

Dorchester Town Council

RESPONSE TO THE DORSET COUNCIL LOCAL PLAN CONSULTATION, JANUARY 2021

Monday, 1 March 2021

Dorchester Town Council continues to strongly object to policy DOR13 (previously DOR15), recognising that this specific site carries a significant level of risk that it will fail to address the local needs of the town, nor will it produce a comprehensive, relevant, viable and sustainable development that supports the area's future rather than destabilising it.

In deciding how much housing is needed, the Government housing target is the starting point. That starting point does not take into account environmental constraints – which can and do impact on what may be sustainable.

Yet despite the many environmental constraints, the Local Plan is proposing significantly (30%) more housing than its starting point of 30,481 dwellings.

There is no clarity on how housing and employment growth are related, or any attempt to think through the potential outcomes of Brexit and the Covid-19 pandemic.

We seem to have inherited a strategy that simply knits together earlier drafts of the separate plans, and fails to consider the overall picture at either the county or functional area level.

The Plan has not fully explored other options that may be more sustainable.

One alternative would be to look at other locations for a new settlement. The Council suggests this work is 'still to be done' – so why commit to North Dorchester, now when there are other, potentially better, options out there? Some of these, such as North Woodsford, have been put forward already and on first sight appear to be more sustainable.

Another alternative would be to look at higher densities in town centres. This is very much supported in national policy. It was done previously for Weymouth (where 400 new homes are assumed from the town centre regeneration) but this approach has not been carried out consistently across the Dorset Council area. We consider that there is considerable potential in Dorchester, if the Council were willing to invest time and resources into masterplanning the town centre regeneration.

Because of this lack of proper planning, we have been given a proposal that we consider would be highly damaging to the town and its rural surrounds, is poorly justified, and would not be able to deliver anything like the benefits that are being promised.

The Town Council has consistently raised concerns about the deliverability of the proposed development north of Dorchester, but no work has been done despite Dorset Council and its predecessor having funding awarded to explore these critical issues.

The previous Halcrow assessment made clear that the scale of development proposed would not fund the necessary infrastructure.

And the lack of any clear evidence on deliverability is a major concern.

It is also clear that the scale and mass of the development will fundamentally change the character of the town and its setting. Furthermore, what is proposed now may not even reflect the full extent of the future settlement, given the lack of a clear northern limit.

There would be significant landscape and heritage impacts from the proposed development.

There are also unknown impacts flooding and groundwater that would arise from this scale of development.

And given the difficulties inherent in providing good connections given its relationship with the town, it is likely that the development would lead to more car-borne traffic.

We therefore would take this opportunity to raise the strongest objection to the continued inclusion of DOR13 within the Dorset Council's Local Plan. It is not supported by any evidence to demonstrate that it is sustainable and deliverable.

We also reserve the right to add further to this objection should new evidence be forthcoming.

OVERALL GROWTH, AND SPATIAL DISTRIBUTION

DEV1: The housing requirement and the need for employment land in Dorset DEV3: Growth in the Central Dorset functional area

In deciding how much housing is needed, the Government housing target is the starting point. That starting point does not take into account environmental constraints – which can and do impact on what may be sustainable.

It is accepted that, given national policy, the starting point of the housing numbers for the area is a matter dictated by the housing projections cascaded down from central Government. Whilst we may query the basis on which these were derived (as they use out-of-date population projections and an arguably arbitrary formula to adjust to affordability), they are still the numbers we are given.

However, the recent Government response to the consultation on the methodology makes clear once again that the derived housing numbers are a starting point, and can be varied. The response to the consultation¹ (dated 16 December 2020) states:

"Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints."

The wording of the NPPF (para 60) refers to being "informed by" the standard method for calculating the local housing need and that the policies should "seek to meet" that need, but also accepts that there may be unmet need in certain circumstances, in order to achieve sustainable development. The tests of soundness (NPPF para 35) require that Local Plans must be:

*a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need*

¹ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

Dorset is a particularly environmentally constrained area. The standard method for calculating housing need does not take into account this factor, but it is clear that such a high degree of environmental constraints can influence the Council's consideration of how many homes can be sustainably accommodated. Dorset is arguably one of the most environmentally sensitive areas within the UK - as referenced in the sustainability appraisal scoping report²:

"Dorset is home to an incredibly diverse range of wildlife habitats and species, some of which are of exceptional ecological importance."

"The Dorset landscape is unique in its landscape character, variety and quality." – it has two AONBs that together occupy more than half (55.7%) of the plan area

"The South East Dorset Green Belt occupies approximately 244km² or 9.7% of the Dorset Plan area" – and is necessary to control urban sprawl in southeast Dorset

"The rich historic and built heritage of the plan area is an irreplaceable resource"

Furthermore, the Plan makes no reference at all to the potential proposal for a National Park (not even under section 3.5 on landscape), and the implications that this may have for reviewing and possibly extending the designated nationally protected landscapes further still.

The Glover "Landscapes Review" report³ in September 2019 recognised that:

"Dorset has some of the greatest concentrations of biodiversity in Britain and opportunities for enjoyment. It includes the Jurassic Coast World Heritage Site as well as farmed areas inland where development pressures are less strong and support for a change in status may be less established. We heard from opponents as well as supporters of a new status. Both the Cotswolds and the Dorset proposals are strong candidates, alongside the Chilterns, to be considered for National Park status. We suggest Natural England and ministers consider the case for each."

The original submission proposed the inclusion of Egdon Heath⁴ reflecting its importance as part of Thomas Hardy's landscapes, and there is a case to be made that other areas within Dorset, including those strongly associated with Thomas Hardy, should also be considered.

Yet despite the many environmental constraints, the Local Plan is proposing significantly (30%) more housing than its starting point of 30,481 dwellings.

Not only does the draft Local Plan propose to meet its housing target, but it proposes allocations that exceed this target by a considerable margin. The calculated target for the Council area (based on the currently available underpinning data) is 1,793 net additional dwellings per annum (dpa), which over a 17-year period equates to 30,481 dwellings (para 2.2.4). The housing supply proposed (figure 2.7) is 39,285 dwellings. This provides some 8,804 additional dwellings over and above the Government-derived figure, or the equivalent of 4.9 additional years' worth of housing land supply.

The purported reasons for this degree of oversupply are based on a number of points (2.2.5 - 7):

- Having flexibility to respond to possible changes in the Government's proposed 'standard method' for calculating housing numbers;
- Providing some contingency should the delivery of housing not come forward as expected;
- The potential for absorbing a level of unmet need (as yet unquantified) from Bournemouth, Christchurch and Poole Council, New Forest District Council and / or New Forest National Park

² <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/sa-scoping-report-draft-after-consultation-2-redacted.pdf>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf

⁴ <https://www.dorsetnationalpark.com/map>

Authority that could be delivered within Dorset.

