there a Statement of Common Ground with National Highway Company Ltd, as a statutory agency.</p> <p>It is clear that cross boundary issues that surround strategic infrastructure and involving all these bodies are relevant to the preparation of this plan.</p> <p>In fact, looking at the full suite of published material, it is quite fair to say that there is no evidence of strategic cross-boundary consideration in the plan at all, despite the expectations in NPPF and in statute that no plan can be considered sound and properly prepared without this.</p> <p>Since the Duty to Cooperate has not been demonstrably discharged in line with the requirements of the law and NPPF, we consider that plan is not legally compliant.</p>	<p>Draft BCP/DC SoCG, provided at very end of plan-making process, a place-holding exercise not formally agreed/endorsed by competent authorities. Principally covers housing issues to ‘shut the door’ on consideration of how housing needs will be appropriately met in South East Dorset HMA. Other themes, including cross boundary strategic infrastructure, not covered. Evidence presented in SoCG does not meet statutory or NPPF duty to co-operate requirements. No similar SoCGs with New Forest District Council, Wiltshire Council, Hampshire County Council or National Highways. Cross boundary strategic infrastructure issues are relevant and involvement of these bodies relevant to plan preparation. No evidence of any strategic cross-boundary consideration, therefore duty to co-operate not demonstrated and plan not legally compliant.</p>	Objection	<p>Having met to discuss the representations the following was discussed and agreed:</p> <p>We acknowledge that the SOCG with New Forest District Council, New Forest National Park Authority and Hampshire County Council was delayed due to sign off processes from each Council and wasn’t available for the Pre-Submission consultation. However this is now available and GSC can comment in this SOCG (and hearings statement).</p> <p>National Highways (NH) have been engaged throughout the process. They requested we update the transport model which we did and we remodelled the housing impacts. BCP/NH agreeing a SOCG shortly. There is only one issue, the junction of A31 and A338 with NH wanting traffic count data to understand the implications of the junction and this is being modelled.</p> <p>Dorset Council (DC) and BCP Council are currently working on the Local Transport Plan 4, and already have a joint LTP3. Go South Coast (GSC) are involved in the LTP4 engagement exercise.</p> <p>GSC are not a prescribed body under the duty to cooperate, but have been involved in shaping the sustainable transport strategy that supports the Draft Local Plan. In particular the Bus Service Improvement Plan (2021) (CAT6).</p> <p>GSC were contacted by Planning Policy team in April 2023 along with all service providers. This confidential consultation sought the views of service providers about the preferred local plan strategy, development amounts and proposed allocations. Unfortunately there was a change over in GSC staff at the time and the opportunity to comment was missed.</p> <p>In hindsight, the Planning Policy could have followed up with GSC, but was unaware that GSC had concerns until the 2024 Pre-Submission consultation response. It was assumed that as GSC were supportive of an urban growth strategy due to agreement to the BSIP and focus on public transport as the mitigation strategy.</p>	<p>Noted. GSC has made further comments in its response to Inspector’ MIQs.</p> <p>Noted. The agreement with NH on substantive TEB points is welcome.</p> <p>Noted and AGREED</p> <p>It is AGREED that GSC nor any bus operator is a prescribed body. It is AGREED that effective ongoing collaboration with GSC is not something that in itself has a bearing on legal compliance.</p> <p>However NPPF paragraph 16 c) make specific reference to collaboration between plan-making bodies and “transport...providers”, outwith the statutory Duty to Cooperate.</p> <p>AGREED. To the extent that the informal consultation was focused on whether there was capacity on bus services to accommodate demands arising, GSC does not consider that this exercise was one that would have bearing on shaping the plan.</p> <p>It is AGREED that GSC do support in principle an urban focus, subject to wider evidence demonstrating that such intensification does not cause material deterioration in highways congestion and bus operating conditions.</p>

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Legal compliance	<p>SD3 Local Development Scheme and Preparation of the Plan</p> <p>The National Planning Policy Framework (“NPPF”) requires at paragraph 16 that: “Plans should... c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;”</p> <p>Go South Coast, trading as morebus, does not consider that the progression of the plan to date properly reflects this requirement.</p> <p>The Plan has not been published pursuant to an up-to-date, published Local Development Scheme (“LDS”) as is required by law. This must set out the documents the Council intends to prepare and the timescales anticipated to prepare them. Until this consultation commenced, the published LDS dated back to 2019.</p> <p>A revised LDS was published in February 2024 stating the Council’s intention to proceed immediately to Reg 19 “pre-submission” consultation in “March-April 2024”. This in effect all-but-retroactively signalled the Council’s intent just weeks prior this draft document and the evidence base being published for consultation. It is simply not credible to suggest that this material was all prepared subsequent to the approval and publication of the LDS.</p> <p>An Issues and Options Consultation took place in 2022. However, no evidence was published, nor a draft Strategic Environmental Appraisal, to allow its examination and seek relevant input, including to the evidential methodology for technical work, such as on infrastructure and transport, which are clearly important planning themes reflected in Chapter 9 of NPPF.</p> <p>With regard to the transport theme, in the local context, it is very apparent that there are very serious challenges and constraints, not least from the picture painted by the Joint Local Transport Plan 3 (“JLTP3”) (EIP Ref CAT4) which was adopted in 2012. With the local declaration of “Climate Emergency” and national policy and a legally binding commitment to “Net Zero” by 2050 in view, the role of the plan is addressing the environmental impacts of mobility in particular, is of hugely greater importance than it was acknowledged to be in 2012. Alongside this, the socio-economic dimensions of sustainable transport, which play out at the scale of the locality, should be considered to be at least as great importance.</p> <p>Despite the time that has elapsed since the “Issues and Options” consultation there has been no formal process of consultation on a draft plan nor its evidence base. It bears pointing out that previous plan-making exercises took place in Bournemouth in 2008-11, and in Christchurch in 2010-13: well over a decade ago. This being the case, the Council cannot point to a relatively recent process of public engagement that allows the draft plan-making process to reflect current public and business concerns.</p> <p>Rather, the Council has proceeded directly to a Regulation 19 pre-submission draft. We confirm that we, as a key stakeholder alongside the utilities, were approached in Spring 2023 with a confidential list of potential regeneration sites, with a view to confirming that “infrastructural capacity existed” to serve them, but nothing more. We were not in a position to review this in detail but in any case, the capacity of bus services to serve developments across the conurbation is broadly not in doubt. This does not represent continuing meaningful and ongoing collaboration with infrastructural and service providers as NPPF expects at paragraph 15 and 16.</p> <p>Much less a plan-making process in which the wider community, including local businesses, can broadly participate, as the law set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (“The Regulations”), and national policy set out in the NPPF expect.</p> <p>As the Regulations and NPPF make clear this is a draft that the Council considers “sound” and as such should be taken to represent a fully legally compliant-plan, as well as one that complies with NPPF and is backed by suitable relevant proportionate and up-to-date evidence. An Examination in Public under Regulation 24 has the purpose of testing a credibly sound plan. It is neither intended nor able to make sound, after its submission, a plan that is legally or evidentially inadequate. This point has been made and repeatedly reinforced by the Planning Inspectorate in publicly available correspondence to a very wide range of planning authorities in recent years, including Uttlesford, Wealden, The West of England Authorities and Stroud.</p> <p>No meaningful opportunity has been given to key stakeholder and much less the wider public, to examine the evidence base, much less the plan strategy, until this final pre-submission stage. The plan has been prepared entirely out of the public gaze, and as such it is published as a “fait accompli” prior to submission to the Secretary of State for Examination in Public (“EiP”). Meaningful ongoing collaboration with key transport operators cannot be considered to have taken place as NPPF paragraph 16 c) requires.</p> <p>Nor is the LDS realistic regarding the future progression of the plan to adoption. The consultation closes in May 2024, yet Reg 22 submission is indicated to take place in June 2024, almost immediately thereafter. This gives no real time for the Council to even begin to consider responses to the consultation, much less to properly package the material, which will no doubt be voluminous, to HM Planning Inspectorate (“PINS”).</p>	<p>Plan does not meet the NPPF requirements for engagement with communities and stakeholders. The Local Development Scheme was outdated and last revised in February 2024, suggesting the plan materials were prepared before the revised LDS. During the Issues and Options Consultation in 2022, no supporting evidence or draft Strategic Environmental Appraisal was published. There has been no formal consultation on the draft plan or its evidence base since the Issues and Options consultation. The consultation process has been inadequate, with key stakeholders, including transport operators, not given a meaningful opportunity to participate. The LDS proposes an unrealistic timeline, with consultation closing in May 2024 and Reg 22 submission in June 2024, leaving insufficient time to consider responses properly. The immediate examination commencement in July 2024 is also deemed implausible given the Planning Inspectorate’s workload.</p>	Objection	<p>Having met to discuss the representations the following was discussed and agreed:</p> <p>There have been 4 iterations of the LDS in 2019, 2022 and twice in 2024. The 2022 LDS clearly showed the Council was planning to prepare a Pre-Submission Draft as the next stage in the process and wouldn’t be producing an additional ‘preferred options stage’. This was necessary to meet the legal requirement of having a local plan in place within 5 years of the authority forming (which was 2024). A preferred options would have added another 12 months to the timetable.</p> <p>Despite this the Council confidentially consulted service providers including GSC in April 2023 to seek views on the proposed draft strategy, location and amount of planned growth. In addition, the Council’s transport policy team has also been working closely with transport providers including GSC to ensure the Draft Local Plan could be mitigated through a sustainable transport strategy with a focus on public transport and active travel.</p> <p>The consultation arrangements have followed those set out in the relevant planning regulations for plan making and included opportunities for engagement with stakeholders and communities. All representations were considered between the Pre-Submission consultation and submission as evidenced in SD7b Statement of Consultation (June 2024).</p> <p>Evidence to support the plan has been available on the Council website throughout the process and was uploaded as it was finalised and completed. The SA Scoping was completed at Regulation 18 stage. There is no requirement to publish the SA at Issues and Options stage.</p>	<p>Noted, and AGREED. GSC had no input into the decision made to prepare the plan in this manner.</p> <p>It is clear that the pace and timing of the plan-making process has been determined by outside factors.</p> <p>GSC has a close ongoing working relationship with BCP transport officers. This covers both operational and some more strategic matters.</p> <p>Noted. GSC cannot make representations either in support or otherwise, on material that is not in the public domain during the prescribed consultation period.</p> <p>The Sustainable Transport Strategy is something that some GSC officers were aware of at a high level, but the final content was not available to us until this material was published very late and in any event after the closure of the Reg 19 Consultation.</p> <p>It is nevertheless AGREED that the Sustainable Transport Strategy, now published (CAT2 a-f), is a very material advance in the transport evidence that should underpin the plan and its mitigations.</p>

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	At the point submission is achieved, the LDS claims that Examination will begin immediately thereafter in July 2024. This is inconceivable, especially since PINS are already dealing with an exceptional number of requests for Local Plan Examinations following 30 months of stasis in plan-making on the part of many local planning authorities. Thus, adoption in 2025 is not a credible prospect.				
Evidence Base	<p>We understand that such a study has been prepared. However, it is not published either as evidence to inform this plan, or otherwise. We note the Study is referred to and quoted at a number of points in the draft plan.</p> <p>The approach to parking has multiple serious implications for the plan, and securing its strategic objectives. Among the most important, location, quantum and costs of parking, both at trip origins and destination are among the single biggest influencing factors in travel behaviour. At development level it profoundly influences urban design and place-making, and has a direct bearing on achievable densities and land use, as well as development costs, across all development types and dwelling formats. The approach to on-site parking provision can have significant off-site impacts not least in terms of the way that parking demand is met in practice, including on the public highway. All these, and many other factors, have a direct influence on the provision and use of bus services. Achieving any material change in travel behaviour to reduce car dependency and use, cannot realistically be accomplished with a rational and rigorous approach to providing and managing for parking demand.</p> <p>The plan is exceptionally dependent on high density and very high-density mixed use schemes to meet development requirements. Policy SA2 makes plain that over 90% of housing supply is to come from development exceeding 150 dwg/Ha. It should be obvious to the Council that accommodating any amount of parking on developments of this kind – even at relatively low rates of provision per dwelling – is going to involve multi-storey decked parking provision. This has a very wide range of implications for site access, development design and development costs. It is thus of the greatest concern that this work is not in the public domain when the Council is appearing to rely on it to prepare the Local Plan.</p>	Parking study has not been published to inform the plan or otherwise, but is referred to in plan at numerous points. The approach to parking on public car parks, on-street and in development impact upon the provision and use of the bus services. Any change in travel behaviour to reduce car dependency and use cannot be achieved without managing and providing for parking demand. High density development will result in multi-storey decked parking which has numerous implications for the development.	Objection	A comprehensive parking study is in production. In the interim the Council has prepared EXAM13 Public off street car parking study (November 2024). While this wasn't available for the consultation, it provides some evidence to support the possible release of car parks for development. This strategy requires development and the proposed housing sites are not relied upon in the early part of the plan period, allowing time to prepare a clear approach.	<p>Noted and welcomed.</p> <p>Please see comments above regarding the timing of publication of transport evidence within the overall plan preparation process.</p>
Evidence Base	<p>The only newly commissioned element of the transport evidence base largely consists of the Transport Modelling Report ("TMR"), which is a document setting out the outputs of a South East Dorset Multi Modal Transport Model (SEDMMTM).</p> <p>This is a "SATURN" traffic model set up at strategic scale. It is thus a relatively low-resolution assignment of forecast trip demands between portions of the plan area, and across its borders, using a limited number of the more significant through routes.</p> <p>The SATURN network modelled is thus very coarse. To begin with it is a strategic traffic model and as such is very inadequate basis to assess anything more than the most broad-brush effect on the main through routes and that selection of major junctions modelled. The actual model thins out the network substantially further. It is not designed to look at more detailed operation of junctions. Especially when these are judged to be approaching "saturation" in the model (with a ratio of flow to capacity generally accepted to be around in excess of 90%), the ability of the model to accurately predict delay and queuing rapidly breaks down. In complex parts of the network where saturation starts to cause queues to develop that affect upstream junctions, these models can start to break down.</p> <p>A SATURN model does not look at other modes, nor can it dynamically assign travel demands between modes based on relative "levels of service" "costs" or "generalised journey times" improving or decreasing by mode. It cannot accurately assess the effects of network breakdown on side roads, through things such as trip reassignment down other smaller streets (i.e. rat-running"), for example. This would require much more involved modelling, including micro-simulation modelling tools, and, ideally, multi-modal models that start to assess the potential for behaviour change as alternative travel choices are improved in their attractiveness relative to driving. Such models based on multinomial logit-choice architecture, are quite commonly used overseas but rarely used in the UK. We must acknowledge that these tools are costly and to set then up for a conurbation the size of BCP would involve very substantial costs, and time, as well as expertise that is not found in much quantity in the UK mainly because there has historically been so little demand for these tools. As a methodological tool SATURN is the foundation for the traditional "predict and provide" approach to planning for traffic, rather than sustainable mobility. It can achieve nothing else. It cannot suggest or even predict the outcomes of interventions that make sustainable modes relatively more attractive, despite that being the principle focus of even the current JLTP3. All this is in effect all-but-explicit in section 3 of the TFR.</p> <p>The specifications of the model are laid out in sections 1.2-1.10:</p> <ul style="list-style-type: none"> <li>• The current SATURN network will be used for modelling purposes with a forecast year of 2039.</li> </ul> <p>The model base year is 2017 (para 2.2), and was calibrated in 2019, which, while prior to COVID, also means that it is actually quite out-of-date, especially given how far peak travel demands have tended to shift – and not necessarily reduce. Thus 2023 is a forecast from the 2017 baseline. We would have expected the model to have been calibrated to a 2023 base year. As such the model</p>	Transport Evidence Base CAT1a Transport Modelling Report - A very coarse model and thins out the network. A SATURN model for the network is not efficient for the purposes of the Local Plan, and cannot suggest or predict the outcomes of interventions that make sustainable modes relatively more attractive, despite this being the principle focus of the current LTP3. Data within SATURN network is not up to date as movements have changed since COVID, and don't take these in to account. SEDMMTM Model not reflecting peak times accurately, as these have extended beyond more traditional times, and a set hour in the day. Results of the model present no surprises at all. Model shows development will increase congestion, which will have implications for the efficient delivery of reliable and attractive bus services. Many junctions and A-roads are highlighted as congested (some over capacity) at varying times of the day. A3049 Wallisdown Road is a major congestion area with significant existing issues, and further development at Talbot Village will exacerbate this unless change occurs	Objection	<p>For Stage 1 of the examination the only issue is whether there is sufficient evidence to underpin the local plan, which we believe there is. We have a strong focus on delivering a sustainable transport strategy and improving public transport accessibility as set out in the Transport Background paper.</p> <p>The transport model has been updated to the 2022 model upon the request of National Highways. It provides the required evidence at a strategic local plan stage. While it provides useful evidence, more detailed evidence will be needed. The Sustainable Transport Masterplan (CAT2a-f) is the basis for this and the BSIP (CAT6).</p> <p>The sites and junctions referred to can be covered through an update to this SOCG for Stage 2 of the examination.</p>	<p>Noted and welcomed.</p> <p>It is AGREED that the now-published STS (CAT 2 a-f), alongside the BSIP (CAT6), forms a much more sound basis to establish the transport evidence behind the plan.</p> <p>The role and relevance of the existing JLTP as part of the transport evidence base is not clear in the light of this new evidence.</p> <p>It is AGREED that further discussion of the likely effects on specific junctions, and the possible effect of interventions set out in the STS both at plan-wide level and on specific parts of the network, could take place later in the Examination. We would urge that all parties have sufficient time to examine the STS and its implications for the plan.</p> <p>Given the effects indicated by modelling, the materiality of these impacts are likely to be material, in demonstrating that the plan strategy can be delivered without unacceptable impacts, including on bus reliability and journey times.</p>

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	<p>cannot be said to represent “up-to-date” evidence as NPPF expects.</p> <ul style="list-style-type: none"> <li>• The full extent of the SEDMMTM model has been used in this project. We agree that the BCP area is well represented as shown in Figure 1.2, with a fairly comprehensive representation of the key links, including side roads that would be affected by reassignment from main roads. It includes links into the adjacent parts of Dorset in particular, which are closely related to the plan area and form an integral part of its functional housing and economic market areas. This is welcome.</li> <li>• Morning (AM) peak Hour: 08.00 to 09.00 hours. This is very traditional and its appropriateness is now challengeable as the peak hour is ever-extending both earlier and later, in no small measure due to traffic reassigning by journey time as the network becomes more saturated. Thus, the model entirely fails to examine the key 0700-0800 hour, where increases in saturation and delay at already over-loaded junctions are likely to be exceptionally great for non-discretionary journeys.</li> <li>• Interpeak (IP) demands are modelled as an average of demand between 1000-1600 hours.</li> <li>• Evening (PM) peak Hour: 17.00 to 18.00 hours. Again, this evening peak is spreading earlier, as early as 1500, partly as a result of increased use of cars to pick children up from schools. The interpeak average does not model this well.</li> </ul> <p>We note that:  “2.12 The model calibrates reasonably well in the Study Area. In the AM peak looking at all vehicles, all locations have GEH values (representing the relationship between the observed and the modelled flow at a value) of less than 5.0.” However, we would point back to the fact that this calibration was done in 2019.  The model is run for three scenarios in 2038; a “Do minimum” (DM2038) and a “Do Something” (DS2038/DS2038 LP) which reflects the delivery of a very limited number of interventions to address capacity issues, as well as the delivery of a full range of sites in both BCP and adjacent areas of Dorset. Confusingly “DS2038” and “LP2038” seem to be used interchangeably but refer to the same output.  Known allocated sites are shown at Fig 1.3 and on top of these a windfall allowance on unidentified sites is attributed to polygons within the model which are illustrated at fig 1.5. While crude, this seems reasonable given the very high level of uncertainty about the high proportion of growth that is expected from unidentified sites.  The results of the model, in the absence of any material mitigation strategy or set of interventions to address additional demand in the network if somehow the Local Plan development quantum were to be achieved, present no surprises at all. To the extent that the baseline model (BASE) calibrates “reasonably well” it shows today’s widespread congestion and delay based on “average” conditions. As the outputs of DS2038 show, traffic conditions across the plan area become markedly worse when traffic arising from the expected developments is added. These are already discounted by 20% to account, in effect, for non-delivery. This has grave implication for the efficient delivery of reliable and attractive bus services, especially given how far congestion already seriously challenges us across the Conurbation.  This is summarised by a single comment at TFR para 7.4 “It is noted there is a fairly significant drop in average speeds in both the AM and PM peaks.” As the major bus operator in the plan area, this bland statement is one of many that greatly concerns us and ought rightly to concern the Council and all stakeholders in the Plan.  We work through the results in greater detail below.  Central (Bournemouth) area  The results of the model in the Bournemouth area showing the junctions and links approaching or at saturation (VoverC% &gt;80, Delays &gt;60 seconds) is shown in the TMR at Tables 8.3 and 8.4.  8.27 For the Central Area - Bournemouth, again several junctions are over capacity on some or all arms in the BASE, and again matters just get worse in the DM2038 &amp; DS2038LP scenarios. According to the TMR report “Junctions of concern” are:  • A348/A3049 “Mountbatten Arms” (today the “Miller and Carter”) Ringwood Road/Wallisdown Road – Over capacity on Ringwood Road South arm in the PM, for both DM and DS. (services 6, 6a, 14, X6)  • A338/A35 County Gates Roundabout, Westbourne – over capacity AM, IP &amp; PM. This is one of the most serious choke points at the end of Wessex Way, used by some of the most frequent bus services in the conurbation including m1 and m2 together operating as often as every 3-5 minutes in each direction.  • A 347/B3063/B3064 “Cemetery Junction” Lansdowne Road/Charminster Road/Wimborne Road- over capacity AM &amp; less so PM. This is on the key route between the town centre and the universities; but also towards Winton and the northern edge of the conurbation. As such it is especially important on the bus network, and transited at peak times by upwards of 30 buses per hour each way on routes m1, 5, 5a, 6, 6a, 12, 13, 13a, 17, 32 and Unibus U1 and U4. It is probably one of the three busiest and most critical junctions on the conurbation bus network.  • Royal Bournemouth University Hospital, Castle Lane East – Littledown over capacity AM &amp; PM . This is the main hospital access junction. This a key point on the bus network – both for local and</p>	<p>through behaviour or measures. Additional urban extensions to west of Bear Cross roundabout (A348/A341) will exacerbate existing congestion, when bus provision is likely to increase in this area in the early years of the plan. Routes may become inoperable if congestion isn't resolved. Many problem junction in the Christchurch area where bus services are less frequent, or destinations are outside of the conurbation, and so has a more prevalent impact on these. Key areas of congestion in Christchurch not acknowledged in report. Congestion at Hurn, and the predicted increase in this, makes it impossible to justify adding a bus service to the area, despite a need due to its outlying position in the conurbation. Impact of congestion on longer bus routes not reflected in the TMR. Bus routes which are longer and serving areas outside conurbation need to be able to access urban areas easily and with minimal congestion as reliance on these services is becoming more prevalent as people seek to occupy lower value housing. Congestion at junction which all buses leaving Poole Bus Station have to use is of concern, and should not be exacerbated. There are junctions outside of the conurbation which significantly affect bus journeys in and out of the conurbation. Agrees with concluding paras 8.22, 8.25, 8.44, 8.60, 8.61 and 9.7 of the Transport Modelling Report. Network is already operating at capacity at many places, and no mitigation is modelled or proposed. Confirms content of report as a key operator and user of the network. Seasonal and event traffic exacerbate problems. Roadworks assist in exacerbating congestion, and no network resilience. Buses cannot avoid congestion due to fixed routes, making journeys slower and less reliable, and contributes to undermining the effectiveness and attractiveness of the bus offer, as well as its efficiency. Some factors not</p>			

