

Response by Dorchester Town Council to the WDDC Local Plan Preferred Options (October 2018) - Policy DOR15

Headline Response

Dorchester Town Council would like to begin by acknowledging the work completed by members of West Dorset District Council. We recognise that the policies have developed beyond those published in the Initial Issues and Options Document, with consideration of several points raised in our initial response (April 2017).

We note that further attention has been given to Policy DOR15, with additional caveats relating to affordable housing and infrastructure. However, we remain unconvinced that Policy DOR15 will provide a quality development for Dorchester. We also remain unconvinced that there is a need for housebuilding on the scale identified in the Preferred Options document.

The Town Council has therefore resolved as follows:

Dorchester Town Council objects

to Policy 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.

Considerations and Concerns

1. Housing Numbers and Site Allocations

In our submission to an earlier phase of the Local Plan Review, a year ago, we expressed the view that the overall numbers of dwellings being proposed was too high and that Dorchester was being required to bear the burden of far more housing than is its fair share. We asked for evidence that house number volumes were essential and that alternative options be fully explored before committing to an approach that places such heavy emphasis on Dorchester. We note that the numbers in the last phase of the review are almost identical to those determined more recently by Central Government and that effectively the District Council is faced with having to respond to a centrally imposed diktat.

Notwithstanding this the Town Council does not consider that the numbers required in the plan are driven by the need for homes for workers to assist the growth of the local economy. Instead the numbers appear to be driven by historic patterns which can be linked to the inward migration of other than working-age members of the population who will place an increasing burden on local health care services.

Put very bluntly Government requires that West Dorset must be spoilt to accommodate the needs of those in the south east who are nearing or reaching retirement age.

We advocated that the required housing numbers could be shared across the district and so deliver sustainable growth in outlying settlements, thereby helping to sustain the dwindling services within villages. There is no sign in the current material out for consultation that this suggestion has been properly considered.

Nor do we believe that other site options within the Plan area have been sufficiently explored or considered fully. As an example we cite the emerging North Woodsford proposals, which are at least in part focused on the reuse of disturbed land. We can find no

evidence that these proposals have been given the same level of consideration as DOR15. We feel that the willingness of the landowners within the area covered by Policy DOR15 to see their land developed is the main driver behind the choice of this site.

In challenging the housing numbers, we would like the District Council to follow the lead given by South Gloucestershire Council, which undertook legal proceedings to overturn the planning inspector's decision to grant consent for development in Thornbury. South Gloucestershire councillors believed that the proposed development was unsustainable, would undermine the West of England's joint spatial plan and allow developers to circumvent the plan-led system, consequently submitting an application for judicial review in September 2018. Such concerns are shared by Dorchester Town Council, and we continue to observe the Thornbury case with Dorchester in mind.

The dramatic scale of DOR15 guarantees it 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. Many councillors feel that DOR15 is merely the 'easy option' for planners to meet a nationally calculated, retirement housing demand-led, housing need for the coming years. Placing a large amount of development in one location may assist the District Council in hitting target numbers without reliance on a multitude of small sites but this approach brings with it a responsibility to address the subsequent impacts, a responsibility we do not see being met at the present time.

2. Affordable Housing

Affordable housing for young workers and families is essential to allow people to live where they work, rather than commuting from Weymouth, Yeovil and further afield.

The national definition of 'affordable', at 20% below market value, does not deliver property which is genuinely affordable to local young people in Dorset. Consequently, we consider that a discount of nearer 50% is required to deliver locally affordable housing. Genuinely affordable rented housing is also needed for those not ready or able to own property. The issue of "genuine affordability" would need to be specifically addressed within DOR15. We are not satisfied that the cost of delivering at least 35% of genuinely affordable housing has been properly established. Based on past performance and as evidenced by the prison development, we do not believe that the proposed "at least 35% ... affordable housing" will be adhered to in Policy DOR15.

3. Access and Movement – a Northern Bypass, Vehicle and Non-Vehicle links to the town centre

There is no clarity regarding the role of streets and roads across the DOR15 site and how they will be integrated into the town's current road network.

The land under consideration provides the last remaining opportunity for a northern bypass, which many believe is necessary to relieve the town centre of traffic that moves from north of the town (the A37) to the east (A35) and vice versa.

Failure to deliver a suitable link from the A37 to the A35 will have two major impacts

- It will fail to deliver the needed relief for the town centre, against the background of additional traffic due to the development itself

- It will blight the development as through-traffic follows Satnav systems that do not understand that the link road is designed for local traffic only.

