



Longham Village Residents Association

Working to make Longham a safe, welcoming, and vibrant village for everyone

Dorset Council Local Plan (Options Consultation 2025) Formal Objection

Submitted by: Longham Village Residents' Association (LVRA)

Contact: Kevin McNeill (Chair) Email: chair@lvra.uk or Sally Tune (Secretary) Email: secretary@lvra.uk

Plan-Stage Scope (what this objection covers)

This consultation is about whether sites should be allocated in the Local Plan. Design-level matters (for example, precise buffer widths, lighting levels, SuDS specifications and access geometry) are generally settled later at planning application stage. However, the Local Plan must still pass its own tests now: it has to be 'sound' under national policy (NPPF Dec 2024 paras 36–37) and legally compliant. This means the Council needs proportionate, up-to-date evidence and secured, deliverable mechanisms for mitigation and infrastructure at plan stage (for example, habitats mitigation, nutrient neutrality routes, strategic flood avoidance, and a funded infrastructure programme). [2][41]

Executive Summary

- LVRA objects to allocating greenfield land around Longham, Ferndown and West Parley: LA/FERN/016,029,039 (about 637 homes), LA/FERN/011,012,015 (about 325), LA/FERN/002,007,032 (about 208), LA/FERN/003 (about 60) and LA/FERN/033 (about 43), as set out in Dorset Council's 2025 consultation and Appendix A. [1]
- On the current evidence these allocations are unsound at plan stage under the NPPF (paras 36–37): not positively prepared, not justified by proportionate evidence and reasonable alternatives, not effective (deliverable with effective joint working), and not consistent with national policy. [2][41]
- Plan-stage requirements are not met on: Green Belt (paras 145–151: no exceptional circumstances; golden rules at paras 156–157), Habitats Regulations (heathland 400 m exclusion; secured mitigation for the 400 m–5 km zone; New Forest 13.8 km recreation), Poole Harbour nutrient neutrality (no plan-level, funded route), flood risk (paras 174–179: sequential approach to steer allocations from FZ2/3), protected species and biodiversity net gain (policy principles and dark corridors), heritage (great weight to significance), transport (proportionate evidence and a funded, time-bound programme so residual impacts are not severe), water-supply headroom, minerals safeguarding and overall deliverability. [2][3][4][5][6][7][8][9][10][14][16][41][42][43]
- Public benefits do not outweigh the permanent harms. LVRA requests deletion of the Longham allocations; alternatively, significant boundary pull-backs and capacity reductions; removal of land in Flood Zones 2/3 and within 400 m of heathland; identification and securing of the mitigation route (for example, SANG/SAMM) for the whole quantum; at least 10% biodiversity net gain with long-term management and dark corridors; and infrastructure-first phasing tied to fully funded highways, schools, health and bus services. [2][3][4][5][7][9][41]

Background and Sites

Longham lies within the South East Dorset Green Belt on the River Stour floodplain between Ferndown/West Parley and the Bournemouth/Poole conurbation. The settlement is centred on the A348/B3073 Longham roundabouts, with Longham Lakes immediately west and the River Stour to the south and east. Longham Lakes are bankside storage reservoirs for the public water supply, managed for water quality and wildlife with controlled access; they are not suitable as a general leisure destination for intensified recreation from large new estates. [11][12][13] The area contains

extensive hedgerows and trees, riparian grassland, and heritage assets (including Dudsbury Camp, a Scheduled Monument, and Longham House, Grade II). [6][18] Longham sits within multiple constraint zones: the 5 km Dorset Heathlands zone (with a 400 m absolute exclusion for new dwellings), the 13.8 km New Forest recreation zone, the Poole Harbour nutrient catchment, and sand and gravel Mineral Safeguarding Areas. [3][4][5][9] Highway capacity is constrained at the Longham roundabouts and along the A348; walking and cycling links are incomplete.

Longham cluster – proposed allocations summary:

Site Ref	Name	Area (ha)	Approx. homes	Green Belt	Key ecology/heath	Heritage	Flood/drainage	Access/highways
LA/FERN/016,029,039	SE of Longham roundabouts	62.7	about 637	Yes	Riparian grassland; within 5 km heath; New Forest 13.8 km; mitigation needed	Dudsbury Camp; views to church and The Manse; Hillamsland Farmhouse	About half in floodplain; Stour-side buffers needed	Longham roundabouts barrier; signals/link road mooted; bus uplift not secured
LA/FERN/011,012,015	NW of Longham roundabouts	30.56	about 325	Yes	Adjacent designated sites; part within 400 m heath; 5 km zone	Setting of scheduled barrows; near church/The Manse	Surface water pockets; discharge/outfall uncertain	Severe at Longham roundabouts; active travel missing; power line north-south
LA/FERN/002,007,032	SW of Longham roundabout	8.76	about 208	Yes	Hedgerows/trees; Longham Lakes corridor; 5 km heath	Setting of White Hart Inn (listed)	Surface-water risk; culvert/outfall/infiltration uncertain	Access from Ham Lane/Ringwood Road; roundabouts already constrained

LA/FERN/ 003	Opposite former Dudsbury Golf Course	2.91	about 60	Yes	Hedgerow s/TPOs; 5 km heath; New Forest 13.8 km; minerals	Barrow nearby (Belle View Plantation) ; possible historic trackway	No strategic flood risk identified	Cumulativ e impacts on New Road/ Parley Cross; public transport uplift needed
LA/FERN/ 033	Misty Meadows	2.91	about 43	Yes (brownfiel d)	Hedgerow s/ grassland; lakes proximity; 5 km heath; minerals	Adjacent to Longham House (Grade II)	Access road recorded as flood-liabl e; drainage solution unknown	Visibility on Ringwood Road; missing footway; access questions

The Longham cluster should be assessed alongside nearby Ferndown/Colehill sites (Ham Lane Colehill; Award/Stapehill; Canford Bottom), because combined traffic, ecological and infrastructure effects are cumulative across the A348/A31 corridors, the heathland mitigation framework and local services. [1][2][9]

1. Housing Numbers and Strategic Constraints

Before considering specific site allocations, we believe the plan’s starting point — its overall housing requirement — is itself unsound and inconsistent with national policy and local constraints.

