

# **Christchurch and East Dorset Core Strategy Examination**

# MATTER 3: STRATEGIC ALLOCATIONS: GENERAL MATTERS

# Statement by Christchurch and East Dorset Councils



Prepared by Christchurch Borough Council and East Dorset District Council

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# 1 Issue 1: Strategic Allocation Boundaries

# Response to Issue

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

# Response to Issue

1.1 See the Council's response to Matters and Issues 2 Green Belt, in particular Issue 4, where this matter is addressed. All of the strategic allocations where development is proposed, with the exception of WMC4 Stone Lane New Neighbourhood, Wimborne, are Green Belt sites on the edge of the settlements. The Stone Lane site lies within the existing urban area of Wimborne and is a clearly defined site on the ground.

# 2 Issue 2: Flood Risk Sequential and Exception Tests

# Response to Issue

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

2.1 The strategic allocations consist of housing and employment sites. The strategic allocations were selected using a sieving process based on a range of criteria, including flood risk. The Christchurch and East Dorset Strategic Flood Risk Assessment Level 1 (2008) (ED3) and Christchurch Strategic Flood Risk Assessment Level 2 (2009) (ED4) were used to confirm the impact of flood risk and for applying a sequential approach within the sites.

# 2.2 Housing sites

# 2.3 Sieving Process and Consideration of Flood risk

- 2.4 As part of the preparation of the South West Regional Spatial Strategy five urban extensions were identified to potentially accommodate around 3,000 new dwellings across the South East Dorset area.
- 2.5 In identifying land for development, a two stage sieving process was carried out in each area of search. The first stage was to identify sub-areas (within each of the areas of search) that were considered more suitable locations for development based on criteria such as: location in relation to existing services; transport accessibility; environmental designations and coalescence.
- 2.6 The second stage of this process was to refine this further and identify specific sites, based on more localised factors such as landscape, environmental and conservation designations and land use. Flood risk considerations were taken into account at this stage of the process, which would have formed the basis of undertaking a sequential site assessment.
- 2.7 In order to assess suitable areas for development, an analysis of the constraints and opportunities within each of the areas of search was undertaken. Flood risk was also taken into account at this stage of the process.
- 2.8 As part of the preparation of the Core Strategy, Strategic Flood Risk Assessment data (Level 1 & 2) has also been used to ensure that the sites are in appropriate locations and that any flood risk on the sites could be mitigated through site design and layout.
- 2.9 Masterplanning work undertaken for the Core Strategy new neighbourhoods has used the SFRAs (ED3, ED4) as a basis for a sequential approach within the sites and has also helped to refine the site layout and design.

# 2.10 Christchurch Urban Extension (ED68, ED69)

**2.11** No other site in the Borough could accommodate this number of houses and the Christchurch Level 2 SFRA has demonstrated that this allocation is not inhibited by flood risk. Master Planning work undertaken for this site by Broadway Malyan has demonstrated that the proposed level of residential development can be located within flood zone 1.

# **2.12** East Dorset Housing Options Masterplan Report (ED62, ED63, ED64, ED65)

2.13 The Environment Agency Flood maps shown in this section indicate that all of the sites are within Flood Zone 1 which means that they are in areas of low risk (return periods greater than 1,000 years) and that all land use types are suitable in these areas. Only one small part of the site at Cuthbury Gardens, Wimborne (WMC3) lies partly within Flood Zone 2, but this area is proposed to be open space.

#### **2.14** Land South of Burton

- 2.15 In contributing towards local housing need identified in the Strategic Housing market Assessment (2012) and the Bournemouth, Dorset and Poole population and Household Projections (2012), a further site has been identified for limited residential development. This site has been identified through a strategic review of housing land informed by the Council's Strategic Housing Land Availability Assessment (2011) (ED32).
- 2.16 The location of this allocation and number of dwellings has been informed by the Christchurch Strategic Flood Risk Assessment (Level 2, 2009) (ED4).

