



Dorchester Civic Society

An Independent Voice

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Dorset Council Local Plan Consultation, January 2021

Dorchester Civic Society Position Statement 1 (of 2)

Approved at a meeting of the Society's Committee on 9 March 2021

Executive summary

- i. The Society believes that the plan, as currently put forward for consultation, is unsound due to its failure to have regard to the National Planning Policy Framework. Critically, it is not backed by relevant and up-to-date evidence and, therefore unfit for public consultation. As a consequence of Government imposed targets and a self-imposed adoption date of 2023, the plan is merely a hurried stitching together of the plans of the former District Councils. The opportunity to take advantage of the 'new geography' of the Council has been missed. The gaps and inconsistencies of the plan are glaring - most seriously the failure to put forward a meaningful overall council-wide strategy, or even begin to address transport issues - which are unbelievably 'still being developed'.
- ii. Since the adoption of the 2015 West Dorset, Weymouth and Portland Local Plan, both West Dorset District Council and Dorset Council have declined to put forward a sub area strategy for the Dorchester catchment area against which to examine alternative strategies for the distribution of residential development. As a consequence, Weymouth is treated separately despite its obvious functional linkages with Dorchester. The lack of transport input cruelly exposes the inadequacy of the 2021 Consultation Plan, particularly at this local level, with a resultant lack of joined up thinking, and failure to examine more sustainable development alternatives and transport solutions, including the long-term impact of current trends and issues such as Covid 19 on long term travel patterns.
- iii. The Society is extremely disappointed that its previous submissions regarding proposals for development north of Dorchester have been ignored. The landscape setting of Dorchester on its northern side is not only of inherent value but also, critically, of both national and international importance due to the writings of Thomas Hardy; and yet the DOR13 proposal remains, seemingly because it is regarded by the Council as an 'easy option'. No thought has been given, even at this stage, to how the proposal could be made to work. The difficulties are highlighted in the Heritage Impact Assessment. More difficulties will be revealed as the work to test viability, deliverability and overall credibility is, belatedly, carried out. Critically, all the plan's DOR13 proposals, including infrastructure and affordable housing, depend on viability

Dorchester Civic Society exists to stimulate people's interest in the town and its setting; promote high standards of architecture, urban design and planning; safeguard buildings and areas of historic interest; and promote civic pride.



which, given the evidence of previous studies, is extremely unlikely to be demonstrated. Without this evidence, the plan must be considered unsound.

- iv. In its 2018 submission, the Society emphasised that the parameters and prerequisites for the DOR13 Master Plan must be set out in the plan. Despite a successful Garden Communities bid, masterplanning has taken a backwards step with the very real threat, as land values crystallise at higher levels, of an 'anywhere' urban sprawl of housing devoid of local character and necessary infrastructure. As at the council-wide level and the central Dorset level, there is a gaping hole relating to transport evidence typified by the total confusion about the role of the link road - presumably undeliverable at the standard required to serve any intended strategic road network function.
- v. Times have changed, but the proposals for Dorchester town centre have not. Irrespective of the lack of transport input, there is a failure to grasp the opportunities presented to rethink the future of the town centre as a vibrant mixed use community hub with sustainable transport at its heart. The plan fails to match up to this vision and provide the basis for the much-needed town centre land use and transport master plan.
- vi. Such are the gaps and deficiencies of the current plan that it is not fit for public consultation. It should be withdrawn giving time for the missing council-wide and local studies to be prepared, the situation to be reassessed in the light of all the up-to-date evidence, and the plan represented at a time to enable the process to adoption to be completed by 2024.

Section 1

Background to this statement

1.1. This Position Statement 1 [PS1] comprises a targeted identification of principal objections to the overall plan based on the evidence currently available. It highlights the gaps, [including particularly the lack of a Council-wide geographically-based spatial and transport strategy] and inconsistencies of the plan; challenges the deliverability of DOR13 [‘Land North of Dorchester’]; criticises DOR13’s relationship with and, impact on, Dorchester and its setting; questions the lack of a sub-area spatial and transport strategy for Central Dorset and Dorchester itself; and challenges the lack of a coherent strategy for Dorchester town in these changing times. The Society reserves the right to comment further beyond the formal consultation stage as new background documents and evidence emerge.