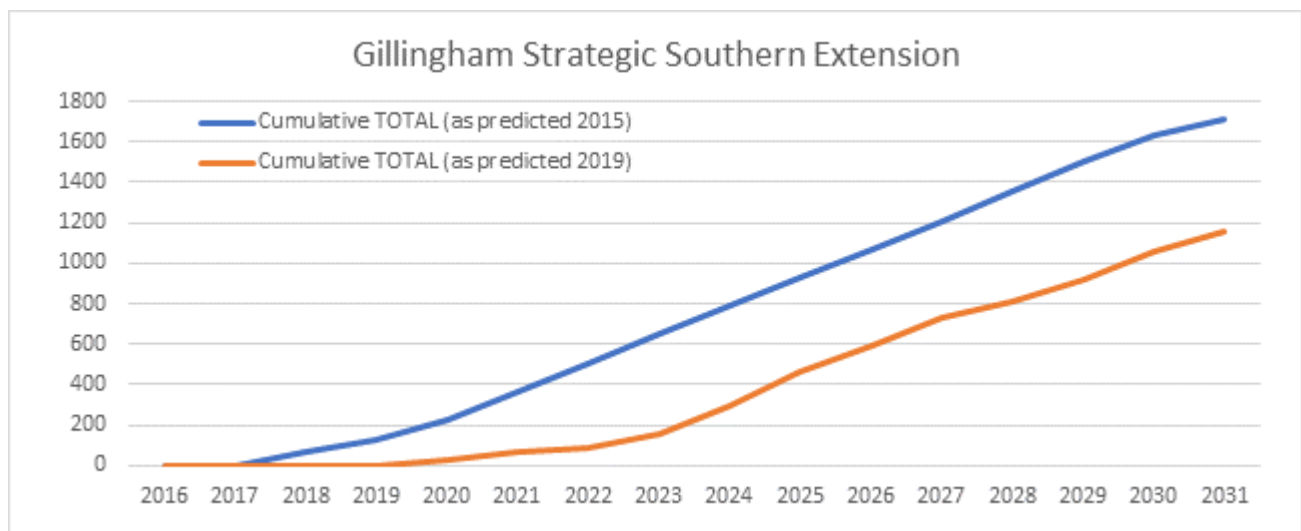
In terms of having flexibility to meet the possible changes – the indicative annual target as published in December 2020⁵ comprised:

Purbeck	177
North Dorset	353
West Dorset, Weymouth and Portland	800
East Dorset, Christchurch	806

Whilst there is not a set formula as yet for the East Dorset and Christchurch figure, taking a simple 50% would suggest the new figure should be in the region of 1,733, which is not significantly different from existing target, and if based on the previous split ratio used, it would be lower still at around 1,653.

The argument that more housing will provide some contingency, should the housing delivery falter, similarly does not stand up to scrutiny. Section 2.7.3 highlights that past delivery has been below the target rate set in local plans, but provides no analysis as to why this is the case – which is critical if we are to avoid repeating this problem (and unnecessarily releasing less suitable land for development).

Whilst it has not been possible to research this matter in detail, it is notable that the North Dorset Plan has reported the most significant housing supply shortfall (most recently reporting only 3.3 years' supply) despite being the most recently adopted. A key reason behind this the delays in bringing forward the Gillingham Strategic Southern extension. The housing supply report published in December 2015, a month before the plan was formally adopted, predicted that the first completions would be in 2017/18. Four years later, in the latest (2019) monitoring report, the programme has slipped so that the first completions are not until 2019/20. The masterplan for the site, which was first development as a concept plan by the Local Planning Authority in March 2013, was not approved until February 2019 – some 6 years after the first genuine community engagement. And, furthermore, the amount of affordable housing, which was to be delivered as 25%, has been reduced to 15% for the first phases on the basis that the higher level is not currently showing to be viable (with far less infrastructure requirements than required in the North Dorchester proposals).



All of these factors highlight both the timescales and viability challenges of a significant town expansion.

The final point on unmet need has yet to be substantiated, and in any event does not justify an increased target that would necessitate the release of unsuitable sites for development. With reference to Bournemouth, Christchurch and Poole Council, it is understood that their housing target is likely to require the release of Green Belt land, but this is also the case within Dorset. However, there has been

⁵ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

no obvious evidence of engagement between the two councils – which was thought to be the role of the Strategic Planning Forum. Whilst the BCP Housing Delivery Action Plan from October 2019⁶ identified the need to review the Forums' terms of reference (during 2019) and review options and agree approach to address future housing requirement, potentially including Hampshire's needs (during 2019/2020) no active liaison has been recorded or open to scrutiny. As far as we are aware, the Forum has yet to meet.

There is no clarity on how housing and employment growth are related, or any attempt to think through the potential outcomes of Brexit and the Covid-19 pandemic.

Furthermore, the overarching policy on housing and employment does not appear to recognise the need for housing and employment (and infrastructure) to be delivered in a timely, coordinated manner – the delivery of one without the other can lead to an unbalanced, unsustainable outcome. Neither is it clear whether the 21,000 jobs proposed relate to either the 30,481 homes or the higher figure of 39,285 homes. Is a growth ratio of approximately 1 job for every 1.5 to 2 houses a realistic basis? According to the workplace strategy update⁷ the scenario indicates a 0.5% per annum growth in full time equivalent employment. An increase in 1,793 homes (based on the 30,481 homes over 17 years) equates to a 0.98% per annum growth in dwellings⁸, twice the proposed employment growth. And if all the anticipated and allocated sites come forward within the plan period (delivering 39,285 homes, or the equivalent of 2,310 homes each year), the level of housing / population growth would be higher still, at around 1.27% per annum. Whilst we may have an aging population, it is unclear why the growth in housing is not more closely aligned to the proposed growth in employment, and what the implications of any imbalance would be.

Para 5.1.6 (and to a lesser extent 2.2.10) of the Local Plan recognise that:

"Recent significant events such as the declaration of a climate and ecological emergency, Brexit and the Covid-19 pandemic have the potential to profoundly impact the local and wider economy. Although some effects are already becoming apparent there is much uncertainty and it is too early to tell how places and sectors will change as a result of these issues. Further work will be necessary to fully appreciate their implications for the economy."

but this is not addressed in the strategy in any meaningful way, despite the fact that this could have a fundamental impact on overall housing (not just employment) needs, both locally and nationally.

The settlement hierarchy and spatial strategy

We seem to have inherited a strategy that simply knits together earlier drafts of the separate plans, and fails to consider the overall picture at either the county or functional area level.

The tests of soundness (NPPF para 35) require that Local Plans must be:

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

The plan proposes four different settlement tiers (large built-up areas, towns and main settlement, village with development boundaries and villages without development boundaries) and identifies four functional areas (based on the areas with the strongest economic and housing market ties).

Dorchester is identified as a Tier 1 settlement within the Central Dorset functional area. Weymouth is the only other Tier 1 settlement in this area. Portland and Chickerell (both closely related to Weymouth) are identified as Tier 2 settlements, with Tier 3 settlements being the 13 larger villages, such as Cerne

⁶ <https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/bcp-local-plan/bcp-local-plan-docs/housing-delivery-action-plan.pdf>

⁷ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/20210112-workspace-strategy-evidence-update.pdf>

⁸ Based on the 2011 Census data of 182,677 residential properties cited in the SA screening report

Abbas, Charminster, Maiden Newton and Puddletown, most of whom look to Dorchester for their higher level needs and employment.

Whilst there is a background paper explaining how these functional areas were identified, what is missing is any real analysis of how each area functions, its strengths and its weaknesses, so that any future plans can help address these issues as part of a coherent strategy. The explanation within the settlement strategy section of the Local Plan about the proposed development in the Central Dorset area (paras 2.6.8 and 2.6.9) is entirely lacking any description of the area. In section 22 (Central Dorset) the appraisal is similarly light-weight, noting in 22.1.2 that:

"There is significant in-commuting to the county town of Dorchester, particularly from the seaside town of Weymouth, which has a low wage economy and some areas of deprivation. The rapid expansion of Chickerell in recent years has not been matched with growth in facilities and services. The limited access to the Isle of Portland is a major issue and although some regeneration has taken place, there is still much out-commuting for work."

And the function and issues described in Figure 22.1 simply state:

*"**Dorchester** – The county town of Dorchester has a population of about 21,000 and acts as an important retail, employment and service centre for southern Dorset, with some facilities (for example the County Hospital) serving a wider area. The town has rail links to London, Bristol and Weymouth. Dorchester has about twice as many jobs as economically active residents, resulting in a significant level of in-commuting, particularly from Weymouth."*

The description of the environmental constraints at Dorchester (Figure 22.2) is similarly lacking in detail and almost deliberately neglects referencing any issues to the north side of the town:

*"**Dorchester** – The Dorset AONB wraps around the south and west of Dorchester with the floodplain of the River Frome running to the north of the town. There are many heritage assets within and close to the town, including the archaeological sites of Maiden Castle and Poundbury Camp. The town falls inside the drainage catchment for Poole Harbour and the River Piddle flowing east from the town is designated as a SSSI."*

In the overall spatial strategy, the proposed Northern extension of the town is simply referenced as having been identified as a 'preferred option' in the review of the Joint Local Plan, and that further work has been undertaken to refine this proposal, which is taken forward in this local plan.

