

**CEDC Core Strategy Examination in Public
Matters and Issues number 3**

Strategic Allocation: General Matters

Flood Risk (Under sub-headings 2 and 3).

It is the view of the Colehill Parish Council, having taken into account the relevant parts of the Core Strategy and both historic and documentary evidence for the area that insufficient examination has taken place of the potential for flooding and the protection of ground water sources under Section 8 of the Strategy.

We can find no evidence that the District Council has undertaken flood risk sequential testing for any of the strategic allocations in those cases where it would appear to be appropriate to do so. It is particularly of issue in relation to the New Neighbourhood referred to as WMC5 and as a consequence we believe that the plans as outlined for that site fail to comply with NPPF policy paragraphs 100 & 101.

It is the Council's contention that the application of Policy ME6 is an absolute requirement before submitting propositions for strategic allocation. It would seem that had there been an Alternative Site consultation in accordance with the Statement of Community Involvement (SD25) other sites would, in flood risk terms especially, have proved to be more suitable for the needs of the area.

Reports on the Flood Risk issue have indicated on a number of occasions that development to the North of Wimborne has the potential to increase the risk of flooding considerably and much of it is a recognised Groundwater Protection Zone. Referring to the SFRA Level 1 Executive Summary (ED3) flooding is not just confined to fluvial or coastal causes, other sources such as surface water, groundwater and sewers play a significant part in increasing the risk. In fact Halcrow give greater strength to this argument when considering the effects of climate change. (Page 5 - paragraph 1.4.4)

Being aware that the area to the North of Wimborne has the potential to lead to an increased risk of flooding through development and is recognised as a Ground Water Protection Zone it is surprising that Halcrow, who work closely with the Environment Agency, have not recommended that a Water Cycle Study be carried out in the Wimborne and Colehill area. (see Appendix 1)

All of this is also so close to the River Allen, a chalk stream of considerable local and national importance which would be destroyed by contaminated groundwater or runoff. Such important streams, once lost, cannot be re-instated.

Appendix 2 makes it clear that the proposed New Neighbourhood will be sited directly on the Ground Water Protection Zones with the potential for water pollution in contravention of NPPF 109.

Appendix 3 identifies water courses via culverts in Cranborne Road, Walford Close and Wimborne Road ultimately leading to the River Allen. December 2012 saw the River Allen at its highest for many years and the tendency for the area to be flooded or at least over saturated has been increasingly common in recent years. The fields and watercourses adjacent to the River Allen leading

from above Walford Mill to the bridge at Elizabeth Road and the adjacent playing fields of Allenborne School were flooded for several weeks.(see Figures 1 to 4) In addition the culvert in Walford Close was full to the brim and only just able to cope with run-off from the hill to the East side of the Cranborne Road where development is proposed.(see Figure 5) Because the water table is high in this area and conventional soak ways cause localised flooding some properties in this vicinity have rainwater from their roofs directed into the sewage system causing temporary overload of sewage drainage. (see Figure 6)

The rain water run-off to the East of the Cranborne Road and from Burts Hill is therefore a major component when considering the effects of climate change on rising levels of the River Allen that will have catastrophic consequences downstream in Wimborne Minster. It is primarily because of its elevation and its clay sub-soil that the East is the main catchment area for the Inner Zone of the Groundwater Protection Zone in the West.

All of this is on the basis of existing building. The potential for regular flooding and the contamination of the chalk stream from development on the proposed site particularly with the eastern side being built on a west facing slope should be obvious.

The kind of scenario that can be envisaged from flooding being caused by the New Neighbourhood site is also inevitably going to have an impact on the main town of Wimborne itself where much is low lying. The council would argue that such a situation would be in contravention of the East Dorset Supplementary Planning Guidance 2005 for Flood Risk, Groundwater and Sustainable Drainage (ED14) and consequently also NPPF 102.

In short we would argue that strategic locations, especially WMC5, have not been subjected to sequential and, where appropriate, exceptions tests.


