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**25 November 2019** 

# BRANKSOME PARK AND CANFORD CLIFFS RESIDENTS' ASSOCIATION (the RA) BOURNEMOUTH, CHRISTCHURCH AND POOLE COUNCIL (the Council) LOCAL PLAN (the Plan)

**REPORT - Identifying Issues for the new BCP Local Plan** 

## **INTRODUCTION**

- 1. The Council has given notice of its intention to draw up a new Local Plan covering its area the former boroughs of Bournemouth, Christchurch and Poole (BCP). Poole recently prepared a Local Plan for its area and this forms a starting point for the development of that area. That plan now needs to be considered in a wider context. Is it still relevant, how does it fit with the needs and opportunities of the new Council?
- 2. By formal notice circulated on 7<sup>th</sup> October 2019, the Council invited comments on the issues it confronts in formulating the new Plan. The RA supports the development of a Local Plan for the new conurbation and the comments below give our initial response. For convenience, they are given next to the key priorities identified by the Council in its invitation.
- 3. The RA covers broadly the areas of Branksome Park and Canford Cliffs, but excluding Sandbanks, all within the Canford Cliffs Ward. Significant Conservation Areas (CA) occur in the Ward. The comments in this report relate largely to planning in the RA area but some broader issues e.g. transportation should be read as commentary on the BCP area as a whole.





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#### **KEY PRIORITIES AND THE ASSOCIATION'S COMMENTS**

#### ISSUE 1 - Sustainable Environment

In planning for sustainable growth, how might we:

- manage congestion and increase opportunities for active eco-friendly travel, by walking, cycling and public transport?
- improve access to parks and open spaces?
- protect and enhance Bournemouth, Christchurch and Poole's exceptional natural environment?
- tackle the challenges posed by climate change?

## **Association's Comments:**

- 4. **Tree preservation orders** including the replanting after approved felling should be strictly enforced
- 5. **Climate change challenge** BCP Council merger has brought together three different approaches to the challenges. It should now rationalise the approach and produce a comprehensive plan to be delivered across the area. Delivering climate change policy on the ground is a massive issue and the RA stands ready to contribute to solutions as the Plan is developed. We should bring a sense of urgency to change and make every decision lead us on a low carbon pathway. We should follow the Manchester example with a policy of no new development unless it is 'zero carbon'.
- 6. On housing provision, it is appreciated that the Plan will chiefly address new development. The Council will still have to deal with the existing stock and its carbon contribution. It should seek out grants, and support nationwide education for retrofitting energy inefficient homes. Some transition rules may be necessary and a specific 'targets' approach with sanctions should be considered. Merely stating that '10% of energy from renewable resources', isn't enough and needs to be backed by regular monitoring, feedback and enforcement.
- 7. The current approach owes more to 'encouragement' rather than 'mandate'. It would be better to have incentives backed up by enforcement where key actions are needed e.g. energy consumption and transportation. BCP can draw on the strength of local digital start-ups and encourage joint ventures between education and business to target de-carbonising the economy over the next 20 years.
- 8. The Plan should also address the additional needs of the ageing population within this area relatively unique in the UK. These needs may mean reducing carbon emissions of energy, transport and buildings, and is more complex.
- 9. Standards for energy, transportation and waste should be part of Planning Approvals as well as operational lifetime requirements for developments. Thus, we should pressurise central government to make policies to address climate change through its National Planning Policy Framework.



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- 10. Safer roads and pathways Road safety in the area is poor. The Plan should encourage better safety risk analysis, rather than reliance on accident information as a driver for improvement. Installation of more speed monitoring /electronic warning signs. Input is also available from Dorset Road Safe and Community Speed Watch. The Plan needs to confront growth in, and economic cost of, litigation from the public arising from road safety incidents. Better road safety for pedestrians should lead to less resorting to cars for 'safety' reasons; a win/win.
- 11. We feel that better demarcation for foot and wheeled users would help together with better signage and clarification of footpaths from other Rights of Way. Confusion can lead to confrontation between members of the public as to their respective rights. It may be helpful to review the relevance of the Byelaws covering the use of the Chines.
- 12. The promenade offers the potential for a unique 'commuter corridor' for cyclists but, if encouraged now, the excess traffic would cause safety issues for pedestrians. We could consider the construction of a board walk corridor, initially over the most popular stretches of the promenade, separating pedestrians from cyclists to the benefit of both.
- 13. **Bus routes** Many bus routes have been terminated in recent years. This has led to a reduction in alternative methods of transport to the car, which in turn, has led to some of the growth in traffic and congestion. We feel the Plan should examine opportunities to open up some of the former routes to advantage, particularly in high visitor season.
- 14. Access to parks and open spaces and green infrastructure The Chines and access do not meet the safety needs of all ages and abilities. Foot and wheeled access requirements differ greatly, and conflict is common. We feel the Plan needs to embrace the opportunities missed in the Poole Local Cycling and Walking Improvement Plan, with attention to the variety of needs of users of the Chines. The current situation leads to aggressive behaviour between classes of user and the development of impromptu BMX tracks spoil the tranquillity of the Chines for pedestrians.
- 15. The Chines are a greatly under used open space resource, often spoiled by being overgrown and neglected. The Plan should address better 'green infrastructure' management with further involvement of local volunteer groups e.g. Pinecliff Gardens.
- 16. We need to provide separation of routes for pedestrians and cyclists particularly along the promenade with clear signage and strict enforcement of speed limits. Plan for more security with the use of CCTV in areas where there is none currently.





