

Christchurch and East Dorset Core Strategy – Examination in Public

Matter 3 –Strategic Allocations

Statement on behalf of
Meyrick Estate Management Ltd (360382)

Prepared by Jackson Planning (521508)

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Matter 3 –Strategic Allocations

1. This statement is made on behalf of Meyrick Estate Management Ltd (MEM) (Rep 360382) in response to the matters and issues to augment evidence provided in the statements and technical reports made at pre submission and proposed modification stage. This statement considers the questions raised by the Inspector under **Matter 3** and highlights why the plan as proposed remains unsound and how modifications to the plan can make it sound. This statement is made only with regard to strategic site allocation CN2.

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

2. Although the plan is shown clearly on the proposals map, the plan does not provide a clear boundary for site CN2. This is explored in response to Matters 3 and 4 by respondent 360382.

Question2. Flood risk: has every strategic allocation been subjected to a sequential and, if appropriate, exceptions test?

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? (Ref: NPPF para 102)

3. If any proposal for development is within Flood Zone 3 an exception test is required for vulnerable development. In the case of site CN2 the site-specific flood risk assessment (SSFRA) completed by the promoter of the site confirmed that a small area of the allocated site is within Zone 3. (see JPP Consulting Structural and Civil Engineers' Report June 2012 submitted with the pre submission CS response by MEM).
4. The policy CN2 states that a flood management strategy will be prepared to address on site flood risk. CBC have not tested the capacity of the site at 45 units with the constraints including flooding and in particular flood zone 3.

- MEM have considered an alternative proposal for development based on site specific technical evidence, including the SSFRA, that confirms the larger site allocation can accommodate development which is within Flood Zones 1 and 2 only and there is ample space for flood attenuation measures that will not give rise to issues with TPO trees and the character of the conservation area. Additional evidence on this is provided in response to the Inspector's questions in Matter 4B by 360382.

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?

- Site CN2 will provide appropriate heathland mitigation with a SANG that will also serve site CNI. For clarity site CN2 and the land for SANG are in the same ownership. The SOCG with Natural England explains that capacity for 45 or 90 dwellings on site CN2 can be supported by SANG jointly provided with Roeshot SANG for site CNI.

Question 5. Do all site allocations satisfactorily address biodiversity?

- MEM commissioned an extended phase I Ecological survey by James Blake Associates (May 2012) on land south of Burton which was submitted with pre submission response to the CS. The report confirmed there was nothing that would preclude development, and concluded that it was likely that following further surveys, appropriate precautionary measures, compensation of habitats or mitigation could be designed to allow the development to proceed with minimal risk of harm to protected BAP or rare species or to local nature conservation, and that the site could be enhanced for biodiversity post development. The survey was of the larger site rather than the boundary of CN2 shown on map 6.3 in the CS.

Modifications required to make the plan sound.

- The allocation of site CN2 as currently proposed is not sound as it does not address all the technical issues with regard to its development and therefore is likely to deliver a lower capacity than anticipated in the plan. This is inconsistent with the housing needs in the

Borough and therefore does not significantly help to meet the objectively assessed housing need.

9. This statement confirms that MEM have carried out considerable technical work to support a strategic allocation of around 90 dwellings on the land south of Burton and both flood risk and biodiversity concerns have been considered and are not a constraint to development.

10. The plan should be modified to support around 90 dwellings in policy CN2 as shown in the previous submissions. This has already been tested in the Sustainability Appraisal and community consultation on this site has already taken place so there is no barrier to a modification as set out in the evidence.