1.2. This Statement sits alongside Position Statement 2 entitled *Development North of Dorchester: Where is the Masterplan?* [PS2]. Attached with this PS1 are Appendix 1: *Critique of the ‘Sustainability Appraisal Options Stage’ with Particular Reference to Dorchester*; and Appendix 2: *Consideration of the Deliverability of the Proposed Development North of Dorchester [Policy DOR13]*. In contrast to the approach in this focused statement of objections, the Society produced and formally submitted wide-ranging, detailed statements in 2017¹ and 2018² in response to the West Dorset and Weymouth & Portland Local Plan consultation exercises.

Section 2

A summary of DCS’s objections to the consultation draft

2.1. The Society contends that the consultation plan is unsound in that it does not comply with the tests set out in the National Planning Policy Framework [NPPF]. As the Heritage Impact Assessment [January 2021]³ states at para 1.17:

It is a fundamental part of Plan-making, as set out in Chapter 3 of the NPPF, that ... ‘The preparation of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate ...’ [NPPF, para 31] ... and ‘... should demonstrate how the plan has addressed relevant economic, social and environmental objectives [...] Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued’. [NPPF, para 32].

The Society believes that the Consultation Plan fails to provide this evidence.

2.2. The proposal for large scale development north of Dorchester, should it come to pass, would increase the town’s population by around 35% over a 15 – 20-year period, result in significant and irreversible damage to the town’s environment and heritage setting, and place an unsustainable burden on the town’s infrastructure. Given this, the Society would have expected Dorset Council to have taken the unique opportunity now presented by the Council’s ‘new geography’ to take a more strategic approach, and to examine alternative development scenarios on a Council-wide basis, before opting for a development option dating back to the mid-1980s if not earlier; a development option rejected then in favour of the more sustainable Poundbury, and rejected again in the latter 2000s as being unviable.

¹ <https://www.dorchestercivicsociety.org.uk/wp-content/uploads/2021/03/DCS-PositionStatement-WDWP-JointLocalPlanReviewConsultation-4April2017.pdf>

² <https://www.dorchestercivicsociety.org.uk/wp-content/uploads/publications/JointLPR-DCS%20PositionStatement-7October2018.pdf>

³ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/north-of-dorchester-heritage-impact-assessment.aspx>

2.3. The Society contends that the plan is no further forward in respect of Dorchester than the previous West Dorset and Weymouth Councils' 2018 'Preferred Options' draft plan. It has so many omissions and deficiencies as to render it unsound and not fit for purpose as a vehicle for meaningful public consultation. This consultation is currently woefully inadequate and premature. More details in support of this opinion are presented in Appendices 1 and 2, and PS2. The following five paragraphs summarise the plan's deficiencies.

2.4. The fundamental **Council-wide strategic deficiencies [Section 3]** include:

- No effective Council-wide spatial and transport strategy. [para 3.1]
- No 'statement of common accord' with BCP Council. [3.2]
- No recognition of the Council's 'new geography'. [3.3]
- No 'Strategic Market Housing Assessment'. [3.4]
- No transport evidence base and no reference to the 'Western Gateway' proposals. [3.5]
- No up-to-date evidence base across a wide spectrum of issues. [3.6]
- No basis in the Sustainability Appraisal for assessing alternative development strategies such as dispersed or grouped patterns of development. [3.7 & 3.8]

2.5. At the **Central Dorset level [Section 4]** there is:

- No effective spatial strategy and an absence of a transport strategy for central Dorset and the Dorchester catchment area. [4.1]
- No recognition of the complementary nature of Dorchester and Weymouth as a housing and employment unit. [4.2]
- No consideration given to the likely impacts of Covid 19 on ways of working and patterns of commuting. [4.3 & 4.4]
- No consideration of alternative patterns of development, including large scale allocations such as Woodsford [Crossways]. [4.5]

2.6. Regarding the justification for **DOR13 and the proposal in detail [Section 5]** there is:

- No recognition of the damage that DOR13 would cause to Dorchester's historic and cultural setting. [5.2.1]
- No acknowledgement of the recommendations of the Heritage Impact Assessment. [5.2.2]
- No detailed Landscape Visual Impact Assessment. [5.2.3]
- No evidence to demonstrate the viability and credibility of DOR13. [5.3.1 & 5.3.2]
- No evidence to support the deliverability of projected housing completion rates. [5.3.3]
- No Infrastructure Delivery Plan – thus undermining the very basis for the allocation. [5.3.4]
- No measures to ensure the promised affordable housing will be provided. [5.4]
- No framework presented for the preparation of a masterplan. [5.5.1]
- No prerequisites for development are established, including the basis for all planning obligations and legal agreements. [5.5.2, 5.5.3 & 5.5.4]
- An inadequate 'Movement Strategy' which is confused about the role of the 'link road', and offers no examination of alternative traffic scenarios. [5.6.1 & 5.6.2].
- No consideration given to the damaging impact of the proposed link road junction on views from Poundbury Camp. [5.6.3]