Para. 2.7.7 (which refers to the choice of housing allocations) goes on to state that:

"Within each functional area the larger settlements with a good range of facilities are the focus for this strategic growth. At each of these settlement [sic] the most appropriate sites to deliver the longer term growth of the settlement have been selected having regard to the infrastructure and facilities needed at each with the aim of improving their sustainability."

There appears to be little in the way of a meaningful, considered spatial strategy that looks holistically either at the county level or at the level of the functional areas – the plan very much appears to be the result of the 'knitting together' of the previous draft plans. The strategic diagram adds very little in this context, with little definition. On this basis the plan is clearly flawed.

And on the more detailed maps, even the positioning of the symbols showing the housing employment wrongly indicate that these are central to the town, close to the railway and between the two rivers.



Dorset Council Key Diagram



Key Strategy map for the Central Dorset Functional Area



The following table attempts to consider the growth more holistically by area and settlement size. This is based on the available data but could be refined further with access to the Council's database/s for monitoring permissions and completions by settlement / area, together with small sites / windfall assumptions broken down by area. We have asked for the underlying data, in order that we can check the facts, but in the interim can only draw conclusions based on what is available.

Location	Population and housing growth							Employment	
	2011 (parish / BUA)	2018 (DCLP/ stats)	Extant alloc's	Site Options	Total (Max)	Pop'n ↑ @ 2.1pph	% ↑ since 2011 (4)	Site options	Jobs pp (@ 100 jobs/ha)
SE Dorset (1)	115769	119523	7544	4640	8151	17118	18%	108.9	0.64
BCP Corfe Mullen	10133	10175	112	400	512	1075	11%	--	0
BCP Upton	7983	8544	92	0	92	193	9%	--	0
Blandford	11694	11000	605	900	1505	3161	21%	6.7	0.21
Ferndown / WP	18998	20200	540	1,100	1640	3444	24%	17.5 - 38.5	1.12
St Leonards (2)	6859	7200	0	0	0	0	5%	12.9	jobs only
Swanage	9586	9800	90	150	240	504	7%	--	0
Verwood	13360	14800	230	100	330	693	16%	0.7	0.10
Wareham (3)	5496	6000	207	0	207	435	17%	5.7	1.31
West Moors	7561	7400	0	170	170	357	3%	--	0
Wimb / Colehill	13722	13300	969	495	1464	3074	19%	2.0	0.07
Alderholt	2848	2832		300	300	630	22%	--	0
Lytchett Matr's	3315	3467	196	200	396	832	30%	--	0
Sturm' Marshall	1490	1670	0	425	425	893	72%	3.3	0.37
Wool	2724	3135	470	300 - 400	870	1827	82%	38.4	2.10
Central Dorset	94802	98340	11202	5,095	11,250	23625	29%	33	0.14
Dorchester	19060	21000		3,600		11214	69%	17	0.15
Weymouth	52176	53100		550		5813	13%	13	0.22
Chickerell	5515	6000		0		1701	40%	--	0
Portland	12844	12800		0		731	5%	0.8	0.11
Char / Ch Down	2940	3000		340		714	26%	--	0
Crossways	2267	2440		605		3452	160%	2.5	0.07
Northern Dorset	35122	37700	4359	2280	5227	10977	39%	31	0.28
Gillingham	11278	12000		70 - 670		5607	56%	12.8	0.23
Shaftesbury	7314	8700		0		399	24%	6.6	1.65
Sherborne	9523	9900		1,200		3043	36%	8.0	0.26
Stalbridge	2704	2600		430		1281	44%	0.7	0.05
Sturm' Newton	4303	4500		0		647	20%	2.9	0.45
Western Dorset	20365	20400	1469	185	1502	3155	16%	9.3	0.29
Beaminster	2957	2900		120		584	18%	4.5	0.77
Bridport	13737	13900		0		2392	19%	4.8	0.20
Lyme Regis	3671	3600		40		179	3%	--	0.15

(1) total reflects only those settlement shown and not wider functional area

(2) inc Woolsbridge employment proposals as nearest major settlement

(3) inc Holton Heath employment proposals as nearest major settlement

(4) red highlight above average proportionate growth

Despite the lack of access to useful data, what this table does highlight is the significant range in growth and lack of meaningful links to job growth in the absence of more refined analysis of need.

The proposals for Dorchester significantly outstrip the proposals for any other settlements – no other town has this level of planned population increase (either in overall size or as a proportionate level of growth). It would appear that the population growth of the town would be in excess of 11,000 (as the figures do not include infill), compared to the next largest increase of around 6,000 at both Gillingham and Weymouth. The latter is also surprising if the strategy is to genuinely re-balance jobs and housing between Weymouth and Dorchester. Proportionately most settlements are on average proposed to increase by about a quarter (24%) from the 2011 base population. In comparison Dorchester would increase by 69%.

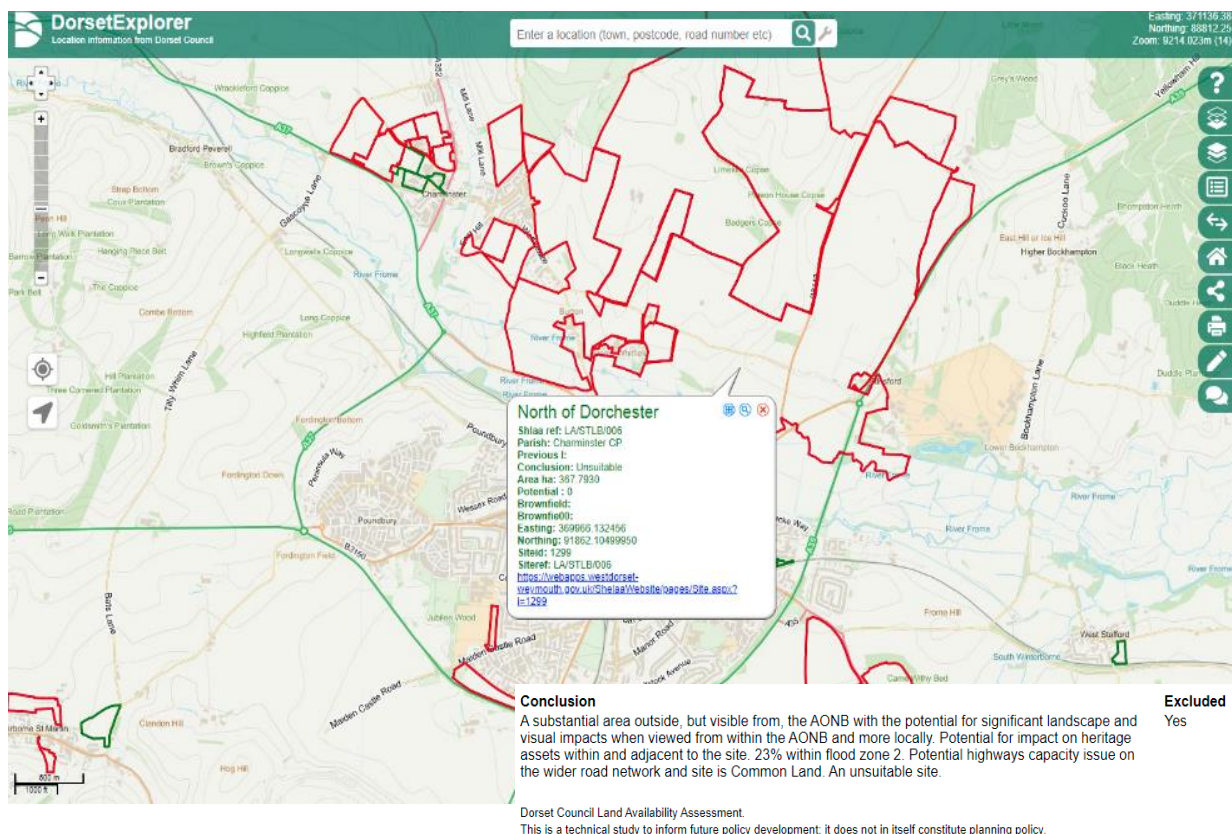
The table also highlights how the level of jobs relative to population growth is imbalanced, with the greatest proportionate job increase focused on the South-Eastern Dorset functional area, whilst Central Dorset sees the least proportionate increase compared to its housing growth. This would suggest that the level of commuting to the South East Dorset area for jobs will increase (and according to a recent study⁹ based on 2011 Census data the jobs within Poole and Purbeck areas already account for the largest net out-commuting from West Dorset). Even within the functional areas there are no explanation as to why some settlements are seeing significant population growth and very little employment, and some the opposite.