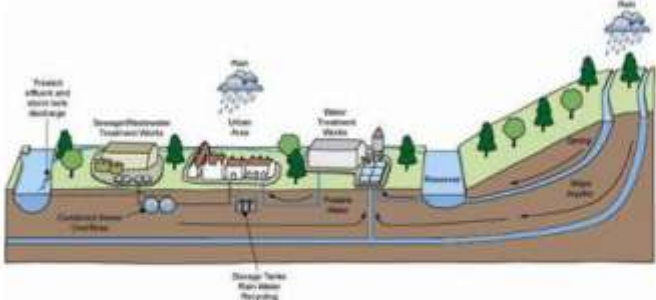

We would further argue that there does not exist for each site allocation, a site specific flood risk assessment to demonstrate the safety of such a development throughout its lifetime that is adequately relevant to the site and, perhaps even more importantly, to the question of consequential flood risk elsewhere.



It is perhaps also important to point out that any flood risk not only impacts upon the town and its residents but also on the ecology and biodiversity of the area.

The Parish Council also refers to the proposals for the development of the site referred to as WMC6. It has already been made clear in our submissions that in principal the Council does not oppose the overall objectives save perhaps for the sheer scale of building which once again we believe to be too extensive.

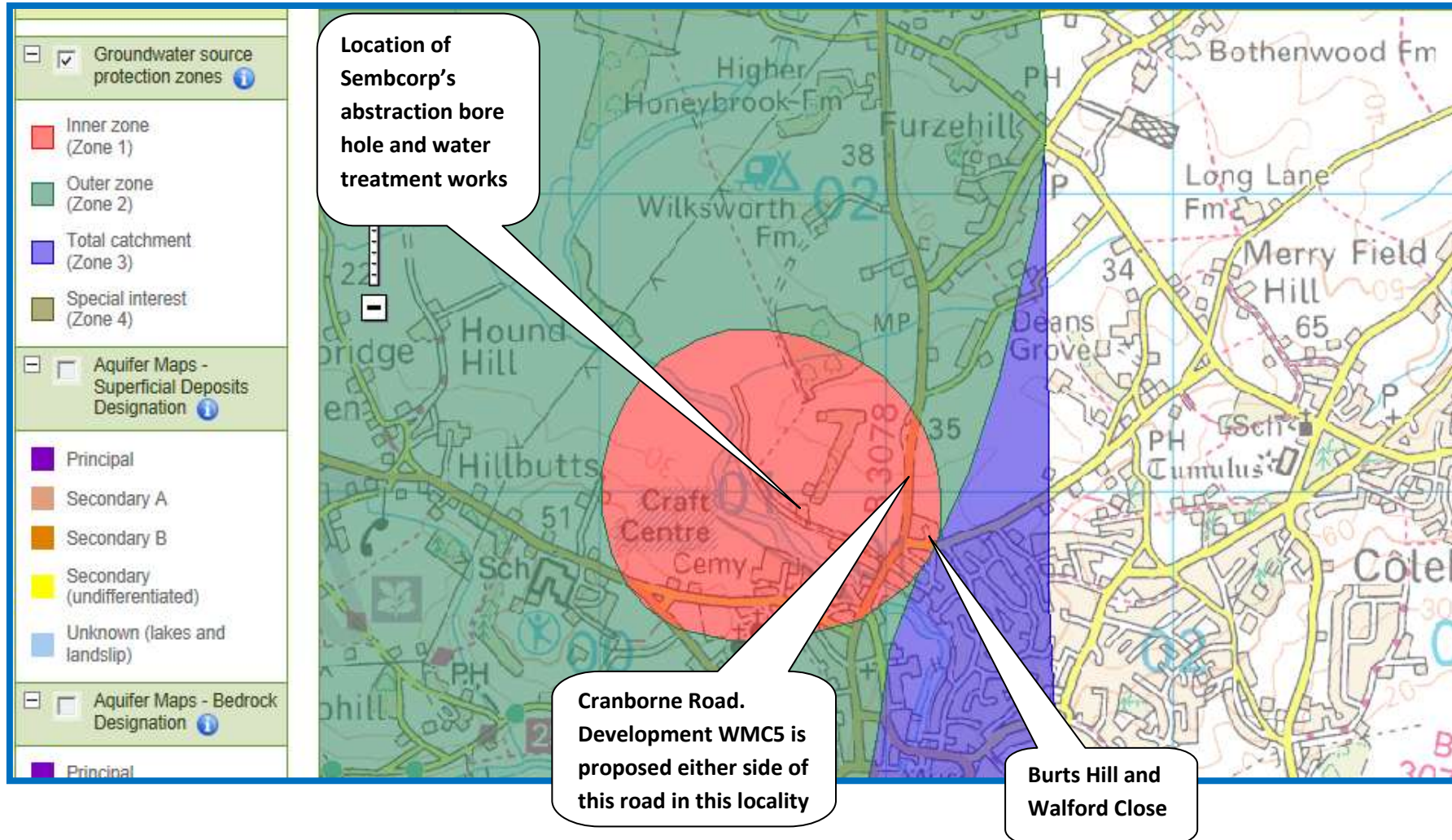
This is a low lying site. It too is prone to some flooding bounded as it is to the south by the A31. There needs to be proper assessment made of this area for flood risk and the proper way to attenuate risk allowing for the perceived changes in climate that could well see much higher rainfall, particularly in the south of England. The 'Sports Village' proposal for this site implies the need for year round access. That requires a certainty that flood risk has been obviated.

