

# Alderholt Neighbourhood Plan 2022-2034 Submission Version: April 2024 Draft for Regulation 16 Consultation

Written representations prepared on behalf of Macra Limited





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## 1. Introduction

- 1.1 These written representations have been prepared by Nova Planning Limited on behalf of Macra Limited ('Macra') in response to the Alderholt Neighbourhood Plan 2022-2034 Submission Version for Regulation 16 Consultation ('draft Neighbourhood Plan') dated April 2024. These written representations relate to this publication of the draft Neighbourhood Plan and its supporting evidence base.
- 1.2 Macra is promoting land to the south of Daggons Road in Alderholt ('the Site'), which has previously been promoted through the earlier stages of the Neighbourhood Plan process. This has subsequently led to the Site being identified as a draft allocation, known as 'Site 006a: Paddock South of Daggons Road', for "about 15 dwellings and at least 0.2ha of employment land (falling within Use Class E or similar)", under Draft Policy 13 of the emerging Neighbourhood Plan.
- 1.3 The Site is located at the western end of the settlement of Alderholt, on the southern side of Daggons Road. It is broadly rectangular in shape and extends to approximately 1ha in area, located immediately to the west of Alderholt Motors. It rises gently to the west and comprises a paddock which has most recently been used for horse grazing. There is an existing field gate access to the Site located centrally along the Daggons Road frontage. The Site's boundaries comprise existing trees and hedgerows.
- 1.4 In promoting the Site for future development, Macra has commissioned a Testing Layout for a proposed mixed-use residential and commercial development. An extract of the draft proposal is included in Figure 1 below and further details of the form and quantum of development considered deliverable on the Site are set out later in these written representations:



Figure 1 – Extract of Testing Layout for the Site

1.5 The written representations below provide comments on the details of the draft allocation of the Site, as well as comments in relation to other relevant draft Neighbourhood Plan policies.

1.6 These written representations are supported by separate technical evidence including a Proposed Site Access and Visibility Splays Plan (Drawing No. 1430-001 prepared by CDA); Proposed Site Access Swept Path Analysis Plan (Drawing No. 1430-002 prepared by CDA); Tree Constraints Plan (prepared by Barrell Tree Consultancy Reference Number 20146-1 A); and Flood Risk Note (prepared by CDA dated January 2024). These documents should be read in conjunction with these written representations and confirm the suitability of the Site to deliver the type and level of development proposed by Macra.

## 2. Neighbourhood Plan Period and Housing Need

#### Neighbourhood Plan Period

- 2.1 Macra supports the ambition of Alderholt Parish Council to prepare a Neighbourhood Plan for the settlement to guide future development and agrees with the Neighbourhood Plan progressing ahead of the emerging Dorset Local Plan which is currently not expected to be adopted until 2027.
- 2.2 Macra also supports the Parish Council's recognitition at Paragraph 1.2.13 of the draft Neighbourhood Plan that, because the Neighbourhood Plan is progressing ahead of the emerging Dorset Local Plan, it will be necessary to review the Neighbourhood Plan well before its proposed 2034 end-date, and most likely within five years of the Neighbourhood Plan being 'made'. This will ensure that that the Neighbourhood Plan is in general conformity with the strategic policies contained in the Dorset Local Plan (once adopted) and therefore that it is consistent with national policy including Paragraph 29 (Footnote 19) of the NPPF. The Parish Council's suggestion of an early review of the Neighbourhood Plan will allow for consideration of both the Local Plan housing target for Alderholt (which will not be confirmed until the expected date of adoption of the emerging Dorset Local Plan, i.e. currently 2027) and whether any further allocations in the Neighbourhood Plan may be necessary. Macra supports this approach.

#### Housing Need

- 2.3 Section 4.1 of the draft Neighbourhood Plan sets out an indicative housing target for Alderholt of 192 dwellings (16 dwellings per annum (dpa)). This is at the upper end of the identified appropriate housing target of 4 to 16 dpa, resulting from discussions between Dorset Council and the Parish Council in early 2023.
- 2.4 Further to the above, the draft Neighbourhood Plan deducts the extant housing supply from the total of 192 dwellings, comprising 89 dwellings permitted on the former Surplus Stores site on Daggons Road and 44 dwellings on the former Hawthorn Nurseries site on Ringwood Road. The draft Neighbrouhood Plan states that this leaves a remaining indicative housing target of 50 dwellings to be identified (albeit 192 dwellings 89 dwelling 44 dwellings = 59 dwellings remaining). The draft Neighbouhood Plan identifies three draft housing allocations to meet this remaining indicative housing target, as follows:
  - Draft Policy 12: Alderholt Nursery, East of Ringwood Road (Site 002) = about 20 dwellings.
  - Draft Policy 13: Paddock South of Daggons Road (Site 006a) = about 15 dwellings (Site controlled by Macra).
  - Draft Policy 14: Land South of Blackwater Grove (Site 009) = about 15-20 dwellings. Total draft housing allocations = about 50-55 dwellings.
- 2.5 In response to the three draft housing allocations, Macra wishes to make two points. Firstly, evidence has previously been submitted, and is provided again in support of these current written representations (see Section 3.0 below), to confirm that the Site has capacity to accommodate up to 20 dwellings (together with the proposed employment land also identified as part of the draft allocation). It is therefore considered that the wording of Draft Policy 13 of the Neighbourhood Plan (which relates to Macra's Site) should be consistent with the wording of Draft Policy 14 relating to Land South of Blackwater Grove, which provides a range of 15-20 dwellings for this allocation. As well as ensuring consistency between the allocations, this amendment will allow flexibility in how the indicative housing target for Alderholt is achieved, as well as more accurately reflecting the actual indicative housing target of 59 dwellings (not 50 dwellings). If the quantum of development identified for the Site is amended in Draft Policy 13 to

"about 15-20 dwellings", the actual indicative housing target for Alderholt of 59 dwellings can be met as follows:

- Draft Policy 12: Alderholt Nursery, East of Ringwood Road (Site 002) = about 20 dwellings.
- Draft Policy 13: Paddock South of Daggons Road (Site 006a) = about 15-20 dwellings (*Site controlled by Macra*).
- Draft Policy 14: Land South of Blackwater Grove (Site 009) = about 15-20 dwellings.
   Total draft housing allocations = about 50-60 dwellings.
- 2.6 In addition to the above, the Government's PPG provides advice at Paragraph 009 (Reference ID 41-009-20190509; Revision Date 09.05.2019) in relation to Neighbourhood Plans coming forward before an up-to-date Local Plan or Spatial Development Strategy is in place (as will be the case with the Alderholt Neighbourhood Plan ahead of the emerging Dorset Local Plan) and states the following:

"Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its local plan (or, where applicable, a spatial development strategy is being prepared by an elected Mayor or combined authority).

A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.

Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- the emerging neighbourhood plan
- the emerging local plan (or spatial development strategy)
- the adopted development plan

with appropriate regard to national policy and guidance.

The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan."

2.7 The above Planning Practice Guidance advice provides further justification in support of the draft Neighbourhood Plan identifying sufficient site allocations to meet the upper end of its indicative housing target as a minimum (i.e. the "about 50-60 dwellings" suggested by Macra in Paragraph 2.5 above), including amending Draft Policy 13 to identify the Site for "about 15-20 dwellings". Section 3.0 below provides confirmation that the Site can accommodate the suggested increased range of 15-20 dwellings.