2.7. Regarding **other local proposals [Section 6]** there is:

- No recognition of the adverse impact of the proposed wind farm at Slyers Lane on the AONB and Dorchester. [6.1]
- No acknowledgement of the difficulties in providing effective transport connection into Dorchester from the Crossways and Charminster proposals. [6.2]

2.8. Regarding **Dorchester town [Section 7]** there is:

- No up to date 'vision' for the town. [7.1]
- No consideration to cross-town links and linking DOR13 with the centre in a sustainable manner. [7.2]
- No up-dated town centre proposals and no basis for a town centre masterplan reflecting current thinking. [7.3].
- No up-to-date local transport strategy and a failure to move towards a pedestrian and cycle friendly town. [7.4]

Section 3

Council-wide strategic deficiencies

3.1. The plan lacks a geographically-based Council-wide spatial and transport strategy, and, therefore, fails to explore alternative and possibly more sustainable options against such a strategy. This failure is demonstrated under the heading 'New Settlements' in paras 2.6.40 and 2.6.41 [p43, vol1]. Instead of the plan determining the siting of possible new settlements within a strategic context, it simply invites landowners and developers to put forward their proposals for consideration at some future date. How such a new settlement might fit within the context of proposals now being put forward is not explored. The Society acknowledges that the details of new settlements are beyond the scope of the current plan, but a strategic assessment of the most appropriate locations should form part of the overall spatial and transport strategy.

3.2 The opportunity to prepare a comprehensive sustainable spatial and transport strategy [and to reconsider the inclusion of DOR13 with its 'link road'], has been compromised by the fact that the Council has chosen, for 'administrative' rather than technical need, to opt for an adoption date of 2023 rather than the Government target of 2024. The additional 12 months could be used to correct the deficiencies and omissions, and put before the public a plan that is technically sound and backed by a comprehensive up-to-date evidence base. The scope for flexibility in timing is illustrated by the decision to plan for 39,285 houses, [excluding possible further development in Alderholt, Gillingham and Wool], in the period to 2038, some 8,800 in excess of the Government's target based on the standard methodology. At present, it appears that no decision has been made on whether this excess is intended to meet unmet need from the BCP conurbation, or merely to boost housing numbers to compensate in the event of the failure of a major allocation, such as DOR13, to come forward as anticipated. In respect of the 'duty to cooperate' with neighbouring authorities, the plan is deficient in its lack of a 'statement of common ground' with BCP which demonstrates that ... *effective joint working on cross boundary strategic matters has been dealt with rather than deferred* ... [as required by para 35 of the National Planning Policy Framework].

3.3. The earlier range of 'options' is referred to in para 2.2.7 [P19, Vol 1], but the only detailed examination in the evidence base as to why they were dismissed is in the recently published Sustainability Appraisal which, in itself, lacks any overall strategic coherence [see attached Sustainability Appraisal Critique at Appendix 1]. The reasoned justification for the selection of the chosen options is not given. This is, perhaps, unsurprising in the absence of a council-wide spatial strategy – the only credible starting point for a new plan. What spatial strategy there is [Section 2.3, P20, Vol1], appears to be based on housing markets and the supply of developable sites [para 2.3.1, P21, Vol1] with little regard, other than acknowledging constraints, to the other factors listed in para 2.3.1. The plan is, therefore, no more than a stitching together of the plans of the former District Councils, with little thought given as to whether they remain valid in the wider context of the 'new geography' of the unitary authority, and the new opportunities presented by the wider perspective.

3.4. A Strategic Market Housing Assessment [SMHA] has been prepared for the Purbeck Local Plan area but not for the whole Dorset Council area. It is understood that an SMHA has been commissioned for the new Council area, but that this will not be available until after the close of this consultation exercise [Spring 2021]. This is yet further evidence of the paucity of the evidence base underlying the current plan and consultation exercise.