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## ISSUE 2 - Dynamic Region

In planning for the economy, how should we:

- revitalise Bournemouth, Christchurch and Poole's town and local centres so that they provide complementary shopping experiences?
- plan for future business growth and deliver better paid jobs?
- balance the need for new homes to meet the challenging targets required, whilst retaining local character?
- maximise delivery of affordable homes for local people?
- deliver specialist accommodation to meet the needs of the ageing population?
- support and develop Bournemouth, Christchurch and Poole's tourism sector?

#### **Association's comments:**

- 17. **Housing design and approval process** The RA contends there should be design or style guidelines for specific wards, or better still, roads within wards, to ensure that Planning Applications are more in keeping with their character and identity. There are too many designs which are not in keeping with their neighbourhood character, as well as pressure to infill and split plots; these are significant issues within CAs. We suggest there should be much stricter adherence to the special planning policies in CAs, e.g. Branksome Park and Chine Gardens CA, and these should be enforced.
- 18. We should also seek high quality design standards. These need to overcome any argument by developers that the returns from any extra cost of high-quality design may not be reflected in selling prices, whilst the benefits flow to the users over the life of a building.
- 19. Planning Officers should maintain a holistic view of all current/recent Planning Applications to ensure areas are not being over developed and there is more consistency in design. The RA recommends that there should be one/two Planning Officers dedicated to each area, so they are more familiar with the issues and constraints and apply more consistent decisions.
- 20. The process should provide for an initial compliance check on Planning Applications to ensure they are demonstrably complying with the Planning Policies rather than just stating that they comply in a Design and Access Statement. Typical areas of current breach include Renewable Energy and the provision of Affordable Housing.
- 21. **Understanding and planning for accommodation need** The RA is concerned at the large number of completed but unoccupied apartments in the Ward. There has been an unacceptable growth in the number of unoccupied second homes within apartment blocks. This leads to areas devoid of life, unnerving and unpleasant at night. This can be attractive to criminals.
- 22. A recent Freedom of Information Request (FOI) from BCP Council has shown that the Council has no knowledge of this number since it does not monitor the statistic at Ward level. The Council suggested that the Valuation Office Agency may help. A follow up FOI to that Agency also drew a blank. It is contended that this information, implying an over-provision of a class of dwelling, is a key component





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in the 'planning for need' and the Council should now take steps to remedy the deficiency and create a Plan to change focus accordingly.

- 23. Affordable Housing and Viability, and Specialist Accommodation The Council should perform better on the provision of Affordable Housing and developers must make their full contribution. Developers claim that the profit in a prime site is too small to enable any contribution to the provision of Affordable Housing, either within the development or by the payment of a commuted sum. Developers should be required to build the necessary number of affordable dwellings to fulfil that obligation prior to the development of the prime site. In this way there should be a win/win for both developer and the Council.
- 24. Empty retail units are a waste of space unlikely ever to be needed in the period of the Plan. Often, they are in prime locations where public transport provision is good and they could be converted into affordable housing.
- 25. Second homes in the BCP area. Although the percentage of dwellings is unknown, evidence suggests that the figure is significant in some apartment blocks and areas. Procedures to cap the concentration of second homes in the BCP area should be explored.
- 26. The growth in an ageing local population produces its own challenges. The Plan should address the growing need for specialist accommodation for older people. This will be a larger proportion than in other UK conurbations. More public transport will be needed for this group who are excluded as 'non-drivers' and in the process this will make pedestrians safer.
- 27. **Beach Road Car Park** Poole Local Plan Site Ref. U8 Poole Local Plan provides for redevelopment of the surface car park to provide 60 homes in apartments below the top of the existing tree line.
- 28. The RA has always opposed development of the site which is designated public open space and is protected by a number of historic restrictive covenants. It provides essential beach-side parking and, rather than the neglect is has suffered over the years, it should be improved and much better signed. The Council's attempts to overturn the covenants have been vigorously opposed by covenant holders and the Council has withdrawn from such action. Our position is unchanged.
- 29. The car park has potential to provide a safe play area for children unable to spend a full day on the sand and could provide welcome shaded seating respite from the unprotected exposure to the sun at the beach.
- 30. **Link with Purbeck** The Council should review future options for the ferry link with Purbeck. This is unreliable and was out of action for over five months in 2019 including some of the peak period. This connection affects the economy of both BCP and Purbeck. Options might include a replacement modern craft as well as a fixed, or moveable, road link but avoiding the mistakes in the complexity of the 'Twin sails' bridge.
- 31. **Link with Poole and West Dorset** The management of congestion to the west of Wessex Way should be investigated and solutions found to provide a better route for through traffic and Poole town centre traffic thereby releasing the pressure on the congested urban route through Penn Hill, Ashley





