

Response to Main Issues for Examination from West Parley Parish Council

We wish to attend the examination to respond orally to the issues listed below. James Stacey, BA (Hons) DipTP MRTPI, Director at Tetlow King Planning will represent the Parish Council at examination. Cllr Richard Heaslip CB (WPPC) will also participate in the debate where appropriate.

Inspector's Questions

- 1 Does the CS provide clearly defined boundaries for every strategic allocation?
- 2 Flood risk: has every strategic allocation been subjected to a sequential and, if appropriate, exceptions test?
- 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?
- 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?

Summary of Objections

	1	2	3	4
Test of Soundness	Not effective	Not justified by evidence.	Not justified by evidence.	Not effective – delivery partners not signed up
Suggested Modification	Council produce plans showing land removed from the Green Belt, extent of SANGs and housing.	Council need to produce a full Flood Risk Assessment to demonstrate the strategic sites can support the quantum of housing proposed.	Council need to produce a full Flood Risk Assessment to demonstrate the strategic sites can support the quantum of housing proposed.	A Design Brief or Masterplan should be produced. The Councils should show that the SANG land is deliverable to support the residential development.

Matter 3: Strategic Allocations – General Matters

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

1.1 Page 72 of the latest concept plan for the strategic allocations ED 64, is clear that:

“SANGs are shown but they are not integral to the design of the site as they are not, at this stage, fixed”

We consider this demonstrates that the boundaries of the strategic allocations have not been clearly defined, as the boundaries of the SANGs which accompany the development have yet to be finalised. This links to WPPC’s concerns in Matter 2 (page 4, 2/359553) that the ambiguity surrounding the Green Belt boundaries contributes to a lack of definition of the strategic allocations.

Suggested modification

1.2 That the Core Strategy is withdrawn until a detailed review and detailed evidence is presented which provides clearly defined boundaries. These boundaries, if relating to proposed Green Belt allocations, should ensure that future housing expansion within the Green Belt is not possible, as this would directly impact on the 5 purposes of the Green Belt, as identified in Paragraph 80 of the NPPF, which should be assessed at the time of the original allocation of the site. Hence, failure to undertake this work would mean that plan is not being positively prepared and is not consistent with National Policy (para’s 79 and 80 of the NPPF), which seeks to:

*“prevent urban sprawl by keeping land **permanently open**”*

(my emphasis).

A review of each site should therefore take place to inform the strategic allocations.

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

1.3 The Councils’ flood evidence is based on a joint assessment (ED3) with Bournemouth, North Dorset, and Salisbury in 2008. Given the large area covered by the report the strategic allocations identified in the Core Strategy are not individually mentioned. There has been no sequential test outlining why the selected sites are the most suitable for development when compared with other development sites. The area to the south of the FWP7 allocation is shown as functional floodplain on Map 1C. However, the Councils

have not explained despite this why this a preferred site for strategic development. There has therefore been no examination of an alternative site for FWP7 due to development within the flood plain and hence the plan has not be **Justified or Positively Prepared**.

Suggested Modification

- 1.4 WPPC suggest the Core Strategy is either withdrawn or suspended in order to allow time for the Councils to conduct a Strategic Flood Risk Assessment of all the strategic allocations to ensure development does not have an adverse effect on flooding both onsite and in the wider floodplain.

Question 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?

- 1.5 ED62 (Housing Options Masterplan Report) provides a desk-top flood assessment but no further work has been conducted (pages 116-117). WPPC are particularly concerned that a flood risk assessment has not been conducted for FWP 7 which contains part of the flood plain for the River Stour and carries a significant flood risk. In addition, the site contains springs and is sloping, affecting the ability of the ground to absorb excess surface water. A site-specific flood risk assessment should have been conducted to assess the combined effects of these issues to ensure the site is suitable for housing in the long term. Hence the plan is not **Justified** as it does not consider reasonable alternatives based on evidence.

Suggested Modification

- 1.6 WPPC suggest the Core Strategy is either withdrawn or suspended in order to allow time for the Councils to conduct a Strategic Flood Risk Assessment of all the strategic allocations to ensure development does not have an adverse effect on flooding both onsite, locally and in the wider floodplain.

Question 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?

- 1.7 WPPC are concerned that the SANG area for FWP7 (shown in figure 1 below) is not deliverable for two reasons. Firstly, the land is in a variety of separate ownerships and to the best of our knowledge has not been assembled to ensure the whole development

can progress. Secondly, a large proportion of the land allocated for SANG is within the flood plain and as such cannot be used for recreational purposes during the winter (see comments on document ED3 above). Figure 2 (below) shows the areas of the SANG affected by flooding and alternative ownerships. Page 39 of the East Dorset District Council's risk assessment (FD5) shows shortcomings in the SANG scheme to support the development at FWP7 and at least a medium risk of the SANG being undeliverable. WPPC considers that further work needs to be conducted by the Council to ensure the deliverability of the SANG mitigation measures at FWP7. The boundaries of the SANG needs to be defined, land ownership needs to be secured and the flood plain issue needs to be resolved.

Figure 1



FWP7: Proposal for development West of New Road. Consolidated Core Strategy 2013 (SD28)

Figure 2



NB: This diagram is a schematic only using the best information available. Aerial photograph taken from Google Maps, SANG boundary drawn from proposal in the consolidated Core Strategy 2013 and floodplain drawn from Environment Agency website.

Suggested Modification

- 1.8 A Design Brief or Masterplan should be produced for the sites explaining how the SANGs will be delivered given the constraints. The Councils should show that the SANG land is deliverable to support the residential development.