In theory there could be many reasons for such variations, but without a clear explanation for these differences, the figures only reinforce the perception that little account has been taken of trying to develop a sustainable strategic pattern of growth.

Exploring alternative strategies

The Plan has not fully explored other options that may be more sustainable.

A number of the sites proposed within the Local Plan, including the North Dorchester proposals, are those that have been considered as unsustainable / unsuitable options as part of the SHLAA assessment.



⁹ https://apps.geowessex.com/insights/Home/Asset/687?asset_type=report&asset_id=322

One alternative would be to look at other locations for a new settlement. The Council suggests this work is 'still do be done' – so why commit to North Dorchester, now when there are other, potentially better, options out there? Some of these, such as North Woodsford, have been put forward already and on first sight appear to be more sustainable.

In the Town Council's submission to the earliest phase of the West Dorset and Weymouth Local Plan Review, in early 2017, and again at the Preferred Options stage in late 2018, we asked for evidence that alternative options be fully explored before committing to an approach that places such heavy emphasis on Dorchester.

It is therefore disappointing that no substantive work appears to have been done on examining the scope for other new or significantly expanded settlements to help deliver the longer term growth needs of Dorset and how these could work within (or form new) function areas.

"2.6.41. In the coming months, the council will be inviting landowners and developers to submit developable opportunities for new settlements."

There are certainly other site options within the functional area, and potentially the much wider area, that have not been sufficiently explored or considered fully. As an example the Town Council previously cited the emerging North Woodsford proposals – SHLAA ref LA/WOOD/001. Whilst this too was rejected at SHLAA level (as being in a rural location outside the settlement development boundary, with potential highways capacity issue on the wider road network and potential for landscape and visual impacts. Affected by a Site of Special Scientific Interest (SSSI)) it does not appear to have been given the same level of consideration as DOR13.

Comparing the two in terms of the sustainability scores, the Woodsford option (CROS H) was ruled out at stage 1 on the grounds that "Development beyond the railway line would restrict access to the services and facilities at Crossways and may result in the loss of high grade agricultural land." It was not considered on the basis of being a new settlement, with its own facilities. No such reasons were used on the North Dorchester sites area (DORCH A) and comparing the two together, it would appear on face value that North Dorchester is not the most sustainable option.

To be absolutely clear this Council is not advocating North Woodsford, merely asking why DOR13 has been promoted to the exclusion of almost every other suitable site in Dorset.

Another alternative would be to look at higher densities in town centres. This is very much supported in national policy. It was done previously for Weymouth (where 400 new homes are assumed from the town centre regeneration) but this approach has not been carried out consistently across the Dorset Council area. We consider that there is considerable potential in Dorchester, if the Council were willing to invest time and resources into masterplanning the town centre regeneration.

Paragraph 123 of the NPPF refers to the importance of achieving a significant uplift in the average density of residential development in city and town centres and other locations that are well served by

Sustainability Objective	DORCH A			CROS H		
	Short	Medium	Long	Short	Medium	Long
Biodiversity	-	-	-	-	-	-
Soil	--	--	--	--	--	--
Water	--	--	--	0	0	0
Air	-	-	-	0	0	0
Climate Change	--	--	--	-	-	-
Flooding & Coastal Change	0	0	-	0	0	0
Landscape	0	0	0	0	0	0
Historic Environment	-	-	-	0	0	0
Community	+	+	+	+	+	+
Housing	+	+	+	+	+	+
Economy	+	+	+	+	+	+

public transport, particularly where there is an existing or anticipated shortage of land for meeting identified housing needs.

The draft Local Plan makes reference to the scope for higher densities in town centres and at other locations well served by public transport – but again there is little evidence on what has been researched and the conclusions reached.

"2.4.5. Both councils have also considered the scope for higher densities in town centres and at other locations well served by public transport. Bournemouth, Christchurch and Poole Council is considering the allocation of a number of town centre sites in their emerging local plan."

In response to Policies DOR2-5 and DOR9, the Town Council is requesting a fundamental rethink of the strategy for Dorchester Town Centre. There is clearly a chance to look again at the potential for redevelopment on areas such as the Great Western Trading Estate, Trinity Street, South Street, the car parks and potentially redundant offices in Charles Street, as well as parts of the High Street and North Square. Uses could include a higher level of residential use whilst still boosting the town centre and how it functions, in a manner that the former Eldridge Pope Brewery site has shown to be feasible. The Brewery site achieved a residential density in the region of 130dph – applying this density to a selection of these sites (Great Western Trading Estate, Trinity Street and Charles Street car parks – which total approx. 3ha) would suggest that these sites along within the town centre could provide more than 350 new homes, if carefully planned. There may be similar potential in other town centres – and whilst these may seem difficult, they are not necessarily any more challenging in scope and deliverability than a major new greenfield development that has no infrastructure, and should be far more sustainable in the long term.

The challenges of improving the balance between housing and jobs in the Central Dorset area

The section on Dorchester notes that the town currently has around twice as many jobs (15,100) as it has economically active residents (9,195), and highlights "one of the challenges" as being to improve the balance between housing and jobs in this area. Putting the economic uncertainties of Brexit to one side, another alternative option would be to create more jobs in the locations where the workers commute in from – which in this case is Weymouth (including Chickerell) and (to a lesser extent) the surrounding villages. Yet, as referenced earlier, the plan proposes less employment land in Weymouth and the villages than it does in Dorchester.

Because of this lack of proper planning, we have been given a proposal that we consider would be highly damaging to the town and its rural surrounds, is poorly justified, and would not be able to deliver anything like the benefits that are being promised.

THE PROPOSED DEVELOPMENT NORTH OF DORCHESTER

In order for a plan to be found sound, it needs to meet a number of tests, as set out in the NPPF. As well as being positively prepared and justified, these tests include the need for the plan to be:

c) **Effective** – deliverable over the plan period; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

DOR13: Land north of Dorchester

The vision for north of Dorchester is couched as "a mixed-use urban extension of linked neighbourhoods north of the Frome Valley" that will "deliver the number of homes, workspace and infrastructure necessary to enable the town to continue to grow as a well-planned cohesive whole" and "enhance the town's role as an economic hub for Dorset, building on its excellent education opportunities, and delivering space for business growth. The town's tourist economy will be expanded through enhancements to the water meadows and capitalising on the town's Hardy heritage."

It is expected to deliver in the region of 3,500 new dwellings (at a rate of about 240 dwellings per annum), a care facility and at least 10 ha of employment land, together with local shops (including a "small" supermarket), first, middle and high schools (and possibly pre-school and special needs provision), additional healthcare provision (possibly GP and dentist surgeries), some form of community hall / meeting place (although this is not specified in the policy), and cemetery provision (which is also not included specifically in the policy). The link road around the northern part of the town is not now intended to function as a northern bypass, although it is expected to relieve congestion at the junctions around the southern bypass (although this is not worded as a requirement). The plan specifies that there will be at least three pedestrian and cycle links between the new development and Dorchester town. The supporting text also notes that upgrades to the water and sewerage network will be necessary (although these are not explicitly specified in the policy).

