

Matters and issues 1 – overall strategy

1. Do the CS vision and objectives set out a robust basis for tackling the key issues that have been identified?

- Do they reflect an objective assessment of alternatives?

I contend that the Core Strategy Vision (Page 20), which refers to climate change and reduced risk of flooding, and Objective 3 (page 23), which refers to the location of development in areas of lowest risk of flooding, is not supported by the evidence documents and is therefore unsound, is not justified, is not effective or consistent with national policy.

It is my belief that Policy ME6 (Page 171) should have been applied to all of the proposed developments without exception prior to their incorporation into the Core Strategy. Significant concern has been expressed by many different organisations and individuals that there is a major risk of flooding in several locations because of development.

In particular the urban extension to the North of Wimborne first proposed in the SE Dorset Regional Spatial Strategy (Document OD21 – page 7 - paragraph 5.1f - dated November 2005), and now known as WMC5 in the Core Strategy (page 102), has slavishly been reflected in EDDC Planning Policy despite a resounding rejection by the Leader of EDDC in 2009. (see Appendix 1 – letter to Secretary of State - 26th June 2009). In his rejection of the urban extension to the north of Wimborne he explained that there were complex issues of transport and flooding which may be impossible to resolve satisfactorily.

It is my contention that the Council, having recognised that RSS proposals relative to WMC5 were unsound in 2009, should not have perpetuated this development and should therefore have put forward alternative sites for housing in the Core Strategy in accordance with paragraph 100 of the NPPF.

In addition EDDC's Statement of Community Involvement (SD25 – Figure 8 pages 14 & 15) required a 4 stage consultation process, the last stage being to consider alternative sites. In November 2012 consultees were informed this was no longer necessary after EDDC had sought advice from the Local Plan Advisory Visit Inspector. An extract of the minutes of the meeting, provided recently by EDDC (attached at Appendix 2) identifies that this was indeed the view of the Inspector provided that "the nature of any consultation met the Councils SCI Protocols." Clearly abandoning the 4th stage of the consultation process contravenes the published and extant SCI protocols identified above. I believe this decision conflicts with the Core Planning Principles of the NPPF paragraph 17.

The plan can only be made sound by applying Policy ME6 before putting forward strategic allocations for development in accordance with the national policy outlined in paragraphs 100 and 101 of the NPPF. There are alternative development sites identified in SHLAA's, which can be used to inform alternative sites for development. Some of these would be more sustainable than those proposed in the Core Strategy.

Despite the significant amount of objections to the proposed development known as WMC5 in the Core Strategy, I am concerned and bemused as to why the Council doggedly maintain that it is the most sustainable location for large scale development in the district, being aware that it will swamp the landscape, the infrastructure and potentially contribute to flooding parts of Wimborne Minster. I

believe the Council would have more credibility if it supported Colehill Parish Council to develop a neighbourhood plan in accordance with paragraph 183 of the NPPF.

Perhaps it is because the Broadway Malyan “East Dorset Housing Options Master Plan report (ED62), which is the base line document for the consideration of housing development in East Dorset, was misdirects us into believing that the area to the North of Wimborne Minster is a sustainable location and the most appropriate place for the biggest housing estate proposed in the district.

Section 04 (Page 41) of the above referenced master plan report identifies that following consultation with EDDC, Parish and Town Councils there was no straightforward solution to accommodating future housing in the district, so a holistic approach would be used with the key aim of planning the Core Strategy in the right way.

Section 01 (Page 10) of the above referenced master plan report identifies the brief which EDDC gave their consultants. This was not to look at East Dorset holistically but to concentrate their activities on Wimborne Minster, Corfe Mullen, Ferndown and West Parley with a second brief to concentrate activity on Verwood. I suggest this was not a holistic approach in searching for sites in the East Dorset district. A more holistic approach would have directed the consultants to potential sites in Three Legged Cross, West Moors, Alderholt, St Leonards and Sturminster Marshall. I therefore raise the question; who is considering the provision of affordable homes for people in these areas of the district?

Section 05 (page 44) of the above referenced master plan report identifies that considerable amounts and parcels of land had been promoted by individuals and landowners and had in the main been processed into the SHLAA by EDDC. The consultants therefore had specific sites clearly drawn to their attention (see page 47) which would ensure a quick solution to achieving housing numbers that the Council had in mind. Time is clearly of the essence in increasing the housing stock in the district because the Council is being heavily criticised for its abysmal track record in prior years. However there has been no thought about the effect that this might have on existing neighbourhoods and settlements. The Core Strategy is all about numbers.