# 2.17 Employment Allocations

# **2.18** Bournemouth Airport and Business Park

- 2.19 The Bournemouth Airport Business Park is an existing allocation that is allocated in the adopted Christchurch Local Plan (2001). The outputs of the level 2 SFRA determine that a significant proportion of the North West business park is subject to high flood risk (Zone 3a) when considering the effects of climate change to 2086. A sequential approach has been undertaken by the Council in allocating the business park as a strategic site in the Core Strategy. This site performs a strategic role in employment land provision for South East Dorset and there are no existing alternative sites capable of delivering the same amount of employment land. As part of the recent outline permission at the business park (8/11/0329) a flood management strategy has been prepared in association with the Environment Agency, which sets out flood storage measures and works to the water course running through the site to ensure that employment development can come forward sustainably.
- 2.20 The North East Business Park is not significantly affected by flood risk and includes some flood zone 2 and small areas affected by high flood risk (3a).

#### 2.21 Sites in East Dorset

- 2.22 The Allendale Area has had a sequential site assessment undertaken (2013, ED73) and this confirms its suitability for specific forms of development.
- 2.23 Neither the Blunts Farm or Bailie Gate employment allocations (policies FWP8 and RA1) are affected by flood risk, being in Flood Zone 1. The strategic employment site at Woolsbridge (policy VTSW6), is very marginally affected with a small area of the overall site being within Flood Zones 2 and 3a.

**2.24** None of the other proposals within the Core Strategy are affected by flood risk, notably land at St Leonards Hospital (policy VTSW7), or the various employment proposals.

# 3 Issue 3: Flood Risk Assessment

# Response to Issue

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)

- **3.1** For the purposes of the Core Strategy it is not necessary for every site allocation to be supported by a site specific flood risk assessment. East Dorset is covered by a level 1 Strategic Flood Risk Assessment (2008) (ED3) and Christchurch is covered by a Level 2 Strategic Flood Risk Assessment (2009) (ED4). These have been used as part of the decision making process in the selection of the site allocations.
- 3.2 Site specific flood risk assessments will be required at the more detailed planning stages to ensure that development is located in the most appropriate locations on each of the site allocations. Some of the policies require a site specific FRA to be undertaken. It is not necessary to have detailed site specific flood risk assessments at this more strategic stage. The Strategic Flood Risk Assessment data available has ensured that the sites allocated are in the most appropriate locations (when taking flood risk into account) and therefore further more detailed flood risk information is not necessary until the detailed site design stages.
- **3.3** There are a number of sites which have had site specific flood risk assessments undertaken and these are set out below.
- 3.4 Allendale Area, Wimborne (ED73)
- 3.5 A site specific flood risk assessment has been undertaken for the Allendale Area as the Council is currently considering the future redevelopment options for this site.
- 3.6 Land South of Burton
- 3.7 Meyrick Estate submitted a flood risk assessment as part of their representations at Pre Submission stage for 90 dwellings on land to the south of Burton.
- 3.8 Bournemouth Airport
- 3.9 Bournemouth Airport has had an FRA undertaken as part of the recent outline consent for 12-15ha of employment development (Application, 8/11/0329) and and a site wide flood management strategy has been developed by the Airprot in association with the Environment Agency. This has also been informed by the Christchurch Level 2 SFRA (2009) (ED4).

#### 3.10 St Leonards Hospital

**3.11** The development brief necessary to facilitate the development of the St Leonards Hospital site, will invite comments from the Environment Agency and Wessex Water. Initial El screening and scoping did not reveal any concerns from either the Environment Agency or Wessex Water. Further work, if required, will be undertaken by the developer as part of the planning application, on behalf of the Homes and Communities Agency.

# 4 Issue 4: Designated Habitat Protection

# Response to Issue

Issue 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?

4.1 The polices within the Core Strategy relating to each of the proposals for residential development set out the prerequisite for a Suitable Alternative Natural Greenspace (SANG) strategy in order to provide protection of internationally designated sites. The exception is Policy FWP4, which proposes 30 new homes. This accords with Policy ME2 and Appendix 5, where sites proposing developments of up to approximately 50 dwellings, are required to pay a financial contribution where adequate mitigation measures cannot be provided on site. The following paragraphs set out for each allocation how the provision of mitigation is capable of taking place:

### **Policy CN1 Christchurch Urban Extension**

4.2 The Christchurch Urban Extension SANG Strategy (2012) (FD4) has been agreed with Natural England and demonstrates an acceptable approach to the avoidance and mitigation of the Urban Extension site. A Statement of Common Ground has been prepared with Natural England and Meyrick Estate to deal with the SANG issue.