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	<p>inter-urban services. Our concerns are, it must be said, significantly tempered by the fact that substantial bus priority exists on the western approach and departure arm, and some on the eastern.</p> <ul style="list-style-type: none"> <li>• A35/A3060 Iford Lane Roundabout Christchurch Road with Castle Lane East and Ifoed Lane. All arms over capacity AM, IP &amp; PM. Again this is a notorious pinch point and a key junction on numerous frequent core bus routes including 1a, 22, 24, X1 and X2. This is crucial to public transport connectivity to and from the wider Christchurch area.</li> <li>• A3049 Wallisdown Road Roundabout (Kinson Road with Wallisdown Road) all arms - over capacity AM &amp; PM Primarily. This is an important node immediately west of the University campuses at Talbot Heath, served by multiple routes including 6, 6a, 14, 15, 17, and Unibus U2. Congestion in the pm peak is acute and can easily start to block back to the main Talbot Heath roundabout and beyond. The A3049 also links much of the conurbation to major employment sites to the west around Alderney and Mannings Heath. This outcome probably does not fully reflect the woeful lack of resilience on the whole A3049 corridor which further development at Talbot Heath will no doubt exacerbate, absent vigorous behaviour change measures.</li> <li>• A347/A3049 Boundary Roundabout, Wallisdown Road and Talbot Ave, over capacity AM, IP &amp; PM. This roundabout relates to a key node at the corner of the University campuses, and well as the A347 Boundary Road linking to the north of the conurbation. It is a key point used by multiple routes and in particular core Unibus service U1 and U3, as well as 6, 6a, 15, 17.</li> <li>• A347 Talbot Roundabout – over capacity most arms AM &amp; PM This lies less than 500m to the east of the Boundary Road roundabout and interacts significantly with it. Bus routes 6, 6a, 15, 17 and Unibus U3 use the northern and western arms, but the key Unibus U1 uses the eastern one also, to link Lansdowne with the Talbot Heath Campuses.</li> <li>• A3060/A347 Redhill Roundabout – over capacity all arms AM &amp; PM. On the north edge of the conurbation this is less intensely used by buses. However, we have just uplifted the 13/13a service from every 30 to every 20 minutes in response to the BSIP and the recognition of substantial planned development being brought forward in the former East Dorset at West parley and East of Wimborne. We note potential allocations in the draft Dorset Local Plan published in 2022 on this corridor west of Parley Cross as well as some further development in the Leigh Road area of Wimborne. Thus pressure on this junction , and well as the demand to further reinforce the bus network, mean that increasing congestion at this junction is a serious threat to the sustainable development of the conurbation and its immediate hinterland.</li> <li>• A348 A341 Bear Cross Roundabout Ringwood Road/Wimborne Road – over capacity all arms AM, IP &amp; PM. On the edge of the conurbation, this lies on a major crossroads of key longer-distance routes where longer distance and local traffic flows meet and cross. It is already under chronic pressure at most times of day and the modelling report presents absolutely no surprise that these will become more severe and affect even off-peak times more generally. We would further draw attention to the three planned urban extension in the former Borough of Poole all of which lie more or less immediately to the west on the A341 Magna Road arm, which will add significant additional demands to that. Use by buses is already significant and is intended to substantially increase during the early years of the plan. Current routes include 6a, and X6.</li> <li>• A348 West Howe Roundabout Ringwood Road with Poole Lane and High Howe Lane– over capacity all arms AM, IP &amp; PM. This is on the A348 on the western fringe of the built up area, and affects fewer bus routes and frequencies. Services 6, 6a and X6 pas through. X6 runs the full length of Ringwood Road and the cumulative impact of delays at successive junctions can be especially severe. The route is the main public transport link to Verwood in Dorset and is already marginal. Further aggravation of delay risks the whole route becoming practically inoperable and commercial unsustainable.</li> </ul> <p>East (Christchurch) Area The results of the model in the Christchurch area showing the junctions and links approaching or at saturation (VoverC% &gt;80, Delays &gt;60 seconds) is shown in the TMR at Table 8.5, 8.28 For the East Area - Christchurch, again a few junctions are over capacity on some or all arms in the BASE, and again matters just get worse in the DM2038 &amp; DS2038LP scenarios. We note that “Junctions of concern” are many but the following have a particular relevance to the public transport offer:</p> <ul style="list-style-type: none"> <li>• A35/B3059 Stour Road Signals (Barrack Road) – over capacity most movements AM &amp; PM The entire A35 corridor has a profound effect on the main bus services across the Christchurch area. This set of signals is at the point where the 1a, 1b and 1c routes together running 8 times per hour in each direction, converge, west of the town centre. See comments below about the consequential wider effects on the wider network.</li> <li>• A35 Stony Lane (Purewell Cross) Roundabout - over capacity AM, IP &amp; PM. This is traversed by the 1a every 30 minutes each way; this is the only public transport link to Burton which includes substantial areas of social housing that are already peripheral aggravating socio-economic disadvantage.</li> <li>• A35/B3059 Somerford Roundabout - over capacity AM, IP &amp; PM. At the eastern end of the</li> </ul>	<p>considered in modelling which skews results, and so delay is often higher than reflected in model. The plan contributes to a serious worsening of bus operating conditions and works against strategic objectives of the draft plan which is not acceptable.</p>			

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	<p>conurbation, this is nevertheless at a key point close to the terminus of the 1 route group at Sainsburys, and is also crossed by the X1 and X2 services which are the principal bus links from the conurbation to substantial communities immediately east of the plan area in the New Forest not all of which have ready access to the railway. Plan led growth is imminent in many of these settlements and it is not clear if the model has included this in the 2038 modelling scenarios. This will be the main point of access to the substantial planned North of Christchurch Urban Extension, delivery of which has been delayed by the Environment Agency.</p> <p>We see no reference made to the A35 Fountain Roundabout at the top of the High Street. All the approaches to this junction can become severely congested, especially in peak summer. Virtually all buses serving Christchurch must navigate this junction.</p> <p>There are also severe chronic issues with key links to the east of the town centre on Bridge Street, and Stony Lane South, which have a direct relationship with the severe levels of congestion over quite a wide area, particularly as traffic heading north from Tuckton and Southbourne tends to reassign to the east via Wick Lane and the High Street South if the A3059 southern arm to the Stour junction is congested. The mini-roundabout at the southern end of the High Street is rapidly overwhelmed and the assignment of priority has an especially severe effect on eastbound service 1 group buses – the main Christchurch route group. This is an excellent example of how the problems within the network affect a much wider range of routes and links than the Strategic-scale SATURN model properly covers.</p> <p>We should add to this that congestion around Hurn is already serious and predicted to get worse by the model. There currently is very limited public transport to the Hurn area despite it being substantially outside the main built-up area, and it being a major concentration of employment. The Plan is aiming to meet a great deal more employment needs at Hurn under Policy EM2. The aspirations for the area include a major improvement in public transport, and while these are not made very specific they do appear explicitly in policy.</p> <p>Congestion on all its approaches, and especially west of the airport, already makes it impossible to justify adding bus capacity and frequency to Hurn. If congestion deteriorates to the degree that the TMR indicates this would entirely jeopardise the ability to provide a meaningful public transport offer to the airport, and the effectiveness of that specific policy, as well as more widely compromising the achievement of the Objectives of the plan.</p> <p><b>West (Poole) Area</b></p> <p>A visual representation of the results of the model in the Poole showing the junctions and links approaching or at saturation (VoverC% &gt;80, Delays &gt;60 seconds) is shown in the TMR at Table 8.6. “8.29 For the West Area - Poole, again a number of junctions are over capacity on some or all arms in the BASE, and again matters just get worse in the DM2038 &amp; DS2038LP scenarios.”</p> <p>We note that “Junctions of concern” include a large number that are on the core bus network;</p> <ul style="list-style-type: none"> <li>• A31/A349 Merley Roundabout – all arms, AM, IP &amp; PM. This is a major junction on the SRN and is a key gateway to the western end of the conurbation. No route directly transit this roundabout but the junction as a whole extends to the south and a second roundabout with the B3073 Oakley Hill which is a significant bus route with routes 4,6 passing through; and one that can expect additional frequencies as a result of plan-led growth at sites within BCP North of Oakey, on which construction is well underway; and within Dorset in Wimborne. These are both long routes and the cumulative effects of congestion at multiple points on these routes is of note. These kinds of cumulative impacts on bus services are not reflected in the TMR.</li> <li>• Broadstone Roundabout – Higher Blandford Road and Broadstone Way AM &amp; PM, Lower Blandford Road PM. This is an unusual 6-arm roundabout at a suburban local centre. Pressure on it is tidal in the peaks. This area is highly car-dependent reflecting its low-density character, location and relatively affluent demography. All the bus services in the wider Broadstone and Corfe Mullen area pass through, though frequency is lesser than many other parts of the plan area, thus still amounts to up to 6 buses/hour each way on services 3, 3X, 4 and 18. Achieving a meaningfully greater bus mode share means that this junction and more fast and reliable journey times will need to be effected through this junction.</li> <li>• A349/A341 Gravel Hill / Queen Anne Drive signals, Merley – Gravel Hill North – AM, IP &amp; PM. The junction is shown in future years to exceed capacity across the day, which is a great concern. The majority of bus routes between Wimborne and both Poole and Bournemouth including services 4 and 6, pass through this junction. It is essential that these service become faster and more reliable than today to support existing plan-led growth, not the contrary.</li> <li>• A349 Darbys Corner - approaching capacity AM &amp; PM. This is a large gyratory and unusually there is space to effect significant improvements in capacity if required. The principal service crossing it is the 18 between Bournemouth, and Broadstone. Running every 30 minutes this has been recently improved to provide a range of relevant connections across the north west and west of the conurbation.</li> <li>• A3049/B3074 Mannings Heath Roundabout – B3074 Canford Heath Road over/at capacity AM/PM. The most affected arm is the western link to Canford Heath. This is not used by large</li> </ul>				



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	<p>numbers of services apart from service 26 terminating at Tower Park.</p> <ul style="list-style-type: none"> <li>• A350/A349 Holes Bay Road North - East &amp; West Arms over/at capacity AM, IP &amp; all in the PM. This is principally related to the position of the junction at a major strategic intersection handling both local and longer distance flows, including port traffic. However, it is used by important out-of-conurbation services including X8 to Blandford, 40 to Wareham and Swanage via Upton, and 10 to the Matravers. These are long services that are especially sensitive to anything that makes them more inefficient and difficult to operate. Substantial plan-led growth is taking place at Blandford and much of the demand for this housing is from those “priced out” of the conurbation. It is essential that services like X8 can become more efficient and effective to meet substantially rising demand for these longer-distance journeys if social, economic and climate mitigation goals are to be credibly met. The model shows especially severe conditions arising at all times of day, which is a very great concern to us.</li> <li>• A35/A3049 Fleets Bridge Interchange – Waterloo &amp; Upton Roads – AM, Waterloo &amp; Wimborne Roads PM These are the principal arms used by local traffic including the majority of services between Poole and Creekmoor, Upton and Broadstone; being service 3,4, 8 and 9. These are relatively distant from the core of the conurbation and include substantial amounts of former local authority housing. There is also substantial employment at Creekmoor.</li> <li>• A35/A3040 Pottery Junction Branksome (Poole Retail Park) Ashley Road, Alder Road, Bournemouth Road - AM, IP &amp; PM. This is a major node for traffic and for the bus network. The high-frequency m1 and m2 that area key public transport artery pass through up to 16 times per hour each way in combination on the principal east-west orientation, along with the 18 route. However, the Unibus U2 and 15 offer important links to Wallisdown and the University from Poole running along Ashley Road. The are is already chronically congested reflected in the baseline model; and there is no resilience such that unpredictable severe disruption can rapidly arise. This includes at weekends given the presence of the retail park. Any aggravation of this is a serious concern to us, and would cause a disproportionate severe effect to the bus network that we are not convinced that the model fully reflects.</li> <li>• A35/B3068 Fernside Road/Longfleet Road “Shah of Persia” signals, Longfleet - DS only AM &amp; PM. This is where a range of bus routes converge from the north (Ringwood Road) and east (Fernside Road) heading to Poole town centre and vice versa. The importance of the junction for bus operations thus exceeds its strategic function where general traffic is concerned important though this is. The main m1 and m2 services offer up to 16 buses/hour each way through the junction, on top of which a wider range of regular services pass through including the 14, 15, 16, 17 and X6 – generally an additional 8 each way per hour. The cumulative impacts of increases in delay here with other serious bottlenecks on the m1 and m2 14 and 17 services in particular, which extend far across the Conurbation, should be highlighted.</li> <li>• A35 Civic Centre gyratory – Sandbanks Road over capacity AM. South of the College and close to Poole Hospital this is a busy node, and it is on the prime frequent m1 and m2 services and also served by the Unibus U2, 15 and 20 which provide important but much less frequent wider links. The cumulative impacts of increases in delay here with other serious bottlenecks on the m1 and m2 services in particular, such as Pottery Junction and County Gates towards Bournemouth where the model shows additional deterioration and “cause for concern”, again needs to be highlighted.</li> <li>• B3068/B3093 George Roundabout Poole Town Centre North – DS worse than DM both AM and PM. This result is especially concerning and a little surprising. The junction, being immediately to the west of the Poole bus station, is traversed by virtually very bus route serving Poole - even the Hamworthy and Upton services 8/9 which operate in a large loop. Buses must leave the bus station to the west, and this unavoidably means they circulate the junction in part or in whole. The cumulative effects of what might be casually interpreted as even relatively small increases in delay, especially when combined with other effects on each of the routes concerned, should not be discounted at all. Furthermore, to extent that the junction sees whatever residual capacity used up at less busy times of day, this leads to less resilience in general, and potentially much more severe issues for bus operation if there is no chance to recover from unforeseeable delays occurring elsewhere in the network during the morning peak – a common scenario. This again serves to highlight how far the nominal value of delay forecast by the TMR may well in fact substantially underestimate the effects on bus service attractiveness and efficiency.</li> <li>• Rigler Road/Blandford Road Hamworthy- Blandford Road - east over capacity PM DM &amp; DS. This is on the signposted link to Poole Port. However a great deal of local traffic between Poole, Hamworthy and Turlin Moor/Upton also passes through, and this involves the regular 8/9 services.</li> </ul> <p>Dorset Area The model does extend well beyond the BCP plan area into Dorset and accordingly its results on the wider network, including the bus routes that extend cross-boundary, are available and relevant to the discussion, especially since NPPF makes clear that strategic cross-boundary infrastructure issues must be addressed by plan-makers. This area is the “Dorset area” in the model. The results of the model in the Dorset area showing the junctions and links approaching or at</p>				

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	<p>saturation (VoverC% &gt;80, Delays &gt;60 seconds) is shown in the TMR at Table 8.2.</p> <p>The TSR reports that:  “8.21 For the Dorset area, a number of junctions are over capacity on some or all arms in the BASE and matters just get worse in the DM2038 &amp; DS2038LP scenarios.”  Junctions (among many others) of concern where the model predicts substantial deterioration against already serious levels of delay and unpredictability in journey time, that directly affect bus routes outside the plan area in Dorset, within a short distance of the plan area, arising from the plan strategy, are:</p> <ul style="list-style-type: none"> <li>• Canford Bottom, A31 in the IP, and most arms AM &amp; PM (service 13)</li> <li>• A31/A338 Ashley Heath interchange - EB off slip and Horton Road AM &amp; PM (services 32, X3, X6)</li> <li>• A348/B3073 Longham Mini Roundabouts AM, &amp; PM (service X6)</li> <li>• A347/B3073 Parley Cross A347 NB AM, IP &amp; PM (service 13, 737)</li> </ul> <p>All these junctions are notorious for congestion and delay. It should be stressed that Parley Cross seems to have seen relatively little amelioration despite a large-scale improvement scheme completed within the last three months to a Dorset Council design, delivered by Bellway Homes.</p> <p>TMR Conclusions  We quote the following concluding passages verbatim from the TMR as they are extremely succinct. We believe they speak perfectly well in their own terms:  8.22 It should be borne in mind that the network is known to be already quite congested in many locations as the BASE model shows, and adding more traffic will just make matters worse. In reality drivers will seek alternative routes (Re-routing) which could result in pressure on other junctions that are not currently over capacity in the BASE (scenario).  8.25 Other junctions are seen to be over capacity in addition to the selection shown in the tables. Most of the junctions over capacity are either mentioned in the VoverC% or Delays text and /or in the text provided with the Queue at End of Time Period, e.g. Surrey Road / Yarmouth Road.  8.44 For the BASE AM vs. DM2038 AM, it can be seen that there are generally large increases in volumes on most roads. The exceptions where there are reductions (shown in Blue) could be the result of re-routing traffic as traffic demand increases in the forecast scenarios.  8.60 The SATURN outputs have been analysed and with the extra traffic in the DM2038 scenario a number of junctions are now over capacity.  8.61 For the DS2038LP (Local Plan scenario) where traffic in some areas has increased again, further issues arise.  9.7 The Local Plan developments appear to cause additional capacity issues at the locations highlighted in Tables 8.10 to 8.13.</p> <p>The plan accordingly is shown to give rise to serious increases in congestion and delay on a network that is already operating seriously above capacity in a very large number of places.  No effective mitigation is proposed, or modelled.  We would stress that a number of major corridors are clearly shown to be operating approaching or over capacity in the BASE (current) situation, with successive junctions on them all failing to accommodate traffic demands at not only peak times, but, increasingly, off peak. This a position that we can readily confirm from our operating experience.  This is not just a matter of “average” conditions. The network is subject to particular seasonal demands that add substantial additional pressure in the peak summer. These pressures are highly weather dependent, when day-trippers come to the coast. Specific events such as the Bournemouth Air Festival, create more predictable but severe network disruption.  On top of all that and much more widely, the fact so much of the network is shown to operate approaching saturation at key junctions is ample empirical evidence that the network lacks resilience, meaning that even apparently modest events like emergency utilities work, can cause serious and widespread disruption for days on end. An excellent example was work undertaken on Wallisdown Road under signal control for a few days between Talbot and Wallisdown Roundabouts in late March 2024, or similar work on Bridge Street Christchurch, which made large sections of our network practically impossible to operate owing to the accumulation of substantial delays on successive journeys passing through these areas.  Such delays can be avoided to some or other extent by general traffic, but this is impossible for bus operators who by law must observe the registered route. The nature of this kind of disruption makes it impossible to plan for. It makes bus journeys much slower and less reliable, and contributes directly to undermining the effectiveness and attractiveness of the bus offer, as well as its efficiency.  The BASE scenario in the Transport Model shows that there is widespread severe congestion encountered across the key links and nodes in the network under “normal” network conditions. The forecast scenarios only show that this congestion becomes still more severe, with longer delays and much more extended periods of time affected. These results are causing “concerns” to the modellers, which rightly should be interpreted as a “severe” impact as expressed at NPPF paragraph 111, for which no effective mitigations are apparently proposed.  As we discuss above the inability of the model to examine the effects of unpredictable constrictions</p>				