3.5. The previous West Dorset and Weymouth consultation plan was prepared, seemingly, with little or no transport input and no overall transport strategy. The creation of a unitary authority does not appear to have improved matters. Where is the traffic modelling that should underpin both a transport strategy and a credible spatial strategy? Evidence for this deficiency is provided in the letter from the Council's Information Compliance Officer dated 21st January in response to a request by the Society for information on transport studies. This states that the ... *transport evidence base for the local plan is still being developed ... we aim to have the substantial part of it published by September 2021 ... with publication of the next stage of the local plan.* This amply demonstrates the inadequacy of the evidence base for the current consultation. Furthermore, Central Dorset lies within the area of the Western Gateway which sets out regional transport proposals which have been endorsed by Dorset Council. Where is the Plan's connection with the published Western Gateway Sub-national Body's proposals? In short where is the transport strategy?

3.6. The absence of the transport evidence base and Strategic Housing Needs Assessment are, however, not the only information gaps. A letter dated 22nd February from Dorset Council, states that: *There are several pieces of work that are ongoing to inform the development of the Dorset Local Plan. They will be used to inform the final draft of the plan which will be consulted on later this year and they are:*

- *Strategic housing needs assessment*
- *Viability study*
- *Strategic flood risk assessment*
- *Economic needs assessment*
- *Gypsy and Traveller accommodation needs assessment*
- *Retail study and town centre needs assessment.*

This stark admission demonstrates beyond question that the plan is not based on an up-to-date evidence base. How then are the plan's proposals justified? The Society could be forgiven for forming the opinion that, as the plan is - on the basis of this consultation - to a large extent committed to its development proposals, these further studies may lack objectivity and be biased in favour of decisions that have already been made. To ensure that this is not the case, these proposals should be withdrawn until such time as an objective evidence base is available. At this advanced stage in the planning process, to offer the defence that the information will be available for the next stage is simply neither acceptable nor credible.

3.7. The Plan was considered by Cabinet and published prior to the '*full sustainability appraisal*' being available [Para 10.5, P125 of the report to Cabinet of 8th December 2020]. This is an essential document against which to test any individual major development such as DOR13. The Society questions how the Council can have come to its decision to publish for public comment without sight of that appraisal. Furthermore, the Sustainability Appraisal of January 2021 is merely an appraisal of individual sites. There is no strategic consideration of the most sustainable pattern of development across the whole Council area. This can be illustrated by reference to the 'settlement hierarchy' [para 2.3.10, P23, Vol1] which sets out a rigid approach based on size of settlement. There is no consideration of how settlements could be grouped together with a sustainable transport system to create a viable and sustainable linked development. A strategic 'top down' approach to neighbourhood planning would result in a more equitable housing distribution based on policy rather than the plan's ad hoc localism. Indeed, the National Planning Policy Framework states at para 65 that ... *within this overall [housing] requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.* More details of the Society's views on sustainable development are set out in Appendix 1.

3.8. An example of an alternative and sustainable strategy is provided by the South Downs National Park [working within the same constraints as applied to Areas of Outstanding Natural Beauty] which worked with local communities to identify their needs for development and local infrastructure to support thriving, dynamic and sustainable communities and the local economy. Their Local Plan [adopted 2020] specifically states ... *the starting point for the housing provision figures is the spatial strategy for a medium level of dispersed growth across the National Park*. Whilst a strategy of dispersed growth may not meet DC's total housing target, it would, together with a greater focus on providing housing in towns and particularly town centres, reduce the need for damaging green-field developments such as DOR13.

Section 4

Approach to Central Dorset

4.1. Following the public examination of the approved West Dorset, Weymouth and Portland Local Plan in 2015, the Inspector asked that the plan be reviewed at an early date and that proposals for any additional development in the Dorchester area should be judged against a strategy for that area. There is no evidence that this 'sub-area strategy' has been prepared, and it is, therefore, impossible to judge the merits of any proposals in the Dorchester catchment area or to evaluate them against possible options such as an alternative location for major development, or a concept based on the modest expansion of smaller settlements along transport corridors and within towns themselves. This lack of a local strategy is yet another fundamental deficiency of the plan. There is no context or logic presented to justify proposals in the Dorchester area.

4.2. 'Central Dorset' is dealt with at Section 22 starting on page 140, Vol 2. Dorchester and Weymouth are referred to in para 1.3.24 [P12, Vol1] and para 22.1.2, [P140, Vol 2] as effectively having 'reverse problems'. Para 2.1.4 [P16, Vol1] refers to the Dorchester to Weymouth 'corridor'. And yet, they are being treated in this plan as separate and unrelated towns. The Society has previously argued that the two towns should be considered as one complementary unit, with Weymouth having 'excess' housing and Dorchester 'excess' employment, with one obvious solution being to improve transport and connectivity between the two. There is an urgent need for a local sustainable transport strategy.