### **Policy CN2 Land south of Burton**

**4.3** The proposed 45 dwellings is below the threshold for requiring Suitable Alternative Natural Greenspace to serve the site as set out in Policy ME2. However, as set out in the text of the Core Strategy linkages will be established from this site south of Burton to the SANG area north of the railway line and to the east of Salisbury Road - both sites are in the same ownership, but the Burton development would need to finance these links.

#### Policy WMC3 Cuthbury Allotments and St Margaret's Close

**4.4** A SANG strategy is currently being finalised between the Cuthbury Allotment site's developers and Natural England and will be reflected in a Statement of Common Ground to be signed by these parties, confirming it as a satisfactory approach. The St Margaret's Close site is in separate ownership (EDDC) and is likely to fall below the threshold of SANG provision and will therefore comply with the provisions of Policy ME2.

# **Policy WMC4 Stone Lane**

**4.5** The site is brownfield and within the existing defined urban area. Currently there have been no detailed negotiations with the landowner on this subject, however they have been made aware of the need for and the requirements of a SANG.

# **Policy WMC5 Cranborne Road**

4.6 Detailed negotiations have taken place between the landowner and Natural England and a Statement of Common Ground has been signed. This confirms that Natural England are satisfied with the proposals by the landowner. A planning application is expected in August 2013 which will include the details of the mitigation strategy.

# Policy WMC6 South of Leigh Road

4.7 The final text of a Statement of Common Ground is being agreed that will confirm Natural England are satisfied with the mitigation package being offered by the site's landowners.

# Policy CM1 Lockyer's School and Land North of Corfe Mullen

- **4.8** For the Lockyer's School part of the site no negotiations have taken place with the landowners Dorset County Council, but they have other land holdings to the north of the settlement that have the potential to operate as SANGs.
- **4.9** A Statement of Common Ground is being prepared for land north of Core Mullen between the landowner, Natural England and Dorset Wildlife Trust (who have control over the land being proposed as the SANG). This will confirm that Natural England are satisfied the proposals for mitigation are sufficient.

# **Policy FWP3 Holmwood House**

**4.10** A SANG strategy has been agreed between the landowner and Natural England and a Statement of Common Ground signed to confirm that Natural England are satisfied with this strategy. A planning application for the site is expected later this year which will include the details of the mitigation.

#### **Policy FWP4 Coppins**

**4.11** The proposed 30 dwellings is below the threshold for requiring Suitable Alternative Natural Greenspace to serve the site and will therefore need to comply with policy ME2.

#### Policy FWP6 East of New Road

**4.12** A SANG strategy has been agreed between the landowner and Natural England and a Statement of Common Ground has been signed to confirm Natural England are satisfied with this strategy.

#### Policy FWP7 West of New Road

**4.13** There are ongoing negotiations between the landowner and Natural England regarding a SANG strategy. Additional habitat survey work is required to inform this, which is expected to be available in time for the public hearings.

#### **Policy VTSW4 North Western Verwood**

**4.14** There are ongoing negotiations between the landowner and Natural England regarding a SANG strategy. This is to ensure Natural England are satisfied that sufficient land is to be made available as part of the development to meet their requirements. The site owner has large landholdings adjacent to the site which can provide appropriate mitigation.

# 5 Issue 5: Biodiversity

# Response to Issue

#### Issue 5: Do all site allocations satisfactorily address biodiversity?

5.1 It is considered that the site allocations all satisfactorily address biodiversity issues, as set out below:

# **5.2** Residential Proposals:

5.3 In East Dorset the Masterplan reports / HRA selection process ensured that the proposed strategic allocations were away from designated sites / outside of heathland mitigation 400 metre zones. They also made it clear that further ecological baseline assessments will be required to inform the more detailed designs for the site. In most cases this is expected to include Phase 1 Habitats Surveys, protected species survey, vegetation, hedgerow and tree surveys, identification of UK and local BAP priority habitats, etc. These will need to accompany the detailed planning applications.

#### 5.4 Other Allocations

- 5.5 The Airport, Employment and Education allocations all either have policy prerequisites and/or need to follow the requirements set out in Policy ME1.
- 5.6 Offsite impacts on protected heathland habitats are dealt with via SANG requirements set out in Policy ME2 and Appendix 5. Informal guidance from Natural England expects Phase 1 surveys have been undertaken for both the site and the SANGs where required. The delivery of SANGs will also be a major contributor in providing biodiversity gain as required by policy ME1.