Housing numbers and the standard method (plan-stage). We recognise that Dorset must calculate local housing need using the standard method (NPPF 62). However, the plan housing requirement must reflect binding constraints and deliverability. Given the South East Dorset Green Belt, statutory heathland protections (400m exclusion; 5km zone), River Stour flood risk, Poole Harbour nutrient neutrality obligations, and water-supply limits linked to Longham Lakes, alongside severe transport constraints at the A348/Longham roundabouts, LVRA considers that Dorset should set a requirement below the LHN and/or phase delivery to infrastructure and mitigation. This approach is consistent with PPG, which confirms the standard method does not produce the housing requirement and that plans must be justified and effective with proportionate evidence. In summary:

1. Housing targets and proportionality: CPRE Dorset analysis indicates the standard-method target for Dorset is ~80–81% above historic delivery; this should not, by itself, justify Green Belt release or allocations on heavily constrained land. [8]
2. BCP Local Plan interaction and Green Belt: BCP has withdrawn its 2024 draft and is preparing a new plan, informed by a joint South East Dorset Green Belt study with Dorset Council. Without an agreed cross-boundary growth and infrastructure strategy, Longham allocations risk compounding BCP pressures and fragmenting the Green Belt. [14] [15]
3. Statements of Common Ground and joint working: the NPPF tests of soundness require effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, evidenced by SoCGs. [41]

4. Community evidence: Longham already experiences peak-hour gridlock at the A348/B3073 roundabouts; residents report 10–15 minute queues at school times, recurrent surface-water flooding on Ham Lane/Longham Bridge, and disturbance around Longham Lakes including reports of illegal fishing.

2. Policy and Legal Framework

- Green Belt (NPPF paras 145–151): exceptional circumstances must be fully evidenced and justified to alter Green Belt boundaries through plan-making; consider brownfield/grey-belt first; boundaries should endure beyond the plan period. [2][42]
- ‘Golden Rules’ for GB housing (paras 156–157): by default a 50% affordable housing contribution applies to housing on land released from the Green Belt unless a higher local policy applies; plus infrastructure and accessible green space. [2][42]
- Dorset Heathlands: allocations must reflect the 400 m exclusion; for 400 m–5 km, the plan should evidence a secured, deliverable mitigation route (for example, SANG/SAMM/Heathland Infrastructure Projects) for the whole housing quantum. [3][21]
- New Forest SPA/SAC: Dorset’s HRA uses a 13.8 km zone of influence for recreation pressure; plan-level mitigation must be set out. [9]
- Poole Harbour nutrient neutrality: the plan should show a credible, funded neutrality route (for example, local credits/catchment projects) covering all relevant allocations. [4][5][23][24]
- Protected species: bats, badgers and hazel dormice are legally protected; policy should require retention of connected habitats and dark corridors; detailed surveys/design at application stage. [25][26][27][28][29]
- Flood risk (paras 174–179): the plan should show the sequential approach has steered allocations away from Flood Zones 2/3 unless robustly justified; detailed drainage is application stage. [2][43]
- Heritage: give great weight to conserving designated assets and their settings; any harm requires clear justification; avoid allocations where benefits would not outweigh harm. [2][20]
- Transport and delivery: plans should be backed by a proportionate evidence base and a funded, time-bound programme so residual cumulative impacts are not severe. [2]
- Minerals safeguarding: avoid sterilising safeguarded sand and gravel or set a workable prior-extraction principle. [2]

3. Ecology, Heathland and Environmental Risks

5. Heathland proximity and wildfire risk: recent Dorset wildfires at Wareham Forest and Canford Heath destroyed large areas near housing; the SPD recognises fire as an urban pressure mitigated via Heathland Infrastructure Projects. [21]
6. Artificial light at night: UK evidence shows light attracts and disrupts nocturnal migrants and affects bats; policy should secure dark corridors around rivers and heathland edges. [33][34]
7. Soil and nutrient enrichment: Natural England, JNCC and peer-reviewed studies show nitrogen deposition reduces heathland species richness; traffic and urban edge effects risk worsening this. [35][36][37][38]
8. Protected species and local observations: residents regularly see bats along hedgerows, badger activity and hazel dormice in hedgerows and woodland edges around the Longham sites; policy should require surveys by licensed ecologists and retention of connected habitats. [25][26][27][28][29]
9. Longham Lakes: as public water-supply reservoirs and an important bird site, the lakes are not a general leisure park suitable for higher visitor pressure from large estates. [11][12][13]