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	<p>on links or additional summer peak conditions means that the actual level of disruption and delay to traffic is often higher, but not reflected in the results.</p> <p>Irrespective, no mode is more seriously compromised by this situation than bus services.</p> <p>As submitted the TMR evidences strongly and unequivocally that the plan directly contributes to a serious worsening of bus operating conditions, threatening the achievement of national and local transport policy goals that seek to increase the attractiveness and use of buses very substantially. It also works against the Strategic Objectives of the draft plan. This is not acceptable.</p> <p>A comprehensive and properly conceived transport strategy including measures that make the local bus network more reliable, more resilient and more attractive, is required to accommodate growth at even the "capacity-constrained" level of 1600 dwg/annum the plan is aiming to meet.</p>				
Evidence Base	<p>A review of JLTP3 has recently commenced. While it is certainly correct that the LTP should form part of the evidence base, this cannot be considered to be "up-to-date" in the sense expected by NPPF.</p> <p>This document was evidentially well-founded as it was based on the South East Dorset Multi Modal Transport Model (SEDMMTM) – one of the better ones nationally of which we are aware. It presents a rich analysis of the transport issues and constraints on solving them. Most of this commentary and analysis remains highly relevant. It also relatively well reflects the current issues and problems in the plan area – mainly because the highways network is not obviously amenable to significant capacity improvements, and as a direct result already serious problems have not been tackled. However, it is now well out of date and there is no meaningful statement of transport priorities that reflect major changes in national and local policy.</p> <p>Primarily these changes are the Council's declaration of a Climate Emergency, and the Governments parallel legally binding commitment to achieving "net zero" by 2050. This is supported by the National Transport Decarbonisation Plan (July 2021). This sets a clear expectation that if the target is to be met there needs to be substantial rebalancing of transport provision and behaviour towards walking cycling and public transport. The statutory carbon mitigation goal is not considered achievable in any scenario without this.</p> <p>No part of the plan, nor its evidence base, reflects this, despite the fact the plan looks ahead over a great part of the remaining time period to 2050.</p> <p>However, while JLTP3 is presented alongside the draft plan, it is entirely opaque how the plan has drawn from it, to shape the plan strategy. In fact, there is virtually nothing evident in the plan objectives, strategy or policies, that ties the plan into JLTP3 objectives in any clear consistent or substantive ways, that could credibly be expected to help secure them.</p> <p>It does not require a reading of JLTP3 to arrive at a broad conclusion that urban intensification would generally result in development being close to existing facilities and promote the use of walking and cycling, and to a lesser extent, public transport, as the plan reasonably posits.</p> <p>What the plan does not do, is demonstrate how such intensification will avoid additional pressure on existing networks, and internal road capacity, which is what JLTP3 set out to start to tackle. In addition, regrettably, there is no sign that existing sclerosis of the network has been ameliorated in the period since 2012.</p> <p>Thus, the submission of JLTP3 alongside this plan seems to reflect a somewhat tokenistic "placeholder" approach, pending production of the JLTP4, which has yet to appear in draft form.</p>	<p>CAT4 Joint LTP3, although of high quality and largely relevant, not up-to-date evidence and no meaningful statement of transport priorities reflecting major changes to national and local policy (climate emergency declaration, net zero by 2050). Substantial rebalancing of provision and behaviour towards walking, cycling and public transport required to achieve; this is not reflected in plan or evidence base. Unclear how plan's strategy shaped by JLTP3, and no consistent or substantive ties to JLTP3 objectives to secure them. Plan does not demonstrate how planned intensification will avoid additional pressure on existing networks/internal road capacity. No significant improvement to road network since 2012. JLTP3 therefore a tokenistic placeholder for unpublished JLTP4.</p>	Objection	<p>GSC is engaged in LTP4 which is reemphasising the need to continue developing a sustainable transport strategy to ease congestion and support growth. Public transport is a vital element of this strategy. The latest progress with the LTP update is explained in EXAM12 Transport Background Paper paras 1.2.7 to 1.2.9.</p> <p>The BCP Council transport strategy is predicted on the ambition that 50% of all journeys by 2030 will be by walking, cycling or public transport. GSC is supportive of this approach.</p> <p>Furthermore, the Council's strategy to achieve this vision is now published in the evidence base, CAT2a-f, the sustainable transport masterplan. Unfortunately, this wasn't available in a format that could be published or shared until after the consultation and these representations were made. GSC have now had time to review this evidence and can understand that the Draft Local Plan is underpinned by a strongly evidenced sustainable transport strategy.</p>	<p>AGREED.</p> <p>GSC will continue to work as collaboratively and constructively as possible on JLTP4 with all stakeholders. Including BCP Council.</p> <p>GSC AGREES that the 50% sustainable modes target is ambitious and will have a very material potential positive impact on the plan area.</p> <p>GSC AGREES that the STS is a major addition to the evidence base that sits alongside the plan.</p> <p>GSC has not had time to fully digest the STS or assess, alongside BCP officers, the interplay between it and the BSIP.</p>
Evidence Base	<p>We note and welcome that the BCP Bus Service Improvement Plan ("BSIP") has been submitted as part of the evidence base. This represents a jointly formulated view between the Council and Bus Operators of what can and should be achieved to markedly increase the attractiveness and use of bus services throughout the plan area, in line with the objectives of the National Bus Strategy for England (April 2021). This was initially submitted to DfT in November 2021 and it is in the process of review.</p> <p>With an initial BSIP focus on delivery within 3 years, it is not primarily a longer-term strategy. Beyond 2026 – the likely earliest date at which a local plan will be adopted - a significant amount of further work would need to be undertaken to establish the scope and deliverability of comprehensive and effective measures to make buses substantially faster and more reliable than they are today.</p> <p>This ought to be considered essential to underpin a sound transport mitigation strategy for the future of the conurbation, securing both current JLTP3 and future JLTP4 objectives to achieve a marked mode shift away from single occupancy car use.</p> <p>In fact, it was the speed at which the TCF bid needed to be prepared that contributed greatly to a view being arrived at regarding scheme deliverability and costs that has proven to be very optimistic, even before the impact of inflation since early 2022. Nor is this problem unique to BCP.</p> <p>Such a strategy will require JLTP4 to be well advanced if not adopted. It has yet to be seen how and when such a strategy might be formulated.</p> <p>The strategic foundation for the plan regarding evidence on transport matters is thus, to say the least, limited. This creates a fundamental problem for the soundness of the plan.</p>	<p>CAT6 BCP Bus Service Improvement Plan - Supports its submission as evidence for Local Plan as shows a jointly formulated view between Council and bus operators of how attractiveness of bus use can be improve, although not a long term strategy (3 years). Further work will need to be done post 2026 to make buses faster and more reliable. JLTP4 will need to be adopted to inform the transport strategy. Strategic foundation for the plan regarding evidence on transport matters is limited which is a fundamental problem for the soundness of the plan.</p>	Objection	<p>The BSIP supports Draft Local Plan Policy T4 and continues to be developed (latest update was in July 2024.) The strategy has been successful with effective implementation and will continue to be developed. This is explained in EXAM12 Transport Background Paper paras 1.2.10 to 1.2.15.</p> <p>GSC is engaged in LTP4 which is reemphasising the need to continue developing a sustainable transport strategy to ease congestion and support growth. Public transport is a vital element of this strategy.</p> <p>The BCP Council transport strategy is predicted on the ambition that 50% of all journeys by 2030 will be by walking, cycling or public transport. GSC is supportive of this approach.</p>	<p>GSC AGREES that the BSIP, recently updated, is a very important element of the transport evidence base and strong collaborative working in its production and implementation is ongoing.</p> <p>GSC as noted above, is engaged with the preparation of JLTP4.</p>

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				Furthermore, the Council's strategy to achieve this vision is now published in the evidence base, CAT2a-f, the sustainable transport masterplan. Unfortunately, this wasn't available in a format that could be published or shared until after the consultation and these representations were made. GSC have now had time to review this evidence and can understand that the Draft Local Plan is underpinned by a strongly evidenced sustainable transport strategy.	GSC AGREES that it has had time to review the STS at a level of detail sufficient to confirm that it is a very material advance in the evidence available to support the draft plan, and future forward planning activity.
Evidence Base	<p>The transport evidence base also includes the "Transforming Cities Fund" ("TCF") strategy. This was the subject of a very successful bid process in 2019 made jointly with Dorset Council to DfT focused on sustainable travel modes, and led to a capital grant of about £150m being committed to the Council by the Department for Transport. The project funds needed to be expended by the end March 2025. The package of works is reaching its final stages. However, a very large proportion of the proposed interventions have not been delivered owing to cost over-runs. Despite the terms of the bid competition, and the availability of separate dedicated Active Travel Funds in successive rounds over this period, the bulk of the works undertaken have been to provide cycling infrastructure, and a large proportion of these have actually been delivered in Dorset, rather than BCP.</p> <p>However, a great deal of design and investigative work has been undertaken as part of TCF and certainly this ought to provide a level of clarity and certainty to underpin, among other things, scheme definition and costs for the Infrastructure Delivery Plan ("IDP"). Rather remarkably, there is no evidence that this has in fact been translated into the IDP. This provides strong circumstantial evidence that the TCF has not in any significant way informed or shaped the plan.</p>	Transport Evidence Base CAT7 Transforming Cities Fund - Much of Transforming Cities Fund strategy works have involved delivery of cycling infrastructure largely in Dorset rather than BCP. Great deal of design and investigative work undertaken which should underpin scheme definition and costs in IDP, but doesn't appear to have been, and doesn't appear to have shaped plan.	Objection	<p>The Council's evidence base has been updated since these representations were made.</p> <p>The sustainable transport masterplan is set out in examination documents CAT2a-f. The IAD2b Infrastructure Delivery Plan was also updated in June 2024 and includes the TCF schemes. Currently through CIL prioritisation work we are looking at how we can use CIL to fund the continued work of the TCF.</p>	<p>The representations were made at Reg 19 stage which is the final "gateway" at which the plan and its evidence base, as published, can legitimately be commented on.</p> <p>We welcome that the STS and IDP have been published, and that as part of this there is evidence BCP are looking to advance the TCF projects, among other things.</p>
Evidence Base	<p>Sub-heading 7 Transport</p> <p>Both the Bournemouth Core Strategy 2012 and the Poole Local Plan 2018 clearly and explicitly tied the spatial strategy to high quality public transport corridors. There were essentially the "Prime Corridors" identified in JLTP3. The definition was made still more explicit in the Poole Local Plan 2018:</p> <p>"Footnote to 4.10, spatial strategy: * For the purpose of this Plan, areas close to sustainable transport corridors are defined as those parts of Poole within 400 metres walk of locations that are served or capable of being served over the plan period by a frequent bus service (at least 4 buses per hour) and/or 500 metres of a railway station."</p> <p>A variety of projects are set out mainly linked to specific allocations. Most relate to cycling infrastructure.</p> <p>The following projects mentioned in the IDP directly reference bus, or have a direct bearing on a major bus corridor. However, they are not clearly aligned with the BCP BSIP nor any other wider vision to secure a more effective, reliable and capable public transport offer across the conurbation. We would additionally comment as follows:</p> <ul style="list-style-type: none"> <li>• P29 Em2 Talbot Village - Provision of a strategic north-south cycle and pedestrian route and enhancement of bus services serving the area. These enhancements are unspecified, and thus their costs cannot be known, even assuming that any upgrades could ultimately be commercially self-sustaining after an initial support period.</li> <li>• P26 PT5 Quay Thistle Hotel - Enhancement of bus services, improve pedestrians' connections through the site between the Quay and areas to the north and east of the site and install bus gate on Green Road. Likewise, the interventions are unspecified. The net costs relative to impacts and the relatively limited scale of a complex regeneration site make it hard to have confidence that these broad aspirations, while certainly desirable, are deliverable.</li> <li>• Policy P2 Bm1 Land north of Merley - Enhance local bus services, improvements to the B3073/Oakley Lane junction (Willet Arm Public House junction) etc. This development allocated in the Pole Local Plan is in the process of being delivered pursuant to APP/19/00955/P. A sum of £1,982,000 index linked is agreed "to enhance local bus provision". We are in dialogue with BCP public transport officers as to the most effective way of securing the required outcomes.</li> <li>• Policy P2 Bm2 Land north of Bearwood - enhance local bus services serving the area, etc..." This development allocated in the Pole Local Plan is in the process of being delivered pursuant to APP/19/00237/P. A sum of £1,877,369 index linked is agreed "to enhance local bus provision". We are in dialogue with BCP public transport officers as to the most effective way of securing the required outcomes. A entirely new direct service between Bearwood, Kinson and Bournemouth town centre is currently anticipated involving wuder betterment of the bus offer to many of the outer estates in the Kinson and Bearwood area in terms of connectivity and journey time.</li> </ul>	IAD2 Infrastructure Delivery Plan - Numerous projects directly reference bus, or have an impact on a major bus corridor, but they are not clearly aligned with the BCP Bus Service Improvement Plan to secure a more effective reliable and capable public transport offer across the conurbation. Many sites contain unspecified enhancements meaning costs are unknown. Some improvements may be unnecessary due to scale of developments, some improvements are already being discussed, concerns over intentions for bus station and depot at Poole, welcome changes at Turlin Moor, costly implementations around the Bournemouth Hospital/Wessex Fields site, interactions with major BSIP bus priority schemes that do not feature in the Infrastructure Delivery Plan list, pedestrian and cycle improvements which may have an adverse impact on buses on major routes. No overall costs are indicated for schemes, nor any potential funding which may assist with these improvements, and so delivery of schemes is speculative. It is not properly	Objection	<p>The sustainable transport masterplan is set out in examination documents CAT2a-f. The IAD2b Infrastructure Delivery Plan was also updated in June 2024.</p> <p>Funding for infrastructure is going to prove difficult as projected CIL can not provide for all identified infrastructure. The Council is currently undertaking a prioritisation exercise for CIL Spending. It is likely that some CIL and some external funding will be needed to improve the transport infrastructure and deliver the sustainable transport masterplan.</p>	<p>Noted</p> <p>It is AGREED that it is unrealistic for all identifiable transport interventions to be entirely developer funded either through CIL or otherwise.</p> <p>The rather higher level of resolution in updated evidence made available since June 2024 is noted and welcome.</p> <p>This includes the IDP.</p>

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	<ul style="list-style-type: none"> <li>• Policy P26 PT1 PT2 Dolphin Centre, Dolphin Poole and Seldown - replacement of level crossing, redevelopment of existing bus station, provision of pedestrian and cycle friendly Seldown Roundabout, segregated path on West Key Road, provision of bus gates on Kingland Road, Newfoundland Drive, Birds Hill Road and Longfleet Road, upgrade subway on Newfoundland Drive with enhanced lighting and CCTV and resolve drainage issues, modal filters on Heckford Road, Maple/Kingston Road and Maple Road/Heckford Road, provision of segregated cycle route along Newfoundland Road and provision of parallel crossing on Pintwines Close and southern end of Seldown bridge to improve existing cycle route provision. We comment at length on the site-specific proposals under that policy heading. The bus depot and bus station are critical facilities and infrastructure to support the entire Poole and East Dorset bus operation. It is entirely unclear that any intention exists on the part of the Council to replace these facilities, and the bus depot in particular, whether in an operationally suitable location or, indeed, at all.</li> <li>• Policy P15 H3 Turlin Moor area - new road junction onto Blandford Road and a road link through the site suitable for bus use connecting Turlin Road with Blandford Road...This is a very welcome proposal that would facilitate the current highly inefficient "double run" to and from Blandford Road.</li> <li>• Policy P10 CT4 Civic Offices, Stoney Lane South - Relocation of the Bridge Street pedestrian crossing further west facilitated by the removal of the bus turn around area and realignment of the Bridge Street footways, closure of Bridge Street to through traffic except bus and cycle, enhancement of the cycle and pedestrian links through the site, and maintain public slipway access.</li> <li>• E5 Em3 Wessex Fields - A338 Link Road/Wessex Fields Access Road (Development Spine Road) connecting Wessex Fields Phase 1.1 scheme with Deansleigh Road, highway capacity reduction scheme at A3060 Castle Lane East / Deansleigh Rd / Riverside Ave; walking, cycling and public transport improvements (Highway capacity reduction scheme) and at Cooper Dean Roundabout / A3060 Castle Lane East / Deansleigh Rd walking, cycling, and public transport improvements; Wessex Fields to Jumpers Common Cycle Route, Queens Park Avenue Segregated Cycle Route, Iford Roundabout to Southbourne Improvements, A35 Bus Lanes to/from Fountain Roundabout and cycle Route between Hurn Road and Wessex Fields via Stour Way / River Way Lansdowne - Lansdowne Road segregated cycle route. This is a comprehensive programme of mitigations around the hospital site, which is a major node on the bus network. These are supported. However many of them will be complex and costly to implement.</li> <li>• P5 Lansdowne -St Pauls Road realignment and junction alterations (ASDA exit slip)</li> <li>• P5 Lansdowne - Continuation of public realm enhancements along Holdenhurst road between Cotlands Road and Bournemouth Station Roundabout – This has interaction with a major BSIP bus priority scheme (Station to Gervis Place) that amazingly does not feature in the IDP list.</li> <li>• Policy P5 Eastcliff - bus gates at Bourne Avenue / Avenue Road and flyover at Bath Road</li> <li>• Policy P5 Eastcliff - walking and cycling enhancements on Hinton Road, Glen Fern Road, Fir Vale Road, Old Christchurch Road, St Peters Road - This has interaction with a major BSIP bus priority scheme (Station to Gervis Place) as mentioned above.</li> <li>• P5 Eastcliff - public realm enhancements at Westover Road, Old Christchurch Road, Albert Road and Yelverton Road: This has interaction with a major BSIP bus priority scheme see above</li> <li>• P5 Eastcliff - Gervis Place public realm enhancements and public transport improvements. We are not clear what the scope of this project is and how it interacts with a major current BSIP Scheme (Station to Gervis Place).</li> <li>• Policy P32 Westbourne - County Gates Gyrotory junction improvements including pedestrian and cycle enhancements. It is not clear how this will work to assist buses given that this is on the most frequent bus service spine in the conurbation (service m1 and m2) and is highlighted as a "junction of concern" in the TMR (EiP Ref CAT1a) where already severe delay is anticipated to increase.</li> <li>• Policy P19 M1 Westover Retail Park - provision of widened footway along Castle Lane West to permitted segregated cycle track, Wimborne Road / Castle Lane West / Muscliffe Lane junction improvements, pedestrian / cycle access from Castle Lane West, Castle Lane West segregated cycle track, enhance local bus services serving the area, pedestrian access from Lawford Road / Valette Road and upgrade service alley adjacent No. 1 Lawford Road to serve as alternative pedestrian access. This apparently comprehensive package of interventions is very welcome and unequivocally supported in principle. However we are unclear what these involve.</li> </ul> <p>Not one of the transport projects listed has an estimated cost or indication of whether it benefits from committed or foreseeable funding. As such the deliverability of this list is completely speculative. The plan is therefore incapable of demonstrating that it will be effective in providing identified transport infrastructure. It is thus not properly evidenced and not effective, and as such must be judged to be unsound.</p> <p>It is especially notable that only the transport head is so treated within the IDP.</p> <p>This sends a very clear indication of the very low real level of regard that is hard to the transport theme within the Local Plan, also evident within the main policy suite. The plan defaults entirely to a broad assumption that as no new sites whatever are allocated, none of the existing transport problems and challenges in the plan area bear on the plan strategy or subsequent development</p>	<p>evidenced, not effective and judged to be unsound. Very low regard to transport theme and associated policies in Local Plan. Ignores existing transport problems and challenges and focuses on development sites. Does not ensure that new development prevents aggravation of existing issues, or contributes to a more sustainable pattern and mix of travel modes. Conflicts with NPPF para 108.</p>			