At the same time, if the link road runs through the middle of DOR15 it will bisect a site that is already separated from the town by the River Frome and the wider flood plain. A major piece of engineering infrastructure running through the development can only serve to further distance new residents from their town centre. It is not clear how the competing demands of through movement (given the role that this road will inevitably have in delivering a northern bypass) can be reconciled with local access and a street network that encourages non-car movements.

Furthermore we do not believe that there is remaining capacity on the A35 at peak periods to cope with the additional vehicles arising from the development itself. The Stinsford Hill roundabout already suffers significant delays at local peak times as well as during the summer period, while residents of North Dorchester seeking to come into town from the Charminster direction will be faced with significant delays crossing local bridges before joining traffic queues on The Grove.

Subsidised public transport has become a first budget reduction option for Councils; such an option cannot be argued for the North Dorchester development. Equally it is unlikely that the “paid for” journeys from 3,500 homes would be sufficient to support a regular unsubsidised public transport service.

Councils have worked hard to ensure that Poundbury is fully connected to the rest of Dorchester even without a physical gap. Between the town and the proposed developments there are rivers, water meadows, SSSIs and extremely limited crossing points.

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 a route into the town centre network could be prohibitive at the Dorchester end. The distances involved may be sufficiently long to deter residents from using them regularly, particularly during the winter months. Without a clear visual link, physical link and importantly a strong psychological link, between the new neighbourhoods and the existing town centre, sustainable modes of travel are unlikely to account for many of the travel movements that will arise.

A lack of viable movement alternatives will force North Dorchester residents to travel into the town centre by car, adding as many as 7,000 extra vehicles (assuming two per home) to the problem that already exists on main roads around the town, on the approach roads to the town and within the town itself.

These additional cars will add further to the significant parking problems currently faced by the town. No mention is made in policy DOR15 regarding how the development will make a financial contribution to resolving the additional problems that it causes within the town centre.

The disconnected nature of the site, the A35/A37 link issue, and the distance from the town centre therefore risks the development becoming one or more separate communities. If

located as far from Dorchester as the indicative layout (page 246 of the LPR, August 2018) suggests, the development might as well be even further adrift of the county town – which returns us to the assessment of suitable alternatives that we do not believe have been fully explored.

4. Education

We are concerned that Policy DOR15 will not deliver suitable education facilities. Education pre-16 has been accounted for, but it will take many years for this to be fully utilised, with highly inefficient delivery during the construction period.

The development is too small to deliver post-16 education on site at an acceptable standard; current education policy is creating a move towards fewer larger, centralised providers. Locally however current post-16 facilities are already at capacity with no obvious opportunities to expand. Discussions will need to take place with post-16 education providers about how, if at all, additional capacity can be created offsite to be funded by the development.

5. Employment

A new community should be able to access employment within an appropriate distance of their homes, to reduce the need for travel and encourage a more positive work/life balance and reduce the number of commuter cars on the road. We are not convinced that Policy DOR15 will foster the modern business environments required by residents. Setting aside a block of land for employment purposes (page 246 of the LPR, August 2018) rather than suggesting an integrated mix to reflect modern working practices does not suggest a forward-thinking mixed-use approach has been considered.

It is not clear that there will be enough local employment land to sustain its new population. This risks the population becoming a segregated settlement without interaction with existing residents and putting added pressure on services throughout the existing town.

6. Health Services

Dorchester town currently only just copes with its existing health services. The Clinical Commissioning Group has referenced a situation in Weymouth where land for a surgery was allocated within a new development but the surgery was never built. In common with many counties Dorset is struggling to recruit qualified healthcare workers, particularly GPs.

We are concerned that Policy DOR15 does not guarantee the delivery of a constructed and staffed GP surgery necessary to sustain a growing population. The addition of 3,500 properties, 7,000-10,000 extra residents necessitates further expansion of Dorset County Hospital. No reference is made to how the development will contribute towards the cost of this expansion.

7. Landscape & Heritage

In Hardy's *Mayor of Casterbridge*, he describes Dorchester as "...a chessboard on a green table cloth". This close connection between town and countryside is a given for the town's residents and is a popular attraction for many visitors, with its origins dating back centuries to Roman times. Many tourism guides reference the water meadows and celebrate the fact that Dorchester has managed to retain its impressive heritage and landscape.

The northern boundary of the town is now the last remaining Roman and Hardyean countryside edge; expanding northwards marks a point of no return. Policy DOR15 would ensure the destruction of Hardy's literary landscape. 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.

We do not accept that ours should be the generation that fails to pass on a valued legacy to future generations. Policy DOR15 would destroy one of the most stunning features of Dorchester.