Section 06 of the above referenced master plan report analyses Constraints and Opportunities of the prescribed sites. On page 50, when describing the new neighbourhood area of search in the Green Belt to the North and North West of Wimborne Minster, the report states that it does not form part of any of the key strategic gaps separating settlements. **I disagree - Furzehill and Colehill are the closest settlements to Wimborne Minster in the North and there are recognised gaps between them which are key to maintaining their individual identities.** The report goes on to qualify that the gaps between Colehill and Wimborne Minster in the South are “key gaps” and have “key edges”. I contend that the existing gaps in the North are equally “key gaps” and the “key edge” is the boundary between the two settlements upon which WMC5 will sit, thus achieving coalescence, or urban sprawl at a stroke. The master plan on page 51 supports the view that the gaps between Wimborne Minster and Colehill are less than 1km and the prevention of further erosion is critical. Further it specifies that the area of search is of key importance to the maintenance of a gap and this must be borne in mind when suggesting any development. This statement is supported in paragraph 80 of the NPPF.

Section 06 (Page 70) of the above referenced master plan report discusses landscape appraisal and landscape capacity and continues through pages 72 to 75 to give its appraisal of the Wimborne Minster sites. This section of the report is erroneous and in some instances draws the wrong conclusions about the landscape sensitivity, landscape value and therefore landscape capacity of some sites. For example the final assessment given for landscape sensitivity for sites 1(a) and 1(b) on page 73, although achieving the same score, differ between Substantial 1(a) to Moderate 1(b). They in fact should both be Substantial having scored 17 each. Regarding landscape value for sites 1(a) and 1(b) on page 74, I believe that being situated in a Ground Water Source Protection Zone is a “designation” and therefore warrants a higher score under “other designations.” As such I would have given site 1(a) a score of 4 and site 1(b) a score of 2 for this aspect alone. The result of these two additions would lift both sites into a final assessment for landscape value from Slight to Moderate. Reviewing the Summary Landscape Capacity on page 75 reveals that site 5 (Stone Park) which had a Substantial landscape sensitivity and Moderate landscape value rating is wrongly afforded a low/medium density capacity rating and should be as the matrix on page 71 identifies a low capacity rating. I contend that if the landscape appraisal had been holistically and positively prepared by the consultants then sites 1(a) and 1(b) (known as WMC5 in the CS) would have been given a low capacity rating and discounted at this stage from development.

Section 06 (Page 80) of the above referenced master plan report discusses Ecology. It seems inconceivable to me that the Core Strategy can put forward a site that has not undergone habitat surveys, vegetation, hedgerow and tree surveys, and the identification of priority habitats for rare and endangered species. I believe this contravenes paragraph 165 of the NPPF. The potential to further upset the ecological balance is enormous without detailed knowledge and expert guidance.

Section 06 (Page 102) of the above referenced master plan report discusses Noise and Vibration. One aspect of the report focuses on construction phase noise and vibration. It identifies that its impacts are by their nature temporary. I do not see how a 10 year construction phase only recently identified in the Housing Delivery Programme (FD1) for WMC5 can conceivably be considered of a temporary nature. I believe this contravenes paragraph 123 of the NPPF.

Section 06 (Page 108) of the above referenced master plan report discusses Flood Risk and Drainage. In calculating the areas requiring attenuation for Wimborne Minster North (Page 110) the report assumes all sites have the same permeability and are consistent across the site. Consequently an impermeable figure of 60% is used to inform the attenuation calculation. The reality is quite different when considering sites 1(a) west and 1(b) east of the Cranborne Road. Site 1(b) sub-soil is clay, it is elevated over that of 1(a) and it would therefore provide a greater run-off in the east as opposed to the west. In my view the calculation should use an impermeable figure closer to 100%. I also contend that the run-off from this area will increase the risk of flooding in other areas of Wimborne Minster and as a consequence contravenes paragraphs 100 and 103 of the NPPF.

Section 09 (Pages 241 - 245) of the above referenced master plan report discusses Refined Areas of Search for Wimborne Minster North. If as identified above, landscape capacity had been positively prepared then the proposed sites either side of the Cranborne Road would have been shown to have low landscape capacity and would have been discounted as was Stone Park. As a consequence I believe that land in the Eastern Area of Search would have been brought into play and a proposal to enhance Colehill’s local infrastructure would have been a strong feature of the Core Strategy to

avoid coalescence with Wimborne Minster on its western extremity and provide improved facilities within the settlement. Such an approach would support the promotion of healthy communities in accordance with paragraph 69 of the NPPF.

Section 10 (pages 266 to 273) of the above referenced master plan report discusses Land Use and Infrastructure Requirements. It is interesting to note that the scale of development recommended by the consultants of circa 1000 homes in Wimborne Minster and Colehill has been increased by the Council in the Core Strategy by 30% to 1300 homes. Additionally no consideration has been given to the recommendations for a new health centre in the north, no provision in either document has been made for a new youth and community centre and no thought has been given to where the additional population will park their cars when visiting the Town Centre, if indeed they will continue to do so.

I consider the East Dorset Housing Options Master Plan report to be subjective rather than objective when considering the flaws I have found within it. I respectfully suggest that alternative proposals are put forward to replace WMC5 in the Core Strategy thus promoting Healthy Communities supported by paragraphs 69 and 70 in the NPPF. In my view alternative parcels of land put forward should be in plots of no greater than 150 homes in order that they can be more quickly completed and be better integrated into existing settlements, rather than swamping an existing community with a large development spread out over an inordinate period of time.