It is also vital that the construction of such a sporting facility with a number of hard surface areas does not create an increased flood risk to the residential areas already at Brookside and Parmiter but also the proposed new homes on that same site.

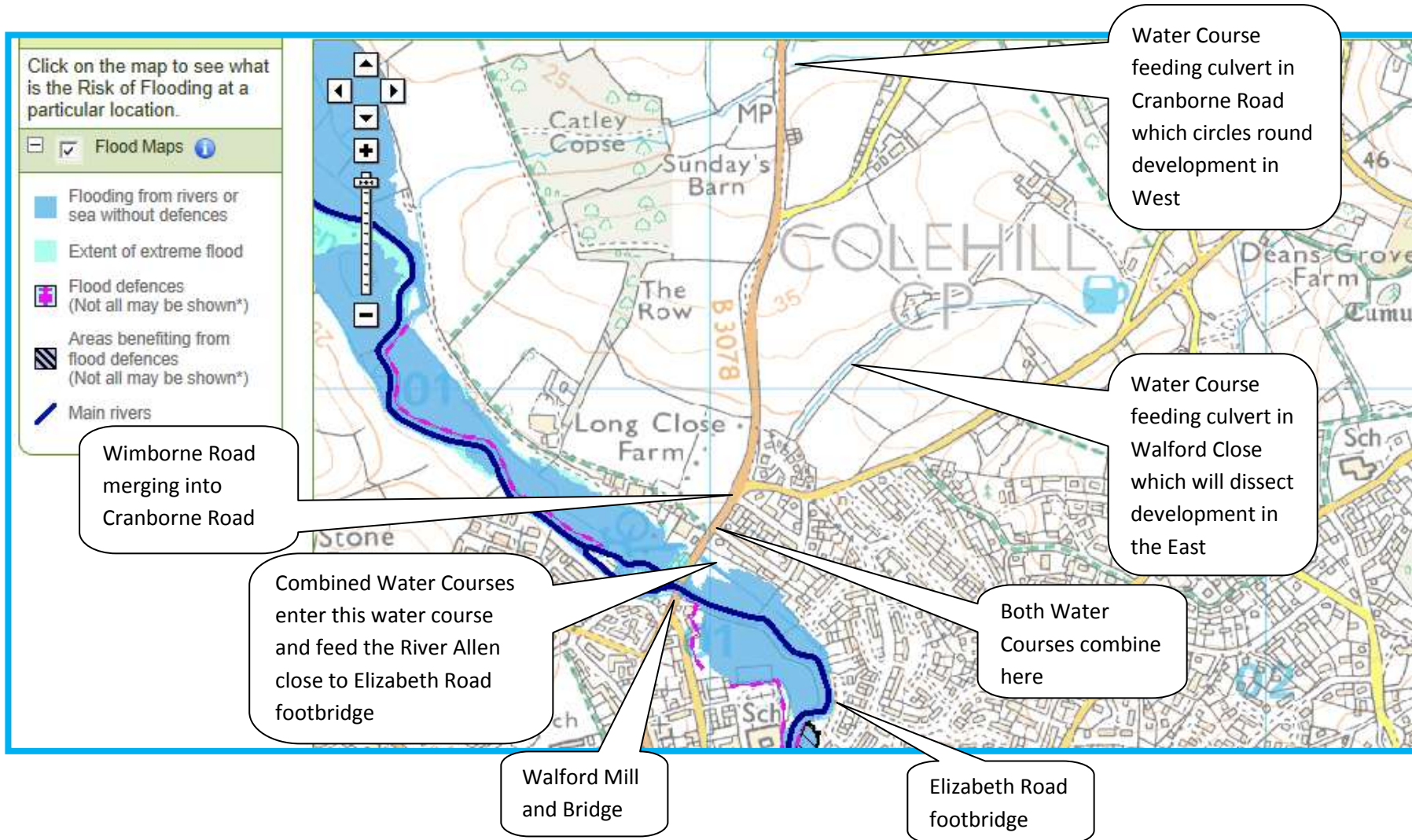
	What is water cycle planning?	How do I carry out a water cycle study?			FAQ	Glossary and sources of information
		Scoping study	Outline study	detailed study		
IN THIS SECTION		The water cycle				
Introduction What is a water cycle study? Water cycle planning policy Why is a water cycle study needed? How do we make development sustainable? What is the water cycle? When is a water cycle study needed? Integration with other plans and policies		<p>Water cycle processes</p> <p>The water cycle includes the processes and systems that collect, store, or transport water in the environment. Water cycle processes are both above and below ground level, and can be either natural or man-made. In an undeveloped area, the water cycle includes rainfall landing on the ground, where it is either transferred into above ground streams, rivers, wetlands, floodplains, and estuaries to the sea, or is absorbed into the soil, ending up in groundwater storage aquifers. The cycle is completed by evaporation from these systems back into the atmosphere.</p> <p>In a developed area, the natural processes and systems are sometimes adapted for development or public health reasons. For example, water is taken from rivers, treated, and piped via water supply systems into urban areas. Wastewater produced by houses is collected in a below ground sewerage system, where it is transported to a wastewater treatment works before being discharged to the sea, rivers or to groundwater.</p> <p>The natural processes are extremely important for wildlife and ecology, and even man made systems can have biodiversity and wildlife interest. It is important that when building new homes, or even redeveloping existing areas we understand the impact on the natural environment.</p> 				
OTHER SECTIONS		<p>Green infrastructure planning</p> <p>A strategy to manage important wildlife and recreation land is a major component of any sustainable development. We refer to these areas as green infrastructure, which comprise a wide range of linked existing and new green spaces and similar environmental assets, both public and private. Along with key roles in protecting biodiversity and providing for recreation, a green infrastructure performs an essential role in the protection and management of natural resources, including air quality, soils and especially the storage and drainage of water.</p> <p>Major parts of the natural hydrological system for a given area, notably rivers and their corridors and floodplains, should be prominent parts of any strategically planned, managed and protected green infrastructure. This is especially important in an urban context where undeveloped green spaces and fully functional water courses are needed to absorb the run off from buildings and roads, prevent flooding and maintain the water table beneath the settlement at an optimum level.</p> <p>It is therefore vital that water cycle studies integrate with green infrastructure strategies where they exist. Where they do not exist, it is important that the WCS is carried with full regard to existing green infrastructure, and that it identifies opportunities to expand and strengthen the capacity of a green infrastructure network to underpin water management whilst also delivering other environmental and social benefits.</p>				