- 2.8 This approach will ensure that the draft Neighbourhood Plan sets out a housing land supply policy which reflects the current housing target for Alderholt provided by the Local Authority, therefore minimising any conflicts between policies in the Neighbourhood Plan and those in the emerging Local Plan and contributing to the achievement of sustainable development, all of which is consistent with the above advice set out in the Government's PPG.
- 2.9 Identifying a sufficient supply to meet the actual indicative housing target of 59 dwellings stated in the draft Neighbourhood Plan will ensure that it is not starting on a surpressed basis, which will be especially important if there is a future need to extend the Neighbourhood Plan period to reflect the emerging Local Plan (see Paragraph 2.2 above) and consequently meet an increased housing requirement to reflect this.

## 3. Draft Policy 13: Paddock South of Daggons Road

- 3.1 Draft Policy 13 relates to the land controlled by Macra and allocates the Site for the development of "about 15 dwellings and at least 0.2ha of employment land (falling within Use Class E or similar)".
- 3.2 For the reasons set out in Section 2.0 above, it is suggested that the wording of Draft Policy 13 should be amended to instead refer to "about 15-20 dwellings…"
- 3.3 An extract of Macra's Testing Layout for the Site is provided at Figure 1 above, and shows an indicative development of 20 dwellings (including a mix of 1 and 2-bedroom flats and 3 and 4-bedroom houses), together with employment land. A full copy of this Testing Layout (Drawing No. P23-1004\_DE\_003\_A\_01 prepared by Pegasus Group) is also submitted as part of these written representations.
- 3.4 The Testing Layout has been informed by initial technical work for the Site, copies of which are submitted with these written representations, including:
  - Proposed Site Access and Visibility Splays Plan (Drawing No. 1430-001 prepared by CDA);
  - Proposed Site Access Swept Path Analysis Plan (Drawing No. 1430-002 prepared by CDA);
  - Flood Risk Note (prepared by CDA dated January 2024); and
  - A Tree Constraints Plan (prepared by Barrell Tree Consultancy Reference Number 20146-1 A).

#### Vehicular Access

- 3.5 The Proposed Site Access and Visibility Splays Plan (Drawing No. 1430-001 prepared by CDA) submitted with these written representations has been discussed with Dorset Council (as the Local Highway Authority) as part of a Highways pre-application enquiry in 2021. The drawing confirms that the proposed Site access will comprise a simple priority T-junction from Daggons Road (consistent with Draft Policy 13), with a 6.0m radii leading into a 5.0-metre-wide internal road built to adoptable standards. The proposed visibility splays of 2.4m x 59m are designed for a 37mph speed on Daggons Road (informed by traffic speed surveys).
- 3.6 The Proposed Site Access Swept Path Analysis Plan (Drawing No. 1430-002 prepared by CDA) submitted with these written representations confirms that the proposed access arrangement for the Site is appropriate for refuse vehicles and sufficient space is available within the Site to allow a refuse vehicle to turn and exit in a forward gear. This also demonstrates that the Site is also suitable to accommodate large vehicles associated with an employment use.
- 3.7 The submitted access drawings confirm that the proposed development can provide a continuous footway with acceptable widths, connecting from the proposed Site access to the existing footway to the east on the south side of Daggons Road and providing pedestrian access into Alderholt. This is consistent with the provisions of Draft Policy 13.
- 3.8 The Testing Layout includes a potential pedestrian link to the northern boundary of the Site opposite Footpath E34/41 on the northern side of Daggons Road. The Testing Layout also include a proposed pedestrian footpath to the south-east boundary of the Site, to create the option for a future link towards the disused railway line to the south. Both potential pedestrian links accord with the provisions of Draft Policy 13.
- 3.9 The submitted access drawings and Testing Layout therefore confirm that the Site can accommodate the proposed development of 15-20 dwellings together with at least 0.2ha of employment land.

#### Trees

- 3.10 The supporting Tree Constraints Plan confirms the location and categorisation of the existing trees on the Site which are primarily located around its boundaries, together with the associated development constraints in relation to their root protection areas (RPAs) and canopies. Together, this information confirms the developable area of the Site.
- 3.11 The proposed Testing Layout for the Site has been designed to incorporate the details of the Tree Constraints Plan, with all Category A and B trees retained and all built form located outside of their RPAs / canopies. The Testing Layout requires the removal of only 1no. Category C tree which is acceptable. This is consistent with the provisions of Draft Policy 13 which refers to mature trees and hedgerows along the site boundaries being retained "as far as practicable".
- 3.12 The Tree Constraints Plan and Testing Layout confirm that the Site can accommodate the proposed development of 15-20 dwellings together with at least 0.2ha of employment land.

#### Location of Employment Land

- 3.13 The wording of Draft Policy 13 suggests that the employment land to be provided on the Site should be located on the Daggons Road frontage (in line with Draft Policy 8 which is discussed in more detail in Section 4.0 of these written representations below). Draft Policy 13 also refers to the employment land on the Site including the area adjoining garage site, therefore implying that the employment land should be located on the eastern side of the Site. Draft Policy 13 also highlights that where the proposed development adjoins Daggons Road, the design, mix and layout should recognise the importance of this frontage as an entrance to the village and therefore critical to establishing its character.
- 3.14 The latter requirement of Draft Policy 13 referred to above is arguably at odds with the others, in terms of the aspiration for any development of the Site to preserve the importance of the entrance to the village and its character whilst also locating the proposed employment land along this frontage. Instead, the proposed Testing Layout represents an appropriate design response for the Site. It locates the employment land in the eastern part of the Site, incorporating the eastern end of the frontage with Daggons Road and located adjacent to the garage site to the east (as suggested by Draft Policy 13). This design approach ensures the proposed employment use on the Site has a frontage with Daggons Road and is located adjacent to the proposed Site access, but at the same time preserves the existing verdant character of the remainder of the Daggons Road frontage and its contribution to the entrance to the village from the west by providing dwellings fronting the street but set behind the existing retained trees, green space and footpaths. This design approach is also consistent with Draft Policy 6 of the emerging Neighbourhood Plan which states that "development on the edge of the settlement should provide a soft, landscaped transition between the built-up area and countryside." The proposed allocation of the Site for development in the emerging Neighbourhood Plan and associated proposed extension of the settlement boundary to incorporate the Site (as shown on Draft Map 10) will result in it forming part of the western extent of the village, with countryside beyond the immediately adjoining dwelling to the west.
- 3.15 The wording of Draft Policy 13 should therefore be amended to allow for some flexibility in the location of the employment land on the Site, to better reflect the remaining wording of the draft policy as summarised above. Rather than stating *"the location of employment areas should be on the road frontage ..."* (arguably implying that the employment land should be located in the northern part of the site stretching along the Daggons Road frontage), Draft Policy 13 should be amended to state *"the location of the employment areas should be in the eastern part of the site adjacent to the adjoining garage site and including the eastern end of the Daggons Road frontage..."* This will allow for the creation of a cluster of employment uses also including The Churchill Arms public house on the opposite site of Daggons Road.

#### Other Matters

- 3.16 As required by Draft Policy 13, comprehensive information will be submitted in support of the proposed development of the Site including a Flood Risk Assessment, Drainage Strategy, landscaping and biodiversity details.
- 3.17 At this stage, a Flood Risk Note has been prepared by CDA (dated January 2024) and is submitted in support of these written representations. The Flood Risk Note confirms that the Site is in Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources. The Site is underlain by Parkstone Sand Formation such that infiltration is not suitable. It is expected that a surface water drainage strategy utilising positive discharge from the Site will result in betterment in terms of flood risk both on and off the site. Foul flows will be discharged via gravity sewer and connected into an existing chamber in Daggons Road. The proposed development is classified as 'More Vulnerable' in flood risk terms according to Annex 3 of the NPPF. In accordance with Table 2 of the NPPG, the proposed development for 15-20 dwellings plus commercial development is suitable in this location.
- 3.18 Any future planning application for the Site will also need to address Dorset Council's Local Validation Requirements in relation to any other applicable technical and policy matters which have been raised by third parties during the consultation stages of the emerging Neighbourhood Plan.

