



Mrs Turner
Planning Inspector
c/o Mrs J Neale, Programme Officer
Christchurch and East Dorset Core Strategy
Christchurch Borough Council
The Priory Room
Civic Offices
Bridge Street
Christchurch
Dorset BH23 1AZ

Date: 23 September 2013

Our Ref: JST M13/0103-08

Your Ref:

By email only

JNeale@christchurchandeastdorset.gov.uk

Dear Mrs Turner

RE: WEST PARLEY PARISH COUNCIL, REPRESENTOR NUMBER 359553 – RESPONSE TO PUBLICATION OF ADDITIONAL EVIDENCE ED53.7 – ADDED 12TH SEPTEMBER 2013 – BURO HAPPOLD B3073 CORRIDOR MODELLING

I write on behalf of West Parley Parish Council (359553) following the publication of additional evidence as placed before the Eip. These comments are submitted on the invitation of the Planning Inspector, Mrs Turner, to make additional comments supporting our objections to the evidence base purported to justify the proposed allocations at West Parley (FWP 6 and 7).

As you will recall at the recent Examination meeting in relation to the two proposed strategic allocations at West Parley, Dorset County Council were relying on their justification of the proposals (in highway terms) on a document that was not available for the Eip. We have now seen sight of the Buro Happold B3073 Corridor Modelling report, which was added to the website on 12 September. I attach as an appendix to this letter a critique of this report (ED 53.7).

Firstly, there are two matters of importance to stress. The report is labelled “draft” and we wonder if, in fact, this is the final version of the report or indeed has the report ever finalised? And secondly, a number of the appendices are incomplete and therefore not available for inspection.

Notwithstanding the concerns on the continued inadequacy of the evidence base put forward in support of the Core Strategy, we have the following brief comments to make:

- There is no Statement of Common Ground for FWP 7 between the Council and English Heritage – presumably awaiting the formal publication of the Proposed Modification for FWP 7 which seeks to realign the link road and reduce the number of dwellings proposed.
- There is no Statement of Common Ground for FWP 7 between the Council and Natural England – presumably awaiting the outcome of new biodiversity reports on the adequacy of the SANG mitigation land.
- There is no Statement of Common Ground for FWP 7 between the Council and the Developer (Banner Homes). Banner Homes have been completely silent at the Eip and therefore it begs the question are they committed to the site? Furthermore, it raises the issue of deliverability, as there is uncertainty not least as a result of the amendments sought by English Heritage. We recognise and fully support the appearance of Mr Cramond, DCPlanning Ltd, Poole on behalf of Wyatt Homes (FWP 6). This is what we would have expected to see from the promoters of FWP 7.

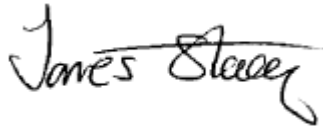
As a result of the critique West Parley Parish Council remains far from convinced that there is sufficient evidence to support the link road via FWP 7. Furthermore, in light of the as yet unconfirmed

Modifications for FWP 7 there remains great uncertainty that the proposed link road is required and/or viable as a result of the reduction in the housing area.

We reserve the right to expand further upon these concerns when the formal Modifications (and any new supporting evidence base – viability reports, highway justifications, SOCG's etc) are published.

Many thanks for considering the representations contained within this letter.

Yours sincerely

A handwritten signature in black ink that reads "James Stacey". The signature is written in a cursive style with a horizontal line crossing through the middle of the name.

**JAMES STACEY BA (HONS) Dip TP MRTPI
DIRECTOR**

For and On Behalf Of
TETLOW KING PLANNING

Enc: Critique of Buro Happold report (ED 53.7)

cc: WPPC
Mr R Henshaw – EDDC
Mr D Cramond – DCPlanning Limited

Critique of Buro Happold Report (ED 53.7)