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	<p>proposals, nor that the plan has a meaningful role to play in ensuring both that these are not aggravated, but more importantly, contributing to a more sustainable pattern and mix of travel modes. The plan is entirely “passive” towards transport.</p> <p>However, the Transport Modelling Report (CAT1a) makes plain that significant impacts on the highways network can be anticipated arising from the Local Plan.</p> <p>However, the treatment of transport in the IDP broadly demonstrates that there is no package of mitigation measures set out within an overarching strategy that aligns with a wider transport and mobility strategy set out in an up-to date Local Transport Plan. As such it cannot be concluded that “transport issues have been considered from the earliest stage of plan-making” as is expected by NPPF paragraph 108; or that the Local Plan can be effective in actively managing patterns of growth and development proposals in the pursuit of the transport goals set out therein.</p>				
Plan Period	<p>Scope of the Plan</p> <p>The Plan is published covering a 14-year period between 2024-2038.</p> <p>NPPF paragraph 22 makes very plain that “strategic policies should look ahead over a minimum 15 year period from (the date of) adoption”.</p> <p>However, a 14-year period in and of itself cannot possibly meet the requirement of NPPF paragraph 22. Even if the plan were to be found sound and adopted this calendar year – something that not even the Council’s exceptionally optimistic LDS indicates is anticipated – it would only look 14 years ahead. The Plan cannot be considered compliant with NPPF. It is thus unsound on this basis.</p> <p>The earliest conceivable date of adoption would be late 2025, having regard to the progression of the EiP and the likely need for modifications to be made and consulted upon. More realistically, the plan would not be adopted before 2026. Indeed, it is not clear that pressure on PINS from multiple plans being advanced simultaneously will allow an Examination in Public to be commenced much before the end of 2025 in any case.</p> <p>As such, having regard to the most realistic assumptions on submission and Examination timescales, 2040 is the earliest appropriate end date for the plan to be found soundly based, positively prepared and compliant with NPPF. A horizon of 2041 would be much more prudent. There are several very stark reasons why swift acceptance, initiation and progression of this Plan through Examination in Public looks exceptionally unlikely.</p> <p>Among other things, the approach taken by the plan to meeting development needs is exceptionally bold in seeking to set aside the expectations of national policy. The “constraints-based” approach is one that will undoubtedly excite very substantial objections in principle and in detail. Go South Coast Ltd. itself makes just such representations.</p> <p>Furthermore, a wide range of supporting material and evidence is presented for the first time in the public realm by the Council. This means that the only opportunity for stakeholders and interested parties to respond to a draft plan is at this formal Regulation 19 stage. However, this is NOT an opportunity to constructively contribute and to shape the plan, as NPPF and the Regulations provide for and indeed expect. The Regulation 19 stage is explicitly one that presents a draft plan believed to be sound by the Council. Input from stakeholders and the public is thus essentially, limited to binary “Support or Object” representations, formally framed, with counter-evidence. To limit meaningful input into a draft plan to such an adversarial process serves only to encumber the Council and any subsequent examination process with more, not less work, prior and subsequent to submission to the Secretary of State; and involves a great deal more risk to the Council.</p> <p>With all this in view, a short and straightforward Examination in Public is thus inconceivable.</p> <p>In fact, given the fundamental difficulties with legal compliance alone, we have significant doubts that the plan as currently drafted will even be accepted for examination by HM Planning Inspectorate, based on recent experiences with other draft plans.</p> <p>Irrespective, to be compliant with NPPF paragraph 61 the Plan should therefore look ahead to 2041, and, prudently, 2042. Compliance with national policy is a fundamental tenet of soundness.</p> <p>The very late base date of the plan is also a cause for fundamental concern. In pursuing this route, it cannot account for delivery or under-delivery to date. In the BCP context, it sets a baseline that intentionally prevents any consideration being made of the extremely poor track record of housing delivery over the last few years, well below even the much lower level of delivery against housing need the Council is seeking to pursue in the initial years of the plan: 1200 per annum. Delivery in the plan area since 2021 has come nowhere near this figure, much less an annualised average rate of delivery of 1600 that the Council accepts it ought to plan towards. Even accepting the initial delivery rate set out in the stepped trajectory proposed by the Council, a properly made trajectory would need to make up an accumulated deficit in the short term – the first five and certainly ten years after adoption. Plainly, this would need an immediate boost to overall identifiable supply as well as credible delivery expressed in the housing trajectory.</p> <p>By denying the problem of past failure to deliver, the approach taken by the Council does however, allow for the all the capacity nominally identified by the plan to be hypothecated to future years. This is especially expedient in a situation where the maximum effort is being made by the Council to identify supply from existing sources, including existing consents and undelivered allocations, a very</p>	<p>Plan period must cover 15 years - earliest adoption date 2025 likely need for modifications to be consulted on, 2026 more realistic. Therefore earliest end date 2040, 2042 more realistic. Plan will not be adopted swiftly because the constraints based approach controversial and will take time to review at examination. No opportunity given to stakeholders/interested parties to shape plan given draft plan only consulted on at Regulation 19 stage - no meaningful input. More work required before and during examination and greater risk to council. Legal compliancy issues mean plan unlikely to be accepted for examination. Late base date means cannot account for under-delivery to date. Prevents consideration of extremely poor housing delivery record (significantly less than planned for in even first 5 years of plan). Deficit must be addressed in first 5/max 10 years after adoption through immediate boost. Heavily reliant on existing consents and undelivered allocations that have failed to come forward for many years. Council therefore have not positively planned to meet needs and plan is unsound.</p>	Objection	<p>It is recommended the time period of the plan is modified to reflect the proposed adoption date in 2025.</p> <p>Action: amend all instances where plan period is stated from 2024-2038 to 2025-2040 as follows:</p> <p>1. Introduction The Bournemouth, Christchurch and Poole (BCP) Local Plan forms the main part of our statutory development plan. It sets out the planning framework that guides decisions on all development and regeneration activity in the BCP area over the next 15 years from <del>2024-2025 to 2040 2039</del>. It is a key part of helping us to address the climate and ecological emergency.</p> <p>1.2 This local plan forms the principal part of the development plan for the area and covers the period from <del>2025 to 2040 2024 to 2039</del>.</p> <p>1.19 In Part 1 Chapter 4 sets out the strategy of how the BCP area will develop over the next 15 years from <del>2024 to 2039</del> 2025 to 2040.</p> <p>4.7 The strategy provides for a minimum of 24,000 homes and around of 80 hectares of employment land between <del>2024 and 2039</del> 2025 to 2040.</p> <p>8.2 The Spatial Strategy sets a housing requirement to deliver at least 24,000 net additional new homes between <del>2024 and 2039</del> 2025 and 2040.</p>	<p>Noted.</p> <p>It is AGREED that the plan period will be compliant with NPPF to the extent that adoption can be achieved by 2025.</p> <p>It is noted and welcomed that the housing quantum is expressed as a minimum.</p>

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	<p>large proportion of which long predate the draft plan as commitments, but which have to date failed to come forward, some over many years.</p> <p>The Plan is thus set up at the outset entirely contrary to the requirement to “positively plan” to meet identifiable development needs in the Plan area. For this reason, too, the Plan is therefore not positively prepared, and accordingly it is unsound.</p>				
S2	<p>Policy S2 Spatial Strategy and levels of growth</p> <p>“Prime Transport Corridors” identified by JLTP3 (EiP Ref CAT4) underpin all the adopted local plan development plan strategies; as just one example, Christchurch and East Dorset Core Strategy 2014 Policy KS9. The policy encourages “higher density development to be located around Prime Transport Corridors in order to reduce the need to travel. Being adjacent to a prime transport corridor reinforces the sustainable nature of the proposal and provides an opportunity for future occupants to access public transport and support a reduced need to travel.”</p> <p>The draft plan fundamentally departs from the spatial justification of the existing adopted Bournemouth Christchurch and Poole Plans that are at least conceptually based around these Prime Corridors.</p> <p>Policy S2 indicates that:</p> <ul style="list-style-type: none"> <li>• The four town centre “Strategic Opportunity Areas” will account for 13785 dwellings of the 24000 dwelling need being planned for. This is 57% of the total. Densities will be a minimum of 150/Ha up to 300 per Ha. This supply will be comprised of small apartments. Past delivery indicates that very few, if any, will be provided for affordable tenures.</li> <li>• The three undelivered greenfield urban extensions inherited from the current plans will deliver 2225 dwellings. These are all consented, and delivery has started on two of them. This is 9.3% of the total, and the fraction on which delivery is likely to be most assured, including of affordable and a wider range of flats and houses of various sizes to meet differing household needs.</li> <li>• “Elsewhere” will deliver 7990 dwellings. This includes “Local Opportunity Areas” and “Opportunity Streets”. Draft Policy S2 also indicates clearly that these will deliver at between 150-300 dwg/Ha. This has to be accepted as meaning through urban intensification on a wide range of sites throughout the rest of the urban area. If achievable, this is bound to be relatively highly sustainable, in terms of access to services and opportunities for sustainable transport. However here too, evidence is overwhelming that securing a wide range of dwelling tenures and typologies will reflect the densities sought and is likely to be exceptionally difficult.</li> </ul> <p>The use of the language above indicates that the plan is based less on a spatial strategy, and much more on an “audit” of perceived opportunities. The deliverability of much of it is highly questionable. There is no real mechanism to steer development towards the most sustainable locations including those that relate most closely to the “Prime Corridors” identified in JLTP3.</p> <p>The nature of achievable urban intensification is not clearly set out in any part of draft policy or the evidence base. However, paragraph 7.22 reveals that:</p> <p>“7.22 The majority of development within the BCP area is windfall development that either consists of the subdivision of existing plots or the replacement of an existing building with flats and/or houses.”</p> <p>This situation reflects the failure of much long-standing development opportunity identified in town centres, much of it land in which the Council itself has a controlling interest, to take place. By abandoning any attempt to relate and direct the local plan development strategy to transport considerations broadly across the plan area, the plan is improperly justified. It cannot secure the intent of NPPF paragraphs 108-110 which require active management of development patterns to secure important transport related objectives, and maximise the use of sustainable modes. It is therefore unsound.</p> <p>Spatial Strategy</p> <p>This is set out in explanatory text at paragraphs 4.6 – 4.15.</p> <p>Embedded in this is a justification for an approach that seeks to avoid planning for new housing to the greatest extent possible. This is justified by a wide range of landscape, heritage, environmental and biological designations.</p> <p>It also invokes the “constraint” of Green Belt. This is a policy designation to keep land undeveloped and open, and is not rightly or properly amenable to being conflated with the other designations which have much more fundamental basis, mainly in scientific evidence.</p> <p>Positively Planning to meet development needs</p> <p>NPPF paragraph 11 a) in stating the presumption in favour of sustainable development, emphasises at the outset that</p> <p>“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure...”</p> <p>At paragraph 11b) it continues by expressing that</p> <p>“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</p> <p>i) the application of policies in this Framework that protect areas or assets of particular importance</p>	<p>Securing a wide range of dwelling tenures and typologies through urban intensification will be difficult. Delivery highlight questionable. Development is not steered toward the most sustainable locations along prime transport corridors. Plan should be related to transport considerations, it does not link development patterns to maximise the use of sustainable modes and is unsound. Strategy is to avoid planning for new housing as far as possible.</p> <p>Green Belt not comparable to other constraining designations as can be changed at Council's discretion to release lowest performing elements to meet needs - very special circumstances to justify this exist. Historic failure by legacy authorities to meet housing needs, particularly affordable housing. Only strategic extensions providing range of housing (including affordable and family homes). Planned provision significantly lower than standard method figure. Inconsistent for council to suggest exceptional circumstances exist to diverge from standard method, while suggesting very special circumstances exist to justify green belt review on unconstrained land on periphery of urban area. Inability for neighbouring authorities to help meet needs further reason to meet needs near where they arise with less extensive movement patterns. Among most unaffordable locations in UK - nearly impossible for average earner (including under 45s and service workers (including transport)) to get on housing ladder in area without financial support. Rental market lacks affordable/suitable and available accommodation. Smaller proportion of affordable rental properties than average in area. Worsened by retired in-migration to area. Morebus one of the largest private employers</p>	Objection	<p>The plan focusses on sustainable development and minimising trips by the private car. We have identified sustainable neighbourhoods across the BCP area that ensure all development coming forward has a clear strategy for how residents will access basic facilities through cycling and walking and public transport.</p> <p>The H3 Housing mix policy will go further than previous policy and provide a range of dwelling types within the urban area, with the aim of providing houses as opposed to schemes for 1-2 bed flats.</p> <p>The NPPF (Dec 2023) is clear that the Green Belt boundaries should only be amended in exceptional circumstances to meet housing needs. We do not believe these exceptional circumstances exist.</p> <p>Under the new NPPF (Dec 2024) the Council is required to prepare a new local plan to the Draft Local Plan housing numbers are over 20% lower than the new standard method. The Council is preparing a new Local Development Scheme to commence a partial review of this Draft Local Plan. This partial review will start in the Spring and will be in parallel to the examination of the Draft Local Plan.</p> <p>Both Dorset Council and New Forest District Council will be working on new local plans. BCP Council will work with them to ensure a strategic approach to growth is considered. The adoption of a baseline local plan will help with this process as it will enable the Council to focus fully on additional growth and infrastructure needs.</p> <p>The HELAA demonstrates a supply of windfall sites that can support urban intensification, along with the allocations. The area has a strong and consistent record of windfall delivery over 15 years and there is no evidence to suggest this would not continue. Densities are indicative and the intensification appropriate will depend on the site.</p>	<p>Noted. We note, however, that previous policy in legacy plans, with a near - identical urban focus, has not translated into the intended outcomes with regards to dwelling and tenure mix.</p> <p>It is noted and AGREED that a Partial Review of the plan offers the opportunity to revisit these matters.</p> <p>Noted. A reprise of a collaborative approach with neighbouring authorities is welcomed.</p> <p>It is AGREED that the substantially updated transport evidence base, including the updated BSIP (CAT 6) and the new Sustainable Transport Strategy (CAT 2 a-f) offer a very sound base on which any further plan-making activity can progress.</p>

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	<p>provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; (including those listed at footnote 7)</p> <p>As stated at paragraph 4.9, the Government's Standard Method sets a starting point for the objective evaluation of housing needs across the Plan area at 2806 homes per annum. The Local Housing Needs Assessment also sets out a substantial need for affordable housing.</p> <p>Footnote 7 lists the nationally-defined policy considerations that might bind on and restrict the ability of a plan-making authority to meet objectively-assessed development needs in full. These include:</p> <p>"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change."</p> <p>It is evident that many of these constraints bind on the Plan area, as they have done for many years. There is nothing new or unexpected in any of this discourse. The planning authorities in the area have long been faced with these problems. Successive rounds of plan-making have singularly failed to address these needs. This is a principal reason why housing delivery has failed to achieve close to the levels required to deliver housing, and affordable housing in particular.</p> <p>Paragraph 4.9 of the draft plan acknowledges that:</p> <p>"One of the most significant challenges we face is population growth and the need for new homes....our Local Housing Needs Assessment states that there is a significant need for affordable housing."</p> <p>The Council intends to deliver only 1600 homes per annum, citing that "exceptional circumstances exist" to justify departing from the Standard Method, which presents a need 2806 dwellings per annum. This is a very substantial variance indeed. It has to be recognised though, that consistently delivering even 1600/annum would represent a very great uplift against delivery rates achieved in recent times, and would demand a progressive acceleration over the plan period to levels that are greatly higher even than this. The proposed housing trajectory reflects this.</p> <p>The invocation of "exceptional circumstances" used by the Council to hugely undershoot planning against the need identified by the Standard Method, is very close to the test expressed in law and NPPF that only "very special circumstances" justify releasing land from the Green Belt to meet housing needs. It is notable and logically quite inconsistent that the Council believes it can advance credible evidence for such "exceptional circumstances" to justify a great under-shoot of housing delivery against need, at the same time as claiming, emphatically, that no "very special circumstances" exist that justify a Green Belt Review, to meet some housing needs from otherwise unconstrained land within it, on the edge of the urban area.</p> <p>The unwillingness and inability of neighbouring authorities to make provision to meet some of the Council's needs beyond its boundaries under the Duty to Cooperate (paragraph 4.12) is a material further contributory factor that suggests that the Council should do all it realistically can to meet housing needs within its own boundaries. This is also inherently more sustainable as it means that housing needs would be met as close as possible to where they arise, and as such patterns of movement arising from the resulting development strategy will be less extensive, and inherently be met more sustainably.</p> <p>Housing need and affordability</p> <p>Lack of housing supply binds directly, and increasingly tightly, on all service providers, including ourselves as the principal provider of public transport in the Conurbation and its immediate hinterland.</p> <p>This is not simply a matter of house prices. The rental market in recent years has if anything seen even stronger increases in rents. The ability to secure high returns through short-term holiday lets, often with less regulatory burdens and scrutiny, has apparently had a particular impact in parts of the Conurbation taking privately rented homes from stock. Both sale values and rental levels are shown by evidence presented in the draft plan to be substantially above UK averages.</p> <p>By contrast Median Average Full-Time Pay in 2022 is £31,500 (fig 2.2 page 4) (ONS £33,243 in 2023) compared with a UK average of £33,000 (2023 about £35,000). The BCP area along with neighbouring Dorset, is actually a relatively low-wage economy.</p> <p>When levels of income are set against current housing costs both for rent and for sale, housing affordability is at levels that are amongst the most challenged in the UK. According to the ONS 2023 Housing Affordability Analysis "In 2023, full-time employees in England could expect to spend around 8.3 times their annual earnings buying a home." A five times multiple is accepted by Government as representing a ratio that is broadly affordable. In BCP the figure is 10.1 times. This has fallen back from "over 11 times annual household earnings (in 2021)" reflecting a national trend which saw a pronounced spike induced by COVID and inflation, that has now been redressed to a limited extent by substantial pay inflation that has lagged house prices, rather than any significant reduction in property values and rents. ONS data shows that the median house price in the BCP</p>	<p>in area and provides almost all internal public transport, so important to economy and society dependent on.</p> <p>Significant issues recruiting, training and retaining staff due to housing costs and no suitable accommodation, younger candidates having no driving license due to costs acquiring, and competition from other service work providers. Issues will worsen and limited ability for increased wages to address and would adversely affect other sectors. Poor housing supply credible causative factor in slow growth in Dorset LEP. Highlight impact of flood risk in Poole and Christchurch town centres on design, economics and time for development to come forward due to need for agreement with EA. Increased flood risk in future. BCP Council have not approached adjoining authorities to attempt to meet housing need. High level of past under delivery of housing, lack of suitable housing suppressed household formation and graduate retention. Statement that plan will "support sensitive, gentle intensification across the urban area" vague and unspecific with no evidence achievable through supply of sites or outputs can be realistically expected. Not a change from existing strategy. Intensification not possible with current car use as shown in Transport Modelling Report - transport arteries already heavily congested and would worsen. Substantial investment in public transport connectivity and efficiency required - insulating buses from congestion - and increases walking and cycling needed for strategy's sustainability. Plan does not align with such an approach. Plan does not provide sufficient number, range or mix of new homes. Some intensification already taking place - conversions to housing and increasing occupation levels in existing stock. Typologies associated with gentle intensification (mansion blocks, terraced and semi-detached houses) lower density</p>			



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	<p>area was £320,000 in 2021 but rose to £340,000 in 2023.</p> <p>The average (as opposed to median) house price was £400,000 in December 2023. Standard affordability assumptions for first-time buyers involve a minimum 10% deposit and a borrowing level based on 4x long-term earnings. This crudely translates to a need for a household to have earnings of £90,000 per annum, as well as having saved a very substantial deposit. The median personal income in the BCP area in 2023 is £33,000. Two earners at around this level come nowhere near qualifying for a mortgage.</p> <p>This means that it is virtually impossible for anyone entering the local housing market, without external financial support (such as substantial equity from a higher value property) to secure any kind of acceptable accommodation. This affects younger people and the economically active (under 45) much more than older groups.</p> <p>It also exposes the fact that many service workers, in transport in particular, but also very broadly in other services such as health and education, cannot hope to get onto the housing ladder, even with several year post-qualification experience.</p> <p>Nor is the rental market able to supply more affordable or suitable accommodation. On the contrary, national data shows that supply has tightened, and private rental levels have risen more rapidly than inflation, especially since COVID. This is also true in the plan area. Rightmove and Zoopla Data gathered by Savills for the BCP area shows that compared with the 2017-19 average number of properties listed as available to rent, the number of listed available rental properties in the plan area has dropped by 35% in Q4 2023. Rents have shown annual growth between 8% and 10% per annum since January 2022, and this has compounded to make current rental levels greatly less affordable than prior to COVID.</p> <p>Data makes plain that the very high and rising numbers of retired residents in the plan area, for whom the Conurbation has long been an attractive destination to migrate to, and who are not so constrained, are directly contributing to an ongoing trend that is squeezing younger demographic out of the housing market, within a housing stock that is relatively static and has failed to meet housing demands fully for years.</p> <p>Impacts of lack of affordable housing on the economy</p> <p>Our morebus business runs a fleet of over 250 buses across the conurbation and serving adjoining parts of Dorset and Hampshire. We employ around 500 driving staff and over 100 technical engineering and other support staff at operational level. The company headquarters is in Poole which supports a substantial further headcount, including our Directors, and business support teams. As such, we are one of the largest private sector employers in the plan area. Since the failure or withdrawal of other operators, we are delivering substantially all the internal public transport in the plan area; there is limited local use of the Southampton-Weymouth rail line between local stations. Among our activities is a bespoke network operated under contract with the Universities branded as Unibus, but available to the wider public. This involves 15 double-deck vehicles.</p> <p>We are thus a very important part of the “foundational economy” of the conurbation without which substantial parts of the economy and society would struggle to function. This includes tourism and hospitality - on which the conurbation remains highly dependent – health and social care, education and training.</p> <p>Following COVID previously ongoing challenges recruiting and retaining staff at our Bournemouth operating centre became substantially more serious. Poole is under ongoing pressure, albeit it is less acute.</p> <p>We have repeatedly raised pay rates in recent years at both of our Poole and Bournemouth based operations - well ahead of inflation - to address rising costs of living. However, the costs of housing have advanced far ahead of inflation in the plan area for decades.</p> <p>We are competing with a wide range of employers in the conurbation for service workers. This includes a range of roles that involve directly serving the public as a core part of the role. This includes the retail, hospitality, education, health, and social care sectors. Dorset LEP data monitoring job vacancies makes plain that the biggest recruiters in the conurbation are all in these broad fields, and the increasing length of time taken to fill posts, and the number of times posts are re-advertised, is substantially rising. Dorset LEP data shows that 2023 recruitment volume in 2023 was 114% of 2019 – the highest on record. Compared with 2022 when UK recruitment volumes dropped 4.5%, in Dorset and BCP it rose 35%.</p> <p>Plainly this reflects a recruitment crisis, and it has evidently been long in the making. Between 2020- and 2022 national data shows that a substantial number of those aged over 55 left the labour market. It is backfilling staff into these posts that is a significant component of the current problem. The retiring cohort benefits from being established in their own properties in the BCP area; a very large proportion owning without a mortgage. The next generations from whom we need to recruit are in a very different and much more difficult position. The situation in the BCP area is clearly further exacerbated by the existing housing stock and tenure composition, where affordable rental properties comprise a much lower proportion than the national average.</p> <p>Nor does this data reflect the degree to which posts are being filled through informal channels.</p>	<p>than minimum densities in policy, which would require sites of a significant size, few of which are evidenced to exist. Land supply tables indicate most development on smaller sites covered by generic development management policies. Delivery is often protracted or may not take place [gives examples], indicating economics of comprehensive development finely balanced. Gentle intensification in town centre opportunity areas thus unlikely to deliver sufficient housing supply. Beyond allocation unclear what gentle intensification looks like and no evidence can meet development needs. Given above intensification not an effective strategy alone.</p>			