4. Area-Wide (Cumulative) Objections

10. Green Belt purposes would be undermined: the allocations enable urban sprawl, countryside encroachment and coalescence toward Bournemouth/Poole; exceptional circumstances are not demonstrated. [2][16][42]
11. Habitats Regulations: development within 400 m of heath is incompatible; for 400 m–5 km the plan has not evidenced a secured mitigation route to enable a lawful no adverse effect on integrity conclusion. [3]
12. New Forest recreation: no certain mitigation or monitoring is identified; cumulative visitor pressure will increase if Longham allocations proceed. [9]
13. Heathland fire risk and encirclement: estates on multiple flanks of heath increase ignition sources, reduce firebreaks and complicate emergency access. [21]
14. Air quality and nitrogen deposition: additional traffic adds NOx/ammonia along sensitive corridors; without quantified assessment and mitigation, adverse effects cannot be ruled out. [35][36][38]
15. Poole Harbour nutrients: there is no plan-level, funded neutrality route for the Longham quantum; allocations should not proceed without one. [4][5][23][24]
16. Protected species and dark corridors: lighting, fences and pets from new estates would fragment bat, dormouse and badger routes; achieving at least 10% biodiversity net gain while retaining wide buffers is unproven. [25][26][27][28][29]
17. Flood risk and drainage: the south-east allocation overlaps the River Stour floodplain; Misty Meadows has a flood-labile access; elsewhere outfalls and infiltration are uncertain; the plan has not shown the sequential approach is satisfied. [1][2][43]
18. Water supply: Bournemouth Water indicates tight resources and investment needs to maintain headroom and contingency; the plan should evidence capacity for the full period. [7][17][31]
19. Transport and safety: Longham roundabouts and the A348 already suffer recurrent congestion; without a funded, time-bound programme and continuous active-travel/bus links, the plan has not shown impacts would not be severe. [2]
20. Heritage and landscape: the settings of Dudsbury Camp and Longham House would be harmed; public benefits do not outweigh this on the evidence presented. [6][20]
21. Leisure pressure on Longham Lakes: increased disturbance, light spill and misuse (including illegal fishing) would conflict with water-supply and wildlife objectives. [11][12][13]
22. Deliverability: multiple ownerships, minerals safeguarding and potential title covenants remain unresolved; effectiveness is undermined. [1]
23. Edge-of-town description: several parcels do not adjoin the built-up area and function as open countryside/Green Belt rather than logical rounding-off. [1][2]

5. Site-Specific Objections

5.1 LA/FERN/016, 029, 039 – South-East of Longham Roundabouts (about 637 homes)

- Floodplain: about half the land lies in River Stour Flood Zones 2/3; at plan stage the Council should show the sequential approach has steered allocations away from higher-risk land unless robustly justified. [1][2][43]
- Green Belt and scale: exceptional circumstances are not evidenced for a release of this magnitude; delete or significantly reduce. [2][42]

- Heritage: evidence indicates harm to the settings of Dudsbury Camp and Longham church/Manse that is not clearly justified; public benefits do not outweigh that harm; reduce or delete. [6][20]
- Heathlands/New Forest: within the 5 km heathland zone and the 13.8 km New Forest zone; the plan has not evidenced a secured mitigation route for the full quantum. [3][9]
- Ecology/BNG: riparian grassland and hedgerow networks would be affected; the plan should demonstrate connected habitats and dark routes will be retained and that at least 10% BNG is achievable; currently unproven. [3]
- Transport and infrastructure: there is no funded, time-bound programme for roundabout redesign or bus uplift; not effective as drafted. [2]
- Water and lakes: added pressure on Longham Lakes and on water-supply headroom; the plan does not evidence capacity and protection measures. [11][12][13][7]
- Resident observations: bats along riparian hedges; dormice in boundary hedgerows; badger activity; plan policy should require licensed surveys and habitat retention. [25][26][27][28][29]

5.2 LA/FERN/011, 012, 015 – North-West of Longham Roundabouts (about 325 homes)

- Heathlands: the 400 m exclusion affects parts of the site; those areas should be deleted at plan stage. Remaining land still fails Green Belt tests; delete or substantially reduce. [3][2]
- Protected species: no secured commitment to retain bat, badger and dormouse corridors or control lighting; contrary to policy; require at plan stage. [25][26][27][28][29]
- Heritage/archaeology: setting harm to scheduled barrows and listed assets is likely; benefits do not outweigh harm; pull back with setbacks and height limits or delete. [1][20]
- Flood and drainage: surface-water and watercourse issues are unresolved at evidence level; plan-stage principles should be satisfied before allocation proceeds. [1][2]
- Minerals and utilities: Mineral Safeguarding Area and a north-south power line constrain layout and deliverability; plan should address prior-extraction and utilities at principle level. [1]
- Movement: no committed junction scheme or continuous walking and cycling; the plan has not shown impacts would not be severe. [2]
- Resident observations: bat foraging over pasture, dormouse activity reported nearby, badger setts in woodland edges; plan policy should require surveys and retained connectivity. [25][26][27][28][29]

5.3 LA/FERN/002, 007, 032 – South-West of Longham Roundabout (about 208 homes)

- Green Belt: exceptional circumstances are not demonstrated; the site would urbanise the approach to Longham and erode the gap toward Bearwood; delete. [2][42]
- Heritage: harm to the setting of the White Hart Inn (listed) is not justified; benefits do not outweigh harm; reduce or delete. [1][20]
- Ecology/BNG: proximity to Longham Lakes and hedgerows/trees requires retained dark corridors; the plan should demonstrate 10% BNG is achievable; unproven. [11][12][13][3]
- Flood and drainage: surface-water constraints and uncertain outfalls or infiltration remain; plan should not allocate without credible evidence on discharge routes. [1]
- Transport: without a funded roundabout programme and continuous walking and cycling links, the plan has not shown impacts would not be severe. [2]
- Equestrian land: loss and displacement would harm rural character and local recreation; reduce or delete.