Viability and Deliverability

The Town Council has consistently raised concerns about the deliverability of the proposed development north of Dorchester, but no work has been done despite Dorset Council and its predecessor having funding awarded to explore these critical issues.

In June 2019 Central Government awarded the Council £150,000 capacity funding to support the delivery of the North Dorchester site¹⁰. As part of the bid, the Council had made clear its intention to undertake a high level Viability Appraisal to inform the next stage of the production of the Local Plan Review, and said that from recent experience of the Gillingham Southern Extension the Council appreciated the need to understand the cost implications of the infrastructure requirements on large scale schemes. It is therefore extremely disappointing and questionable as to why no work on this has yet been undertaken, and there is still no evidence to demonstrate that the proposal will be deliverable in a sustainable fashion.

The previous Halcrow assessment made clear that the scale of development proposed would not fund the necessary infrastructure.

All the evidence that has been produced previously has shown that the development is not deliverable. The possibility for a northern extension is not a new idea – it was one of the options considered in the late 1980s, when the decision was taken to instead expand the town to the west (creating Poundbury). It was reconsidered again at the start of this century, when proposals in the draft 2006 Regional Spatial Strategy and subsequent Panel Report recommended an urban extension at Dorchester (with a 360° area of search). The 2008 Halcrow report¹¹ was drafted in response to this proposal, and highlighted a number of critical issues (para 3.4.9):

"The most significant constraint to an urban extension to Dorchester is the critical capacity of the existing strategic road network. The assessment has identified the need for significant investment in the network in order to accommodate even modest levels of development. Other infrastructure constraints include the limited capacity of the existing electrical distribution network and the sewage treatment works."

One of the options (option A, as shown in the following table) considered the potential for a northern extension, estimating that this could potentially accommodate up to 6,850 dwellings. The key programme / timeline constraint was noted to be the highways network, although the total investment in key infrastructure would be £229.1m (Table 4.2 and 4A) – or a lower total figure of £191.4m for the 3,000 dwellings suggested in the Regional Spatial Strategy (but a much higher per dwelling cost). This

¹⁰ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/garden-communities/20190627-mhclg-award-garden-communities-north-dorchester-redacted.pdf>

¹¹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/evidence-base/pdfs/sustainability/west-dorset-urban-extension-study-main-report-halcrow-group-ltd.PDF> and associated documents in <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/evidence-base/evidence-base-for-adopted-west-dorset-weymouth-portland-local-plan.aspx>

figure did not include the build costs (at 2006 prices), fees (10%), contingency (15%) and developer profit (5%), which further increase the total cost.

Table 4A: Development Option A - Key strategic infrastructure required to deliver development

Development Option A	Dorchester Urban Extension: Northern Area Land parcels: E, F, T2, U2		Potential development capacity = 6858 dwellings			
Strategic infrastructure	Requirement for development		Estimated cost		Phasing requirements	Implementation time (years)
			3000 dwellings	6858 dwellings		
Road network	1 New northern bypass road - single carriageway with junctions at each end (grade separated at eastern end). 21 No. roundabout junctions to provide access to development Major upgrade to Monkeys Jump roundabout Dual the A35 between junction with new bypass and Yellowham Hill.		£90m	£90m	Operational prior to housing development	10
			£10m	£10m		
			£6m	£6m		
Water	Extensive upgrading of trunk main network with provision of storage reservoir to satisfy increased demand - WW unable to scope without detailed appraisal and network modelling.		£4.5m ¹	£10.3m	Phased with development	5
Wastewater	Approx. 1500metres of new connecting sewer to Dorchester STW, potentially with over-sizing to accommodate further phased development westwards towards Charminster. Moderate investment in process improvements at existing STW.		£0.9m ³	£1.2m ³	Phased with housing development	3
			£2.5m ³	£2.5m ³	Trigger of 1500 dwellings ²	5
Electricity	Significant upgrade of supply network - likely to include extension and reinforcement of 33kV network and provision of new major substation.		£4.2m ⁴	£9.6m ⁴	Phased with development	3
Gas	None specified - requirements subject to economic appraisal by network operator. Assume as a minimum a new 1200m connection to existing supply mains.		£0.4m ⁵	£0.4m ⁵	Phased with development	3
Health services	1 No. GP surgery & 1 No. Dental surgery Community hospital facilities ⁶	2 No. GP surgeries & 2 No. Dental surgeries Community hospital facilities ⁶	£3m £0.9m	£6m £2m	Phased with development	3
Education	2 No. First Schools, 1 No. Middle School & extension to Upper School	4 No. First Schools, 2 No. Middle School & Extend/Re-organise Upper School provision	£17.2m ⁸	£39.3m ⁸	Phased with development	3
Waste and recycling	1 New Household Recycling Centre		£2.5m	£2.5m	Phased with development	3
Leisure and recreation	1 New Leisure Centre plus contribution to arts and culture (including library facilities)		£15m	£15m	Phased with development	3
Access/ connectivity	Multiple good quality pedestrian and cycle links to existing urban area Substantial public transport provision - bus services ⁷		£3m £1.3m	£3m £1.3m	Operational prior to housing development	2
Total			£191.4m	£229.1m		

Notes:
1) Wessex Water guidance indicates water supply infrastructure costs of between £1000 and £2000 per dwelling given the scale of infrastructure required - assume £1500 per dwelling.
2) Dorchester STW could accommodate circa 3000 additional dwellings (Dorchester-wide) within existing capacity. A moderate level of investment could accommodate a further 5000 dwellings. Development beyond 8000 dwellings would require major investment programme. Investment costs not provided by Wessex Water at this stage.
3) Waste water costs estimated as £2.5m for moderate investment in STW. New connection = £400/metre. New pumping station = £0.3m.
4) Electricity upgrade costs estimated as £1400 per dwelling, derived from an estimate of £7m strategic upgrade to serve an additional 5000 dwellings.
5) Gas costs - connections less than 11km assume cost covered by supplier. Connections greater than 11km assume cost of £250 per metre.
6) Contribution to Community Hospital Facilities assumed as £300/dwelling.
7) Bus provision: frequent shuttle service throughout the day, 6 days per week for 5 years at £250k/year.
8) Cost of Education facilities estimated as £5736 per dwelling by Dorset County Council.

Based on the assumption that 35% of the homes would be affordable, the Halcrow report concluded that the Dorchester North Option would have a significant negative residual value.

Table 4.4: Summary of npv Residual Value results

Development Option	NPV of Total Costs	NPV of Total Dwellings	Residual Value
A - Dorchester North	£311,532,257	£137,559,290	- £173,972,967

The report went on to conclude that the significant infrastructure required for an urban extension north of Dorchester could not be funded by developer contributions, and would require in the order of £72,000 to £118,000 per dwelling supplement.

In the absence of any more recent studies, we can consider whether there may have been any major changes as a result of the scheme or the economy that could lead us to a different conclusion. This is touched on briefly below.

House prices (average property values for sales purposes) at that time were assessed as around £322,205 – this does not appear to have altered significantly with reference to the house price sales data on home.co.uk (February 2021) which gives a current average of £313,024, and taking into account that there will normally be some degree of premium in respect of new build prices.

Dorchester Property	
Dorchester Homes For Sale	178
Average Asking Price	£313,024

House building costs have risen (rather than fallen), if we refer to the viability information used in the Purbeck Examination, which used a build cost of £1,154/sqm (2017 prices). This is at least a 28% increase from the estimated build price of £72,460 per dwelling used in the Halcrow report (which would equate to £905/sqm based on a dwelling size of 80m²).