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	<p>We are permanently recruiting staff across virtually all core operational and technical job roles. As well as significantly boosting pay, this often involves lengthy and costly staff training.</p> <p>We see the following on a regular basis:</p> <ul style="list-style-type: none"> <li>• qualified and experienced bus drivers seeking to move into the area for a variety of reasons, who are accepted for employment but do not take up posts because they cannot secure suitable accommodation.</li> <li>• A general lack of suitable candidates under the age of 30. This is because relatively few have a current (car) driving license. Within the demographics we recruit from, the high cost of housing among other things is believed to be acting in a significant way to prevent residents from being willing or able to take on the costs of acquiring this skill.</li> </ul> <p>Looking forward, and in view of the age profile of our current staff, this problem could well become more serious.</p> <p>Simply raising wages even more dramatically above background inflation than the historically high rates we have seen recently, is not commercially sustainable. It would demand substantial increases in fares, which much of our clientele would struggle to afford, in any event. This would have a significant knock-on socio-economic impact for some of the more vulnerable and economically stressed households and individuals in the conurbation – those who do not have access to a car or who are otherwise unable to drive.</p> <p>It would also obviously start to have a distorting effect on the wider labour market, as well. This would affect the public sector disproportionately as pay levels are set nationally with very limited discretion to vary them. By making one sector substantially better paid, in the absence of any other mechanism, market forces will simply tend to denude sectors like health and social care of a recruitment pipeline. There is some evidence that this is already taking place.</p> <p>An excellent example is the way that, immediately post-COVID, a shortage of qualified HGV drivers led to huge uplifts in pay in that sector, which had the direct effect of stripping bus companies (as well as other employers) of significant numbers of staff. The government directly participated in this, by using the DVSA database to approach all existing bus drivers to encourage them to leave and become lorry drivers.</p> <p>This kind of reactive short-term activity is nothing other than a “band-aid” to address what at root are serious and long-standing weaknesses in the economy, which have housing supply as one key causative factor, and re particularly evident in the BCP area. After year of dodging the problem, it binds on government at all levels to start to take appropriate steps to deal with the root causes.</p> <p>This focus on the service economy leaves aside the wider economic picture. ONS data on Regional Gross Value Added between 1998 and 2019, during which time housing delivery has consistently lagged, shows that the Dorset LEP area, including BCP, has grown 19.11%, about half the English regional average. This figure is lower than any other LEP area except the Black Country.</p> <p>There are clearly major structural factors hindering higher knowledge- and technically-led sectors in growing in the area, despite the presence of a very substantial cluster of high-technology businesses and financial services already existing in the BCP area. When other localities in the wider adjoining areas are concerned that are showing substantially better results - such as Swindon and Wiltshire - and the next worst performing – Buckinghamshire – the role of housing supply and pricing seems to be a credible causative factor.</p> <p><b>The Role of the Green Belt</b></p> <p>As law and policy separately makes plain, Green Belt has a substantially different role to the other listed constraints at Footnote 7 of NPPF. It is a policy tool that exists only to protect the openness of land, and in essence, check urban sprawl and coalescence. It has NO other purpose, in terms of meeting wider policy objectives or legal obligations for the protection of biological, environmental, heritage or other assets. In fact, it does not even have a role in protecting the beauty of valued landscapes on aesthetic grounds. All these objectives are separately addressed by these other policy and legal designations. Green Belt is thus intended to offer enduring limits to the extent of existing built-up areas, but explicitly not “permanent” limits as do the other listed constraints.</p> <p>However, the effectiveness of the policy over decades in greatly limiting change has made it’s a very “popular” policy, and as such its purpose is clearly in the public mind and discourse with “protection” of land from development for its own sake – reinforced by multiple other reasons.</p> <p>It is, and has always been within the Council’s discretion to evaluate the extent of the Green Belt, having regard to its statutory purposes and the ability to otherwise meet development needs, to review it and when “very special circumstances exist” (“VSCs”), to remove those areas that are least effective in meeting those purposes to meet those development needs.</p> <p>This was indeed done by the Poole Local Plan 2018. Such a process is bound to be contentious, but the preparation of that Plan and its Examination in Public confirmed that Very Special Circumstances did indeed exist that justified this step. Somewhat earlier in 2014, the Christchurch and East Dorset Joint Local Plan drew exactly the same conclusions, which were likewise confirmed at independent Examination in Public.</p> <p>These VSCs continue to apply. In particular, in no part of the plan area is housing delivery achieving</p>				

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	<p>remotely close to delivering against housing needs. This includes the contribution made by allocated previously developed sites and unidentified “windfalls”.</p> <p>In fact, the only sites that are delivering a broad range of homes, including family houses and affordable housing (including affordable and social rented tenures) are the urban extension sites within the former Borough of Poole, released from the Green Belt in 2018.</p> <p><b>Strategic Flood Risk</b></p> <p>In looking at objective and fixed constraints, it is important to highlight that flood risk affects a substantial proportion of the already identified development land in the plan area, around Poole Town Centre and Christchurch Town Centre. Even where developers are advancing proposals in these areas, this has had a significant impact both on development design and economics on the one hand, and the time needed to secure agreement from the environment Agency as a statutory consultee.</p> <p>We note that in some cases, anticipated changes to the Strategic Flood Risk Zones that arise from climate change are binding on larger areas close to the foreshore.</p> <p><b>HOM 1b Reviewing Housing Need – the Housing Needs Assessment Methodology</b></p> <p>The Council is intending to depart radically from the expectations set out in government policy that the Standard Methodology laid down in Planning Practice Guidance (PPG) should be the starting point to assess housing requirements. Deviation from this is permitted in exceptional circumstances. However, the presumption remains that planning authorities should meet their assessed development needs in full.</p> <p>Where they cannot do so, they should seek to approach neighbouring authorities under the Duty to Cooperate which remains current in law, though the current government has made provision to repeal this. BCP Council have made no such approach to any adjoining or nearby authority, as the Statement of Comon Ground on the Duty to Cooperate with Dorset Council makes explicit.</p> <p>We will leave it to others to comment in detail on the evidence in the Joint Housing Needs Report that appears to suggest that housing need is not as great as that calculated under the Standard Methodology. However, it is plainly contestable, on a number of grounds. In particular, the role of the student population and retention rates in the Conurbation are worthy of particular scrutiny.</p> <p>We would highlight past under-delivery as representing a very substantial issue that the work bdhnd the plans and the strategic policies ignore. There seems no doubt that retention of graduates has been damped by the lack of suitable accommodation at affordable levels, including of rental properties. This will also have suppressed household formation.</p>				

**Stage 2 – To follow**

The following representations will be agreed for Stage 2 of the Local Plan examination. They are included here for completeness.

Plan Ref	Full comment	Officer summarised comment	Support/ Object	Officer Response and action	Go South Coast Position (TO BE ADDED SPRING 2025)
Vision and Objectives	<p>Plan Objectives - Transport and Mobility</p> <p>We note and welcome that among the objectives the Plan sets out to:</p> <ul style="list-style-type: none"> <li>• provide a safe, sustainable and convenient transport network that meets the needs of all residents</li> <li>• deliver the infrastructure needed to support sustainable communities, businesses and development</li> </ul> <p>This is elaborated upon at page 8 of the draft plan. The need to reduce dependence on the private car is stated as it has been in successive plans since 1998. Previous planning strategies have repeatedly failed to achieve this. Rather, given the general absence of investment in highways infrastructure over the same period, traffic congestion has increased leading to increasing levels of delay and unpredictability of journey time. This affects bus services, which run to fixed timetables and cannot by law reassign route to avoid congestion, more than any other mode.</p> <p>The lack of resilience in the Council's highways network is well evidenced in the Transport Evidence Base including the existing JLTP3 2011-2026 (EiP Ref CAT 4) and the Traffic Modelling Report (EiP Ref CAT1a) published alongside this consultation.</p> <p>There is no Objective that highlights the need to resolve the inadequacy of existing transport infrastructure; much less to make buses faster and more reliable, reversing decades of decline in bus productivity. This objective sits as a core tenet of the National Transport Decarbonisation Plan, the National Bus Strategy for England, and the Council's own Bus Service Improvement Plan. As such the draft objectives continue to pay lip service to the matter, and given the current situation reflects 20 years of very similarly -couched local plan objectives, it must be concluded that the passive and non-committal approach expressed is ineffective, prima facie. It must thus set the plan up to be unsound.</p> <p>In the absence of a clear alignment with a deliverable transport strategy that secures mode shift and effectively addresses the imbalances between highways capacity and traffic demands to secure more reliable and efficient access and mobility, it is impossible to see how the plan can secure the full range of transport and mobility objectives that are expressed on page 8.</p> <p>Additionally, we are very concerned that the Plan does not attempt to provide sufficient housing to meet social and economic needs. The relevant objective is</p> <ul style="list-style-type: none"> <li>• provide new market and affordable homes to meet the different needs of our communities.</li> </ul> <p>This objective is passive and inspecific, and fails to properly reflect the clear expectations set out at paragraph 60 of NPPF:</p> <p>"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community."</p> <p>The Plan thus is aiming:</p> <ul style="list-style-type: none"> <li>• NOT to meet as much of the areas identified housing needs as possible,</li> <li>• NOT to provide a sufficient amount and variety of land to meet those needs.</li> </ul> <p>The objective is worded to draw a semantic veil over the serious and increasing problems that lack of housing supply is causing, especially for economically active sectors of the population on which both the general prosperity of the plan area, and personal well-being of all its residents depends. It sets the plan up to be ineffective, and not positively prepared, in this regard. It is therefore unsound.</p> <p>The Objectives seek to:</p> <ul style="list-style-type: none"> <li>• focus the most intensive developments of new homes in our town centres and areas which have the best walking, wheeling, cycling and public transport access to facilities and services."</li> </ul> <p>This statement expresses what could be considered a truism. Certainly, Poole and Bournemouth town centres are the two main public transport hubs. As such, they offer high levels of connectivity to nearly all parts of the conurbation. However, this is an extensive and very complex, polycentric built-up area, and distances from the town centres to many parts of the conurbation are consequently quite extended. Furthermore, much of the topography, especially near the coast is also quite unfavourable to both walking, and cycling in particular, being dissected by steeply sided "chines" (steep valleys). Bournemouth town centre, by virtue of this, is especially hilly, with steep slopes. Finally, many of the key facilities and employment centres are well dispersed outside the central areas, including at Hurn Airport, around Holes Bay, and at the Bournemouth General Hospital on the edge of or beyond the main built up area. Retail has also tended to become more dispersed with Bournemouth town centre having seen the greatest decline. Thus, a great deal more evidence needs to be advanced as to how focusing most new housing at town centres – if it is actually deliverable and is an adequate response to the requirement set out in NPPF paragraph 60 and 61 about the amount type and location of housing - actually supports shorter travel</p>	<p>Poor track record of planning strategies reducing dependence on private cars, contrary to objectives. Lack of investment in highway infrastructure leads to traffic congestion, leading to delays and unpredictability of journey, affecting bus services. Transport evidence shows lack of resilience. No objective highlighting need to resolve inadequate public transport infrastructure or make buses faster/more reliability - therefore strategy ineffective and plan unsound. No clear alignment with deliverable transport strategy addressing issues, therefore cannot meet transport and mobility objectives. Plan does not attempt to provide sufficient housing and therefore does not meet objective to meet new market and affordable homes, which itself is unspecific, passive and inconsistent with national policy. Plan does not meet identified needs as far as possible or provide sufficient amount and variety of land to meet needs. Lack of supply is adversely impacting working population, prosperity of area and resident wellbeing. Evidence needs to demonstrate intensification in town centres supports shorter journeys, inclusive and sustainability accessibility to employment, and quality of life, balanced against housing needs being met in broader range of locations and meeting broader needs. Significant departure from focusing growth on main public transport corridors. While Poole and Bournemouth are transport hubs, nature of conurbation means journeys to other areas can be long. Much of the area, particularly coastal areas and</p>	Objection	<p>Objectives reference improvements to bus services and policies within the plan support modal shift. It is not possible to meet the standard methodology housing need figure due to the constraints within the BCP area. In accordance with the NPPF the Plan does not propose to release Green Belt to meet housing needs. Our central areas have the best access to facilities and services, including public transport services which may be used for longer journeys. The majority of our centres are along public transport corridors.</p>	

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	<p>distances, or sustains more inclusive and sustainable accessibility to employment services and quality of life, than a strategy that meets housing need across a broader range of locations, to meet a broader range of housing needs.</p> <p>In particular, the proposed strategy is a significant departure from current plans two of which are focused on driving intensification of uses towards the main public transport corridors. These "Prime Routes" are identified in the existing Joint Local Transport Plan ("JLTP3") and are the main structuring principle of the spatial strategies in both the existing Bournemouth and Christchurch Core strategies.</p>	<p>Bournemouth Town Centre, hilly and unfavourable to cycling and walking. Many employment areas, retail areas and key facilities located away from central areas.</p>			
Para 3.2	<p>Context and Vision</p> <p>The plan is made in the context of an already-ageing population and serious issues with housing affordability. The Council recognises that this "also acts as a barrier to the growth of business in our area." (para 3.2).</p> <p>An analysis of ONS data from the 2021 Census shows a significant imbalance in housing stock locally. Across BCP (173,800 Households) 63% of households own their own home, 25.5% are in private rented accommodation, while only 11% rent from the Council or a Registered Provider (in effect those able to benefit from social and affordable rents). The vast majority of the housing is thus in the private market and directly subject to forces of supply and demand.</p> <p>Additionally, looking forward, the Council believes that towards the end of the plan period the proportion of population over the age of 65 will have risen from 24%, already well over the national average, to 40%. It is important to emphasise that this kind of demographic structure is entirely unprecedented in the locality, within the UK or, indeed, globally. It has profound implications for the economy and the demand for and delivery of local services – not least health and social care, and mobility services including public transport. It also has a great bearing on the current and the future housing market, especially when so high a proportion of the stock is owner-occupied. Churchill Retirement Living, a national but locally based specialist provider of age restricted specialist retirement accommodation, states that the average age of purchase of a retirement flat is 78 and most occupants are over 80. These purchases are typically forced by increasing frailty. This strongly indicates that adults are remaining in their family properties for decades after dependants have left.</p> <p>The Christchurch and East Dorset Core Strategy 2014 (EiP ref DP6) offered evidence in its spatial portrait that 70% of the housing stock is under-occupied. Likewise, the Poole Local Plan 2018 (EiP Ref DP9), showed evidence that the figure across the Borough was 50%. While households are ageing and becoming smaller, the housing market is evidently not acting in a way that is releasing general housing stock to younger generations, including young families, at anything like the necessary rate.</p> <p>The Vision of the draft plan and context behind it fails to properly identify, much less address through its strategies and policies, the way in which the Conurbation is already becoming more highly polarised, between a more-or-less affluent majority living within the urban cores, generally in under-occupied and owner-occupied homes, most without a mortgage, and a substantially poorer, more morbid and younger demographic living in former local-authority estates the vast majority of which are on the far western and northern edges of the conurbation including at Alderney, Rossmore, Kinson, Throop, Somerford and Burton. This represents a significant and increasingly entrenched pattern of socio-economic segregation.</p> <p>To this should be added increasingly intense use of older high density pre-1939 stock in the private rental sector, including as houses in multiple occupation, where dwellings are under immense pressure and offer in many cases highly substandard space and living amenity for residents.</p> <p>The Plan is oblivious to this. Rather the Council is intentionally choosing to minimise housing supply, and by so doing maintain and aggravate the conditions that have been "squeezing out" the economically active over many years.</p> <p>There is no question that preserving as much of the plan area from change is electorally popular. However, the perpetuation of such a strategic approach with regard to housing in particular, but also infrastructure, cannot but lead to existing exceptional pressures, also identified and acknowledged in the Plan's spatial portrait, becoming that much more severe.</p> <p>The impact on housing affordability is the most obvious one.</p> <p>Directly consequent upon this, is the current and increasing dependency of the conurbation on areas well beyond it, where housing is more affordable, to maintain the labour force. This has the direct effect of adding a larger number of journeys to an already saturated road network. It also increases the extent and intensity of spatial interactions between the conurbation and an ever-wider hinterland. This is far from unique to the plan area – it is true for all urban authorities where development has been circumscribed by Green Belt policy over decades. It is not socially, economically or environmentally sustainable, as has been pointed out by an increasing range of bodies over recent years.</p>	<p>Significant housing stock imbalance with limited housing for young families. Significant projected ageing population increasing demand for local services and evidence demonstrates are not downsizing from family properties at rate required. Vision, strategy and policies fail to identify or address polarisation/socio-economic segregation between affluent majority in urban cores in under-occupied owner-occupied homes without mortgages, and poorer younger demographic in former council estates and those living in highly substandard high density private rented stock (including HMOs). Immense pressure for dwellings. Strategy for housing and infrastructure will 'squeeze out' economically active, and will result in exceptional pressures identified in spatial portrait becoming more severe. Strategy will result in greater dependency on areas beyond conurbation to maintain workforce, increasing journeys on saturated road network. Will increase extent and intensity of interactions between conurbation and ever wider hinterland - not socially, economically or environmentally sustainable.</p>	Objection	<p>The housing mix policy seeks to provide a range of property sizes. A number of one and two bed properties have consent and would support options to downsize.</p>	
S1	<p>Development Strategy</p> <p>Strategic Policy S1</p> <p>The Policy does not go very much further than restate the broad and quite generic Objectives.</p> <p>All the statements are desirable, in principle, and are reflective of all current public policy. However, the plan needs to demonstrate how the Council will "actively manage patterns of growth" to achieve those Objectives</p>	<p>Repeats broad and generic objectives. Point e. vague and passive, and will not achieve radical shift in behaviour to low/zero carbon</p>	Objection	<p>Agree policy needs amendment as not all criteria are relevant or are too difficult to achieve.</p> <p>Action: Policy S1 to read:</p>	

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	<p>– including the transport and mobility objectives set out in NPPF Chapter 9 at paragraph 108. Point e. is vague and passive. To achieve the net-zero objectives set out in the National Transport Decarbonisation Plan requires, for every scenario, a radical shift of travel behaviour towards low and zero-carbon active travel modes, including public transport. The scale of this challenge will no doubt become clearer when the review of the Joint BCP and Dorset Local Transport plan is complete. Policy does not seek to achieve this. It is thus ineffective, and consequently unsound.</p>	<p>travel modes (including public transport) required to achieve National Transport Decarbonisation Plan requirements.</p>		<p>Strategic Policy S1: Addressing the climate and ecological emergency</p> <p>New development should contribute towards the Local Plan's objectives and deliver sustainable development to address the climate and ecological emergency. <del>Within the BCP area this requires A</del> applicants should, where appropriate, to demonstrate through either their Design and Access Statement (major developments) or the council checklist, how their proposal will, where relevant:</p> <ul style="list-style-type: none"> <li><del>a. reduce</del> contribute to achieving net zero carbon emissions to net zero by 2050;</li> <li><del>b. mitigate and adapt to the impacts of climate change;</del></li> <li><del>c. b.</del> provide urban greening and biodiversity net gain;</li> <li><del>d. c.</del> be sustainably located within easy access by walking, wheeling, cycling and public transport to facilities and services which meet people's day to day needs;</li> <li><del>e. d.</del> incorporate and improve walking, wheeling, cycling and public transport to support more journeys using sustainable travel;</li> <li><del>f. e.</del> maximise contribute to social value, creating healthy, safe and cohesive communities;</li> <li><del>g. f.</del> promote the optimal use of land, prioritising the reuse of existing buildings, previously developed land and upper floors of retail and commercial buildings;</li> <li><del>h. g.</del> prioritise making good places with a high standard of design that is based on an understanding of the context of the site;</li> <li><del>i. h.</del> contribute to a range of services, facilities, jobs and recreational opportunities;</li> <li><del>j. i.</del> deliver a mix and type of housing to meet local needs, including affordable housing and specialist needs housing;</li> <li><del>k. j.</del> deliver contribute to the delivery of essential infrastructure in step with development;</li> <li><del>l. k.</del> take a sequential approach to avoid development in areas of flooding risk;</li> <li><del>m. l.</del> avoid adverse environmental impacts such as ground, water and air pollution; and</li> <li><del>n. m.</del> be financially viable and deliverable within a suitable time frame.</li> </ul> <p>Development proposals which accord with the policies within the BCP Local Plan and any relevant neighbourhood plan will be approved without delay, unless material considerations indicate otherwise. The council will work pro-actively with applicants jointly to find solutions so that proposals that deliver sustainable development can be approved wherever possible.</p>	
<p>Para 4.9</p>	<p>Housing Delivery According to the draft plan text at paragraph 4.9, housing delivery has averaged 1117 per annum over the past 15 years. We recognise that severe credit constraints in 2008-2012 served to depress delivery in that earlier part of the period, while since 2022, cost inflation and significant credit tightening has also helped damp delivery more recently. Nevertheless, the Local Housing Needs Assessment ("LHNA") (EiP Ref HOM1a) evidences that just 127 affordable homes per annum have been delivered on average since 2012: little more than 11% of this average figure, despite policy requirements in former Poole and Christchurch being set at 40%. We discuss</p>	<p>Housing supply/delivery is well below what has been required. Lack of affordable housing. Viability constraints on high density development. No houses (as oppose to flats) are being built, family housing needed to maintain</p>	<p>Objection</p>	<p>The plan seeks to support housing delivery and the provision of a mix of units.</p>	