- Resident observations: bats using hedgerow corridors; dormice and badgers reported by adjacent residents; plan policy should require surveys and retained connectivity. [25][26][27][28][29]

5.4 LA/FERN/003 – Opposite Former Dudsbury Golf Course (about 60 homes)

- Green Belt: exceptional circumstances are not demonstrated; remove. [2][42]
- Heathlands/New Forest: mitigation is not evidenced at plan stage; cannot conclude no adverse effect; delete or defer until secured. [3][9]
- Trees/TPOs and hedgerows: dark bat corridors and buffers are not secured in principle; benefits do not outweigh harm; reduce or remove. [26][29]
- Transport (cumulative): safe access and capacity on New Road/Parley Cross are not evidenced; the plan has not shown impacts would not be severe. [2]
- Minerals safeguarding: potential sterilisation without prior extraction at principle level; contrary to policy; delete or reduce capacity with extraction secured. [2]
- Resident observations: bat activity along Belle View Plantation; dormouse and badger signs in hedgerows; surveys required at application stage; principles secured at plan stage. [25][26][27][28][29]

5.5 LA/FERN/033 – Misty Meadows (about 43 homes; brownfield)

- Access and flooding: current access is recorded as flood-labile; the plan should not allocate without a credible principle for safe access and drainage; remove. [1][2][43]
- Heritage: adjacent to Longham House (Grade II); harm to setting is not outweighed by benefits; delete or impose strict setbacks and height limits with capacity reduction. [18][20]
- Ecology/Longham Lakes: without secured dark corridors and buffers to the lakes, ecological harm is likely; reduce or delete. [11][12][13][3]
- Highway safety: Ringwood Road visibility and missing footway remain unresolved; not effective as drafted; remove or phase back pending funded works. [2]
- Green Belt and minerals: even as brownfield it remains Green Belt and may sterilise safeguarded minerals; no exceptional circumstances or safeguarding strategy; reduce or delete. [2]
- Resident observations: bats foraging over the site; dormice in adjacent hedgerows; badger paths across the southern boundary; surveys and licences required at application stage; principles secured at plan stage. [25][26][27][28][29]

6. Heritage Character and Potential Conservation Area Appraisal

Longham is not currently a designated conservation area. However, the cluster of designated assets (for example, Dudsbury Camp and Longham House) and the coherent historic village character indicate that the area could be a candidate for a future conservation area appraisal under Historic England's criteria. Large, car-led estates would harm this significance and the opportunity for any future designation. [6][18][39]

7. Procedural and Evidence-Base Gaps

- No secured nutrient-neutrality route for Poole Harbour at plan stage (for example, credits/catchment projects and governance); legal risk to allocations contributing to the catchment. [4][5][23][24]
- Habitats Regulations and air-quality effects on heathlands are not quantified for cumulative traffic; adverse effects cannot be ruled out without robust modelling and mitigation. [3][35][36][38]
- No clear cross-boundary transport strategy with BCP for the A348/A31 corridors and bus services; Statement(s) of Common Ground not evidenced. [14][15][41]

- No binding Infrastructure Delivery Plan linking housing phases to funded junction upgrades, active-travel networks, schools and health capacity. [2]
- Uncertain water-supply headroom and drought resilience; Bournemouth Water indicates need for new resources and demand reduction to maintain standards across 2025–30. [7][17][31]
- Minerals prior-extraction principles are not evidenced where safeguarding applies; risk of sterilisation undermines deliverability. [2]
- Potential private title covenants remain unresolved; effectiveness is undermined. [1]

8. Modifications Sought

24. Delete the Longham allocations (LA/FERN/016,029,039; LA/FERN/011,012,015; LA/FERN/002,007,032; LA/FERN/003; LA/FERN/033) as inconsistent with national policy and not effective or deliverable. [2][3][4][5][9][10][41][42][43]
25. If any land is retained: (i) remove all land within the 400 m heathland exclusion; (ii) remove all land in Flood Zones 2/3 and include wide riparian buffers; (iii) materially reduce capacities and pull back boundaries to protect Green Belt openness, heritage settings and landscape; (iv) identify and secure the mitigation route (for example, SANG/SAMM for the full quantum) and at least 10% biodiversity net gain with long-term management and dark corridors; (v) adopt an infrastructure-first masterplan tying phases to fully funded highways, active-travel and bus upgrades, schools and health; (vi) agree minerals prior-extraction principles where safeguarding applies; (vii) evidence nutrient neutrality and water-supply capacity for the full plan period. [2][3][4][5][7][9][10][41][42][43]