8. Environment

The River Frome separates site DOR15 from the town. There is no evidence that this development will not exacerbate flooding as a serious issue, with additional environmental concerns for wildlife habitats. We believe that a flood mitigation strategy – comprising prevention of fluvial flooding, surface water run-off, and ground water flooding – must be agreed upon before Policy DOR15 is formally adopted. Has West Dorset District Council complied with their Local Plan Policy ENV6 in relation to Policy DOR15?

We believe that Dorchester's sewerage system is at capacity, and it is anticipated that significant off-site contributions will be required to offset the impacts of development on this scale on Poole Harbour. We have seen no evidence that Policy DOR15 will help West Dorset District Council achieve the default 'good' quality status for water bodies, such as Poole Harbour, by 2021 – a task set out in the Department for Environment, Food & Rural Affairs and Environment Agency's *'Water for life and livelihoods; Part 1: South West river basin district, River basin management plan'*, Dec 2015.

We believe all mitigation for nitrogen neutrality obligations must be presented and agreed upon before Policy DOR15 is formally adopted, to ensure that nitrogen neutrality is met. See Natural England's Policy Recommendations in *'Improvement Programme for England's Natural 2000 sites (IPENS); Planning for the Future; Site Improvement Plan Poole Harbour'*. There are formulas available to estimate the amount of nitrogen a new housing development will create through waste water sewage. Has West Dorset District Council seriously calculated and considered the amount of increased nitrogen levels that will be deposited in Poole Harbour, should Policy DOR15 be implemented?

Dorchester is the only large settlement in West Dorset that sits within the Poole Harbour Catchment Area. Has West Dorset District Council seriously considered other areas of the district, like Sherborne, Bridport and Weymouth, which are not affected by the international restrictions placed on Poole Harbour as a Special Protection Area (SPA) and RAMSAR site? See Wessex Water's *'Wessex Water Position Statement on Nitrogen Levels in Poole Harbour'*, October 2017.

Natural England has registered the current water pollution levels in Poole Harbour as a threat and cite West Dorset District Council as one of the bodies responsible for investigating, monitoring and managing water pollution issues in Poole Harbour. Has West Dorset District Council complied with their Local Plan Policy ENV11 in relation to Policy DOR15?

9. Cultural Infrastructure

The Town Council does not accept that cultural infrastructure requirements stop at the boundary of the development and believes that Policy DOR15 should go much further, recognising the impact of the development on the town of Dorchester itself.

In addition to the additional traffic impacts within the town described above, development at this scale will place significant additional burdens on the town's cultural, recreational and sports infrastructure. These need to be allowed for within Policy DOR15, with a contribution to ensure that existing facilities can cope with the additional demands that a 30% increase in the population of the town will bring.

10. Design Quality

Many new developments across the country are of extremely poor quality, due to being developer and/or landowner-led rather than design-led. We have no confidence that Policy DOR15 will go against the norm and therefore fear poor quality houses will be bolted on to the town as an urban extension. Our comments elsewhere regarding the physical gap between the town and the development area identify our concern that in reality this will not be a genuine urban extension at all, instead being a separate settlement with none of the advantages and many of the disadvantages that a town located further from the town could have achieved.

The current policy does not specify the level of detail that would be required by a masterplan, such as the inclusion of a design code (and the topic areas it should cover such as materials, environmental standards, access and travel plans) and the mechanism by which DOR15 would retain the highest design standards over the lifetime of its construction and beyond. A detailed vision for the future is essential even at this earliest stage. A developer and landowner-led scheme may exclude costly infrastructure that we consider essential and fail to foster a sense of place, rather than create somewhere that is worth living in.

As currently laid out, Policy DOR15 does not rule out another development of large 4-bedroom properties bought as investments; it does not guarantee to accommodate the genuine needs of the local population.

11. Timing of Development and the need for infrastructure before development commences

It is acknowledged that the plan is for development to take place over many years. While some public benefits can be delivered as development happens, for example affordable housing, most elements will be required ahead of development.

Because of a current lack of capacity in the town, education, health, road and sewerage infrastructures need to be put in place ahead of development. Health and education capacity will then need to be delivered inefficiently for the first years of the development's life. Policy DOR15 makes no comment about the costs associated with implementing essential infrastructure ahead of the release of the housing that will pay for it.

12. Proving Viability

For the many reasons identified above the Town Council has no confidence that the development north of Dorchester is capable of supporting the on-site and off-site affordable

housing and infrastructure requirements necessary for a sustainable development which does not negatively impact on the town of Dorchester.