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	<p>the actual situation in more detail later in these representations.</p> <p>The evidence shows that historically and over a much longer period, all three constituent authorities have lagged against their previously-assessed and agreed housing delivery targets, set at much lower levels, to a greater or lesser extent:</p> <p>“Between 2006 and 2011 housing completions averaged 991 dwellings per year (net), delivering a total of 4,955 new homes.” (Bournemouth Core Strategy 2012 para 4.3.3)</p> <p>Poole Local Plan 2018 “3.21 651 affordable homes have been delivered between 2006 and 2018. This is significantly below the Core Strategy target of 2,450 over the same period.”</p> <p>The Local Development Scheme 2024 (LDS) (Eip Ref SD3) acknowledges at paragraph 7.1 that the Council is bound to provide a formal report monitoring the effectiveness of its statutory development plan. This Annual Monitoring Report (“AMR”) should be produced annually.</p> <p>The Council has failed to produce annual monitoring reports for some years. Establishing what the current statutory development plans are delivering within the BCP area is exceptionally difficult.</p> <p>Notwithstanding this, the existing adopted local plans as well as the monitoring activity that has been published, shows very clearly that housing supply has fallen well below requirements since 2018. Moreover, it also reveals a downward trend.</p> <p>Looking at overall supply volumes, the Council’s Latest Annual Monitoring Report 2023 (Examination Library Ref IAD4) shows that delivery of housing has dropped to a level less than half that level of 1,600/annum the Council accepts that it ought to look to plan for:</p> <p>Local Plan Area 2019/2020 2020/2021 2021/22 2022/23  Bournemouth 796 468 209 288  Christchurch 273 72 57 168  Poole 634 292 430 317  Total 1,703 832 696 773</p> <p>Housing Delivery Test (“HDT”) results show that over the last four years the former Bournemouth Council area delivered just 51% of requirements, and Poole 80%.</p> <p>Summary</p> <p>The fundamental problems, that date back decades, are well visible but are clearly seen in the evidence behind this and previous local plans:</p> <ul style="list-style-type: none"> <li>• Exceptionally high levels of owner-occupation across the plan area, with a commensurately low level of supply of all affordable tenures, especially affordable and social rent within the current stock.</li> <li>• Very low levels of delivery of affordable housing from new development. The Local Housing Needs Assessment 2021 indicates that over the last 10 years across the plan area, an average of only 127 affordable dwellings have been built annually. Attempts to directly procure new social housing stock by the Council and its predecessors have had some modest success but numbers are very small compared with need.</li> <li>• Viability constraints on high density redevelopment of previously developed land, on which the draft plans and those already adopted seek to depend, severely constrains affordable housing supply. The existing Poole Local Plan 2018 is relatively recently prepared. This seeks only 10% affordable housing in the Town Centre, where the much the largest proportion of planned supply arises, directly reflecting this.</li> <li>• However, not even this is apparently viably achievable when permissions are examined. The 5-year Housing Land Supply Statement reveals that in almost all cases high-density residential schemes in both Poole Christchurch and Bournemouth on previously developed land, either allocated or windfall, delivers no on-site affordable at all, and only relatively rarely a small commuted sum under a s106 obligation for off-site provision.</li> <li>• Likewise, the high historic and future dependence on windfalls of very small (re-) developments of under 10 dwellings, which deliver no affordable tenures, also is a serious drag on affordable housing delivery.</li> <li>• Almost no houses (as opposed to flats) have been built across the plan area for many years. To the degree that the market is being supplied, it is with 1- and 2-bedroom flats; purpose-built student accommodation, and specialist homes for the elderly. All of these segments represent needs that need to be supplied, especially given the growth of Higher Education and an already elderly and ageing demographic in much of the plan area. However, the larger “family” housing stock needed to maintain economic activity rates – already some of the lowest in the UK – is not being delivered in any significant numbers, nor has it for years.</li> <li>• The under-occupancy of much of the existing owner-occupied stock – as much as 50% of total stock is under-occupied according to the adopted Poole Local Plan and 70% in the former Christchurch Borough – aggravates the lack of housing availability for the economically active population and families in particular.</li> </ul>	<p>economic activity rates, most of existing stock is under occupied and aggravates lack of housing availability for economically active.</p>			
C1	<p>Policy C1 Addressing Climate Change</p> <p>We note and welcome that the Council expects development to</p> <p>“a. reduce carbon emissions by:</p> <p>i. reducing the need to travel by car by directing development to locations that are well served by cycling, walking, public transport and existing local services and facilities, or to locations where such facilities are</p>	<p>There is no way for decision makers or developers to assess compliance with a.i, policy is ineffective and unsound</p>	Objection	<p>Part 'a' aims to provide a strategic approach that is important to combating climate change with details set out across the other policies within the chapter. No action required.</p>	

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	<p>capable of being improved;..."</p> <p>However, there is no means for development promoters or decision-takers to assess on any objective basis, what these opportunities are.</p> <p>This is especially true for "locations where facilities are capable of being improved". There is no way in which developers or decision takers can effectively assess what such improvements are likely to demand, what appropriate costs should be borne by developments, and thus their necessity, proportionality and reasonableness as set out by the Community Infrastructure Levy Regulations (2010) at Regulation 122. The policy is thus ineffective and unsound.</p>				
Figure 8.3 Housing Trajectory	<p>This is set out at Fig 1 of the Housing Delivery Report ("HDR") (EiP Ref HOM10), with a date of 01/04/2023. It shows how the Council considers that it will meet a stepped trajectory of 1200 dwellings/annum in the initial period 2023-2028, rising to 1800 dwellings/annum thereafter.</p> <p>The graph clearly shows an approach that retroactively fits statistics to the stepped requirement, and there is very little evidence to show for the first five years of the plan, how either commitments formed by windfall permissions or those accounted for by existing local plan allocations are attributed to the delivery trajectory. The HDR makes transparent that the plan relies exceptionally heavily on existing local plan allocations coming forwards in the first six years. With the exception of the greenfield urban extensions in former Poole which are both commenced on site, the bulk of these are very long-standing large regeneration sites, the majority in and around Poole and Bournemouth town centres - the Opportunity Areas of Policy S2.</p> <p><b>Forward Housing Land Supply</b></p> <p>However, the Council has not published transparent data monitoring the forward supply of deliverable housing land since 2020-21, as it should.</p> <p>Thus, is it extremely difficult to very precisely assess how far existing plans are supplying a sufficient pipeline of demonstrably deliverable sites to maintain future supply.</p> <p>There has been no update to the 5-year forward housing land position since 2020-2021. This gives a clear indication of the political priority, or rather, lack of it, given to meeting housing needs in the authority. These latest figures, all out of date, nevertheless show a failing position across all the plan sub-areas, and a particularly serious situation in Bournemouth and Christchurch:</p> <ul style="list-style-type: none"> <li>• Bournemouth area - 2.3 year housing supply</li> <li>• Christchurch area - 2.7 year housing supply</li> <li>• Poole area - 4.1 year housing supply.</li> </ul> <p>The list of sites making up the 5-year supply set out in the Housing Land Supply Statement (not explicitly submitted with the plan but sitting behind the Authority Monitoring Report IAD4) is certainly exhaustive. However, it is practically impossible to distinguish between the stock of permissions, and how fast these are being converted to completions in practice.</p> <p>A very significant number of sites are evidently stalled. Still more significant housing-led proposals, especially in central Bournemouth, while subject to current valid permissions, have been subject to repeated iterative planning applications, none of which to date have led to a start on site. The length of time a number of very prominent sites have stood derelict in the central areas of Poole and Bournemouth further attests to this.</p> <p>In Bournemouth these sites include a substantial number, not restricted to the following, many of which have a long planning history stretching back a decade or more:</p> <p>Planning (DM) Site Ref Description Town Centre AAP allocation ref. Nominal dwelling quantum  643 Former Punshon Memorial Church, Exeter Road A18 96  1179 Richmond Gardens Multi-storey Car Park A19 215  5940 Former Belvedere Hotel Site, 14 Bath Road N/A 68  1273 Former Winter Gardens site, Keystone House and 20, 20a and 20b Exeter Road A31 352  5969 Waverley House, 115-119 Holdenhurst Road N/A TBC  891 Former Odeon Cinemas Hinton Road/Westover Road A29 68  1685 Former ABC Cinemas Hinton Road/Westover Road A29 65  5810 Former Winter Gardens Hotel 32-34 Tregonwell Road N/A 45</p> <p>Poole town centre is characterised by much larger sites mostly in former industrial or similar uses, but has a similarly large pool of sites, most rather larger, that have long been anticipated for development, that has to date not been delivered:</p> <p>Planning (DM) Site Ref Description Town Centre AAP allocation ref. Nominal dwelling quantum  APP/15/01699/F Former HMRC Offices St Johns House Serpentine Road BH15 2DX T3 (part) 203  APP/17/00991/F Sydenhams Timber Blandford Road BH15 4BA T10 353  APP/18/00684/P 27-31 West Quay Road BH15 1HX T8 (part) 78  APP/18/00750/F Between the Bridges West Quay Road T9 459  APP/19/00864/F 59 West Quay Road BH15 1JQ N/A 63  APP/21/00733/P 4-6 Longfleet Road and 5-5a Parkstone Road N/A 118</p>	Not clear how the permission and allocations are attributed to the trajectory. Relies on existing allocations coming forward in first six years. Lack of data on deliverable housing land and 5-year supply. Low levels of five year supply from previous data, many sites are stalled, long allocated sites have not come forward, future supply is over estimated, housing delivery will not be realised, trajectory demonstrates the plan is ineffective and unsound.	Objection	Details about the five year housing land supply are set out in the evidence document - Five Year Land Supply for the Local Plan.	



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	<p>To this the bulk of the remainder of the Poole Town Centre “Opportunity Area” sites that have been allocated in successive local plans for over 20 years, but have not come forward. In most cases no planning application has materialised within the last 5 years, if at all, including:</p> <ul style="list-style-type: none"> <li>• H1 Former Poole Power Station nominally 900 dwellings</li> <li>• T1 Dolphin Centre, Seldown nominally 500 dwellings</li> <li>• T3 Former Goods Yard nominally 300 dwellings</li> <li>• T2 Poole Stadium nominally 300 dwellings</li> <li>• T8 Sunseekers, south of RNLI residual allocated area TBC</li> </ul> <p>This represents a substantial proportion of the land identified for future delivery. As such these cannot be said to represent a secure delivery pipeline, irrespective of whether they benefit from a valid permission. Thus, the true picture of forward supply is likely to be an over-estimate. While the shocks associated with COVID-19 affected output in 2020-21 and 2021-22, and more recent inflationary pressures have certainly significantly raised greater commercial challenges as materials and labour costs have outstripped realisable values, the issues surrounding housing supply in the Plan area long predate these events.</p> <p>A further 1000 or so units is the long-delayed Christchurch North Urban Extension. Delivery of this along with all other development in Christchurch, is subject to a moratorium imposed by the Environment Agency related to nutrient and phosphates neutrality.</p> <p>Given how long many of these sites have been sitting stalled, it is very bold to prediction indeed that these will see planning applications, consented, and discharge of conditions, and then inception of development at a scale and a pace sufficient to achieve this in the timescales available, though we do note a tail of about 200/annum from this source stretching out to 2039 which no doubt reflects a recognition that delivery of these sites could take a good deal longer yet.</p> <p>The overarching conclusion that is most clearly supported by the data is simply that, where housing delivery is concerned, hope continues to triumph over experience.</p> <p>As time passes a very substantial portion of undelivered identified supply is simply hypothecated into the future. The current draft seeks to do the same as has been done over successive plan cycles. However, NPPF expects that Local Plans should be credibly deliverable. The longer that actual substantial construction is delayed, the evidence mounts that supply from this source can at best be described as “aspirational”. However, it cannot be relied upon.</p> <p>The trajectory thus demonstrates that the draft plan is ineffective even in its own terms, and thus unsound.</p>				
H2	<p>This policy in effect maintains the existing broad policy approach in local plans. This approach has, over the last 10 years, delivered just over 11% of completions as affordable tenures. This is massively below the level of need.</p> <p>The approach seeks 40% affordable housing on the Urban Extensions as do the current adopted plans. These urban extensions are all consented and thus this element is reasonably assured. However, this source of supply is less than 10% of the total housing need being planned for.</p> <p>Over 90% of planned supply is from “brownfield” (i.e. previously-developed) sites; and of this a certain proportion – indeed possibly the majority – might arise from sites of under 10 dwellings scope, on which draft policy H2 does not bind at all. While the draft plan does not make this transparent, planning records show that across larger previously developed sites, the vast majority support no affordable housing provision and most cannot even make a meaningful commuted sum contribution to off-site provision.</p> <p>It is notable that committee reports and planning application records make no reference to consultation with or responses from Council housing delivery officers. In many cases the contribution, or lack of it, to affordable housing supply is not even reported to committee.</p> <p>The draft plan proposes to meet almost all housing requirements from unidentified small sites and previously-developed land. There is no evidence offered to indicate that greater future success will be achieved delivering affordable housing from these sites, or ones similar to them, than the exceptionally weak track record sustained over the last 20 years.</p> <p>The egregious exceptions are three substantial greenfield sites that were historically allocated having been removed from the Green Belt. These are all anticipated to deliver homes at a policy-compliant level of affordable housing: 40%.</p> <p>It is hard to see affordable housing delivery being boosted in the face of this evidence either short or longer term. In fact, the recent level of affordable housing delivery looks likely to be very largely dependent on the urban extensions and once this supply ceases, ongoing delivery will be exceedingly limited and sporadic.</p> <p>The policy is thus ineffective in achieving a sufficient supply of affordable tenures as the plan aspires to do. The policy is thus unsound.</p> <p>The clear inability to come close to assuring affordable housing demand also means that the plan is defying the expectations set out in NPPF at policy 22 that the Council should positively plan to meet development needs, especially for affordable housing. It is accordingly neither positively planned nor in conformity with NPPF. It must thus be judged to be unsound on these grounds also.</p>	Policy maintains the existing policy approach to affordable housing which does not delivery affordable housing or commuted sums. Poor delivery will continue. Policy is unsound, Plan should plan positively to meet affordable housing needs.	Objection	The affordable housing has changed, the affordable housing policy changes percentage of affordable housing required to reflect viability and introduces a tariff system to help secure additional affordable housing contributions, and provide certainty to developers.	

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H3	<p>Paragraph 8.20 in the draft Local Plan 2038 admits that of the stock of 9110 consented dwellings across the plan area, just short of 80% are for 1- and 2-bed typologies. It is evident that there is a substantial mis-match between identified supply and assessed housing needs. We welcome that this is recognised by the Council. Paragraph 8.22 states:</p> <p>“8.21 Given our housing needs compared with existing sites with planning permission, consideration needs to be given to diversifying the stock going forward to ensure a range of housing types and sizes are provided in the widest possible choice of locations to balance housing needs and promoting mixed communities. Particular consideration needs to be given to the provision of 3-bed and 4-bed market homes to help meet continued demand for family housing.”</p> <p>This is set out in draft Policy H3.</p> <p>However:</p> <ul style="list-style-type: none"> <li>• The effectiveness of the policy is largely dependent on how far delivery ensures that a 5-year forward housing land supply is maintained. The failure to achieve this has consistently led to existing housing mix policies being given reduced weight or entirely set aside in the planning balance.</li> <li>• “Built to Rent” schemes are exempted. These form a high and apparently rising proportion of both consents and new proposals, especially in the Opportunity Areas, and in Lansdowne, Bournemouth.</li> <li>• The policy sets out that within the key Bournemouth and Poole town centre areas, a minimum of 5% of dwellings should be of three or more bedrooms, and no more than 40% one-bed. Certainly, this is better than some schemes have achieved, but it rather reflects rather than leads reality. It circumstantially appears to reflect a recognition that town centre schemes are not capable of addressing wider housing need in a meaningful way. It is entirely unambitious in addressing the problem identified and the Strategic Objective of the plan that a full range of housing needs will be met.</li> </ul> <p>The evidence is thus already compelling that the approach taken can only compound the imbalances in the supply of housing typologies. The commitment in paragraph 9.24 that “further monitoring” will take place is spurious. It is all too apparent from the plan and its evidence base that the strategy identified can only tend to compound the over-supply of one and 2-bed flats, to the extent that the plan deliver sufficient housing at all.</p> <p>It is much less clear what the position will be after 2029, but given the reliance on allocated PDL and unspecified windfalls, it can only be assumed that this will fall back to historic levels where over 88% of all completions have been flats.</p> <p>It bears highlighting that a consistent failure of the Council and of its predecessors to maintain a five-year forward supply of deliverable housing land has had a direct ongoing bearing on the ability of the Council and its predecessors to retain control of both housing mix and tenure on the relatively few sites that do come forward. The engagement of the presumption in favour of sustainable development at paragraph 11 d) of NPPF in these circumstances, means the weight applicable to policies governing the supply of housing is very much reduced. As a result, apartment schemes do not generally meet housing mix requirements, with large numbers of one-bed units supplied, 2-bed undershooting policy targets and 3-beds being provided exceptionally: again, despite policy targets. Affordable housing is generally not provided at all. Increasingly, high-density schemes are being advanced largely or wholly as private rental sector, with no affordable provision.</p> <p>Given the exceptionally heavy reliance on the town centres as “Opportunity Areas” in policies SD1 and SD2 to deliver the great majority of housing supply over the plan period, a nominal 13,800 dwelling units (paragraph 4.22), it is telling that the Council has not taken the opportunity to reveal the housing mix that the pipeline of commitments represents in these areas, nor their contribution to meeting a wide range of tenure needs including the pressing need for affordable housing.</p> <p>No houses would be involved. Examination of Strategic Policy S2 shows that outside the committed urban extensions, over 90% of the forward supply will exclusively comprise multi-storey flats, at a density of 150-300/Ha.</p> <p>Exceptionally high densities are being achieved on sites in the Lansdowne area of Bournemouth, which has a precedent of taller office buildings. Largely as a result of this and the existing character of the area - which is currently covered by policy that in fact is focused on employment not residential - a more permissive tall buildings regime is leading to proposals each of which proposes ever-higher blocks. A scoping report for land at 41-43 Oxford Road and 6-8 St Paul's Road anticipates a 37-storey residential tower. Consents have been issued for 27 storey blocks. Currently draft policy for tall buildings is quite weak and the way that the Lansdowne area is rapidly evolving, including very high concentrations of purpose-built student accommodation, has some very profound implications for the immediate area as well as the surrounding neighbourhoods. One of these is the exceptionally great pressure at peak times on bus stops, as large numbers of students leave the area.</p> <p>This follows on from the recent developments that have been realised around Poole Harbour, though these have typically not exceeded 11 storeys.</p> <p>The precedent schemes in the plan area make plain that within these schemes there will typically be a very high preponderance of small studio and one-bed flats. These generally account for over 40% and on</p>	<p>Mismatch between supply and need, consented schemes for 1/2 bed homes. Housing mix policies given less weight in 5 year supply not maintained. Built to rent schemes not covered by the policy. Policy is unambitious in meeting housing need. Will compound imbalance of typologies, will result in a large amount of flatted development, lack of 5 year supply resulted in no control of mix or tenure. Not clear what pipeline of mix will be, not meeting needs for range of tenures or houses. Policy on tall buildings is weak. Amount of students in Lansdowne places pressure on bus stops. To provide family homes Green Belt release is needed.</p>	Objection	<p>Part b sets out that build to rent and co-living is exempt from the requirements in the town centres of Poole and Bournemouth. There has not been pressure for these schemes in other locations. Housing mix policy seeks to support greater number of 3+ bed homes. In accordance with the NPPF (Dec 2023) the Plan does not propose to release Green Belt to meet housing needs.</p> <p>The NPPF (Dec 2023) is clear that the Green Belt boundaries should only be amended in exceptional circumstances to meet housing needs. We do not believe these exceptional circumstances exist.</p> <p>Under the new NPPF (Dec 2024) the Council is required to prepare a new local plan to the Draft Local Plan housing numbers are over 20% lower than the new standard method. The Council is preparing a new Local Development Scheme to commence a partial review of this Draft Local Plan. This partial review will start in the Spring and will be in parallel to the examination of the Draft Local Plan.</p>	