8A. Modifications Sought should sites be pursued

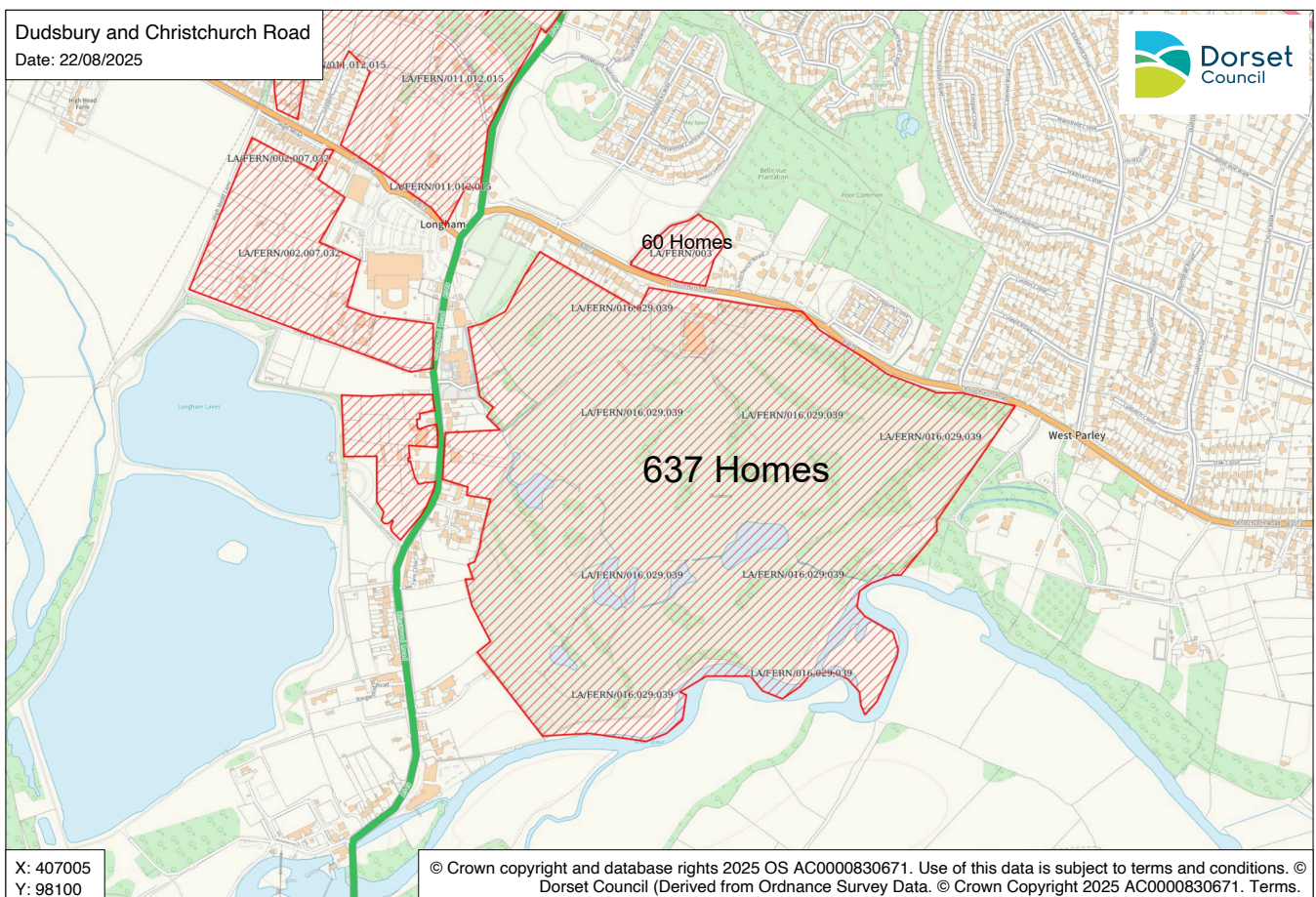
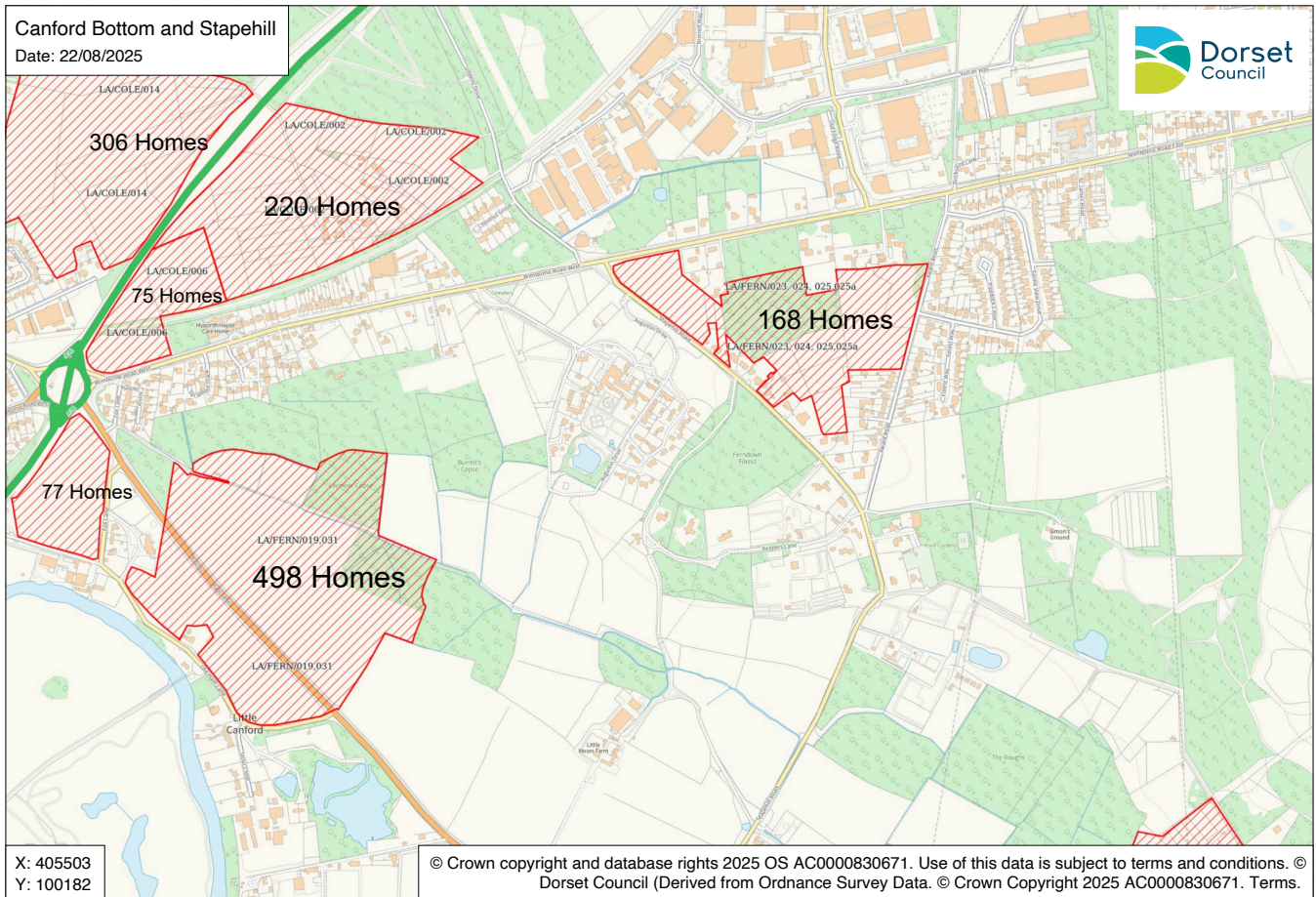
Best outcome: delete all Longham allocations as they do not meet national policy tests and are not deliverable.