## 4. Comments on other Draft Policies

#### Draft Policy 7: Meeting Local Needs - Housing

- 4.1 Draft Policy 7 states that the overall provision of affordable housing will be guided by the requirements set out in the Local Plan. Macra is supportive of this approach and is committed to providing affordable housing as part of any future development of the Site, including a mix of tenures and sizes to be agreed with Dorset Council to address the identified need at the appropriate time. Paragraph 4.1.5 of the draft Neighbourhood Plan refers to recent viability evidence commissioned by Dorset Council suggesting that the current 50% affordable housing target (set out in Policy LN3 of the adopted Core Strategy) is unlikely to be deliverable and a more realistic affordable housing target being 35%. Macra supports the inclusion of this amended 35% affordable housing target in the emerging Dorset Local Plan (and subsequently reflected in the requirements of Draft Policy 7).
- 4.2 Draft Policy 7 also makes reference to a mix of open market dwellings being provided. The Testing Layout for the Site includes a range of 1-bed to 4-bed dwellings confirming that this can be achieved. The exact mix of dwellings to be provided as part of any future development of the Site can be agred with Dorset Council at the appropriate time.
- 4.3 Any development of the Site will also be able to accommodate accessible housing, in accordance with the provisions of Draft Policy 7 and to be agreed with Dorset Council as part of a future planning application.
- 4.4 The proposed development of the Site can also address the necessary Habitats Regulations Requirements, to be agreed with Dorset Council as part of any future planning application as appropriate.

#### Draft Policy 8: The Village "High Street"

- 4.5 Draft Policy 8 relates to land within the village envelope that fronts onto the village "High Street" (as identified on Draft Map 10) and includes the part of Daggons Road adjoining the northern boundary of the Site. Draft Policy 8 states that within this area, retail and other Class E or similar sui generis uses appropriate to a local centre are encouraged, providing that such uses would be compatible with the adjoining land uses. Therefore, the identification of the Site to include some employment land is consistent with Draft Policy 8 given that the site fronts Daggons Road (the "High Street") and is adjacent to the existing garage site to the east.
- 4.6 Draft Policy 8 suggests that development on the "High Street" should ensure an active frontage that enlivens the streetscene; enable buildings on this frontage to convert to retail or other non-residential uses appropriate to a local centre, even if they are first used for residential purposes; and ensure that suitable provision for customer parking is or can be incorporated as far as this is practicable. These three requirements seem like they could be incompatible and it is could be hard to achieve them all. The requirement for buildings to be convertible to retail or other non-residential uses in the future (but allowing them to be residential use in the first instance) will not result in an optimal design response for these dwellings and designing in customer parking (or the future space for this) is likely to compromise the soft, landscaped frontage that could otherwise be achieved.
- 4.7 For the reasons set out in response to Draft Policy 13 above, it is suggested that some flexibility needs to be added to the wording of Draft Policy 8 (and Draft Policy 13), to recognise that it may not be appropriate to apply all the design principles within Draft Policy 8 to every site fronting the "High Street". Whilst these design principles may be appropriate to "High Street" sites in the central part of the village,

they may not be equally appropriate for sites at the end of the "High Street" (such as Macra's Site) which need to deliver homes and form part of the entrance to the village from the countryside beyond.

- 4.8 As set out in response to Draft Policy 13 above, the proposed Testing Layout represents an appropriate design response for the Site which responds appropriately to its location both on the "High Street" but also forming part of the western entrance to the village. The proposed Testing Layout locates the employment land in the eastern part of the Site, incorporating the eastern end of the Daggons Road frontage and located adjacent to the existing garage site to the east (consistent with the provisions of Draft Policy 13), whilst at the same time preserving the verdant character of the remainder of the Daggons Road frontage, with dwellings fronting the street but set behind the existing retained trees, green space and footpaths.
- 4.9 Any requirement to future-proof dwellings on the Site which front Daggons Road for potential conversion to retail or other non-residential uses (as suggested by Draft Policy 8) is too prescriptive and could have a negative effect on the appearance of the Site and its contribution to the character of the entrance to the village from the west. This is because these dwellings would need to be designed with the equivalent of shop front windows and parking provision with direct access to Daggons Road. As demonsrated by the proposed Testing Layout for the Site, it is considered that the proposed development is more appropriate with a primarily landscaped frontage to Daggons Road created by dwellings fronting the street but set behind the existing retained trees, green space and footpaths. The proposed Testing Layout then includes employment land in the eastern part of the Site, forming an active frontage with Daggons Road at this end, closest to the existing development within the village and immediately adjacent to the garage.
- 4.10 Accordingly, some flexibility needs to be added to the wording of Draft Policy 8 (and Draft Policy 13) to recognise that it may not be appropriate to apply all the design principles within Draft Policy 8 to every site fronting the "High Street". It is suggested that the final paragraph of Draft Policy 8 should be amended as follows:

"Development on the road frontage within this Village High Street area should be designed consider the potential for:

- to ensure that there is an active frontage that enlivens the streetscene;

 to enable buildings on this frontage to convert to retail or other non-residential uses appropriate to a local centre, even if they are first used for residential purposes; and or

- to ensure that suitable provision for customer parking is or can to be incorporated as far as this is practicable."

## 5. Conclusion

- 5.1 In conclusion, Macra supports the allocation of the land to the South of Daggons Road under Draft Policy 13 of the emerging Alderholt Neighbourhood Plan. For the reasons set out in these written representations and supporting evidence, the Site represents a sustainable location for a mixed-use development to include residential and employment uses.
- 5.2 However, as set out above, it is suggested that the proposed allocation of Macra's Site under Draft Policy 13 should be amended to refer to the provision of "about 15-20 dwellings". It has been demonstrated within these written representations, in combination with the supporting technical evidence, that the Site can accommodate this level of residential development together with at least 0.2ha of employment land as also referred to in Draft Policy 13. Not only would this better respond to the identified residual housing needs, it would also be consistent with the wording of Draft Policy 14 of the emerging Neighbourhood Plan, which expresses the housing requirement for its associated draft allocation as a range.
- 5.3 These written representations also set out Macra's responses to other draft policies in the emerging Neighbourhood Plan where applicable, including suggesting some amendments to the wording of Draft Policy 8 to provide flexibility and recognise that it may not be appropriate to apply all of the design principles within the draft policy to every site fronting the "High Street" in Alderholt.



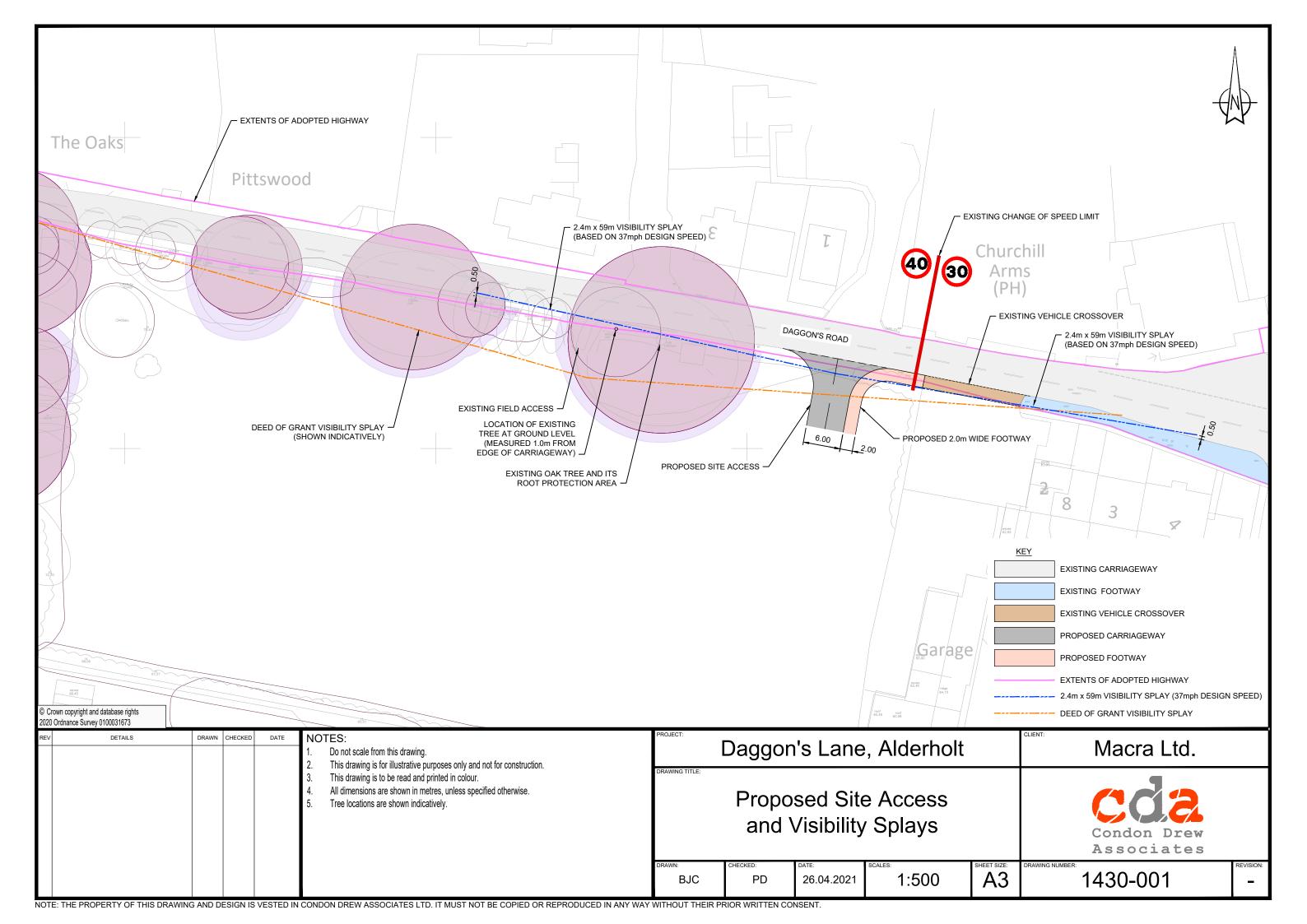
SITE BOUNDARY

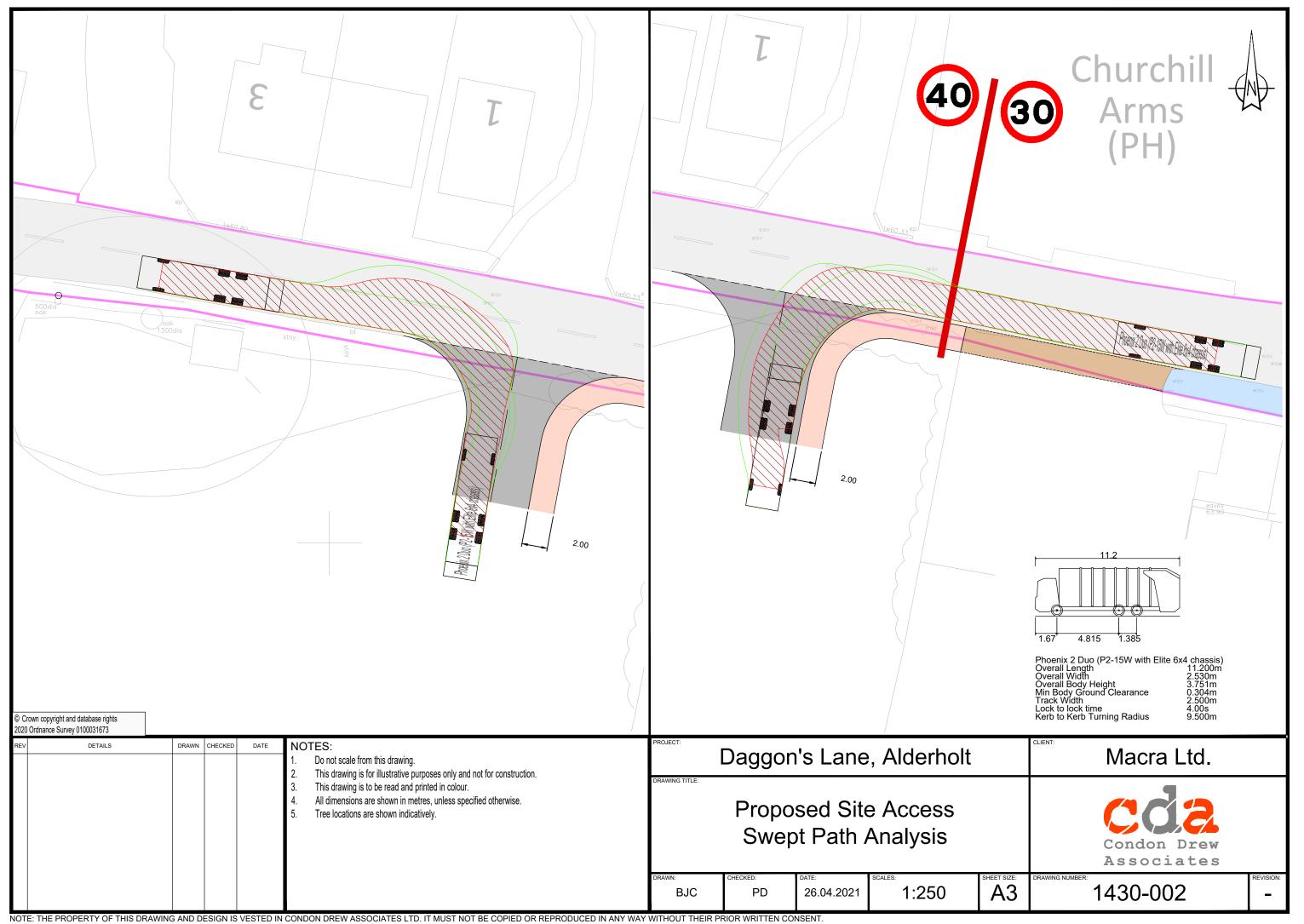
NET DEVELOPABLE AREA (0.584HA)

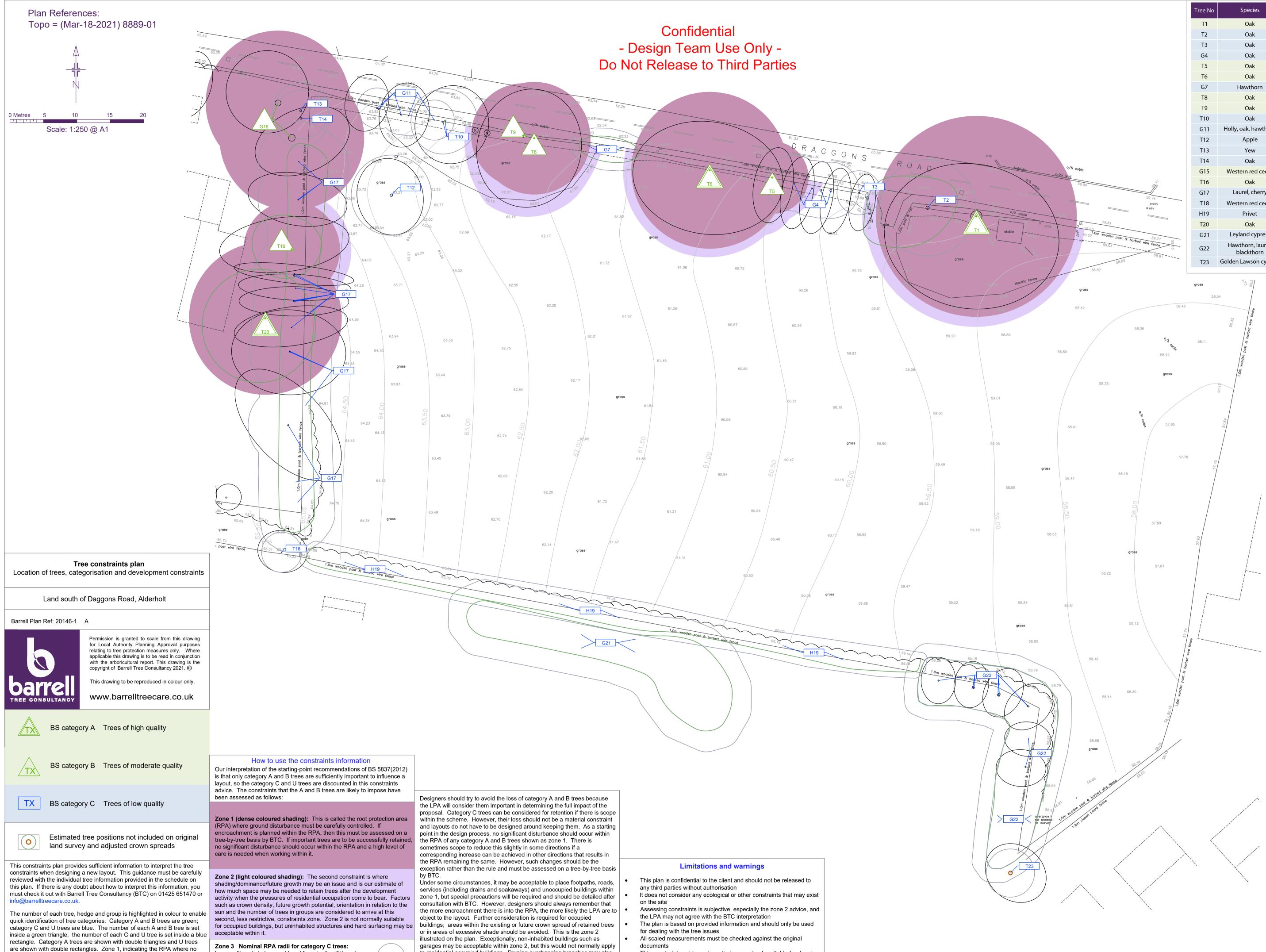
INDICATIVE NEW TREE PLANTING (SUBECT TO DETAILED LANDSCAPING PROPOSALS)

TREE RPA

Unit Type	No. Beds	Storeys	No. of Units	Sqft./unit	Total Sqft	
1BF (1B2P)	1	1 of 2	1	538	538	
1BF (1B2P)	1	1 of 2	1	624	624	
2BF (2B3P)	2	1 of 2	3	764	2,292	
3B (3B5P)	3	2	2	1001	2,002	
3B_A (3B5P)	3	2	2	1065	2,130	
3B_B (3B6P)	3	2	5	1012	5,060	
3B_C (3B6P)	3	2	1	1345	1,345	
4B (4B8P)	4	2	2	1466	2,932	
4B (4B8P)	4	2	3	1560	4,680	
		Total Units	20		21,603	sqft
		Net Developa	able Area		0.58	ha acres
					1.44	autes
		Coverage			14,970	sqft/acre
		Density			34.2	dph
RETAIL		Total Units	4		4,900	sqft







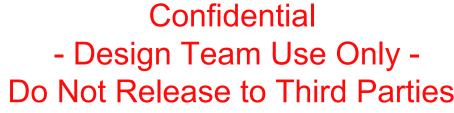
Zone 3 Nominal RPA radii for category C trees: Low quality only to be considered for retention if there is scope within the layout and they do not compromise the potential to establish new trees of higher future sustainability.

ground disturbance should occur, is annotated with dark shading. Zone 2,

is annotated with light shading.

indicating where shading, dominance and/or future growth may be an issue,

garages may be acceptable within zone 2, but this would not normally apply documents to residential occupied buildings. Pruning overhanging branches may also This constraints guidance is preliminary and only suitable for drawing be an option, but often prompts objections from LPAs. If such pruning is up initial design proposals proposed, BTC must advise on the implications. • Further consultation with BTC is essential before finalising any layout



Tree No	Species	Height (m)	Category	RPA Radius
T1	Oak	22	А	15.0
T2	Oak	8	С	7.2
Т3	Oak	8	С	3.3
G4	Oak	10	С	4.2
T5	Oak	16	В	5.4
T6	Oak	22	А	11.7
G7	Hawthorn	3	С	2.4
T8	Oak	22	В	8.4
T9	Oak	22	В	7.8
T10	Oak	11	С	4.8
G11	Holly, oak, hawthorn	6	С	3.0
T12	Apple	8	С	6.0
T13	Yew	6	С	4.2
T14	Oak	12	С	4.2
G15	Western red cedar	20	В	10.8
T16	Oak	20	В	7.2
G17	Laurel, cherry	6	С	6.0
T18	Western red cedar	6	С	3.0
H19	Privet	3	С	1.8
T20	Oak	25	А	11.4
G21	Leyland cypress	15	С	6.0
G22	Hawthorn, laurel, blackthorn	5	С	4.2
T23	Golden Lawson cypress	б	С	3.6
grass	58.9 58.9			



DAGGONS ROAD ALDERHOLT, FORDINGBRIDGE, DORSET

## **FLOOD RISK NOTE**

**PREPARED FOR** 

# 



**33 COLSTON AVENUE** 

BRISTOL BS1 4UA

**JANUARY 2024** 

# cda

#### **DOCUMENT HISTORY**

Project Number:	1876
Project Title:	Daggons Road
Document Reference:	Flood Risk Note

Issue	Date	Prepared by	Checked by	Approved by
1	19 January 2024	JMD	MRM	MRM
Comments				
Issue 1	First Issue			

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### APPENDICES

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#### 1 INTRODUCTION

#### Brief

1.1 Condon Drew Associates Ltd. (CDA) have been appointed by Macra Ltd. (the Client) to prepare a Flood Risk Note (FRN) to support allocation of a site proposing the erection of circa 15-20 residential dwellings and additional commercial buildings. Following allocation of the site in the local plan, a full site-specific Flood Risk Assessment (FRA) will be prepared for any planning application relating to the site.

#### **Requirement for a Flood Risk Note**

- 1.2 The site is shown to be located in Flood Zone 1 on the Government Flood Map for Planning. In line with advice from The NPPF states that all developments in Flood Zone 1 larger than 1 Ha require a site-specific Flood Risk Assessment (FRA) to be completed to support any planning application. As the site area is approximately 1ha, it is proposed that an FRA be completed for any planning application.
- 1.3 Policy 13 of the Alderholt Neighbourhood Plan: 2022-2034 states:

"A comprehensive flood risk assessment will be required to understand potential risk from groundwater and inform the planning application."

1.4 Prior to completion of such an FRA for a planning application, this FRN has been produced to provide an assessment of existing flood risk to the site.

#### Purpose of the Flood Risk Note

1.5 This FRN reviews all forms of flood risk to the site as well as establishing a concept for a drainage strategy that will ensure that flood risk is not increased as a result of any development.



### 2 SITE DESCRIPTION

#### Site Location

2.1 The site is located to the south of Daggons Road some 875m west from the centre of Alderholt. To the north of the site is Daggons Road, to the east of the site is an existing garage, and to the west and south of the site is an existing residential property. The site location in its local context is shown in **Figure 2.1** below:

#### Figure 2.1: Site Location



#### Topography

2.2 A topographical survey of the site was undertaken in November 2020 and is included in **Appendix A**. From the topographical survey, it can be seen that the site falls from west to east at a relatively constant gradient of around 1 in 20 to a low point approximately midway along the eastern boundary. Levels range from approximately 64.8mAOD at the western boundary to 57.6mAOD at the eastern boundary of the site.

#### Hydrology

- 2.3 There are no watercourses on, or immediately adjacent to the Site.
- 2.4 The nearest Main River (as designated by the EA), which receives runoff from the site, is the River Avon, with its closest point 2.90km west of the site.
- 2.5 The Wessex Water assets map shows that the nearest existing foul sewers are adjacent to the



northern boundary of the site in Daggons Road. The nearest surface water sewer is approximately 40m to the east of the north eastern corner of the site. The surface water sewers within Station Road discharge into the minor watercourse north of Station Road, behind the Village Hall, via a strategic surface water sewer. This can be seen in **Appendix B.** 

#### Hydrogeology

- 2.6 According to the British Geological Survey (BGS), the site sits atop Parkstone Sand Formation as its bedrock geology. There are no recorded superficial deposits.
- 2.7 Following a review of nearby planning applications and geological information on the bedrock, infiltration is shown not to be a viable mode of surface water discharge. This has been confirmed following Infiltration Testing carried out on site.
- 2.8 It is therefore proposed to discharge surface water from the site via attenuation at a controlled discharge rate. A concept drainage strategy has been prepared for the site which will be refined for any planning application.



#### 3 FLOOD RISK

#### National Planning Policy Framework

- 3.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF was revised in July 2021 with recent revisions including added onus on using opportunities provided by new developments to reduce the causes and impacts of flooding.
- 3.2 Flooding is addressed in Section 14 'Meeting the Challenge of Climate Change, Flooding and Coastal Change' of the NPPF. Footnote 59 to the NPPF states:

A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use"

- 3.3 The Planning Practise Guidance (PPG) supports the NPPF and was also updated in August 2022.
- 3.4 The development will be located entirely within Environment Agency (EA) Flood Zone 1, an area with a low probability of flooding. Therefore, in planning terms, a residential development (vulnerability classification: More vulnerable) and associated commercial development (vulnerability classification: Less vulnerable) is appropriate.
- 3.5 Based on the vulnerability classification of the site (High for residential) the proposed development is suitable for a site in Flood Zone 1.

#### Lead Local Flood Authority Information

3.6 Dorset County Council (DCC), as the Lead Local Flood Authority (LLFA) have produced a number of guidance documents which are available on their website. The *Local Flood Risk Management Strategy* promotes the use of Sustainable Drainage Systems (SuDS), particularly in new developments

#### **Sources of Flooding**

3.7 There are a wide range of potential flooding mechanisms which can cause flooding. Each potential source of flooding is discussed individually below:



#### **Tidal Flooding**

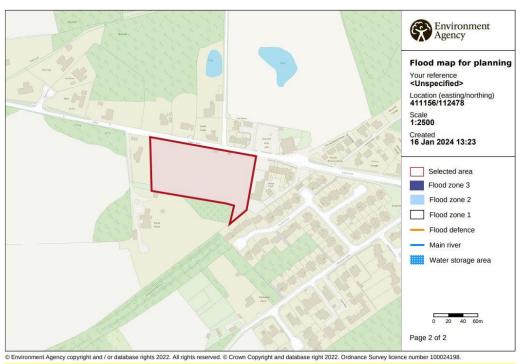
3.8 Tidal flooding occurs through inundation from the sea or estuarine waters. The Site is some 21km from the coast, and at an elevation in excess of 57mAOD. As such tidal flooding will not be discussed further in this report.

#### **Fluvial Flooding**

- 3.9 Fluvial flooding occurs through the inundation from rivers and watercourses. The siting within Flood Zone 1 indicates that the Site has a low risk of flooding from fluvial sources (<0.1% annual probability).
- 3.10 The Government Flood Map for Planning, shown in **Figure 3.1**, below, shows the site in relation to Fluvial and Tidal Flood Zones.

#### **Surface Water Flooding**

- 3.11 This form of flooding can occur during high intensity rainfall events as sheet runoff from fields or large hard paved areas.
- 3.12 The Government Flood Risk from Surface Water is shown in **Figure 3.2** overleaf. There is no flood risk shown within the site.



#### Figure 3.1: Government Flood Map for Planning





#### Figure 3.2: The Government Long Term Flood Risk Information: Surface Water Flood Risk Map

#### Sewer Flooding

High Medium Low Very low + Location you selected

3.13 Wessex Water sewer records show a public foul sewer running adjacent to the northern boundary of the site. This map is provided as **Appendix B**. There is no history of sewer flooding at this location and therefore, the flood risk associated with offsite sewers is considered low. All proposed drainage systems would be designed and constructed to adoptable standards. Therefore, the flood risk associated with the on-site drainage system is considered low.

#### **Groundwater Flooding**

- 3.14 The *Alderholt Neighbourhood Plan 2022-2034* mentions that the site may be susceptible to groundwater flooding. Anecdotal evidence also mentions that the site seems to suffer from ponding at the low end of the site (the east).
- 3.15 The Dorset Explorer is a GIS mapping service that includes planning constraints. **Figure 3.3** shows the layer Groundwater susceptibility to flooding at the site. The site is shown within the area, albeit close to the edge.





Figure 3.3: Dorset Explorer Map: Groundwater susceptibility to flooding

- 3.16 When examining the borehole logs from the site, it appears that there is a clay layer approximately 2.25m deep that separates the shallow topsoil on the site from the underlying sand. Groundwater is unlikely to penetrate the layer of clay and any standing water on the site is more likely caused from perched water on top of the clay. While infiltration testing shows that infiltration is not a viable mode of surface water discharge, even at the low end of the site, there is low potential for infiltration, meaning that over time, any water perched on the clay layer will slowly infiltrate.
- 3.17 It is expected that developing the site will decrease the presence of perched water on-site as any surface water runoff from impermeable areas will be intercepted and conveyed within a drainage system, before discharge off site. A concept drainage strategy is included as **Appendix C**.

#### Flood Risk from other Sources

3.18 There are no other sources identified as being a flood risk to the site. The Government Long term flood risk maps show the site not to be at risk of flooding from reservoirs.

#### **Summary of Flood Risk**

3.19 **Table 3.1** overleaf summarises the flood risk to the site:



Table	3.1:	Flood	Risk	Summary

Source	Probability of	Pre-Mitigation	Post-Mitigation
	Flooding	Flood Risk	Flood Risk
Tidal	-	-	-
Fluvial	<0.1% AEP	Negligible	Negligible
Pluvial	<0.1% AEP	Negligible	Negligible
Groundwater	Low/Medium	Low/Medium	Low
Reservoir Breaches	-	-	-
Sewer	Very Low	Very Low	Very Low
Other Sources	-	-	-

- 3.20 Consideration should be given to the surface water runoff from the site. A suitable surface water drainage strategy should be able to mitigate the existing flood risk to the site, whilst ensuring risk downstream is not increased.
- 3.21 The concept drainage design is based on surface water from the site being intercepted and conveyed to a storage feature within the public open space. Controlled ouflow from the site equalling the Qbar rate will then be discharged to the existing surface water sewer in Station Road.



### 4 CONCLUSIONS AND RECOMMENDATIONS

- 4.1 This Flood Risk Note has been prepared in support of site allocation for a development site at Daggons Road, Alderholt. The note has been prepared to assess flood risk to the site from all sources.
- 4.2 In summary, this note demonstrates that:
  - The site is in Flood Zone 1, which is at low risk of flooding from fluvial and tidal sources. However, the site is approximately 1Ha, and as such a site-specific FRA will be prepared to ensure compliance with planning policy.
  - Outline proposals for the application site comprise the erection of circa 15-20 new dwellings and associated commercial spaces.
  - The site is currently vacant. For the purpose of any planning application, it will be classified as greenfield in runoff calculations.
  - The proposed development is classified as 'More Vulnerable' in flood risk terms according to Annex 3 of the NPPF.
  - In accordance with Table 2 of the NPPG Flood Risk & Coastal Change, the proposed development is suitable and there is no requirement for sequential and exception tests.
  - The site is within the Groundwater susceptibility to flooding area on the Dorset Explorer, however any flooding is likely to be perched water atop a clay layer beneath the topsoil.
  - The site is not at risk of any other form of flooding.
  - The application site is underlain by Parkstone Sand Formation. Infiltration is not suitable for the site.
  - The existing Qbar rate of discharge has been calculated to be 6.1 ls<sup>-1</sup>.
  - It is expected that a surface water drainage strategy utilising positive discharge from the site will result in betterment in terms of flood risk both on and off the site.
  - Foul flows will be discharged via gravity sewer and connected into an existing chamber in Daggons Road.