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	<p>occasion over 50% of the dwelling mix. 2-beds account for the remainder. There is a marked reluctance to offer any 3-bed units, which are generally provided in very small numbers as luxury penthouses, and more rarely as a concession to policy, if they are provided at all.</p> <p>In this context we also note the recent consultation by the Department for Levelling Up Homes and Communities, that seeks to create a nationally applicable mechanism to further boost housing delivery on previously-developed land, by largely arithmetic means, through changes to NPPF; the first of two changes couched in the following terms:</p> <p>“A change to national planning policy that would expect local planning authorities to give significant weight to the benefits of delivering as many homes as possible, and to be flexible in applying policies or guidance on the internal layout of developments especially for proposals on brownfield land.”</p> <p>If enacted, as Government intends, this would effectively enshrine what has been local development management practice for a considerable period. Given the pressures on viability evidenced across scores of planning applications and decisions, that are driving very large numbers of studio and 1-bed units especially in the town centres, it would effectively neuter both existing and any draft policies that sought to provide a greater range of dwellings sizes on multi-storey and high-rise schemes. Thus, such an eventuality reinforces the logic that to have any realistic prospect of delivering family homes (or even sufficient numbers of 2-bed apartments) the draft plan cannot avoid looking at green-field land releases; which inevitably would involve Green Belt Review and release.</p> <p>The plan will fail to meet its own objectives in providing for a range of housing needs. The policy is thus ineffective. It is also out of conformity with national planning policy at paragraph 60 of NPPF. Therefore the plan is unsound.</p> <p>The policy does not allow the plan to comply with NPPF at paragraph 60. It is therefore unsound.</p>				
H7	<p>he role of PBSA in meeting accommodation needs of a large and slowly rising student population is important, and among these is the way it allows students to benefit from specialist accommodation sited to suit their lifestyles, while avoiding the deleterious impacts of large numbers of students on residential areas. The policy looks to concentrate PBSA development very heavily as follows, in the existing main locations. The justification for this is not completely clear.</p> <p>The package offered by the Universities in Bournemouth to their students includes discounted bus travel, with a focus on the dedicated Unibus services run under contract by morebus under contract to the Universities. This allows a tailored offer to be provided. The current 10-year contract runs to 2026, and permits students to take advantage of the whole morebus network within Zone A of the Conurbation as well as the dedicated Unibus services.</p> <p>The recent concentration of high-density PBSA blocks at Lansdowne and immediately adjacent areas of Bournemouth has led to a progressive increase of student use of the main U1 service, between Lansdowne and the main Talbot Heath Campus. This has been balanced to some extent by the increased focus of teaching at new Lansdowne sites; and new PBSA development at the Talbot Heath Campus. This generates important reverse flows. However, we now need to run buses as frequently as every 3 minutes at peak times, and for much of the day buses operate every 5 to 6 minutes during term times. A 15-minute frequency is provided during vacations. It is becoming very difficult to manage the accumulations of students leaving Lansdowne Road in the morning peak and the practicality of scheduling buses more frequently than we currently do is becoming strained.</p> <p>Effective though the core Unibus offer is, a range of other morebus services serves the campus; and Lansdowne is close to the main heart of the public transport network. It is therefore the case that a wider range of locations might be appropriate for PBSA development. The Council should work with the Universities to establish where these may be.</p> <p>The current policy is ineffective.</p>	<p>Justification for concentrating PBSA in some areas is not clear. Bournemouth University offers discounted bus travel. Concentration in Lansdowne increases student use of U1 service, buses every 3 minutes at peak times, difficult to manage students in the peak times. Wider range of locations for PBSA could be appropriate.</p>	<p>Objection</p>	<p>PBSA is proposed to be focused on campus locations which support students day to day activities or within a twenty minute travel time to the university /college by high quality, walking, cycling or existing high frequency bus route, this provides sufficient flexibility regarding the potential location of PBSA.</p>	
E3	<p>The Airport is already a major concentration of employment, with its significance extending greatly beyond aviation and aviation-related activities, important though these are on their own account.</p> <p>Policy E3 looks to substantially consolidate and expand employment, in the following terms, with draft allocation A2/Em.1 Northern Aviation Business Park:</p> <p>“The aviation business park is allocated for up to 38ha or 155,000 sqm of employment floorspace (use classes (E(g) and B2, B8). Development at the aviation park will help to deliver significant improvement of transport and movement to the area by enhancing sustainable transport options, and where appropriate development must provide or contribute to:</p> <p>i. implementation of the Western Spine Road, to include full pedestrian and cycle provision and bus gate within centre of site;</p> <p>...v. enhanced sustainable transport by:</p> <ul style="list-style-type: none"> <li>• the provision of high frequency bus services between Bournemouth town centre and Aviation Park and Christchurch town centre and the Aviation Park; and</li> <li>• providing a car park management strategy to reduce the reliance on the private car.” <p>We need to stress the following very obvious realities:</p> <ul style="list-style-type: none"> <li>• The Airport lies outside the built up area of the Conurbation by a considerable distance.</li> </ul> </li></ul>	<p>Airport is already a concentration of employment. E3 looks to consolidate and expand employment. Airport is outside of built up area of BCP by considerable distance, served well by existing transport routes, only generates travel activity at peak times, multiple destinations and origins on surrounding roads would make it hard to determine successful routes, and it would be hard for bus service</p>	<p>Objection</p>	<p>Detail of mitigation arrangements in relation to public transport would be agreed under individual planning applications. Some applications have already been approved which support improvements to bus services accessing the airport.</p>	

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	<ul style="list-style-type: none"> <li>• The allocated land lies large to the north of the active airfield which in and of itself severs the employment areas and allocations from the main transport routes.</li> <li>• The relatively remote location of the site, and the extreme peakiness of travel activity, militates extremely strongly against the business case for public transport, which thrives on dense corridors of travel demand that are expressed throughout the day, in both directions, between a wide range of true origins and destinations. This is why there is minimal public transport provision to the site today.</li> <li>• The relatively ready access to the A338 and other major strategic routes, leading directly to a very wide range of widely-dispersed origins within the airport effective hinterland, will amek it almost impossible for a bus service to offer suitable competitive journey times even if frequency could be establish – which would be even more challenging in terms of operating costs given the distances involved.</li> <li>• The Transport Forecasting Report (CAT1a) makes plain what experience shows: the road approaches to the airport are exceptionally prone to congestion and delay. This further substantially hinder the economic delivery of public transport. Such congestion actually, perversely, actually makes the car more not less attractive, since in severe and unpredictable traffic congestion, motorists have a much greater control over both their journey time as well as their environment, as well as having the convenience of a level of flexibility that a car invariably confers. Whether for shift changes or for travellers, where there is an even greater need to arrive on time, this is even more important.</li> </ul> <p>It is entirely unclear what public transport services are envisaged, their costs of operation or their ongoing effectiveness and sustainability without permanent high levels of revenue support. As such the deliverability of this policy is far from demonstrated, as is its effectiveness.</p>	<p>to complete with successful road network in terms of journey times. Area around airport becomes heavily congested, which would not create a reliable bus service. Unclear what public transport services are envisaged, their operation costs or ongoing effectiveness and sustainability without permanent high levels of revenue support. Deliverability of policy, or effectiveness is not demonstrated.</p>			
E4	<p>We welcome and endorse the recognition in the draft plan that the two Universities are a major contributor to the life and economic vitality of the Conurbation. They also plainly have a wider national and indeed international importance. It is essential that the Universities can continue to develop to sustain and enhance their economic and social contribution to the plan area and well beyond.</p> <p>The Talbot Village Campus – as well as the major concentration of University activity around Lansdowne – is thus a proper focus for further development focused directly on the needs of the University and the wider knowledge-based economy that needs to cluster with the formal institutions.</p> <p>The scale of activity at Talbot Campus means that it generates a very large number of trips, but the concentration of university accommodation in and around Lansdowne supports an intense dedicated bespoke public transport operation involving 15 buses run by Go South Coast in partnerships with the Universities on a formal contractual basis. This involves 4 main routes radiating from the site and presented under the “unibus” brand. The U1 runs up to every 5 minutes at peak times in the University term, and every 15 minutes in the vacations. This network is supplemented by other “morebus” routes, including the 6, 15 and 17. It is thus a highly sustainable location.</p> <p>We welcome the draft policy at EM3.3 recognises that transport and connectivity issues in the area require amelioration. It seeks that:</p> <p>“Development at Talbot Village will help to deliver significant improvement of transport and movement to the area...”</p> <p>“However, the immediate highway network including the Talbot and the Boundary Roundabouts, is a congestion blackspot as is fully evidenced by the Transport Forecasting Report (CAT1a). We thus greatly regret that the ability to further secure mode shift to bus and make it more relevant to the university and wider community has been entirely missed by the plan. In fact, despite the already-comprehensive bus offer available at the site, no mention is made of this, or of the potential to leverage this through the delivery of bus priority measures, either in the policy or explanatory memorandum.</p> <p>To secure the objectives of national and local policy, including the Strategic Objectives of the Plan, Policy E3 should seek to establish appropriate bus priority measures on the A347/A3049 corridor north of the University site, or make contributions to help secure this.</p>	<p>The universities are a major contributor to life and economic vitality of the conurbation, and are well served by a bespoke public transport operation involving 15 buses subsidised in numerous ways. Improvements to transport and movement at Talbot Village need to take in to consideration existing congestion, and the need for delivery of bus priority measures on the A347 and A3049, or contributions towards these measures. No mention made of existing comprehensive bus offer available.</p>	Objection	<p>The universities are required to provide public transport which includes bus services.</p>	
E5	<p>Go South Coast strongly supports, in principle, supports the identification of Wessex Fields for strategic development, including facilities to allow for the enhancement and expansion of health service provision. The site adjoins the principal acute health care site in the conurbation at Royal Bournemouth Hospital. It also adjoins and established focus of employment generating uses and occupiers.</p> <p>In particular, we also note at EM6.3: “Development within the hospital site to improve the operation of the hospital and intensify the provision of key worker homes will be supported. Proposals should incorporate a high quality public realm to support health and wellbeing.” This is strongly supported. Unquestionably there is a need to ensure that substantially more suitable and affordable accommodation is available for key workers in the health sector, especially given the lack of available housing which is within reach of workers on nationally set pay grades with the conurbation.</p> <p>This is unquestionably a highly sustainable site. Among other things, the concentration of trip generating uses already on the site means that it is a major node on the bus network, which is of a greater scale than Christchurch town centre in terms of frequencies and range of destinations accessible within a 45-minute bus ride. There is an exceptional range of regular (at least every 30 minutes frequency) and in some cases high-frequency bus services (every 10 minutes or better) to a very wide range of destinations within the</p>	<p>Supports identification of Wessex Fields for strategic development, including facilities to allow for the enhancement and expansion of health service provision, and homes for key workers. Site is highly sustainable, and already a major node on bus network for regular, high frequency and inter-urban bus services. Therefore, not clear what is sought under point e. in policy. Already high frequency buses to town</p>	Objection	<p>Point 'e' relates to contributions to transport infrastructure that can be secured as part of future planning applications.</p>	

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	<p>conurbation, without the need to go to Bournemouth town centre first. These include the high frequency M1 to Bournemouth town centre via Charminster.  However, services run direct to the following neighbourhoods at least every 30 minutes, with a journey time of under 40 minutes:  Boscombe X3/22 4bph 16 minutes journey time  Castlepoint m1/14/15/22 12bph 7-8 minutes journey time  Ensbury Park 14 2bph  Holdenhurst 22 2bph 21 minutes  Iford X1/X2 2bph 10 minutes  Kinson 14 2bph 29 mins  Moordown 14/15 3bph 15 minutes  Parkstone 15 2bph 40 minutes  Pokesdown 22 2 bph 11 minutes  Talbot Heath/Uni 15 2bph 27 minutes  Townsend 22 2bph 8 minutes  Wallisdown 14/15 3bph 34 mins  Winton 15 1bph 23 minutes  West Howe 14 2 bph 40 minutes</p> <p>The site is also directly linked with regular inter-urban bus services to a wide range of towns beyond the plan area, in Dorset (Verwood, Ferndown) and the New Forest (Ringwood, Fordingbridge, New Milton and Lymington among others). These services then run into the town centre on a limited stop basis via Wessex Way, providing at least 4 buses/hour, albeit not directly to the station.  Thus, we are not clear what is sought in draft policy EM6.4 in the following respect:  “e. contributing towards enhanced public transport provision including a high frequency bus service between Bournemouth town centre, Bournemouth Railway / Bus Station and Wessex Fields...”  There is no definition of “high frequency; however the combination of X1/X2 and X3 offers 4 bph to the town centre and station, albeit not clock face. These services take between 15 and 25 minutes to reach the town centre. There would be ways of aligning the timetables of these routes better. Serving the station is technically achievable but the convoluted routing into and out of the Interchange is a serious problem greatly extending journey times for the majority of travellers passing through to the town centre – which is why these services do not do so today.  The costs of running additional fast mileage to the town centre along Wessex Way would be high for a “high frequency” service. A 10-minute frequency service would be likely to accrue operating costs of about £1m/annum. It is highly unclear how this would generate sufficient revenue to come close to covering its costs. This is because it would not achieve a faster generalised journey time to most origin points in the conurbation apart from Lansdowne and the town centre itself on the line of route. However, these already benefit from 4 limited stops service per hour. Journey times to almost all other locations would be slower than using existing direct services, especially once changes of bus are factored in.  We would strongly suggest that to meet local plan and wider transport policy objectives, that there may be a more general case to improve frequencies on some of the less frequent routes, such as 15 and 22; and improve frequencies and timetable coverage in the evenings and on Sundays, supported by suitable “pump-priming” funding, or other mechanisms in partnership with the hospital to rapidly accelerate revenue growth from staff and visitors. This is far more likely to secure overall uplifts in public transport use to the Wessex Fields and Hospital area, than a single fast bus service to the town centre that can offer, that would fail to present a particular strategic network benefit, or provide a high level of relevance to a large number of travellers. We invite the Hospital Trust and the Council to discuss this matter further with us in more depth, to inform the policy and the IDP.  Naturally we welcome unequivocally that the development should contribute additionally to bus priority measures; however these are not specified. Significant bus priority on Castle Lane East already exists in both directions. We would be keen to understand what is envisaged.  However, we are already aware of a proposed southbound off-slip from the A338 into Wessex Fields. This is not intended to be useable by general traffic. We are keen to work with the Council and the Hospital Trust for buses on services X3 and X6 to be allowed to use this link as it would substantially reduce southbound journey times from Ringwood and Ferndown into the Hospital site. This could offer a meaningful element of the additional bus priority to which draft policy refers.</p>	<p>centre when combining different services, although servicing interchange is problematic. Would be costly to run a true 'high frequency' service to town centre, and would unlikely cover its costs. Would be more efficient to improve frequency on existing routes, and would secure overall uplifts in public transport use than a single fast bus service. Agreed that development in policy should contribute to bus priority measures, but these are not specified in policy, and already exist on Castle Lane East. Keen to work with Council and Hospital trust for buses to use planned southbound slip road, as would reduce journey times from Ringwood and Ferndown in to hospital site, and could offer element of additional bus priority mentioned in policy.</p>			
T1	<p>The policy is a broad statement of intent to secure more sustainable patterns of movement and travel behaviour. This aligns with national policy and the statements of NPPF at paragraphs 108-111, and it naturally welcomed by Go South Coast that this is affirmed in policy.  However, it is essentially that the development strategy is effective in securing development needs in a way that achieves much different outcomes than previous rounds of planning policy have. Car dependency has little changed and traffic congestion remains acute across the conurbation, as is evidenced by CAT1a</p>	<p>Policy aligns with national policy and is welcomed, however it must secure development in a way that achieves different outcomes than previously. Bus services</p>	Objection	More detail will be included as part of LTP4	

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	<p>Transport Forecasting Report. This also indicates that delivery of development will materially aggravate congestion related delay and unreliability of journey times. This greatly disadvantages bus services more than any other mode.</p> <p>The broad policy objective is loosely and weakly framed:  “...development proposals must contribute towards sustainable and active travel behaviour where people can make more trips by sustainable modes.”</p> <p>Rather, national policy including the National Transport Decarbonisation Plan (July 2021) and local policy including the declaration of Climate Emergency, require an unprecedented rebalancing of travel behaviour away from car use towards active travel and public transport; so-called “mode shift”. This will be challenging to achieve and cannot be achieved simply by individual development proposals making some kind of unspecified contribution to “Travel Plan”-type measures, the effectiveness of which across England over the last 25 years has demonstrably been extremely hard to discern. On the contrary Census data in 2011 and 2021 shows it has had no overall impact at all.</p> <p>The policy needs to set the plan up to drive mode shift through clear policy statements that direct applicants and decision takers towards strategies and solutions - whether by contributing to wider defined initiatives within the IDP, or at development level, that secure a credible increase in the use of active travel and public transport.</p> <p>Read in their own terms, there is little in policy points a-k to disagree with per se. However, in keeping with how the transport theme is treated, these are very bland and overarching statements of broad intent, with little define or explain what will be achieved in practice or evidence how measures will either be delivered through development proposals, or take advantage of improvements. In fact most such measures lie only within the powers of the Council as Local Transport and/or Highways Authority to formulate and deliver, not individual development schemes. It should be reiterated in this regard, that the vast majority of development is going to arise, in the Councils strategy, from a very large number of small and very small development sites.</p> <p>The plan and this policy is evidently “transport passive”. Notwithstanding the description of the draft Strategic Policy T1, there is no transport strategy to support the draft plan. This is apparently waiting on policy and programmes to be worked up in a future review of LTP, as is discussed in the explanatory memorandum at paragraphs 10.6-10.7 The lack of an up-to-date transport evidence base greatly hinders the justification for and the likely effectiveness of the plan development strategy. There is no defined set of coherent transport mitigations.</p> <p>As a result, of this and partly by virtue of their own phrasing many statements in the policy are so weak as to be vaguely exhortational and nothing more. A good example is point e.:  “...exploring innovative approaches to travel demand management and mobility,...”  ..which then goes on to suggest a list of generic measures that are outside the power of developers in many cases to implement, and in any case far from being innovative, represent measures that are already broadly well accepted as possible solutions, depending on context.</p> <p>We have set out elsewhere, for example in representations to Policies EM3 and EM6, where some specific outcomes are expressed in site-specific strategic policies, that these need further definition and evidence of effectiveness, deliverability and funding. However there is a broader deficit apparent across the plan area that it looks likely only an up-to-date LTP4 and revisions to accompanying strategies and statements such as the Bus Service Improvement Plan and IDP will properly resolve.</p> <p>The existing local plans tie their development strategies much more clearly and coherently to the sustainable transport armature of the conurbation, pursuant to JLTP3. We are very perplexed why this one has not done so. The “Prime Corridors” are defined as ones with a core bus frequency of every 15 minutes.</p> <p>Nowhere in this plan is a “frequent” bus service defined, such that this can steer stakeholder and decision takers. This becomes a problem where improvements are being sought by the plan, as they are at T1 point d. which mentions “service improvements to enhance existing services”. Naturally we applaud the intent, but we and development sector stakeholder need a much clearer policy steer to guide our own actions, and justify costs to be borne through developer funding is this proves to be required, as it is likely to be, including through potential wider mechanisms such as through application of CIL Contributions.</p>	<p>are disadvantaged by increase in development as congestion increases due to car dependency. Individual development proposals will struggle to encourage behaviour away from car usage, and contributions to travel plans are not effective. Policy needs to set plan up to encourage mode shift with strategies and solutions, either by contributing to wider initiatives or at development level to increase active travel and public transport use. Policy too broad, and doesn't provide any definitive actions. Not much that Planning can achieve, mostly sat with Transport and/or highways teams to deliver improvements, given small size of development sites. There is no transport strategy to support Draft Local Plan, which reduces effectiveness and justification for strategy, and likely that only an LTP4, Bus Service Improvement Plan and Infrastructure Development Plan will resolve. Development strategies in existing local plans more successful, clear and coherent to sustainable transport. Frequent bus service is not defined in Local Plan, which is required to assisting developers and stakeholders in identifying costs of new/updated services.</p>			
T2	<p>Faced with the evidence set out in CAT1a Transport Forecasting Report, which shows marked increases in traffic congestion and delay across the conurbation as a result of the draft plan strategy, it is very hard to see how draft Strategic policy T2 could be considered properly evidenced or effective.</p> <p>T2.1 a. and b. does nothing more than restate NPPF paragraph 111. Given the reliance on a vast number of small sites, in the main, and the fact that CAT1a makes plain that severe congestion will be aggravated by the plan strategy, it is impossible to see how a single development proposals could be considered to demonstrate that cumulatively, it would not breach these principles. The alternative is to carry on as today, permitting iterative schemes each of which have an individually nugatory modest impact, without any regard to how their cumulative impacts are addressed.</p> <p>This is a still greater risk if the presumption in favour of development at paragraph 11d continues to be engaged, as this prevents exactly the kinds of cumulative impacts and larger scale plan-led transport</p>	<p>T2 is not properly evidenced or effective, in that it restates NPPF, and smaller developments struggle to meet requirements. Presumption in favour of sustainable development at para 11d of NPPF creates cumulative impacts on the network, and this is certain to continue for BCP with</p>	Objection	<p>Amend to provide additional clarity. More detail will be included as part of LTP4.</p> <p>Action: amend Policy T2 to read:</p> <p style="padding-left: 40px;">Policy T2: Transport and development</p> <p><b>1. New development</b></p> <p style="padding-left: 40px;">Development will only be permitted where:</p>	