<p>Further information</p> <p>Water Cycle Management for New Developments (WaND) is a collection of guidance and tools that helps stakeholders sustainably masterplan new developments.</p> <p>Green infrastructure planning guidance</p> <p>Examples of green infrastructure planning</p> 						
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	What is water cycle planning?	How do I carry out a water cycle study?			FAQ	Glossary and sources of information
		Scoping study	Outline study	detailed study		
IN THIS SECTION		Our impact on the water cycle				
<p>Introduction</p> <p>What is a water cycle study?</p> <p>Water cycle planning policy</p> <p>Why is a water cycle study needed?</p> <p>How do we make development sustainable?</p> <p>What is the water cycle?</p> <p>When is a water cycle study needed?</p> <p>Integration with other plans and policies</p>		<p>The water that we drink is abstracted from rivers and from aquifers and then treated to a very high standard before entering our water supply systems.</p> <p>As population and demand for water grows, more water is taken from the environment, and this can have a significant impact on biodiversity, and on the recreational value of the water environment. Additionally, more energy is used to treat and transport the water as demand increases. Once it reaches the household, water is used in many different ways, including washing, flushing toilets, drinking and cooking before, discharging it into our drains.</p> <p>Our wastewater drains into the foul or wastewater network, from where it flows to wastewater treatment works (WwTWs) via sewers and pumping stations, again often using energy. At the WwTW, the waste is treated to a high standard to remove pollutants and discharged to our rivers and seas.</p> <p>The more water that is treated at a WwTW, the greater the potential impact of the treated wastewater discharged on the receiving watercourses. This in turn requires higher levels of treatment at the WwTWs to prevent further environmental deterioration, using additional energy and chemicals. Furthermore, increased flows from WwTW can also increase the risk of river flooding downstream of the works.</p> <p>Sustainable water cycle planning policies, water cycle management for new developments and green infrastructure planning can help ensure that development locations and water infrastructure not only prevent the deterioration of the water cycle environment, but actively improve it.</p> <p>Click here for more information and examples</p>				
OTHER SECTIONS						
<ol style="list-style-type: none"> 1. WHAT IS WATER CYCLE PLANNING? 2. HOW DO I CARRY OUT A WCS? 3. SUPPORTING TECHNICAL INFORMATION 4. FREQUENTLY ASKED QUESTIONS (FAQ) 5. CASE STUDIES & TOOLS 6. DATA SOURCES 7. GLOSSARY 						
<p>Further information</p> <p>Green infrastructure planning</p> <p>Examples of sustainable water cycle management in practice</p>						

