

BCP Council Opening Statement

BCP Local Plan Examination

21 January 2025

Examination opening statement

The BCP Local Plan is a positive strategy to deliver new homes, facilitate economic growth, protect the environment and support sustainable communities across the BCP area. It also provides a framework to help respond to the climate and ecological emergency.

BCP council was formed in 2019. The area is made up three principal towns of Bournemouth, Christchurch and Poole which are interwoven with numerous district and neighbourhood centres. The area enjoys an outstanding natural environment with 15 km of beaches, two natural harbours, numerous river valleys, vast areas of lowland heath and an abundance of trees and open spaces.

Our communities are varied, we have areas of great wealth with some of the highest property prices in England but there are also areas with significant deprivation. Our population is aging and by 2040 40% will be aged over 65. On average the cost of housing compared to wages is high at around 10 times the average wage.

There are a wide variety of businesses within the area, the largest employers are within government services, financial & business services, and distribution, with a rapidly growing information & telecommunications sector. We have a port and an airport which provide international connections. We have railway links to London, but we are not on the motorway network. Tourism makes a significant contribution to our area with over 10 million visitors annually. Our universities attract thousands of students and help to support a thriving digital and creative economy.

Since the creation of the Council, we have been operating off seven local plans dating back to 2001, and comprising over 300 policies. Some of these policies provide different policy approaches for each of the three towns. All of these local plans are now out of date and we are about to publish the latest five year housing land supply position as of January 2025 which demonstrates a 2.1 year housing land supply.

On the creation of the new council there was a legal requirement to prepare a single Local Plan for the area within 5 years, which was 2024.

The Council has strived to meet this requirement. However, the preparation of the BCP Local Plan has taken place during a period of significant local and national political instability. As well as several different government's, BCP Council has changed overall political control on three occasions. We have also had the Covid 19 pandemic. In this turbulent environment we managed to submit a draft local plan in 2024 with the intention of adoption in 2025. This is as close as possible as we could manage to meet these legal constitutional requirements.

The Plan was prepared during the Government's 2022 Planning Reforms that then finally led to the publication of a new NPPF in December 2023. The planning system continues to evolve under a new government, further revisions to the NPPF were released in December 2024 and these made some significant changes. However, as clearly set out within the 2024 version of the NPPF there are transitional arrangements for plans in the later stages of plan making and as such the draft BCP local plan is being examined against the NPPF under which it was submitted, in this case is the December 2023 version.

The new housing targets and requirements in relation to Green Belt and grey belt set out in the 2024 NPPF are therefore not relevant to this examination. We do however acknowledge these are pressing issues and we will be commencing a partial review of the Local Plan in spring 2025 to address the new housing targets, working with our neighbours, Dorset Council and New Forest District Council and preparing a Green Belt review.

For this examination we need to cast our minds back to the previous government's planning reforms published for consultation in December 2022 and ultimately made policy in the December 2023 NPPF. You will recall that Michael Gove as Housing Secretary was encouraging Councils to strive to put local plans in place to provide certainty to communities, redevelop brownfield land first and to protect Green Belt. More certainty was to be provided in relation to the exceptional circumstances where alternative methods for calculating housing needs could be used and the consultation included reference to areas where there is a high proportion of students. Government made it clear that if Councils wanted to release Green Belt to meet housing needs through a local plan, exceptional circumstances must be demonstrated.

In good faith we have followed the previous government's intentions as set out in the December 2023 NPPF and wish to get a local plan in place as soon as possible. This would ensure up to date baseline local plan coverage for the area, providing certainty, with a set of simplified policies, allowing planning applications to be determined more quickly and efficiently.

The draft Local Plan proposes to increase the number of homes built in the area, to 1,600 homes a year, from the average of 1,200 homes a year delivered over the last decade. We believe this is a realistic, deliverable and ambitious plan considering the significant constraints in the BCP area.