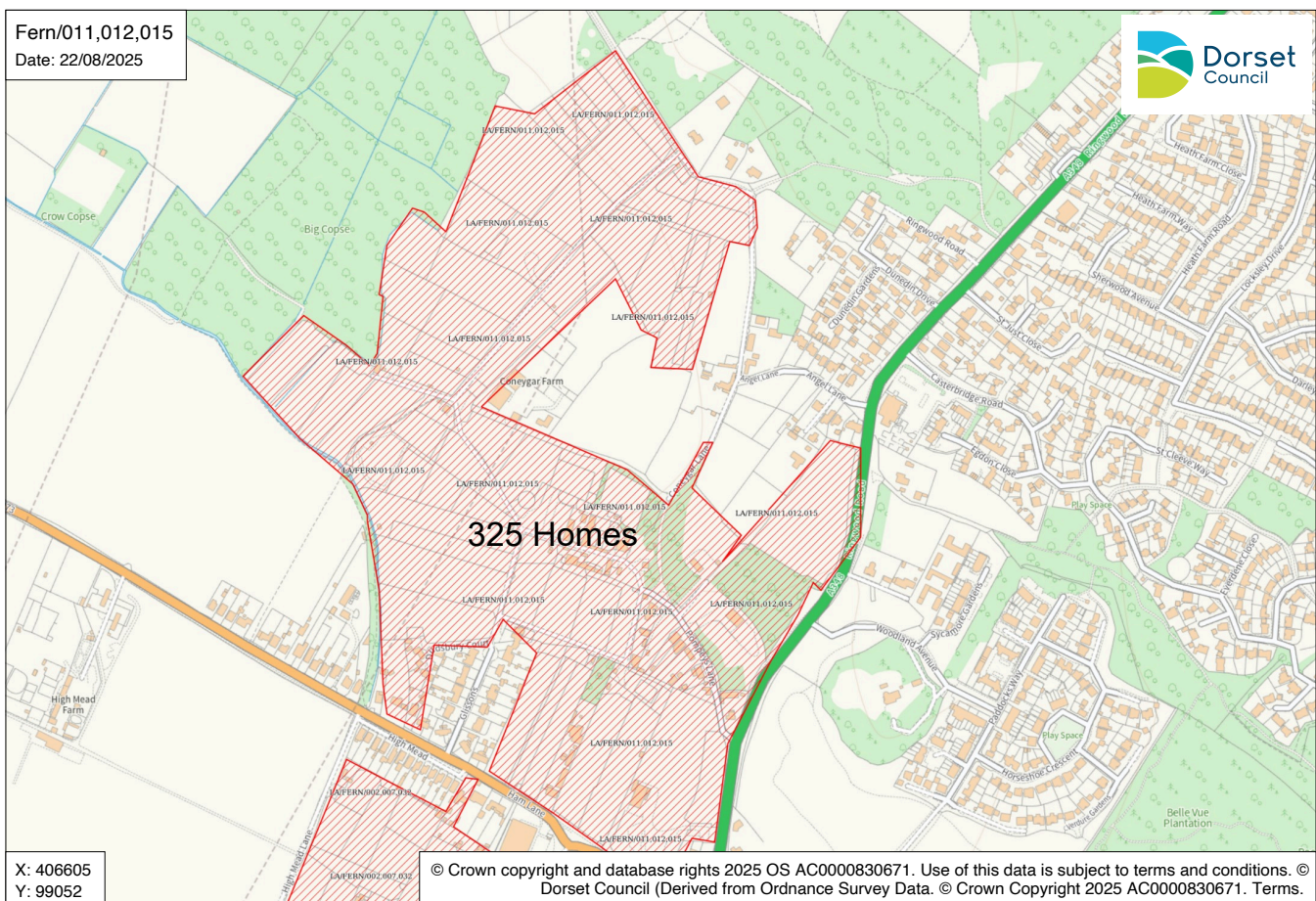
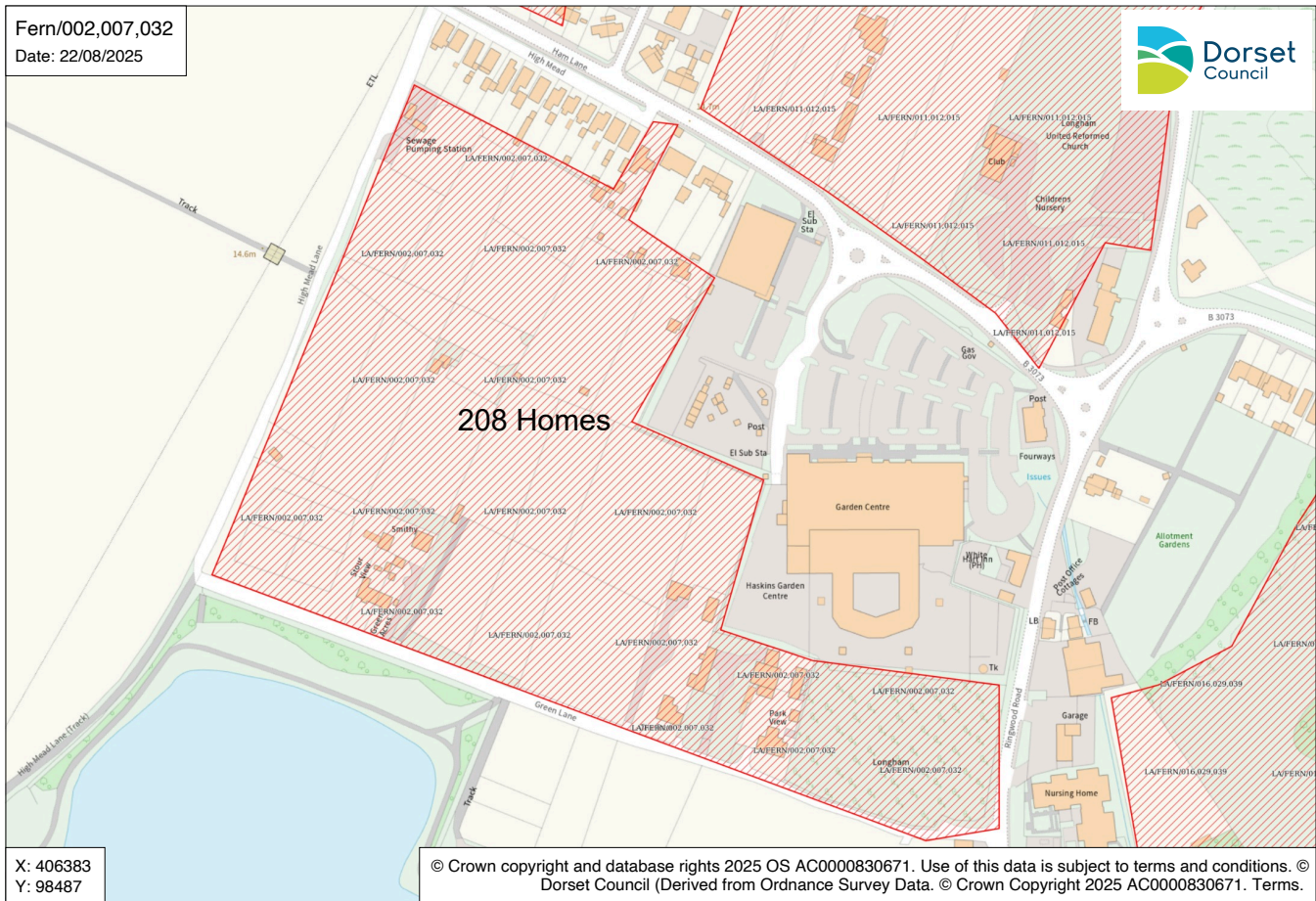
If the Council keeps any land, at a minimum it must:

- Exclude all land within 400 m of protected heathland and all land in Flood Zones 2/3; keep wide, natural river buffers.
- Pull back site boundaries and reduce housing numbers to protect Green Belt openness, heritage settings and landscape.
- Secure the heathland mitigation route (for example, SANG/SAMM) for the whole housing number, deliver at least 10% Biodiversity Net Gain and keep unlit wildlife corridors ('dark corridors').
- Commit to infrastructure-first: fully funded upgrades for Longham roundabouts/A348, continuous walking/cycling, better buses, and extra school and GP/health capacity tied to housing phases.
- Address minerals safeguarding by agreeing prior-extraction principles where sand and gravel are present.
- Provide a credible, funded nutrient-neutrality solution for Poole Harbour covering all proposed homes.
- Evidence that Bournemouth Water can supply the additional homes with adequate resilience for the whole plan period.

References (web sources)

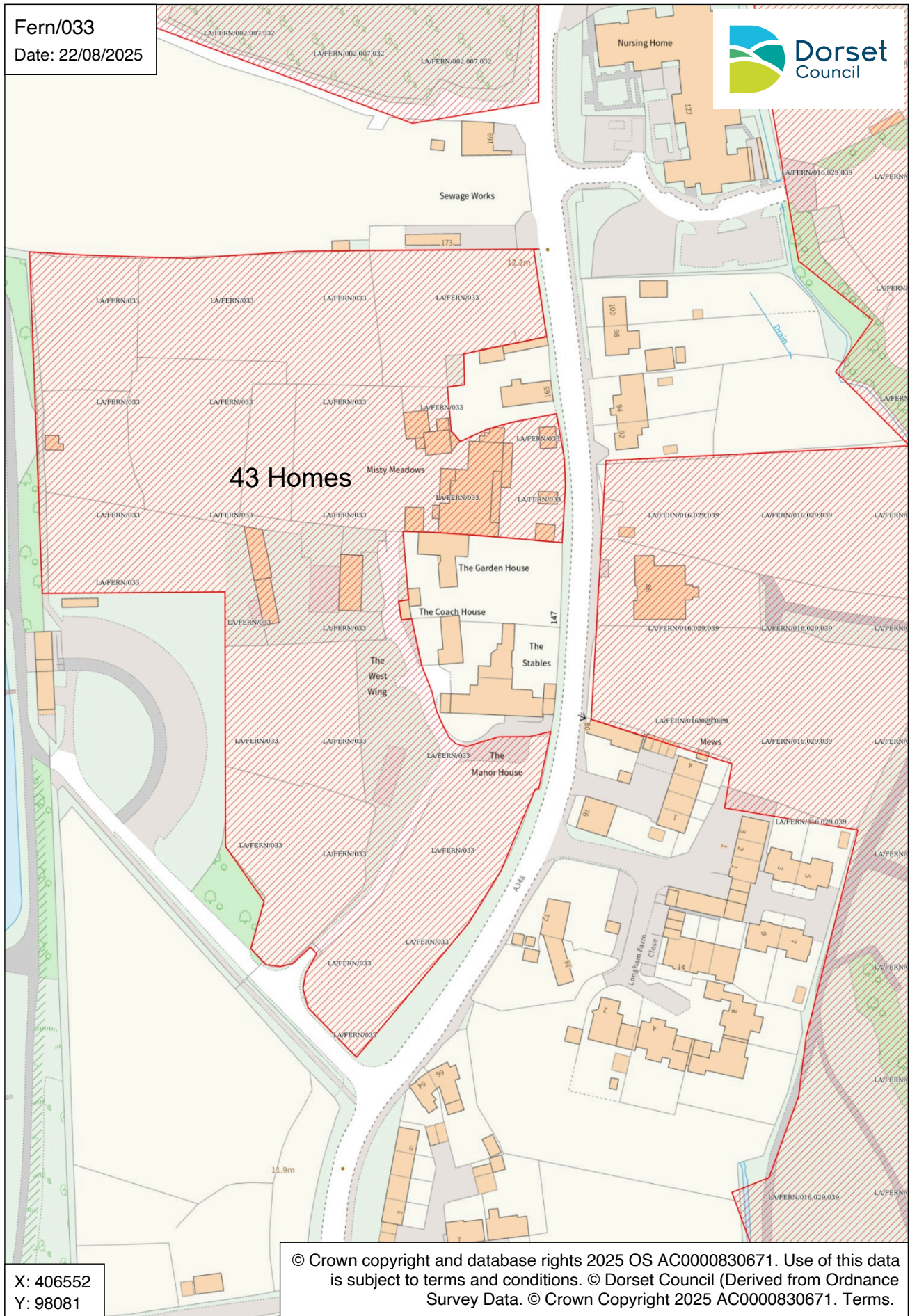
- [1] [1] Dorset Council, Appendix A: Opportunity Sites for Housing (Aug 2025).
- [2] [2] National Planning Policy Framework (December 2024).
- [3] [3] Dorset Heathlands Planning Framework SPD 2020–2025 (BCP & Dorset).
- [4] [4] Dorset Council – Nutrient Neutrality in the Poole Harbour Catchment (2025 web guidance).
- [5] [5] Dorset Council – Poole Harbour Local Nutrient Mitigation Fund (2025).
- [6] [6] Historic England – Dudsbury Camp (Scheduled Monument) list entry.
- [7] [7] Bournemouth Water – Our Plan for Change 2025–30 (Customer summary).
- [8] [8] CPRE Dorset – Dorset housing targets analysis (June 2025).
- [9] [9] Footprint Ecology – Visitor use of the New Forest by residents of Dorset (13.8 km zone of influence).
- [10] [10] GOV.UK – NPPF plan-making guidance page (tests of soundness).
- [11] [11] Stour Valley Way – Longham Lakes description (public water-supply reservoirs).
- [12] [12] Bournemouth Water – Environment pages (Longham Lakes wildlife management).
