

Christchurch and East Dorset Core Strategy Examination

Statement submitted by Savills on behalf of the Canford Estate and Harry J Palmer Holdings Ltd on Matter 10: Environmental Issues

Respondent reference: 523532

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Matter 10: Environmental Issues

3. Is there a strategy to avoid double counting SANG/ mitigation and payment of CIL (ME2)?

1. Heathland mitigation is an essential component of the development plan for Christchurch and East Dorset, however the extent to which it will be covered by the proposed CIL is currently unclear. The Draft Infrastructure Delivery Plan (IDP) recognises the importance of providing infrastructure to mitigate the impact of development on the Dorset Heathlands Special Protection Area and Dorset Heaths Special Area of Conservation.
2. The Dorset Heathlands Planning Framework SPD 2012-2014 currently provides a mechanism for securing developer contributions towards a range of mitigation measures in the period 2012 to 2014. The Dorset Heathlands Development Plan Document is being prepared to take forward the long term strategy for avoidance or mitigation of impacts on the Dorset Heathlands to 2026. Consultation on the Preferred Options for The Dorset Heathlands Development Plan Document took place in February this year. The proposed approach represents a combination of protection, avoidance, management and mitigation measures which include the provision of Suitable Alternative Natural Greenspace (SANGs) as a means of diverting recreational pressure from the Dorset Heathlands.
3. The Draft IDP states that to ensure that development can proceed in the area, the Councils will ensure that the appropriate proportion of CIL monies collected from development will be directed towards delivering the Dorset Heathlands mitigation projects identified in the IDP table as a priority. The IDP Schedule of Projects includes a number of specific projects for delivery between 2012 and 2014, as well as general heathland mitigation measures for delivery throughout the plan period to be identified through the Heathland SPD/DPD.
4. However the emerging Core Strategy is also seeking on-site SANGs provision by developers for settlement extension sites of more than 50 dwellings. The relationship between CIL payments and the provision of SANGs associated with strategic sites is currently unclear, but a requirement for CIL contributions towards heathland mitigation in combination with on-site SANGs provision risks overburdening strategic sites. It also

presents the risk of 'double-dipping', which the CIL Guidance makes clear is to be avoided.¹

5. The issue of heathland mitigation is critical to the delivery of new housing in the district. Clarity of approach is essential and the Core Strategy and CIL charging schedule should be based on a clear understanding of the necessary mitigation costs along with associated prioritisation of projects and funding. Measures to take account of on-site SANGs provision through the CIL Charging Schedule should be considered, this could be in the form of a differential CIL rate for strategic sites where SANGs are provided on-site, or measures to allow land provided for SANGs to be off-set against CIL liability through a payment-in-kind policy.

4. Should Policy ME2 clarify that payment of CIL would be a trigger which would allow development to commence?

6. Clarification that payment of CIL would be a trigger which would allow development to commence on sites where heathland mitigation is to be dealt with via CIL contributions would be a useful addition to Policy ME2. The policy wording should clarify that sites where SANGs are provided through legal agreements will not be required to contribute heathland mitigation through CIL.

5. Do Policies ME4 and ME5 set local requirements in a way which is consistent with paragraph 95 of the NPPF?

7. The second sentence of Policy ME4 states that '*Schemes that meet higher standards will be considered more favourably.*' It is unclear how this will be applied in practice, it also implies that schemes that meet lower standards will be considered less favourably. This is not considered a sound or reasonable approach. The second sentence of Policy ME4 should be deleted.
8. The second and third paragraphs of Policy ME5 are inconsistent with paragraph 95 of the National Planning Policy Framework, which advises that any local requirement should be consistent with national standards. Development that meets high standards of energy use by energy efficiency improvements should be given equal encouragement, allowing the developer the flexibility to select the most appropriate solution for the site.

¹ Paragraph 85

7. Do the SANG guidelines:

- **Provide clear and adequate guidance regarding the location and accessibility of SANG?**
- **Provide clarity regarding the quality and characteristics of SANG?**
- **Provide sufficient flexibility to allow for site specific circumstances?**

9. Greater flexibility is required within the SANG guidelines; the status of the guidance should be clear - it is guidance, not policy, and a 'one size fits all approach' should be avoided.

10. Flexibility should be provided to allow for smaller areas of land to be provided as SANGs where they perform a SANG function as part of a wider network of footpaths and open spaces. A 2.3km walk within a SANG will not always be practical or achievable, but can be accommodated by linking in with existing areas of open space and footpaths. A SANG does not necessarily need to be within 400m of a development site if it will form part of a 2.3km walk.