- The report only looks at, *'an assessment of the expected level of performance of the B3073 corridor in terms of the five junctions and link roads with committed development plus increasing levels of additional business park development in 2020 until failure'* and not all other development committed (and known non committed) in the Core Strategy.
- It considers the testing of proposed improvements at Parley Cross Junction with additional Business Park development. N.B. this excludes the elements of additional traffic generated in the area, as acknowledged by Dorset County Council at the Eip.
- It tests as an additional scenario the impact at Parley Cross Junction of the proposed West Parley eastern residential sites (area 3 and 4), as identified in the East Dorset Housing Options report. At this stage of the Core Strategy there were no agreed or publicised numbers for the size of the proposed allocations.
- The base flows were taken from the Aviation Business Park Modelling for 2020 base plus committed developments. Again this appears to have excluded a number of potential sources of additional traffic – given the data was obtained from a previous report produced in 2008. This is the Bournemouth International Airport; Transport and Infrastructure Study PBA (2008), which was only added to the Eip documents list on the 12 September 2013 and is also a “draft” document. Critically, we note that Department for Transport (DfT) *Guidance on Transport Assessment* states that traffic information used for the assessment of traffic impacts should date from within the last three years – the PBA report is already five years old, and its supporting data is likely to be older still. Therefore yet again, we question the adequacy of the evidence base.
- The same issue would apply to a range of other reports referred to in the Buro Happold document, most of which date from 2010 and are therefore ‘on the cusp’ of reliability, given the DfT guidance.
- We note that the following assumptions were made about the proposed additional development in the Aviation Business Park Report, and were taken from the Drivers Jonas Deloitte Development Review Report on the likely development at this location.
 - 10% of the development GFA will be office space
 - 90% of the development GFA will be light industrial space
 - Over the 25 year period, from 2010-2035, the Aviation Business Park could add 1.1 million sq ft (110,000 square metres) GFA of development

However, the Drivers Jonas Deloitte Development Review Report is not an Eip document.

- We note at 2.2 of the report that, the 2020 base flows selected for the West Parley eastern residential sites (Area 3&4) modelling were also extracted from the PBA report, **but without the committed developments (my emphasis)**. Furthermore, we see that the residential trip rates assumed for this study were obtained from the West Dorset Transport Strategy. The West Dorset Transport Strategy is not an Eip document. We also note that the version of TRICS used in that report, and others dating from the same period, has subsequently been superseded several times – the TRICS rates should therefore be re-checked against the latest version of the database.
- Section 3.2.4 (pages 23-25) considers the Parley Cross Junction improvements on land pertaining to FWP 6. There is no identification for an additional link road required for FWP 7.

- It is noted that, “*only these two proposed gyratory systems were considered in detail at section 6 of report. Of the two junction layouts, the DCC scheme is potentially less confusing to car drivers than the PBA scheme. The DCC proposal is a standard gyratory, whereas the PBA design has a mixture of direct (e.g. south-to-east) and gyratory (e.g. east to west) movements. The PBA design also sterilises three parcels of land, which becomes unusable, whereas the DCC proposed layout keeps one contiguous parcel of land intact. Finally, the DCC proposal additionally includes bus lane facilities. Buro Happold’s have considered both scheme and used them to further develop improvements to the Parley Cross junction, these are discussed later in Section 6 to this report*”.
- Section 3.3 we note and have previously raised concerns about the lack of a coordinated model for the entire network. The report indicates that, ‘*the Parley Cross junction was also examined separately using LinSig 3, due to the complexity of the proposed junction layout and staging and the difficulty of modelling it accurately in an Excel spreadsheet*’.
- Figures 6.5 - 6.8 only seek to identify land to the east of New Road for junction improvements. Therefore the views stated at the Eip by Dorset County Council are incorrect, insomuch as the Buro Happold report did not consider how the link roads, proposed for FWP 6 or FWP 7, can act either independently or in co-ordination with each other.
- We note at 6.6 that an additional scenario test was undertaken, where Buro Happold modelled the proposed Parley Cross signalised junction with the proposed West Parley eastern residential sites (Area 3&4), as identified in the East Dorset Housing Options report.

The scenarios tested were as follows:

- Area 3 (to the East of A347 New Road) consisting of 400 dwellings, accessed from the proposed link road only; and
- Area 3 **plus** Area 4 (**my emphasis**) (to the west of New Road) consisting of 210 dwellings accessed from the B3073 Christchurch Road to the west of Parley Cross junction.

i.e. Area 4 has not been modelled in its own right.