

Planning Policy Team
Town Hall Annexe
St Stephen's Road
Bournemouth
BH2 6EA

2 November 2018

Our ref: TW/3397

Dear Sir/Madam

**Re: Boscombe and Pokesdown Neighbourhood Plan – Regulation 16
Consultation
Representations on behalf of Brightmark Ltd**

These representations are submitted on behalf of Brightmark Ltd in respect of the Boscombe and Pokesdown Neighbourhood Plan Regulation 16 consultation, which is active until 2 November 2018.

This representation is concerned principally with the proposed site allocations, which relates to land within Brightmark's ownership, and with the housing policies within the neighbourhood plan.

Site allocations

Brightmark Ltd is the owner of the former Ashley Road Coal Yard site, which is located within the northern part of the Neighbourhood Plan area and which has been included as a site allocation, principally for housing. The site was originally railway sidings and was subsequently used as a coal yard comprising an office building with a large yard used for open storage of coal. The northern portion of the site was originally part of Boscombe station and has subsequently been used for a variety of purposes. It is currently used as a car wash. Since the closure of the coal yard approximately 15 years ago, that portion of the site has stood disused. It has since become a focus for significant anti-social behaviour issues.

As a large brownfield site located on an important transport corridor the site is ideally placed to deliver a significant enhancement to Boscombe through new development. The site has historically been allocated for employment development through Bournemouth Borough Council's planning policies, although no such use has come forward. In September 2018, Bournemouth Borough Council's planning board resolved to grant outline planning permission for the site's redevelopment to provide up to 60 dwellings.

The principle of a residential use on the site is therefore established as acceptable. Brightmark therefore welcomes the inclusion of the former Coal Yard site as a residential allocation within the neighbourhood plan which further underlines that acceptability. However while the range of 50-60 dwellings is in accordance with the recent resolution to grant planning permission on the site, it is considered that this range provides an unnecessary restriction upon the development which may be achieved on the site.

The National Planning Policy Framework places great emphasis upon making effective use of land. Paragraph 122 states that both policies and decisions should support development that makes efficient use of land with considerations including meeting identified needs, local market conditions, infrastructure capacity, character and the importance of securing well designed places. Paragraph 123 goes on to state that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and that the optimal use of each site's potential is made.

The current planning application for up to 60 units is based upon an indicative layout with a combination of flats and houses but it is clear that there is potential for alternative approaches to be pursued which could change the density of development. It is not therefore considered appropriate to establish a maximum number of dwellings through policy.

It is noted that the allocation also lists other acceptable floor spaces on the site as being open space, a transport hub and active commercial uses at ground floor level. While Brightmark does not object to their identification as being broadly acceptable for the site, it should be recognised that certain uses other than residential are unlikely to come forward. Open space is incorporated into the layout of the current planning application for the site, and when implemented the development will need to include detailed landscape proposals.

A transport hub is unlikely to be achieved on the site in a meaningful way. The site has been designed to allow access to a proposed railway halt which is a long-standing aspiration of the council to establish. However the site is unlikely to be suitable as a hub for other modes of transport. Road access to the site is heavily constrained and must be from North Road due to poor visibility along Ashley Road. There is also an existing and established travel interchange to the south, at the Sovereign Centre which is better located for access to the local centre than this site.

Policy BAP6

Policy BAP 6 is concerned with the number and type of new homes. There are serious concerns in respect of the appropriateness of this policy as it sets extremely prescriptive expectations in terms of the mix of housing types in new development which don't take any account of constraints on development, market demands or development viability.

For developments involving the conversion of existing buildings that sets an expectation that for developments of 9 dwellings or fewer there is at least 1 two-bedroom flat with direct access to outside amenity space, and 1 unit which meets lifetime homes standards. For developments of 10 or more dwellings, it sets an expectation that 50% of units are to be 3 or more bedrooms, 40% to be two bedrooms and 10% to be 1 bedroom.

These expectations do not however recognise or reflect the realities of development involving the conversion of existing buildings. It is of course necessary to undertake such development within the existing fabric of the building, which can be a considerable constraint, particularly in historic buildings.

In addition to the physical constraints which may prevent the ability of developers to comply with those expectations, the requirements do not have regard to any considerations of development viability or market demand for the units that the policy seeks.

Similarly for more comprehensive redevelopment proposals the policy sets an expectation that all development will deliver 50% 3 bed units, 40% two bedroom units and 10% 1 bedroom units. That expectation does not reflect market need for housing in the local plan area which is clearly for smaller units.

The number of houses in multiple occupation within the neighbourhood plan area underlines a need for smaller and more inherently affordable units of accommodation within the neighbourhood plan area. The overly prescriptive expectations of policy BAP6 would prevent that demand from being met by restricting the supply of smaller dwellings. That would, in turn lead to additional pressure for the creation of houses in multiple occupation, as not providing smaller units would not cause the need for them to go away.

As noted above paragraph 122 of the NPPF requires that in order to support development that makes efficient use of land, local market conditions and viability should be taken into account. If it were the case that market conditions supported the viable delivery of larger family housing ahead of smaller units, then the market would already deliver housing in that form.

It is important to recognise in this context that the neighbourhood plan area is part of the wider Borough of Bournemouth which itself sits as part of the conurbation of Poole, Bournemouth and Christchurch which effectively operates as a single settlement. The housing market operates across the whole urban area and also extends into surrounding areas as well so it is not appropriate to consider Boscombe and Pokesdown in isolation.

As it is centrally located in the wider urban area, the Boscombe and Pokesdown neighbourhood plan area will naturally attract higher density development. However it must still be viewed in the context of the wider whole which includes residential development at various densities and which does include a variety of house types and sizes. It is unrealistic to expect that development in what is

a tightly constrained urban area, to deliver predominantly family housing, when the demand is not necessarily there.

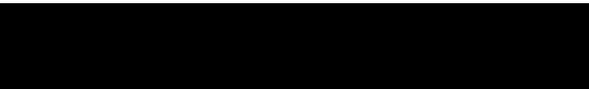
It is therefore considered that the requirements are unduly and unreasonably restrictive and would undermine the deliverability and soundness of the plan. It could also have significant consequences for the delivery of existing consented and anticipated development within the neighbourhood plan area.

Conclusion

Brightmark Ltd supports the proposed allocation of the former coal yard site on Ashley Road for housing led development. It is however considered that the allocation should allow flexibility in terms of the amount of development which can be achieved to allow for the best use of the land to be achieved, in accordance with the requirements of the National Planning Policy Framework.

Brightmark Ltd also has significant concerns in respect of the implications of policy BAP6. The policy sets requirements for housing mix which are overly prescriptive, do not reflect local housing needs, and which could threaten the delivery of forms of housing for which there is a clear and ongoing demand, compounding issues, such as the proliferation of HMOs, which the neighbourhood plan seeks to tackle.

Yours sincerely



Tom Whild BA (Hons) MSc MRTPI
Associate Planning Consultant

Direct email:



Website:

