

Matter 5 Written Statement – Dr Brian Kirkup (163PC / 101FC)

Dear Mr Kemp,

I would like to make a written submission regarding the examiners question 5.1 in regard to site selections, in this case in relation to Frisby on the Wreake. I submitted this criticism to the council and it is included in their list of comments but it has been précised to such an extent as to have lost its point.

Overall looking at the spatial strategy regarding the 35% of housing to be delivered in rural areas I think the council have fairly adhered to a 'proportionate policy' for each of the service centres and rural hubs. Looking at the latest consultation document on the white paper 'Planning for the right homes in the right places' (Sept 2017) this accords with the approach suggested by government in the allocation of houses to neighbourhood plan groups in paras 94-100.

To me table 4 does look clear, so that in Frisby's case the proportionate number of houses towards the borough requirement of 6125 houses is 72 less the 4 already built. This leaves a requirement of 68 houses and I would regard that headline number as being the number Frisby needs to provide. Obviously there has to be some give and take in this as housing developments come in varying sizes.

I have 2 objections to the approach in Frisby, one about overall numbers in the site allocations and one about site FRIS 2 which seems to have been chosen without due regard to the NPPF.

Starting with FRIS 2 first, it has 4 attendant flood risks which I list below

FRIS 2 is the 0.89 eastern end of the Water Lane site. Its flood risks based on Environment agency maps and British Geological Survey maps are,

1. Fluvial flood risk, about 33% in flood zone 2 and 67% in flood zone 1. That is on the flood risk for planning map, but the on the EA website their flood zoning maps suggest more like 50/50.
2. Surface water flooding, this shows that about 50% of the site is subject to surface water flooding and that about 90% of that flooding is at the highest risk level of likely to occur on a 1/30 yr. frequency. It is this eastern end of the site which has the most significant surface water risk.
3. Groundwater flooding, 100% of the site is subject to 'groundwater flooding likely to occur at the surface' (highest risk category, BGS map)
4. Reservoir flooding, about 60% of the site is affected by a reservoir breach with a 0-2m depth.

I think that considering NPPF guidance on flooding, particularly Paras 99-101, and the associated practice guidance (particularly paras 018-022, and 063), the council should have taken a sequential approach to this site and sought alternatives with no or lower flood risk.

There are 2 other sites in Frisby brought forward at a similar time which the council had the choice of but chose to make 'omission sites'. These sites had no flood risk and were in fact positively commented on in the SHLAA process as possible sites for future use.

The second objection is to say why when Frisby's residual requirement is 68 houses is it necessary to have this site in anyway as FRIS1 and FRIS3 combined would provide 96 houses? The principal reason looks to be that all 3 sites came forward with development plans and the council decided to promote them.

To bring you up to date with this, FRIS1 has received outline planning permission for 48 houses.

FRIS3 has received outline planning permission for 48 houses, but that is currently held up by a possible call in by the Secretary of State.

The village neighbourhood plan has proposed that site FRIS1 be extended by another 30 houses so providing 78 houses in one place. The neighbourhood plan is currently in examination,

Yours sincerely,

Dr Brian Kirkup