Appendix 1 page 1

Secretary of State
Department of Communities and Local
Government
Eland House
Bressenden Place
London
SW1E 5DU

Contact: Cllr S Flower
Extension: 2002
E-mail:
Our Reference: SF/sh
Your Reference:
Date: 26 June 2009

Dear

May I offer the Council's congratulations on your appointment as Secretary of State for Communities and Local Government and hope that the Council will have a positive dialogue with you as we have enjoyed with your predecessors.

I appreciate that you will have many major decisions to take in the next few weeks but would ask you to bear in mind particularly the issues in East Dorset when you make your determination on the Changes to the Regional Spatial Strategy. East Dorset, situated on the edge of the south west region, is under severe pressure from migration from the south east. No practicable level of housebuilding in the district is able to absorb this pressure and bring down the local level of house prices. Development proposals in the District will therefore be environmentally damaging without being able to change the tone of the local housing market.

Of the three main urban extensions to which this Council objects, those north of Wimborne and west and north of Corfe Mullen are in areas of extremely fine landscape, which we would invite you to view for yourself. There are complex issues of topography at Corfe Mullen and **traffic and flooding** at Wimborne which may be impossible to resolve satisfactorily. The proposed urban extension east and south of Ferndown is in an area of lesser landscape value, but lies in a narrow and sensitive gap between Ferndown/West Parley and northern Bournemouth, and is heavily constrained by pylon lines, traffic, noise from the airport, floodplain, a major ancient monument and nature conservation issues.

All the urban extensions proposed are in the Green Belt, and local opinion is very strong in seeking its continued protection from development.

In the whole area we have major problems in trying to offset the impact of increased housing on areas of international nature conservation importance, as we are required to do under the Habitats Regulations. The Council is not confident that it will be able to do this and this may

Appendix 1 page 2

be a fatal flaw in implementing any proposals for the urban extensions which remain in the Regional Spatial Strategy.

The Council is also aware that major urban development in the district is dependent on solutions being found to the capacity issues on the A31 Trunk Road, and understand that the very major expenditure required to overcome these will not be available before 2019.

The Council would ask you therefore to delete these proposed urban extensions when you approve the Changes and instead to require a review of the long term strategic development of the area through the refresh and roll-forward of the Regional Spatial Strategy.

I look forward to your reply with interest.

Yours sincerely

Cllr S Flower

Leader of Council

Appendix 2 page 1

Email 13th August 2013

Dear Councillor Spencer,

I have been asked to respond to your request for information on the consideration of Alternative Sites on behalf of Richard Henshaw, who is currently on leave.

By way of background, all potential development sites submitted as part of the SHLAA process were considered by Broadway Malyan, our masterplanners, as part of the main sifting exercise for sites. A report was prepared in 2010, which outlined why sites should or should not be pursued in terms of their topography, flood risk, infrastructure, landscape, sustainability etc. It can be read at <http://www.dorsetforyou.com/399964>

The Core Strategy moved forward with those sites recommended in the Broadway Malyan Report and formed the basis for the consultation which took place in the Pre-Submission Consultation in the summer of 2012.

An Alternative Sites consultation was originally planned for late summer 2012, but was not undertaken following advice from the Planning Inspectorate on 6th July 2012. The view was given that it was at the Council's discretion to undertake an Alternative Sites consultation, as the process was no longer statutory, following the introduction of the NPPF in 2012 and the revocation of the Planning Policy Statements. To hold the consultation may introduce confusion about the status of the sites, when the Councils did not support the alternative proposals.

An extract from the notes of the meeting on 6th July 2012 reads:

LOCAL PLAN ADVISORY VISIT
CHRISTCHURCH & EAST DORSET COUNCILS
CORE STRATEGY
FRIDAY 6 JULY 2012

5. Other questions

b. Alternative sites

- The Councils are considering consulting on alternative sites to cover sites put forward during consultation on pre-submission plan;
- it may be more appropriate to carry out a quick "focused consultation" on the main modifications proposed to the plan, including those additional/alternative sites which the Council intends to include (our emphasis) in the final plan, as part of the consultation on any other main modifications; otherwise there could be confusion about the status of all these sites; any Sustainability Appraisal should also be carried out before submission;
- consultation on any main modifications to be made pre-submission should be a "one-stage" process, including the final amendments to the plan, rather than involving further iterative stages of consultation;
- **the nature of any consultation should meet the Councils' SCI/protocols;**

Stephen J Pratt – Local Plan Advisory Visit Inspector 27.07.12

After this meeting, and given this advice, the view was taken to move forward with the Schedule of Proposed Changes Consultation in November 2012 with only those modifications proposed, and not to run a further round of consultation beforehand on sites which the Council did not already support in the Core Strategy. The Councils considered that to consult on sites which they did not support would cause undue confusion and potential distress to residents when they were not intending to propose such sites in the Submission document.

I hope this information is helpful to you.

Kind regards,

Sally Knott

Policy Planning Officer

Christchurch and East Dorset Councils