- [13] [13] Case study – algal bloom control at Longham Lakes (drinking water reservoirs).
- [14] [14] BCP & Dorset – Strategic Green Belt Review (South East Dorset Green Belt).
- [15] [15] BCP Council – Local Plan updates/evidence (withdrawn 2024/2025; evidence base remains).
- [16] [16] UK Parliament Library – Green Belt briefing.
- [17] [17] Bournemouth Water – Annual/Regulatory Report 2024 (resources and resilience).
- [18] [18] Historic England – Longham House (Grade II) list entry.
- [19] [19] Historic England guidance – great weight/clear and convincing justification (heritage).
- [20] [20] Historic England – Policy/Advice on heritage significance and setting.
- [21] [21] Dorset Heathlands SPD extracts – 400 m exclusion; 5 km mitigation; fire as urban pressure.
- [22] [22] New Forest recreational mitigation/SAMM – overview reports.
- [23] [23] Natural England – Nutrient mitigation credits for Poole Harbour (how to apply).
- [24] [24] Dorset Council – Credit schemes: temporary nitrogen credits (to 2030).
- [25] [31] Bournemouth Water – Environment partnerships and Longham Lakes.
- [26] [33] British Trust for Ornithology – light at night and nocturnal migrants.
- [27] [34] Research summary – light pollution disrupts nocturnal migration.
- [28] [35] Natural England – nitrogen deposition impacts on heathland.
- [29] [36] JNCC – evidence review on nitrogen deposition on heathland (Report 449).
- [30] [37] PLOS ONE (2013) – nitrogen deposition reduces plant diversity in UK heathlands.
- [31] [38] Environmental Pollution/CEH – nitrogen deposition and heathland soils.
- [32] [39] Historic England Advice Note 1 – Conservation Area designation, appraisal and management.
- [33] [41] NPPF Dec 2024 – plan-making/tests of soundness (para 36–37).
- [34] [42] NPPF Dec 2024 – Green Belt (paras 145–151; 156–157 ‘golden rules’).
- [35] [43] NPPF Dec 2024 – Flood risk/Sequential & Exception Tests (paras 174–179).





Fern/033

Date: 22/08/2025



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