The standard method is an advisory starting-point for establishing a housing requirement for the area. The draft Plan housing requirement of 1,600 homes a year reflects the extent to which the standard method could be met over the plan period. Our geography means we are constrained by the sea to the south and harbours to the east and west. We have 22 internationally protected habitat sites, significant areas at risk of flooding, heritage assets and Green Belt that limit the amount of land that is suitable for housing development. In accordance with the Presumption in Favour of Sustainable Development set out in paragraph 11 of the NPPF, these constraints provide a strong reason for restricting the overall scale, type and distribution of housing development in the plan area.

Whilst this was the correct process for setting our housing requirement, we also have serious concerns about the accuracy of the standard methodology used to calculate local housing needs. Bournemouth was identified retrospectively by the Office of National Statistics as one of six towns where the migration estimates which fed into the 2014 predictions were inaccurate, with population growth overestimated by 1%. This ONS update better captured out-migration of people from student areas, such as Bournemouth. This change was significant and demonstrates the 2014 household projections were an incorrect starting point for setting local housing need through the standard methodology. We welcome the opportunity to explore this as part of the examination to see if a case can be made that exceptional circumstances exist and an alternative approach to setting local housing need can be made. Given the uncertainties over this issue it was unclear whether exceptional circumstances existed to release Green Belt through the drafting of the Local Plan.

Working within the constraints, the Plan identifies opportunities for regeneration and allocates over 80 sites for housing development, including the first gypsy and traveller site in a generation. The Plan directs residential development into the most accessible locations with the greatest range of facilities. The Plan supports strategic employment sites at Bournemouth Airport, Talbot Village and Wessex Fields. To relieve congestion our transport strategy aspires to achieve 50% of all journeys to be made by public transport, cycling and walking by 2030.

The Plan includes a series of ward policies to set out the priorities for development and provide a strategy to support our communities to bring forward neighbourhood plans. The Plan also provides a simplified suite of development management policies.

The Local Plan has been shaped by ongoing consultation and engagement involving local people, businesses, community groups and organisations. Public consultations have informed the approach to key issues and evolution of policies within the Plan. Together with a robust and proportionate evidence base - on housing, employment, infrastructure and viability to name but a few, we consider we have put together a sound Local Plan that reflects the evidence and community aspirations.

The Local Plan has also undergone a sustainability appraisal to assess and consider the Plan's overall environmental, social and economic impacts, a Habitats Regulations Assessment has also been completed to ensure there are no adverse impacts to Habitat sites. We are pleased the Plan has the support of Natural England, Environment Agency, National Highways and Historic England amongst others.

We know the Local Plan cannot address everyone's issues. The Council are often in the middle between those who think we are going too far and those who think we are not going far enough. As such, we consider that the Plan takes a balanced approach to promoting sustainable growth, recognising what is valued in the area and striking the right balance between certainty and flexibility.

If the Plan is found sound we can quickly progress the partial review with a focus on meeting additional housing growth as required by the December 2024 NPPF. We will explore options to meet housing needs within the Green Belt. This will not be straight forward. Due to the Habitats Regulations there are multiple issues to explore and while we have a strong track record in pioneering mitigation strategies with Dorset Council, there are still significant issues to address relating to air quality, water supply and the preservation of foraging areas for key species such as nightjars. There are also issues with the capacity of the local and national highway network and inability to build new roads. These issues will need to be properly considered through a focussed partial review.

To conclude, we consider that this is the best plan we could produce within the changing planning and political environment. The Plan provides a sound, positive and deliverable strategy for achieving sustainable development and will enable the delivery of more homes and employment space. It will simplify a very complex number of plans and policies to provide greater certainty to applicants seeking planning permission and to our local communities. We are in a very beneficial position that if found sound the BCP Local Plan will provide a solid baseline to enable us to focus our resources on securing housing growth through the Partial Review, speeding up plan making.

We would like to thank everyone who has contributed to the Local Plan to date and welcome this public examination.