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	<p>mitigation approaches to be considered as material factors carrying much if any weight in the planning balance. Rather “each proposal will need to be considered on its merits”. Given the very high risks attendant on the Council’s proposed approach to housing delivery, this particular risk appears to us to be exceptionally high – in fact, “a racing certainty”.</p> <p>Irrespective, given the development strategy set out at Strategic Policies S1 and S2 that are so highly dependent on a large number of sites on PDL, much of it unidentified on sites of less than 10 dwellings, it is for the Council to arrive at such a strategy and then find a mechanism for development of all scales to help bring it to pass, if only through the application of CIL contributions to schemes that support a comprehensive LTP Vision and strategy.</p> <p>Policy T2.1 c. needs at the very least to reference LTP4, and its adopted accompanying strategies such as the LCWIP and the BSIP.</p> <p>Where major development is concerned, we broadly support Policy T2.2.</p> <p>At T2.2 e. we would urge that car club spaces ought to be assumed to be provided. Where densities exceed 150/Ha. as the plan broadly expects for over 92% of the dwelling supply, this is clearly likely to be both viable and effective.</p> <p>T2.3 a. broadly restates the expectations of NPPF but the clarity this gives is probably sound. The lack of national guidance on the content or rigour of Transport Assessments is a major current lacuna but we could expect this to be resolved within the lifetime of this plan by actions on the part of the Department for Transport.</p> <p>Travel Plans are largely ineffective – if they are even implemented in a consistent way, or at all. Thus T2.3 b. is ineffective. In its current form the policy cannot be expected to achieve anything more than current policy, which we do not see to have been broadly impactful.</p>	<p>proposed housing delivery approach. Council need to find a mechanism for enduring all development help to achieve desired strategy, and could be through CIL. T2 1 c. needs to reference LTP4, LCWIP and BSIP. Supports T2 2 for major development. T2 2 e. should include car club spaces, an advance on current 'could'. T2 3 a. restates NPPF expectations, but is sound, with lack of national guidance at present. T2 3 b. (travel plans) are largely ineffective. Proposed policy will not achieve anything more than current policy, which has had no impact.</p>		<ul style="list-style-type: none"> <li>a. there is no unacceptable impact on highway safety;</li> <li>b. the residual cumulative impact of additional trips on the local and strategic highway network is not severe;</li> <li>c. the impacts on the local and strategic highway network arising from the development itself, or the cumulative effects of development on the network, are mitigated through measures prioritised in the following order that would avoid and/or reduce the need to travel by private motor vehicle: <ul style="list-style-type: none"> <li>i. active travel;</li> <li>ii. public transport;</li> <li>iii. provision of improvements and enhancements to the local network; and</li> <li>iv. contributions towards necessary or relevant off-site transport improvement schemes.</li> </ul> </li> <li>d. it accords with BCP Council’s <b>adopted</b> <b>Parking Standards SPD, the Local Transport Plan, Local Cycling and Walking Improvement Plan, Bus Service Improvement Plan and the Rights of Way Improvement Plan.</b></li> </ul>	
T4	<p>However, like the rest of the transport evidence base and policy suite, it is too broad and ill-defined. This is in effect another “place-holder policy” that cannot be effective until the deficiencies in the transport evidence base and wider transport strategy for the conurbation are properly brought up-to-date. A little unusually compared to the broader language in the draft plan, it sets an unusually strongly-worded imperative, with no clear defined goals: “ The bus network must be enhanced...”.</p> <p>The lack of clarity on what would justify bus service improvements is a particular problem, as is the lack of clarity on where bus priority is thought to be deliverable – something that the IDP does little to resolve. The Quality Bus Corridors” need to be defined – are these the same as the “Prime Corridors” in the current JLTP3?</p> <p>What improvements could be justified, and to what standards? On some routes, for example, daytime bus frequencies may need reinforcement rather less than evening and Sunday services, especially looking at changes in travel patterns where it is at these times that we are seeing some of the greatest positive movements in patronage.</p> <p>While it is clear that the bus network will need to be enhanced – indeed potentially substantially to meet DFT Transport Decarbonisation objectives - ultimately this will need to be driven across the plan area through the ongoing collaboration of the Council with the bus industry, guided by the BSIP. We readily acknowledge that there is a clear and important potential role for the development in the BCP area to make proportionate and justified contributions and direct investments in infrastructure, where appropriate, to achieve this.</p>	<p>Policy too broad and ill-defined. Not effective until evidence base is brought up to date. Strongly worded, but with no defined goals and lack of clarity on what would justify bus service improvements. 'Quality bus corridors' need to be defined. Bus network will need to be enhanced to meet DFT objectives, through collaboration with Council, bus industry and guided by BSIP. There is an important role for developments across the area to play in this through contributions and direct investments in infrastructure.</p>	Objection	<p>More detail will be included as part of LTP4 and through collaborative work outside of the Local Plan process.</p>	
P26	<p>The policy anticipates that “a minimum of 3735 new homes will be built in the ward.” This is clearly a very large proportion of the supply that the plan aims to identify. These homes, looking at the track record of delivery the ward to date, will comprise exclusively flats, a large proportion studio and 1-bed, and be offered only for sale as luxury developments, or for private rent by institutional investors.</p>	<p>New homes likely to be high density flats built at the expense of space and amenity. Policy phrasing is</p>	Objection	<p>Proposals will need to accord with housing mix policy. Various actions underway to support or secure delivery on longstanding sites.</p>	

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	<p>We note at 3.c “Build to rent and co-living schemes will be suitable in the Town Centre North area. They may be suitable elsewhere in the town centre provided they do not result in an over concentration of similar uses, including student accommodation and HMOs, which may be detrimental to the overall balance and mix of uses within the town centre.” We recognise that these kinds of development allow for extremely high dwellings densities indeed, achieved at the expense of space and household amenity, which is provided for communally. These kinds of developments are increasingly marketed as bundled “lifestyle” products to a relatively limited demographic, which is single, footloose and generally both young and affluent. It remains to be seen if there is a market identifiable in this location that would attract the risk capital necessary to bring such a scheme or schemes forward.</p> <p>The draft policy is phrased in a way that is remarkably bold give that most of the land concerned has been allocated for residential led regeneration for the last 20 years or so, and has not yet been brought forward. This is despite the fact that:</p> <ul style="list-style-type: none"> <li>• A great deal of the land is directly owned by the Council or by other public bodies</li> <li>• Substantial capital funding has been won from government to bring planned development forward including £12.75m in 2010-11 to build the Twin Sails Bridge</li> <li>• The Council and its predecessors had established a special purpose vehicle to bring these opportunities forward, without any great success.</li> <li>• Barriers to development, including addressing the Strategic Flood Risk Zone are now much better understood.</li> </ul>	bold given long allocated sites have not come forward.			
PT.1	<p>This in effect rolls forward allocation T1 in the Poole Local Plan 2018, covering the Dolphin Centre, Bus Station and Seldown, with a nominal yield of 500 dwellings; into a much wider allocation that additionally folds in the Stadium (allocation T2 300 dwellings and various associated leisure uses) and Goods Yard (allocation T3 300 dwellings) that are also long-standing allocations. The T1 allocation in itself is a roll-forward of a broadly similar allocated area in the 2009 Poole Core Strategy. We note that the dwelling yield has risen from a nominal 1100 dwellings to 1700 under PT.1.</p> <p>This has been done on the basis only of an ongoing assumption that such an allocation is deliverable, and that all the land is available. This is not the case.</p> <p>It proposes as follows, among other things:</p> <p>“i. Deliver a high-quality bus station and rail station which are attractive, highly accessible, with good quality passenger waiting areas and pedestrian circulation areas, that enhances the overall operation;</p> <p>ii. Relocate the bus depot to free up land for development and provide an east-west pedestrian and cycle link north of the railway line between Falkland Square and Seldown Bridge”.</p> <p>As the Council knows, both the Bus Station and the Bus Depot are in the freehold control of Go South Coast Ltd. There have been periodic high-level discussions with the Councils and their partners and consultants about a succession of redevelopment aspirations involving both sites for as long as we have owned the former Wilts and Dorset business. However, we have never indicated that the sites are available for development, at any stage.</p> <p>No attempt has been made by the Council to establish with this business in the last few years whether the portions of the site allocation in our ownership and ongoing use are available, and what would need to be true for them to become so.</p> <p><b>Bus Station Relocation</b></p> <p>The bus station is acknowledged to be visually quite prominent, facing north onto Kingland Road. It includes a manoeuvring apron, a waiting area under a canopy extending east from the Dolphin Centre, and a building running along the length of the facility that accommodates all our operational support functions, including management/supervisory offices, staff rest and welfare facilities and a enquiry and retail shop to support customer services. This is all owned freehold by Go South Coast Ltd. with certain rights of way.</p> <p>It functions on a “drive-in reverse-out” basis. The depth of the apron and the intensity of use is such that it is operationally quite sub-optimal. Certain Unibus services as well as coach services are run from Seldown. Separate aspirations in the JLTP and in the BSIP to achieve a greater contribution to local mobility from bus services would certainly involve the need to expand the bus station. We therefore welcome the aspiration in the draft policy that a replacement bus station should be “one that enhances the overall operation.”</p> <p>However, its current location is very beneficial, north of the railway and adjacent to the Dolphin Centre, which is now the clear leading venue for comparison retail in the conurbation, as well as an increasingly important leisure draw,— probably mutually so, given the amount of footfall to the wider town centre that has to walk through the Centre to reach the High Street, and residential areas to the south, and vice versa. It also positions the centre of the network most advantageously for the main core of the town centre, and a variety of the main arterial routes linking the centre to the rest of the conurbation. Given the number of bus movements, relocating the facility south of the railway would involve substantial additional operational mileage and time. It would also make bus journeys to and from the town centre that bit longer and less convenient compared with driving. Given wider local and national policy imperatives this is clearly inappropriate.</p>	Not all the land is available, Bus Station and depot have been discussed but never been indicated sites are available. Bus station is operationally sub optimal, welcome aspiration that a replacement bus station should enhance the operation. Current location very beneficial, proximity to Dolphin Centre and centrally in the network, not appropriate to relocate south of the railway link. Further discussion needed. Practicality difficult to locate with railway station. Cost of bus station relocation very high, costs not stated nor included in IDP. No commitment from Network Rail. Allocation is not clear or evidenced or deliverable. Bus depot is critical, optimally located, no site identified to relocate the depot, site unlikely to be available, needs to be 1000m from current site, an additional operational expenses would need to be covered from a move. No clear reason why bus depot would need to be moved. Elements set out in the proposed masterplan have significant impact on buses, criteria are not based on published evidence. More engagement needed. Strongly objects to allocation, prejudices future bus	Objection	<p>Agree, amend PT1 to reflect intention to work with land owners to develop a masterplan but that does not preclude sites coming forward in the meantime.</p> <p>Action: Amend PT1 site allocations text to read.</p> <p><b>Site allocations</b></p> <p>Poole Town contains eleven site allocations. The sites include former industrial land around the Backwater Channel and buildings that are at the end of their operational life. These sites will be important to create new homes along with leisure and cultural uses that would add to the offer of the area:</p> <p><b>Town Centre North (PT.1) and Dolphin Swimming Pool and Leisure Centre (PT.2)</b> sites fall within an area of Poole Town Centre which was comprehensively redeveloped during the postwar years. As was typical of such schemes, motorised traffic was prioritised over walking and cycling, and as a result the area is difficult and unattractive to navigate for pedestrians and cyclists. The overall townscape quality of the area is also poor and results in negative initial impressions of the town. Regeneration of these sites to reinvigorate this area of the town, provide a more attractive gateway and deliver major new residential, retail, commercial, leisure and office development is therefore sought. We expect to see innovative and distinctive design that is of an exceptional quality, supports the creation of a new, positive identity for the area and celebrates the wider town centre’s identity. Development should follow accepted design principles that are known to create high quality places.</p>	



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	<p>We remain ready to pick up discussions about what a better long term facility should look like and where it should be.</p> <p>The policy ties the matter to the relocation of the railway station. It is obvious why in principle, this looks like an attractive and worthy goal, and one that in principle we would naturally love to see. The current station site is relatively close to the town centre but suffers greatly from severance on all sides. Bus-rail inter-connectivity is certainly unattractive, aggravated by convoluted wayfinding, and very unattractive surroundings, though distances are not very great.</p> <p>Our concern surrounds how this worthy goal can be translated from aspiration and vision, to delivery, given its costs and the particular constraints on the area that are a product of a legacy in the wider built environment going back many decades.</p> <p>National experience makes plan that the costs of station relocations in general are exceptionally high, and have been rising faster than inflation for many years. Major relocations such as at Elland and Morley in West Yorkshire, have involved costs exceeding £20m. A new station to provide a better link to the White Rose Centre among other things, involving relocation of Cottingley Station 750m to the south, and was due to open later in 2024 is currently priced at £26.5m. In March 2024 construction was paused indefinitely at a quite advanced stage owing to cost overruns.</p> <p>The Poole station handles significantly more passengers than any of those facilities. Nowhere are the costs of this stated in the plan, including in the IDP. Nor is it at all clear how far this aspiration aligns with committed investments by Network Rail. There are no current Network Rail aspirations in the public domain, and at the point the Town Centre North Masterplan was procured in December 2019 comments made public by Network Rail committed no more than to give any ideas arising from this exercise “serious consideration.” There is no further evidence presented that Network Rail are actively involved in promoting this objective.</p> <p>The feasibility and deliverability of a new station and bus station complex within the draft PT.1 allocation is thus not clear, nor evidenced in any significant manner. Whether this element is considered on its own, or as part of the overarching allocation, the policy is not evidenced as being demonstrably deliverable, and it is thus ineffective. The policy must therefore be considered unsound. We will cover the soundness of the wider policy aspirations separately below.</p> <p><b>Bus Depot Relocation</b></p> <p>The depot is a critical element of the transport infrastructure for the conurbation. It supports a very substantial proportion of all the operated bus mileage in the conurbation, including virtually all that run within the former Poole Borough, and a substantial contribution to routes that run north and east into the former Bournemouth authority.</p> <p>Because it is at the heart of the local network, the depot is optimally located. Bus operators cannot be compared with haulage businesses where a driver stays with a single vehicle all day. Our vehicle operating days are generally much longer and more intense, meaning that a vehicle will typically be driven by at least two drivers each day. Managing driver rest and shift reliefs thus involves maximising the number of duties that start and finish at or very close to the same place, to avoid complex and expensive staff transfers. Having the depot at the centre of the network also avoids excessive mileage running “out of service” at the start and finish of the operating day.</p> <p>There is no site identified to which to “relocate the bus depot”. In fact, it is arguable if any site exists that is currently allocated and available for such a use anywhere in the Poole area. However, to avoid burdening the business with permanent additional operational costs a replacement site would need to be within 1000m of the current site – in essence, within the PT.1 allocation area. In locational terms, a site within the old Goods Yard area immediately east of the existing rail station would probably be sufficiently equivalent to meet the business’ needs. However, it is clear from the wording of the policy that the residential redevelopment capacity of the allocation is to be maximised.</p> <p>To consider moving to a peripheral location some mechanism would need to be found to defray our additional operating expenses in perpetuity, probably with a legal charge on rental income from the redevelopment. However, we see no prospect of this – mainly because development viability is evidently already so challenged.</p> <p>The costs of removing and replacing the depot with an equivalent facility, to be transferred to Go South Coast freehold, would additionally need to be borne entirely by the development. This would include both demolition and construction costs of the replacement. This itself would be a substantial sum, probably well into eight figures.</p> <p>Sit between a multi-storey car park and the railway, facing back-land, the depot currently presents no amenity or other negative impacts to the immediate environment. There are no clear objective reasons why it is in the public interest to remove it and relocate it. It does not prevent wider policy objectives from being achieved. In particular, there are no reasons either set out in the plan nor readily deductible, why this site is better used for high-density market/luxury housing than in its current use.</p> <p><b>Master Plan</b></p> <p>At PT.1 policy explicitly refers to a master planning exercise as follows:  “The development of sites within the area must be completed in accordance with an overall masterplan</p>	<p>operation, no commitment to fund replacement facilities.</p>		<p>The council aspires to create a masterplan for the town centre north area. In doing so it would work with land owners, stakeholders and delivery partners. A key aspect of the masterplan would be to explore access and movement within the area. Particularly exploring how to improve the bus station and railway station to create more attractive, highly accessible facilities with good quality passenger waiting areas and improved pedestrian circulation areas, that enhances the overall operation. Masterplanning would also explore the future of the level crossing and pedestrian and cycle links, including if the bus depot could be relocated to free up land for development and provide an east-west pedestrian and cycle link to the north of the railway line between Falkland Square and Seldown Bridge.</p> <p>Action: also amend below text:  <b>Strategic Policy P26: Poole Town</b>  <b>5. Site allocations</b></p> <p>The following sites are allocated for development and are shown on the policies map:  <b>a. Town Centre North (PT.1)</b></p> <p>Town Centre North will be regenerated as a modern and vibrant part of the town. Development should contribute towards transformational change with major new residential, retail, commercial, leisure and office development. The development of sites within the area must be completed in accordance with <b>any guidance, design code or an</b> overall masterplan agreed by the <b>Council Local Planning Authority</b>.</p> <p><b>The Council plan to undertake a masterplan exercise</b> which will explore options to:</p> <ol style="list-style-type: none"> <li>i. Deliver a high-quality bus station and rail station which are attractive, highly accessible, with good quality passenger waiting areas and pedestrian circulation areas, that enhances the overall</li> <li>ii. Relocate the bus depot to free up land for development and provide an east-west pedestrian and cycle link north of the railway line between Falkland Square and Seldown Bridge; <b>and</b></li> <li>iii. Enable people to safely and conveniently cross the railway at the north of the High</li> </ol>	

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	<p>agreed by the Local Planning Authority. The masterplan will explore options to....”</p> <p>A list of mandatory criteria are then set out regarding what such a Master Plan must achieve. This involves some quite specific parameters including:</p> <ul style="list-style-type: none"> <li>• Between 4-15 storeys</li> <li>• Providing “around 3500” car parking spaces</li> <li>• “Not compromise the potential closure of Kingland Road to private cars and the creation of a public space outside the Lighthouse” which obviously has profound implications for the movement of buses in the immediate area, though depending on where a replacement bus station might be sited, in theory this could be achievable.</li> </ul> <p>This kind of language betrays the possibility that such a master planning exercise might already be underway.</p> <p>This presumably would build upon or supersede the work done in 2020 by BDP and Ridge on a Poole Town Centre North Master Plan, for whom the client was Poole Borough Council/BCP. This work has never been placed in the public domain and there is no record produced when this is used as a search term on the Council’s website. However, the scope of the work, including transport related feasibility undertaken by Ridge and Partners, appears in broad terms on the consultant’s website. It reveals that a significant exercise to establish vehicular and pedestrian movements, and parking demand formed part of this commission. Thus, pre-existing evidence on which the Council seems to be basing the draft allocation is not presented for scrutiny and cannot be relied upon. This is profoundly concerning, especially given the lack of ongoing engagement with us as a substantial landowner as well as the main public transport operator.</p> <p>Compulsory Purchase Order</p> <p>We note that at its Cabinet Meeting on December 20th 2019 under item 14 e) the Council considered a Compulsory Purchase Order Strategy as part of its procurement of a Master plan for the Town Centre North area covered by draft allocation PT.1. This related to a successful Expression of Interest to the Future High Streets Fund for £25m. It was framed as follows:</p> <p>“Approve the development of an Acquisition and a Compulsory Purchase Order (CPO) Strategy along with associated specialist agent and legal fees, that can be deployed should the need arise.”</p> <p>It is notable that the driving issue in the EoI bid was the state of the High Street south of the railway and its level crossing, not the allocated regeneration site to the north.</p> <p>The bid did not progress to successful award.</p> <p>Irrespective, the Council will be well aware of the legal tests and requirements that govern compulsory purchase. We urge the Council, in order to de-risk this process, to properly engage with the company if it is serious about seeking to secure ownership of our assets, in connection with redevelopment aspirations for Town Centre North. We note that to date, the Council its officers or its appointed consultants have not elected to do so.</p> <p>Conclusion</p> <p>Go South Coast strongly objects to the proposed allocation PT.1.</p> <p>Leaving proprietary commercial considerations entirely aside – which are considerable – the bus depot and bus station facilities are critical to the delivery of the conurbation’s public transport offer. The proposals entirely prejudice the future operation of about half the bus mileage operating today within the plan area. The draft plan makes no commitment to fund the relocation of either facility which are both in our ownership, nor does it make any clear indication as to where replacement facilities would or could be sited.</p> <p>As key elements of transport infrastructure we would also expect this to be covered and costed in the Infrastructure Delivery Plan. It is not.</p> <p>The draft allocation is thus not demonstrated to be appropriate nor is it deliverable. The draft allocation is insufficiently evidenced and ineffective, in particular with regard to the relocation of the bus station and bus depot. The allocation PT.1 must be judged to be unsound.</p>			<p>Street to the Dolphin Shopping Centre; and iv. <del>Incorporate a minimum two hectares of public open space, including a play area that serves children of all ages.</del></p> <p>Proposals in the Town Centre North area must, <del>where relevant:</del></p> <p>a. Uses:</p> <p>i. Together, <del>ensure</del> sites within the area should provide at least 1,700 homes including a minimum of 500 homes on sites forming part of the Dolphin Shopping Centre;</p> <p>ii. <del>Development should</del> support a vibrant mix of town centre uses with active commercial ground floors fronting key pedestrian routes in and around the Dolphin Shopping Centre and along Kingland Road.</p>	