

Christchurch and East Dorset Core Strategy Examination

Statement submitted by Savills on behalf Barratt David Wilson Homes on Matter 3: Strategic Allocations: General Matters

Respondent reference: 661008

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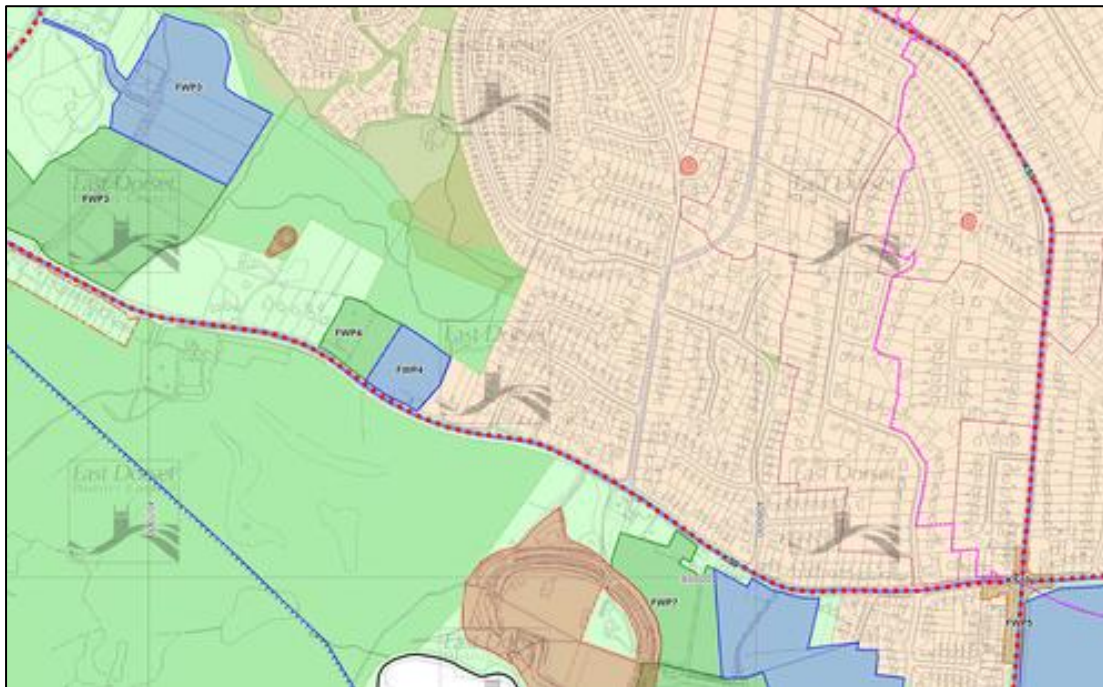


Matter 3: Strategic Allocations: General Matters

Issue 1. Does the CS provide clearly defined boundaries for every strategic allocation?

1. The Core Strategy would benefit from greater clarity in relation to the boundaries for the strategic allocations. An extract from the submission policies map showing Policy FWP4 Coppins Nursery New Neighbourhood is shown below. The boundary for the site is not clearly defined on this plan; an arbitrary line through the centre of the site divides it in half, with only half of the site shown for housing, and the remainder as 'Potential Suitable Alternative Natural Greenspace (SANG) / Other Greenspace'.

Extract from the Christchurch and East Dorset Core Strategy policies map



2. The Core Strategy would benefit from clarification of the status of the aerial photograph based plans that are provided within the document for each of the New Neighbourhoods (e.g. Map 10.5 in relation to the Coppins New Neighbourhood). These plans are illustrations of how the sites could be delivered, but cannot be considered as definitive masterplans. The detail in these plans, other than the red line showing the extent of the site, can only be considered as illustrative only.

3. This is a particular concern in relation to Policy FWP4: Coppins New Neighbourhood. The Core Strategy Options consultation originally identified the site for the provision of about 45 homes, with a small proportion of the site identified for greenspace along the eastern edge of the site. The Pre-Submission Core Strategy allocates the site for about 30 homes, with at least half of the site set out as informal open space. The reason given for this at paragraph 10.29 of the Pre-Submission Core Strategy is to protect the Green Belt Gap between Longham and Ferndown. There is nothing in the evidence base to justify this change.
4. The Land to the north of Christchurch Road, West Parley – development concept document submitted by Savills on behalf of Barratt David Wilson Homes in support of these representations sets out a proposed layout for the site which can accommodate up to 45 dwellings. This is based on a detailed, site specific evidence base, and is considered to represent the most appropriate design and development response for the Coppins Nursery site, taking account of all relevant considerations.
5. The Barratt David Wilson Homes proposals for the site are supported by a Landscape and Visual Appraisal and a Review of Green Belt Considerations, which are also submitted alongside these representations.
6. The Landscape and Visual Appraisal concludes that with appropriate layout and building design, and landscape spaces and planting, the proposed residential development on this site, which is located adjacent to the existing settlement, would not have negative effects on existing townscape character or the wider landscape setting of West Parley.
7. The Review of Green Belt Considerations considers the site against the five purposes for including land in the Green Belts as set out in the NPPF and against the Green Belt considerations set out in the South East Dorset Green Belt Review. The report demonstrates that the development of the site for 45 houses in the manner proposed in the Core Strategy options consultation would not compromise any of the purposes of the Green Belt in this area.
8. The Review of Green Belt Considerations notes that the Dorset Landscape Character Assessment identifies the site as lying within the ‘urban’ landscape character area. Due to the topography of the site and surrounding area, adjoining residential development to the east and west, and mature vegetation associated with the woodlands to the north

and golf course to the south, the development of the site would not affect the openness or any of the functions of the South East Dorset Green Belt.