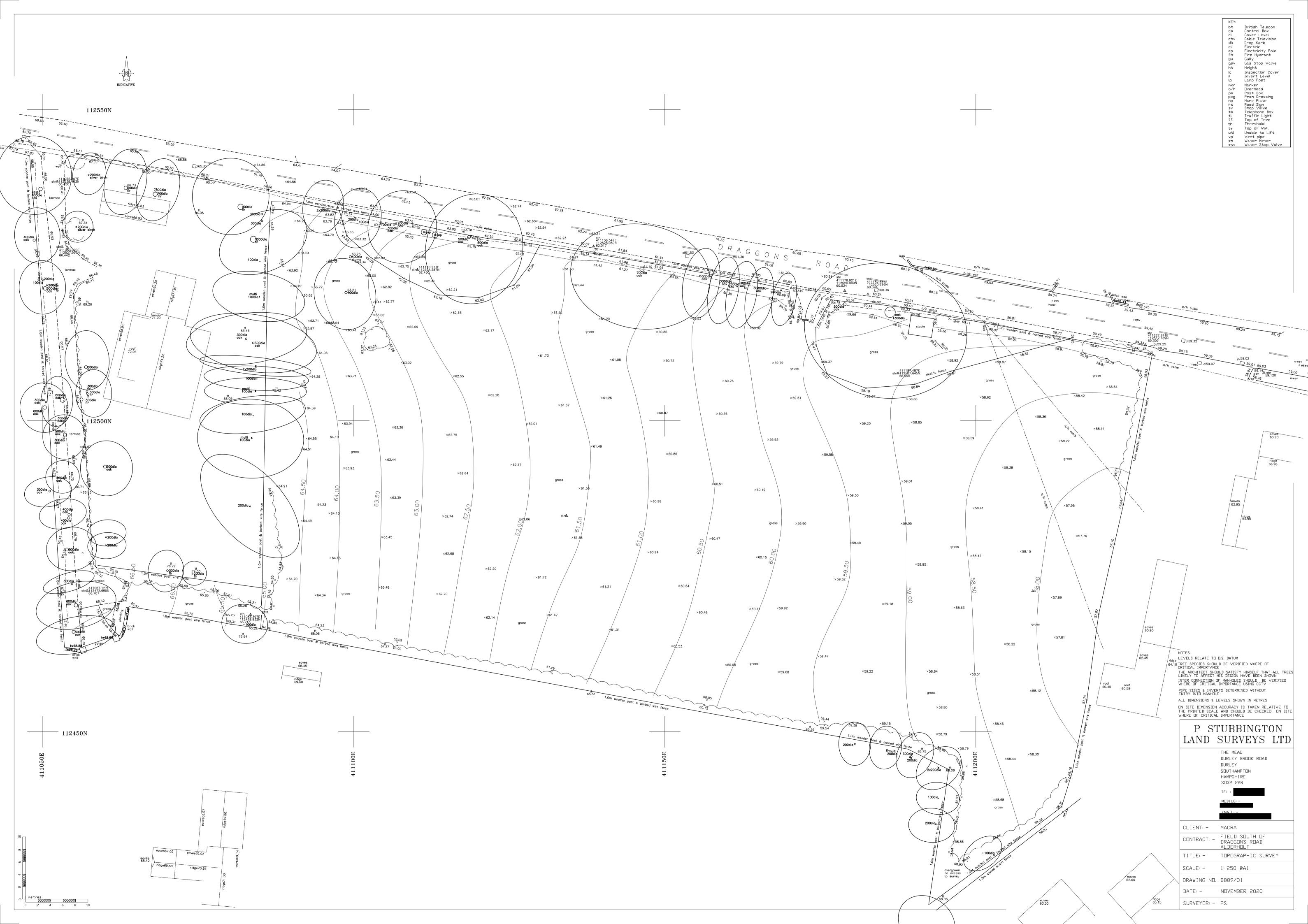


APPENDICES



## APPENDIX A

Topographical Survey

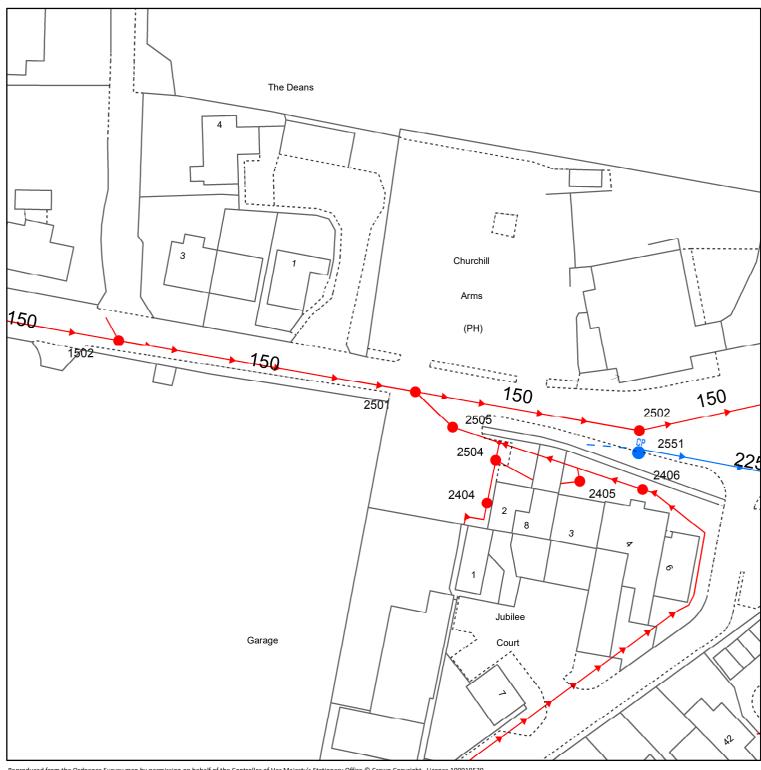




## **APPENDIX B**

Wessex Water Asset Plans

## Wessex Water Network Map



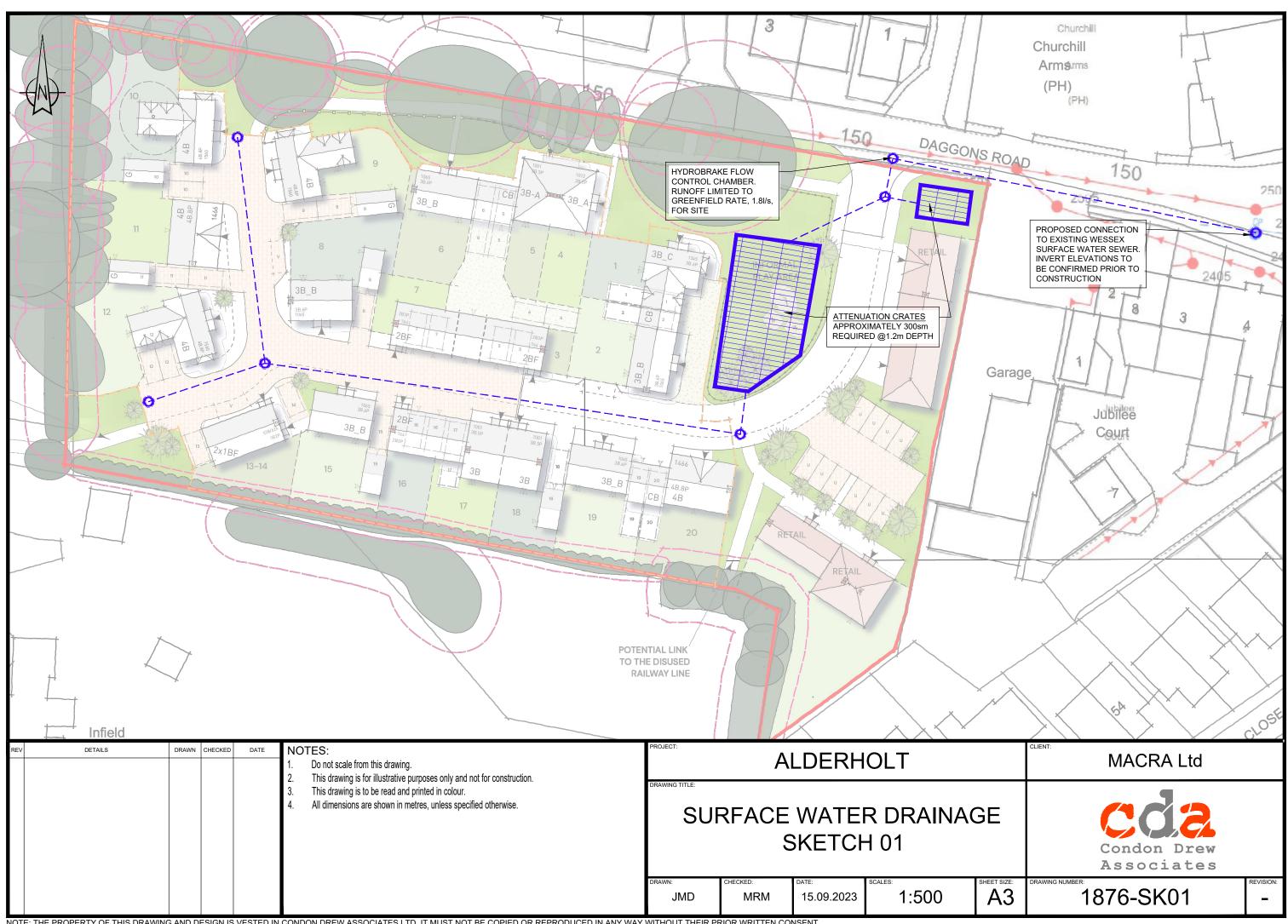
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WATER MAINS	SEWERS STRATEGIC PL	BLIC PRIVATE SECTION 104 OTH	ER WESSEX PIPES NON-WESSEX / UNKNOWN
Distribution	Foul — —	→ · · · · · · · · · · · · · · · · · · ·	Rising Mains Private Rising Mains
	Surface 🗾 🔁 —	<b>→</b> · · · · · · · · · · · · · · · · · · ·	- — Standby Rising Mains====: CW:===: Culverted Watercourse
Washout	Combined — 🗩 —	→→ · · · · · · · · · · · · · · · · · ·	DM — Effluent Disposal — H— Highway Drain
Raw Water	Abandoned —	<del> </del>	▷── Overflow ───?── Use Unknown
Abandanad	Colours generally indicate the use of t	e sewer/drain (i.e Red - Foul, Dark Blue - Surface,	-S
Abandoned	Magenta - Combined/Dual Use, Light	reen - Highway Drain, Mid Green - Overflow).	
Private	Some styles of line and symbol are sho	wn on the key in sample/typical colours.	OTHER STRUCTURES 🔲 Chamber
FITTINGS	STRUCTURES	A Pumping Station - Surface	Attenuation Tank 📃 Tunnel
	Manhole - Foul	Pumping Stn - Foul/Combined	🔄 Storage Tank 📃 Interceptor
Hydrant	<ul> <li>Manhole - Surface</li> </ul>	📩 Gully	
Other	Manhole - Combined	Vent Column	
- Other	– –) Inlet – – Outfall	Rodding Eye	
	💾 Lamphole	Catchpit	Woccox Water
	Bifurcation - Foul	Flushing Chamber	Wessex Water
	Bifurcation - Surface	🖔 Soakaway	
	📮 Bifurcation - Combined	Non Return Valve	
	Combined Sewage Overf		/ashout
		y is given or implied. The precise route of pipe work may not exactly match the Vessex Water under the Water Industry (Schemes for Adoption of Private Sev	
Regulations 2011 are to be plotted over	ime and may not yet be shown. In carrying out any v	orks, you accept liability for the cost of any repairs to Wessex Water apparatu	us damaged Contro: 111228 112511
		chanical digging equipment should not be used until pipe work has been pre- of your property or a property to be purchased (or very close by) a surveyor	
		er or near Wessex Water's apparatus you should contact the Developer Servi	ices Team. Scale: 1.625
tel: or e-mail: developer.e	nquiries@wessexwater.co.uk to discuss your proposi	s. Details of assets within Wessex Water's land ownership are unavailable the	rough this service. (when printed at A4 size)



**APPENDIX C** 

**Concept Drainage Strategy** 



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