The affordable housing proposals contained in the Halcrow report were based on 35% of the homes being affordable. The draft Local Plan (under Policy HOUS2) maintains the proposal for 35% of the homes in Dorchester being affordable. Unlike the adopted plan, a change in the current strategy is

proposed to provide social rented as part of the affordable housing supply (at a minimum of 30% of the affordable housing mix). Whilst this is something that is very much welcomed by the Town Council, as this will provide a greater range of affordable units that are genuinely affordable to people on local wage levels, it is unlikely that this increase in social rented housing provision will make the scheme more affordable.

Other costs are unclear, but there are no obvious reasons to conclude that as a whole they would be lower than previously assumed. Education provision now includes proposals for all three tiers (although this still does not clarify post-16 provision or delivery timescales), and there may be pre-school and/or special needs requirements. The policy gives no clear indication as to what healthcare may be needed – and simply states that “the development should offer opportunities for additional healthcare provision on site in a form that meets the needs of Dorset Clinical Commissioning Group” without specifying what this is, and there was no clear response recorded from the CCG in response to the previous 2018 consultation, but it is reasonable to assume that these costs would not have diminished, given the lack of capacity experienced in the current service.

It is noted that the previous proposal for a single carriageway northern bypass (as referenced in the Halcrow report) have been ‘downgraded’ to a link road. It is unclear on what basis this decision has been made, particularly in light of the Halcrow report findings, and what the implications would be on traffic flows both through the development and around the town. Whilst it is understood that modelling work has been commissioned by the Dorset LEP and should be available February / March 2021, the evidence has not been made available nor was it available to inform the proposed strategy. There are also further implications for the proposed link road approach, which could have unforeseen indirect consequences:

- Higher levels of traffic within the town on High East / High West Street (which has been declared an air quality management area (AQMA) due to high levels of nitrogen dioxide levels above the national annual mean objective of $40\mu\text{g}/\text{m}^3$);
- Reduced capacity / relief to the A35, which is already experiencing significant delays at local peak times as well as during the summer period, including significant queuing along the London Road / Stinsford Hill backing up to Greys Bridge.

There are many other queries regarding the viability of the site. The provision / capacity of utilities is not clearly reflected in any evidence. The provision of 10ha of serviced employment is also not costed (and was not an element covered in the Halcrow Report).

The NPPF stresses the need for planning policies to take viability into account in identifying suitable sites (para 67). Whilst para 2.9.8 refers to the need for engagement with infrastructure providers to determine what infrastructure is needed to support growth for those communities working on a neighbourhood plan, but this has not been done for the Local Plan proposals. Similarly 6.1.5 refers to the production of an Infrastructure Delivery Plan (IDP) to provide “an overview of the range of infrastructure projects required to support the growth in the local plan.” And goes on to state that “An IDP will be produced for the submission stage of the local plan production, once future infrastructure needs become clearer through consultation.”

The findings from the recent (December 2020) Examination on the North Essex Garden Communities¹² is very pertinent as to the need for clear viability evidence. The Inspector found that:

- neither the proposed Colchester / Braintree Borders GC nor the proposed West of Braintree GC were deliverable, because the former would not achieve a viable land price and the latter is below, or at best is at the very margin of, financial viability; and
- it had also not been shown that the necessary public transport connections were capable of being provided, and the failure to do so would directly conflict with the NPPF’s advice that the transport system needs to be balanced in favour of sustainable transport modes.

¹² <https://www.braintree.gov.uk/downloads/file/2940/examiners-report-on-the-examination-of-nea-s1-10th-dec-2020>

The Inspector, in his post-hearing note of May 2020¹³, drew the Councils' attention to the PPG on viability, which makes it clear that understanding Local Plan viability is critical to the overall assessment of deliverability. Viability assessment should not compromise the quality of development but should ensure that the vision and policies are realistic and provide high-level assurance that plan policies are viable. He goes on to conclude (in para 256) that the Plan's spatial strategy would only be justified as the most appropriate strategy if it can be shown that each Garden Community would be deliverable, not just over the Plan period, and that these would include the infrastructure necessary to support its development.

A similar issue can also be found with respect to the Inspector's preliminary conclusions and advice on the Tandridge Local Plan in December 2020¹⁴, nearly 2 years on from the Local Plan submission in January 2019. The key concern was with regard to the proposed South Godstone Garden Community and related infrastructure improvements (particularly highways) and uncertainty over their funding and deliverability. The Council's viability report had already cast uncertainty over the 40% affordable housing requirement, and the Council had already proposed that an Area Action Plan should be developed and examined to provide the detailed policies and implementation mechanisms. Costs such as the education requirements for 4,000 dwellings (based on their submitted 2018 viability report¹⁵) were at around £49million, which is significantly higher than assumed in the Halcrow report. The Inspector notes in their letter that "the work needed to move the Plan to adoption is akin to plan preparation rather than plan examination."

And the lack of any clear evidence on deliverability is a major concern.

The NPPF clearly states that:

"31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

Yet Dorset Council appears to be putting the cart before the horse, in preparing the plan and then hoping that the evidence (that it has yet to gather) will justify the end result. This is a high risk strategy that could fundamentally undermine the ability to produce a sound and deliverable plan in the timeframe set by Government.

It is also clear that the scale and mass of the development will fundamentally change the character of the town and its setting. Furthermore, what is proposed now may not even reflect the full extent of the future settlement, given the lack of a clear northern limit.

It is quite possible that the proposals for the growth north of Dorchester may only be the 'start' of a larger settlement still. There is no clear indication that the settlement will not ultimately extend further north through a future review of the plan, as there is no defined or logical outer limit discussed. Whilst in theory this is a decision for another day, such a piecemeal approach would not be sound planning. Proposed changes to the National Planning Policy Framework, published in January 2020¹⁶, seek to clarify this point:

¹³ <https://www.braintree.gov.uk/downloads/file/267/iedo22-inspector-s-post-hearing-letter-to-neas-15th-may-2020>

¹⁴ <https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/Examination%20matters%20and%20documents/ID-16-Inspector-Preliminary-Conclusions-Advice.pdf>

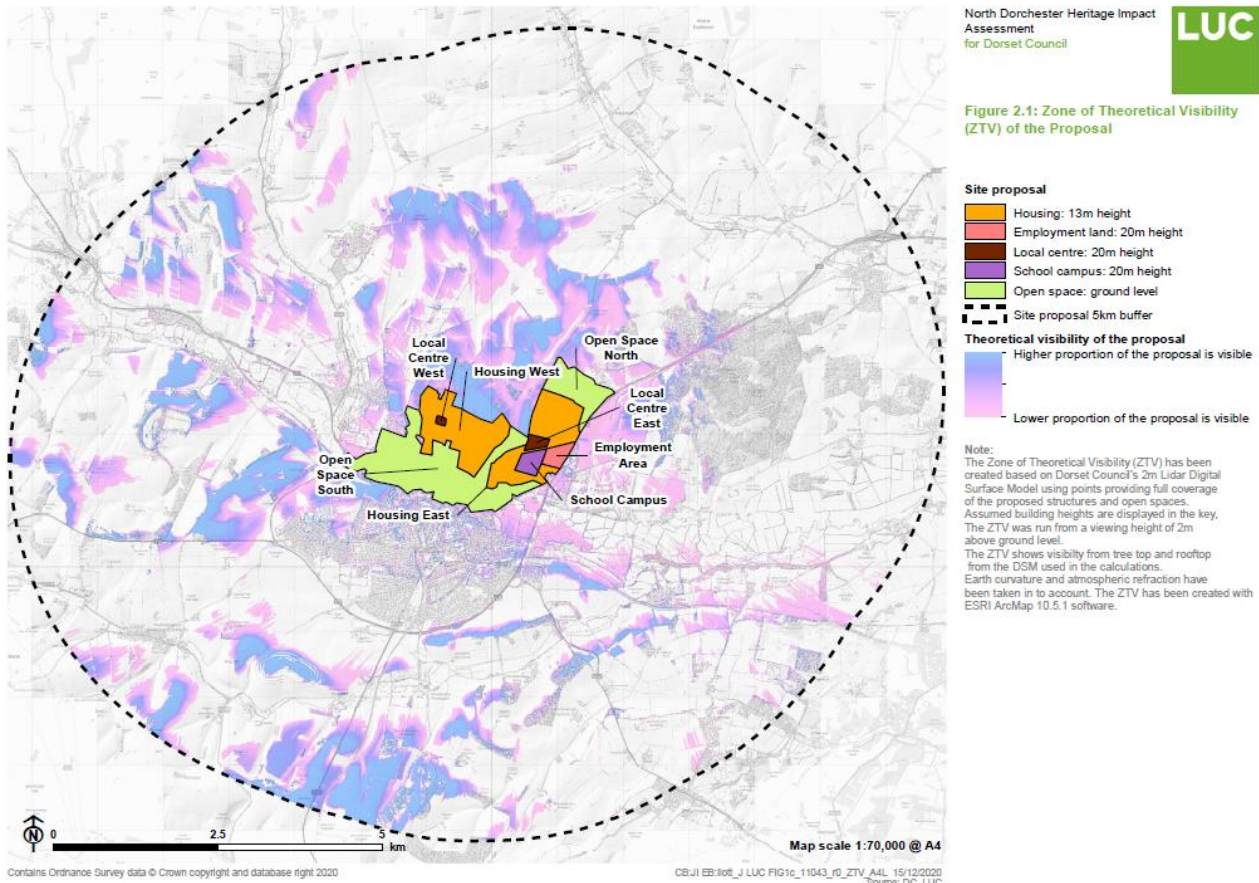
¹⁵ <https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/INFRASTRUCTURE%20%26%20VIABILITY/INF2-Tandridge.pdf>

¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/961244/Draft_NPPF_for_consultation.pdf

"Where larger scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."

There would be significant landscape and heritage impacts from the proposed development.

The Town Council has consistently argued that the scale of development proposed guarantees that the DOR13 will make a historic, step change, impact on Dorchester. It is difficult to see how the town will cope with this scale and mass without fundamentally changing its character.



This was recognised in the Halcrow Study, which flagged up:

"the sensitive built and cultural heritage, the landscape assessment identified several locations where the impact of development upon the existing landscape was considered critical, notable at Maiden Castle, the South Winterbourne Valley and the Frome floodplain."

The Council commissioned a Heritage Impact Assessment of the North Dorchester proposals, which they published in January 2021¹⁷. This report includes an approximate assessment of the potential visibility of the site (Figure 2.1). It highlights the general visibility of the site, which will be extensive.

The previous 2018 landscape and heritage report¹⁸, also undertaken by LUC, noted the medium-high landscape sensitivity of the site, describing it as:

¹⁷ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/north-of-dorchester-heritage-impact-assessment.aspx>

¹⁸ West Dorset, Weymouth and Portland Strategic Landscape and Heritage Study Stage 2 Assessment: Dorchester <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/pdf/evidence/dorchester-stage-2-assessments.pdf>

"The prominent sloping landform, sense of openness and unsettled character, strong intervisibility with Dorchester (with skylines marked by historic buildings within its Conservation Area), views to the AONB beyond the town, and role as a natural containment and rural setting to the town result in an overall moderate-high landscape sensitivity. Sensitivity is reduced slightly (from the 'high' rating) by the lack of historic field patterns and limited naturalistic features within the landscape itself."

The associated guidelines that they proposed states that any new development should:

- *Protect the rural, agricultural setting the area provides to northern Dorchester – rising up from the Frome Valley to create natural containment of the town.*
- *Avoid siting development on the more open, visible slopes, including those rising up from the Frome Valley (designated as part of a wider area of Local Landscape Importance), and elevated land in the north of the assessment area.*
- *Utilise areas of rolling topography and dips in the landform to help screen limited new development within the landscape but avoid locations with channelled views to Dorchester.*
- *Respect and seek to conserve surrounding rural character and high levels of tranquillity in the siting and design of any new development.*

Yet it is hard to see how these guidelines can be followed in light of the potential visibility of the proposal.

The more recent heritage report notes that:

"Dorchester and the surrounding area have particularly strong associations with the writer and poet Thomas Hardy."

and the report recognizes that key components of the site and its setting are associated with Hardy's works, including the River Frome water meadows, Grey's Bridge (now listed) and Ten Hatch Weir, amongst others.

The report goes on to identify potential high adverse impacts on a number of the Listed bridges, and medium to high adverse impacts on the setting of Poundbury Camp and the Conservation Area. The route (and status) of the proposed link road could have a profound effect on the archaeology and the scheduled monument of Poundbury hillfort, as LUC acknowledges with their recommendation to realign the route (although it is not clear how the route could realistically be realigned without impacting on something else) and to set back the development further to the north (to the far side of the Charminster to Stinsford Road).

View from footpath alongside the River Frome looking north-east, near Grey's Bridge:



View from Grey's Bridge looking north-west:



The report downplays the importance of the landscape, as they say that Hardy's works were ultimately fictional, with any landscapes subject to a degree of creative license. Yet DOR13 would significantly impact on the settings of his works, such as the short story 'The Three Strangers' and 'Far From the Madding Crowd'. People travel from all over the world to visit the sites which so profoundly inspired Thomas Hardy, as noted by Dr Tony Fincham, chair of the Hardy Society in his letter responding to the Local Plan consultation¹⁹, who describes the potential impact of the development as "an act of the most severe literary, historic and environmental vandalism".

The assessment has also assumed that the open space and strategic landscaping would have no development impacts, although it acknowledges that in reality drainage, paths / cycle routes lighting etc will have some impact that will need to be assessed at a future stage. The water meadow landscape is replete with heritage assets, as well as being associated with Thomas Hardy. The assessment concludes that the level of effect is likely to be medium-high, but acknowledges that there is much uncertainty about their importance.

It also downplays the potential pre-historic significance and connectivity of the area, as explained in the Discussion Paper by Linda Poulsen. She explains how the Stinsford Barrow Group (which is within the proposed development area) may have links to other Neolithic / early Bronze Age henge monuments within the Frome Valley, and be part of a northern, linear cemetery echoing the cemeteries found along the South Dorset Ridgeway.

The vision for Dorchester articulated in the Plan states that development will:

Make the most of the surrounding countryside, including its links with Thomas Hardy, Maiden Castle and Kingston Maurward College.