Policy DOR15 begins the process of defining an extensive and expensive range of essential affordable housing and other infrastructure requirements. We have made suggestions for additional highways and cultural requirements that also need to be addressed, which exist within the existing town boundary.

There is no benefit in creating Policy DOR15 to discharge these requirements if the North Dorchester development is ultimately unable to comprehensively deliver the requirements described.

We therefore request that, if West Dorset District Council choose to press on with Policy DOR15, an independent viability assessment is commissioned that evidences whether or not the full list of requirements can be delivered while still allowing the landowners and developers a reasonable return on their investment.

Failure to prove viability now damages the credibility of the policy and leaves West Dorset District Council open to viability claims from the developer at a later date.

13. Local Plan Policy and National Planning Policy Framework Requirements

From the concerns raised, the Town Council is yet to be convinced that Policy DOR15 will satisfy the following policy requirements of the West Dorset, Weymouth & Portland Local Plan and the National Planning Policy Framework (July 2018):

West Dorset, Weymouth & Portland Local Plan

ENV3. Wildlife Habitats and Species

ENV4. Green Infrastructure Network

ENV5. Heritage Assets

ENV6. Flood Risk

ENV10. Agricultural Land and Community Schemes for Local Food or Crops

ENV11. Pollution and Contaminated Land

ENV12. The Landscape and Townscape Setting

ENV14. The Siting and Design of Buildings

ENV17. Effective and Efficient Use of Land

ECON1. Provision of Employment

HOUS1. Affordable Housing

HOUS3. Open Market Housing Mix

COM1. Making Sure New Development Makes Suitable Provision for Community Infrastructure

COM6. The Provision of Education and Training Facilities

COM7. Creating a Safe and Efficient Transport Network

COM9. The Provision of Utilities Service Infrastructure

National Planning Policy Framework (July 2018)

Para 8. Economic/Social and Environmental Objectives

Paras 16. b) and c), 20, 36 and 41

Section 5. Delivering a sufficient supply of homes – particularly paras 71. And 72.

Paras 91, 92, 94 and 98

Section 9. Promoting sustainable transport

Section 11. Making effective use of land

Section 12. Achieving well designed places

Section 14. Planning and flood risk

Section 15. Conserving and enhancing the natural environment

Section 16. Conserving and enhancing the historic environment

14. Additional Notes

The decision to use the word 'will' or the word 'should' within the policy wording contained in the Local Plan leads to serious concerns about whether certain policy requirements will be delivered, or whether they are merely platitudes. Recent negative experience with development proposals in the District has left Dorchester Town Council very sceptical about the reality of benefits such as the percentage of affordable housing.

While the Town Council has no reason to doubt that the District Council has followed its consultation protocol and statutory guidance regarding the timing of consultation we remain concerned at the numbers of Dorchester residents who, even today, are unaware that consultation is taking place. Members are concerned that insufficient effort was put into promoting the single consultation event at South Walks House, nor do they consider a single event to be sufficient for a process that could inexorably alter the town's future.

Members are also concerned about the number of comments received from residents seeking to make representations using the online comments system. The system is clearly designed to drive individual responses to all of the questions in the Preferred Options document, whereas many of our residents wish to direct their comments on only one or two questions. Our advice to residents has been to use e-mail, letter and other means of communication, with an expectation that the District Council will consider these responses with as much care as those being submitted using the online service.

Finally, we have received a couple of comments regarding an EIA for Policy DOR15. Can WDDC demonstrate that the impacts of DOR15, if implemented as intended, have been properly considered through an Equalities Impact Assessment? If such an assessment has been carried out, what if any revisions to DOR15 have been made as a result of the assessment findings?

15. Next Steps

Dorchester Town Council remains committed to continued engagement with West Dorset District Council on proposals for Dorchester. We appreciate being given the opportunity to respond to the Preferred Options and look forward to discussing the future of the town in detail.