Screen Print of the Environment Agency Web Site
showing Groundwater Source Protection Zones to the North of Wimborne
and relative to the development WMC5.



Screen Print of the Environment Agency Web Site
showing 2 Water Courses to the North of Wimborne
relative to the development at WMC5 which feed into the River Allen.



Flood Risk (Under sub-headings 2 and 3).

Appendix 3 (all images also provided in A4 format)

The River Allen in Flood (photos taken 30th December 2012)



Figure 1 - West Face of Walford Bridge



Figure 2 – Riverside Walk adjacent to Allenborne School Playing Fields



Figure 3 – The Allen and its Water Courses Combine at Elizabeth Road Footbridge



Figure 4 – Riverside Walk towards the Allendale Centre from Elizabeth Road

Culvert & Water Course – 6 Walford Close
(photo taken on 31st December 2012)



Figure 5 – Reservoir at capacity feeding 600mm Culvert Pipe at end of Water Course

Sewage Drain overload in Burts Hill
(snapshot of video taken 22nd December 2012)

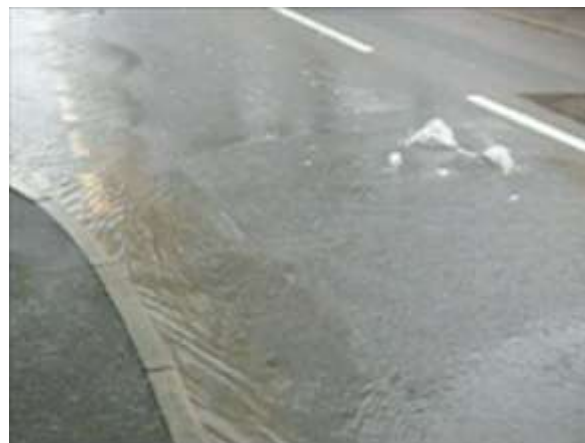


Figure 6 – “Geyser” from Foul Water Drain in Burts Hill