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Cross and the Civic Centre areas. These areas may then return to the 'local centre' role that they had in the past without being overwhelmed by through traffic.

- 32. **Town Centre Challenges** All three large town centres face massive challenges; there is no magic solution. Nevertheless, the Plan should encourage gradual transition to a town centre environment that is more appropriate for leisure and community activities with designs that provide a welcoming, safe experience for people of all ages and open for a larger portion of the day. Whilst the climate is often unfriendly, the use of more outdoor space should be encouraged together with the opportunity for exercise, walking, etcetera. An example could be Poole Road, Westbourne village centre where traffic flows could be removed by using two way working in Seamoor Road, providing more of a 'forum' feel to that busy area. This could enhance leisure, market, performance and children's activity in a safe environment.
- 33. We could plan for a harbour-side wide plaza at Poole Quay as an attractive night-time destination with its exceptional surroundings rather than the long impractical and unwelcoming High Street. A land train could provide access from the quayside to the rail/bus station.
- 34. Clearly there is a range of major issues to address, not least including the impact of business rating on town centres. Nevertheless, we would welcome the opportunity to engage on town centre options as the Plan develops.
- 35. **Tourism development** The new BCP Council provides the opportunity to frame the development of the conurbation with the town's tourism role. Each of the three former boroughs can increase its distinctiveness within the overall package that is BCP. A suggestion to start the debate might be:
  - a. Christchurch Historic cultural centre
  - b. Bournemouth Fun and excitement for the young
  - c. Poole Happy families

We would welcome the opportunity to engage on this line of thinking with the Plan team.





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#### ISSUE 3 - Connected Communities

In empowering our communities, how should we:

- shape growth to ensure that the individual identities of Bournemouth, Christchurch and Poole are retained?
- ensure the delivery of high quality and attractive urban environments?
- strengthen cultural identity and preserve or enhance our historic environment?
- plan for safe, mixed and socially inclusive communities?
   ensure essential services and community facilities are easily accessible to everyone?

#### **Association's comments:**

36. These are covered above in the Dynamic Region section.

## ISSUE 4 - Brighter Futures

In caring for our children and young people, how might we:

• plan for the provision of high-quality educational facilities?

#### **Association's comments:**

37. Education – The Plan should support the provision of high-quality education. This should include university as well as further education to meet the growing need for vocational, skilled and craft competences. The RA encourages the continued cooperation of grammar schools, academies and the private sector, in raising academic standards as well as promoting co-curricular activities to nurture the intellectual, emotional, social development of children across the BCP Area. .

#### ISSUE 5 - Fulfilled Lives

In helping people lead active, healthy and independent lives, how should we:

- provide accessible, well connected, high quality urban environments and public open spaces?
- provide the opportunities for people to make healthy lifestyle choices?
- improve air quality by reducing reliance on the motor car?

#### **Association's comments:**

38. These are covered above in the Dynamic Region section.



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### **CONCLUSION**

- 39. The RA is pleased to be able to input to this first stage of the production of the BCP Local Plan. It appreciates that, at this stage, the objective is to identify the key issues. When these have been noted, we seek to engage with the Council so that it can input the views of its members and ensure that they are properly heard.
- 40. An overriding objective of the RA is that it is essential that the 'local' character of the Ward be retained, and its own exceptional environmental character is maintained and, where possible, enhanced. The Council shares these objectives. The RA sees its role to include the preservation and enhancement of the CAs. Recent planning issues suggest that, for one reason or another, this is not being supported by other stakeholders. The new Local Plan creation provides a welcome opportunity to raise the profile of the CA and discuss its future in the planning process.
- 41. We look forward to contributing to the next phase of work to create the BCP Local Plan.