Dorchester Town Council

Special Meeting of the Planning and Environment Committee – 10 September 2018

Comments on policies and plans in West Dorset District Council's Local Plan Preferred Options Consultation Document

| Dorchester | |
|---|--|
| DOR2 | Future Town Centre Expansion WDDC committee decisions have overtaken this policy and it needs to be rewritten. |
| DOR3 | Fairfield Car Park 11-i Little or no expansion is likely anywhere at present. See also comment at DOR2. |
| DOR6 | Dorchester Transport and Environment Plan DTC does not agree with a P&R site south of the Town at the Stadium Roundabout – it is too big to be viable - look for something smaller and more appropriate. |
| DOR9 DOR10 DOR11 | No further development should be allowed on these sites until all the parking and traffic issues on Lubbecke Way/Long Bridge Way/St Georges Road are resolved. |
| DOR12 | Former Dorchester Prison Why is this site designated as a 'Preferred Option' when it already has an approved planning permission on it? Is this a technical issue? |
| DOR16 | Land to the West of Charminster This site will need to pay careful attention to policies ENV. 1, 3, 4, 5, 6, 10, 12, 13, 14, 15, 17, COM. 7 and HOUS. 3 in particular. This policy recognises that Charminster is to be kept separate from Dorchester but yet demands facilitating ease of travel to Dorchester. These seem incompatible. |

| 1. Introduction (to Dorchester) | |
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| 1-ii | In paragraph 1.2.19 add "and this is expected to continue". 1.2.12 significant investment in transport network and other infrastructure is needed. |
| 1-iii | "Strategic Priorities" need greater prominence within the plan and greater weight given to realistic ways of meeting them. ADD 'Retention of good agricultural land'. |
| 1-iv | Balance between "needs of the present", "of future generations" and of "local circumstances" should be made more explicit so that prospective developers, local residents and the local planning authority have a clearer perspective about what should happen. |
| 1-v | INT 1 should include "Permission will not normally be granted when it is conflict with policies in this document". |
| Environment | |
| | Environment policies acceptable: Table 2.2 in Green Infrastructure - Policy references need renumbering. |
| ENV14 2-xi | Policies should be included NOW! |
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| Sustainable Pattern of Development | |
|---|---|
| SUS 1 | The Level of Housing and Economic Growth 3-i Do we have any choice? Do we have any way of ensuring that the land we supply will be developed to reflect local needs rather than those of a developer? |
| | 3-ii Infrastructure needs and connectivity must be addressed more carefully to ensure our needs are met - not the developer's. "Number of dwellings" should be broken down by type and size. HOUS3 must be rigorously applied. |
| | 3-iv Employment land supply - flexibility of provision is needed. |
| SUS2 | Spatial Strategy 3-v This refers to "needs of the local area". How local? |
| SUS3 | Re-Use of Buildings Outside Defined Development Boundaries 3-vi May be too restrictive, encouraging dilapidated buildings to be allowed to decay further when an alternative use is possible. |
| SUS4 | Neighbourhood Development Plans 3-ix Is there any mechanism for assessing more carefully the type of housing needed locally and including a policy to ensure such needs are addressed? |
| Economy | |
| ECON3 | Protection of Other (Non-Key) Employment Sites 4-iii Should this apply to retail? E.g. closure of a shop. |
| ECON4 | Retail Need and Provision 4-iv We can only provide, not develop. At present there is little or no prospect of sustainable development. |
| ECON5 | Retail Hierarchy, the Sequential Test and Impact Assessments 4-v Should be Table 4.3 |
| ECON 9 & 10 | Tourism Attractions and Facilities/Built Tourist Accommodation The term "Adequate visitor facilities" needs clarification. |
| Housing | |
| HOUS1 | Affordable Housing 5-i Add to HOUS1 para iv). detailing which elements are contributing to the claim of non-viability. Planners must be robust in examining carefully any claim of non-viability and offer alternative ways of reaching viability. |
| HOUS3 | Open Market Housing Mix 5-iii Delete "whenever possible" ADD Residential development should include an appropriate mix of size, type and affordability of dwelling, taking into account the likely need in that locality. |
| Community | |
| COM1 | Making Sure New Development Makes Suitable Provision for Community Infrastructure 6-i The trend at present is for more space for informal leisure/play rather than playing pitches. However, this may well change. How can the need for flexibility in provision be accommodated? |
| COM7 | Creating a Safe and Efficient Transport Network 6-iii Add in to COM7 'Proposals which would have a negative impact on access to sustainable transport solutions will not be supported.' |
| | |

Policy Maps

Policy maps (currently un-numbered) in the Policies Map Amendments Document August 2018 should be numbered to fit with their respective description in the main Consultation Document.

Dorchester

- Remove secondary shopping frontage on Eldridge Street, Brewery Square as this is now has approved residential use
- Add area of Nappers Court and shops at the end of Hardye Arcade/Charles Street to secondary shopping frontage

Poundbury

This map indicates that the area around Queen Mother Square is designated as being part of the 'Town Centre Boundary' – should this area be treated as a 'District' or 'Local Centre' for the duration of this Local Plan? See the description in Poundbury Urban Extension paragraph 11.4.19. – seems to conflict.