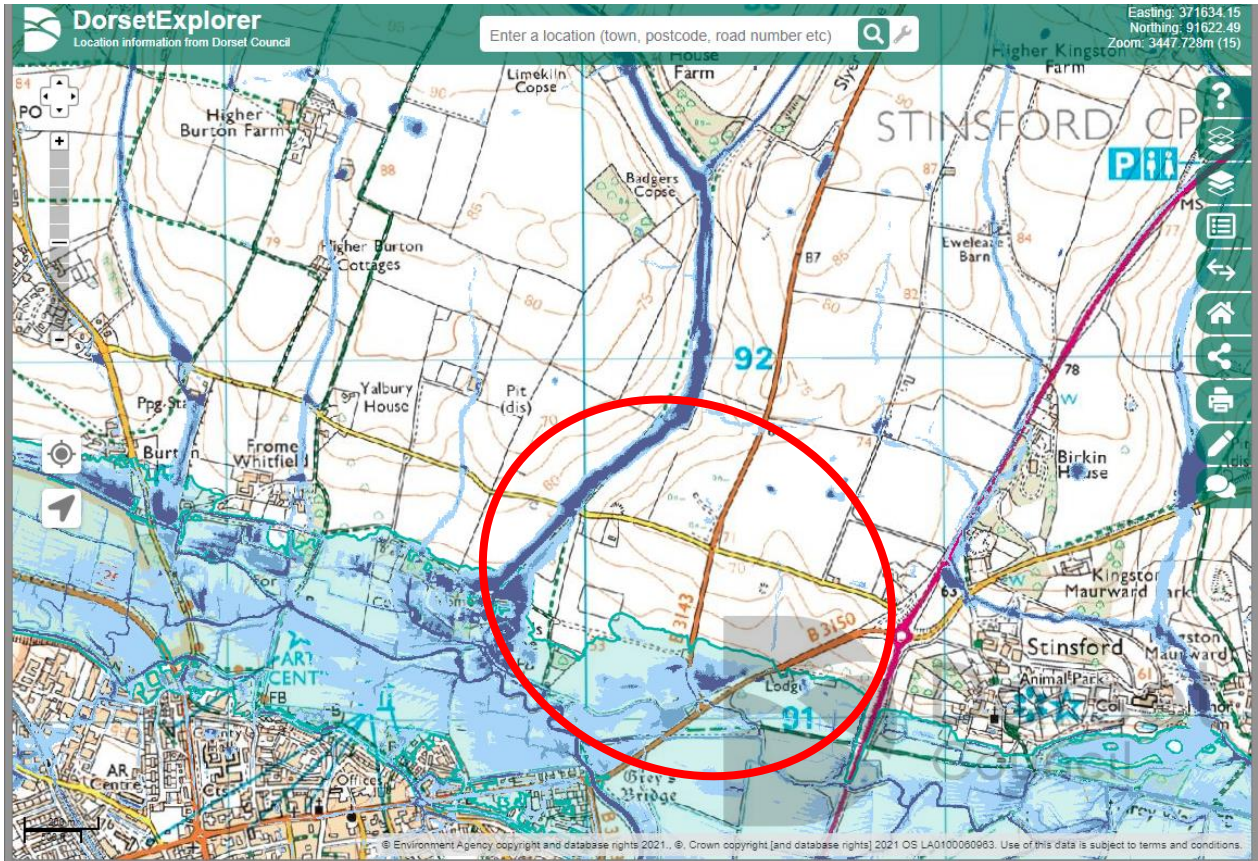
Yet it is difficult to see how DOR13 will achieve these aims when it will clearly adversely impact on the landscape qualities of the countryside north of the town and its Thomas Hardy connections.

The Town maintains its position that DOR13 would ensure the destruction of Hardy's literary landscape, as well as causing significant harm to the prehistoric landscape and Listed structures. Any additional people movement across the water meadows and the infrastructure to support it will negatively impact on a unique place whose centuries-old land use quietly and unassumedly showcases Dorchester's agricultural heritage. It is unclear how this harm can be justified (in line with para 195 of the NPPF) given the proposed over-supply of housing across the area and potential alternatives.

¹⁹ https://standdorchester.files.wordpress.com/2021/01/th-s-statement_dor13-1.pdf

There are also unknown impacts flooding and groundwater that would arise from this scale of development.

The large area of ground is subject to flooding on the northern edge of the town, either side of the River Frome that flows through the watermeadows. There is also a Zone 1 inner source protection area in approximately the area highlighted on the map, and the groundwater underlying the whole site is safeguarded for providing a public supply for drinking water.



No evidence has been provided to demonstrate that the run-off from the development would not increase the flood risk to infrastructure and dwellings already within the flood risk areas on the northern edge of the town, or adversely impact on an important public drinking water supply.

And given the difficulties inherent in providing good connections given its relationship with the town, it is likely that the development would lead to more car-borne traffic.

The vision for Dorchester as set out in the plan states that it will:

"Have good quality transport links to the surrounding towns and rural area" and

"Be a place where more people can live and work locally, without having to commute."

It doesn't mention being able to walk to work (commute rather implies a longer distance of leaving the town for work) or to reach the town centre other than by car – which if a genuine aim should be clarified in the vision.

Realistically, what is being proposed is a community 1½ to 2 times the scale of Poundbury at a similar distance (as the crow flies) from the town centre and jobs, and which will arguably be less well connected due to the barrier created by the flood plain.

Poundbury has both businesses, shops, and housing within its mix (as well as being in close proximity to the cluster of industrial estates either side of Poundbury Road to the north-east). In 2018²⁰ it was

²⁰ https://duchyofcornwall.org/assets/images/Poundbury_Impact_June_2018_update.pdf

assessed as having more than 99,000m² of commercial floorspace, accommodating close to 200 businesses and an estimated 1,900 full time equivalent jobs (FTEs), and a further 5,000m² of commercial development planned in the last phase, which should create a further 95 FTE posts. This suggests a job:person ratio of about 0.4, significantly higher (by more than 2½ times) than that proposed for the North Dorchester extension.

Poundbury also has a regular bus service (no. 6) that stops at the station, hospital, and town centre (although this does not operate on a Sunday) as well as being on the route of the X51 service that also connects to Bridport and the west and the no.10 Service that operates from Weymouth to Poundbury (Mansell Square). However sustaining an uneconomic bus service is not a long-term solution, and the commercial viability of any routes connecting the North Dorchester extension are likely to be challenging. The no. 6 service is currently subsidised through the S106 agreement relating to Poundbury. As recently as February 2021 the half hourly Blandford town bus (subsidised at a cost of £91,000 by Lidl as a condition of a planning permission) was withdrawn as the bus operator said it was unable to continue running it without funding²¹.

The park and ride proposals contained within the plan are for land to the south of the Stadium Roundabout on the southern (Weymouth) side of the town. The proposals appear to give no consideration to the North Dorchester proposal, and despite being in the plan since 2015 has not progressed.

The southernmost edge of the development (if taken to be the Charminster – Stinsford roundabout road) is 1.2km across the watermeadows to reach High East / High West Street. From the outer edge of the development (eg Eweleaze Barn) to the market site at Fairfield would be is likely to be around 3.5km (assuming a reasonably direct route utilizing a new crossing point).

Guidance on acceptable walking distances for people without mobility impairment²², as reproduced below, suggests that the majority of people within the development would be highly unlikely to walk into Dorchester given the distances involved. Furthermore, there is clearly a conflict between having a well-lit route across the watermeadows and the ecological and heritage significance of this area. Without adequate lighting the most direct routes will not be safe and attractive outside daylight hours, significantly limiting their effectiveness for work and school journeys during the winter months.

	Town centres (m)	Commuting/school Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred maximum	800	2,000	1,200

Even accepting the principle that one or more new pedestrian/cycle routes could be established from the centre of the settlement across the water meadows and uphill to the town centre, the cost of integrating such routes into the town centre network could be prohibitive at the Dorchester end.

There is no information on the likely trip rate generation, but even with a subsidised public transport service and walking / cycle links, it is still considered that the development would be likely to generate in the region of 0.5 trips per household in the peak periods. This would add a further 1,750 vehicle movements plus on the local road network, on the approach roads into the town and within the town itself, including further pressure on the town centre car parks.

In summary, there is no indication that the development could provide for high quality walking and cycling networks and supporting facilities such as cycle parking. There is no indication that the mix of

²¹ As reported in the February 2021 Blandford Forum Focus magazine

²² Institute of Highways & Transportation (2000) Guidelines for Providing for Journeys on Foot, London: Institution of Highways & Transportation

uses that would minimise the number and length of journeys needed for employment, shopping, leisure, education, and other activities. There is no indication that the proposals have been prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned. Nor is there any information to show that the critical infrastructure needed to widen transport choice and realise opportunities for large scale development could be delivered. All of these are requirements set out in para 104 of the NPPF.

We therefore would take this opportunity to raise the strongest objection to the continued inclusion of DOR13 within the Dorset Council's Local Plan. It is not supported by any evidence to demonstrate that it is sustainable and deliverable.

We also reserve the right to add further to this objection should new evidence be forthcoming.

Report prepared by Jo Witherden BSc(Hons) DipTP DipUD MRTPI on behalf of Dorchester Town Council.

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