9. These documents clearly demonstrate that the whole of the site can be developed without adverse impact on the Green Belt or on the townscape character or wider landscape setting of West Parley and Ferndown, and provide a compelling evidence base for a policy allocating the whole of the site for development of up to 45 dwellings.
10. In summary, the site allocation boundaries are not adequately defined on the proposals maps. In order to provide a sound basis for decision making, and to ensure the timely delivery of the New Neighbourhoods / strategic sites proposed in the plan, the Core Strategy should clearly identify the boundaries for the strategic allocations, with corresponding changes to Green Belt boundaries. For the avoidance of doubt, the strategic site allocation boundary for FWP4 Coppins New Neighbourhood should be drawn up to include the whole of the site for development as outlined on the map below.

Map 1: Area to be allocated for development in relation to Coppins Nursey



Issue 2. Flood risk: has every strategic allocation been subjected to a sequential and, if appropriate, exceptions test?

and

Issue 3. Flood Risk: is every site allocation supported, where necessary, by a site specific flood risk assessment to demonstrate that development will be safe for its lifetime without increasing flood risk elsewhere? (Ref: NPPF para 102)

11. The NPPF advises that Local Plans should apply a sequential, risk based approach to the location of development to avoid flood risk where possible. The aim of the sequential test is to steer development to areas with the lowest probability of flooding, Flood Zone 1.
12. The Policy FWP4 Coppins New Neighbourhood allocation lies within Flood Zone 1. It therefore passes the sequential test and a site specific flood risk assessment is not required to support the allocation.
13. A preliminary assessment of the fluvial and surface water drainage considerations for the proposed Coppins New Neighbourhood development has been undertaken by geotechnical and environmental consultants Wilson Bailey Partnership and consulting engineers Esher Silverman. The findings of which are summarised below and in the Development Concept document submitted alongside our previous representations on the emerging Core Strategy
14. The Environment Agency flood maps show that the site is at low risk of fluvial flooding and is therefore located in Flood Zone 1. The NPPD advises that all land uses are acceptable within Flood Zone 1 and developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of development, the appropriate application of Sustainable Drainage Systems (SUDS).
15. Information from the British Geological Survey indicates the northwestern part of the site to be underlain by silty fine sand, with the southeast corner of the site underlain by silty clay soils. This has been confirmed by site investigation work. Initial percolation testing indicates that soakaways will be viable across the majority of the site where silty fine soils have been encountered.

16. Further ground investigation work will be undertaken to ensure that infiltration systems and other SUDS components are designed to prevent onsite flooding and mitigate offsite impacts to ensure that the development would not increase flood risk elsewhere and would reduce flood risk overall. A full Flood Risk Assessment and drainage strategy will be produced at the planning application stage in line with the requirements of the NPPF.

4. Protection of designated habitats: Are all site allocations for residential development which are required to provide mitigation capable of providing SANG or alternative acceptable mitigation?

17. The Policy FWP4 Coppins New Neighbourhood site is located adjoining Poor Common, a large area of informal open space that serves as a strategic SANG. The site is also within easy walking distance of the Stour Valley, another large scale area of open space that serves a strategic SANGS function. The site has a capacity of less than 50 dwellings, on-site SANG provision is therefore not required, and heathland mitigation can be delivered by a s106 or CIL contribution in line with the accepted heathland mitigation strategy.

18. It should be noted that Map 10.5 shows half of the Policy FWP4 Coppins New Neighbourhood as a potential SANG. This has arisen as a result of an earlier version of the plan including a requirement for on-site SANG provision. The requirement for on-site SANG provision has been removed from the submission CS, but the capacity of the site and the illustrative masterplan have not been updated in response to this key change. We have set out proposed changes to address this in our representation on Policy FWP4.

19. In the event of a requirement to incorporate a significant area of open space on-site within the Coppins New Neighbourhood, this should be in lieu of a s106 or CIL contribution towards heathland mitigation.

5. Do all site allocations satisfactorily address biodiversity?

20. In relation to Policy FWP4 Coppins New Neighbourhood, an ecological appraisal has been undertaken by Aluco Ecology to identify any potential ecological and nature conservation issues associated with the development of the site. The findings of the

appraisal are summarise below and in the Development Concept document submitted alongside our previous representations.

21. The methodology for this appraisal is based on the Guidelines for Ecological Impact Assessment (EclA) in the United Kingdom published by the Institute of Ecology and Environmental Management (IEEM, 2006).
22. The appraisal involved a desk study of the site and associated Zone of Influence to gather relevant information from a variety of sources, followed by field surveys on a number of dates between June and August 2011 to map and evaluate the ecological interest of the site including habitats, vegetation and potential to support protected and valued species. Further ecological survey work is currently ongoing in order to inform and accompany a planning application.
23. Overall, the ecological appraisal concludes that provided the mitigation measures outlined in the appraisal are taken into account in the scheme design, pre-development and during construction, then protected species and habitats would not be adversely affected. A number of options for providing ecological gain can be incorporated into the development proposals, principally around the protection and enhancement of the northern and eastern boundaries of the site.