4.3. The plan makes much of the need to increase the amount of housing in Dorchester in order to reduce the need for in-commuting. However, even if 3,500 houses were built as proposed, this would be likely only to cut the number of commuters into Dorchester from 7,000 to 5,000. This further illustrates the need for traffic/transportation data in order to be able to understand where these commuters come from, and to encourage more sustainable means of transport

4.4. A local strategy should be the opportunity to consider some post-Covid 19 issues including levels and types of employment in Dorchester, changing commuting patterns, changing transportation needs and the effects on retail and the high street. The major employers in Dorchester are Dorset Council and the NHS. For the last year, most LA staff have been working from home, as have some NHS administrative staff. It is unlikely that in-commuting levels will return to their pre Covid 19 levels and, therefore, the need for housing in Dorchester will be reduced. The 12 months re-timetabling suggested in para 3.2 above would give time for the situation to be reassessed.

4.5. Fig 22.3 [P143, Vol 2] sets out allocation and existing permission numbers, including 3,500 at DOR13. At Crossways/Moreton a total of 1,595 homes is planned [with DOR13 now listed as 3,715]. The Plan does not, however, discuss whether further development in the Crossways area [the 'Woodsford' land north of the railway] would be a viable and sustainable alternative to DOR13. This should be part of any discussion of a strategy for delivering housing numbers in the Dorchester catchment area – unfortunately this strategy is absent from the plan. This is despite the understanding that the Council has been looking at the possibility of 'new settlements' – including up to 4,500 homes in the Woodsford area.

Section 5

The North of Dorchester proposal – DOR13

5.1. The Council has failed to appreciate the extent of the damaging impact of DOR13 on the heritage and environment of Dorchester and its setting [Reference paras 23.6.25 onwards, P159 to P169], and to demonstrate that DOR13 is viable and can be successfully delivered. The Society's detailed critique of DOR13 is set out in Statement 2: 'Development North of Dorchester: Where is the Masterplan?'

5.2. Vision and concept

5.2.1. The Society objects strongly to the principle of DOR13 and, therefore, does not comment on the 'vision' at Fig 23.4, [P159, Vol2]. This does not imply any acceptance. Para 23.6.41 [P163, Vol2] accepts that the north of Dorchester area contributes to the landscape setting of the AONB – and yet the plan proposes its development. Indeed, the Society objects to the proposal because of demonstrable harm to both the setting of the AONB and that of the town. Para 23.6.42 [P164, Vol2] refers to views from DOR13 to the town. Whilst these views may enhance the value of the DOR13 site, the critical aspect from a heritage and cultural standpoint is views from the town to DOR13. These views are a frequent reminder of the proximity of the town to open countryside, and yet the plan ignores them. Para 23.6.45 [P164, Vol2] refers to the River Frome water meadows and transition to open countryside – within the DOR13 area - as part of Dorchester's conservation area setting. Para 23.6.46 [P164, Vol2] refers to Thomas Hardy but without reference to his 'distinct edge' to the town on its northern side. Whilst there has been continual change to this landscape in traditions of land drainage and patterns of farming, this distinctive northern edge has survived to the present and retains the timeless iconic townscape into which this development would intrude. This edge, which helps tell the story of Dorchester, would undoubtedly be seriously harmed by DOR13.

5.2.2. It is essential that time is given to fully assess the implications of the very recently published Heritage Impact Assessment [HIA] before any consideration can be given to the inclusion of this damaging proposal in the plan. It is notable that the HIA concludes that '*landscaping, drainage, paths/cycle routes, lighting etc. will need to be assessed*'. These items could all seriously harm the existing appearance and character of the water meadows. It is noted that the Webinar held on 2nd February, defined '*heritage interest*' as '*aspects of the past that have survived to the present*'. The answer to the question 'does the local plan compromise the significance of those assets' must be 'yes', particularly so with north of Dorchester which helps tell the story of, and give meaning to, Dorchester itself. Further consideration is given to the conclusions of the HIA in Statement 2.

5.2.3. Dorchester is a special place in which to live and visit. If development is needed, it needs to be sensitive, sustainable and sympathetic to local character and history. The area north of Dorchester is a valued landscape as it contributes to the setting of the AONB, the historic town, and scheduled ancient monuments. A detailed Landscape Visual Impact Assessment [LVIA] is required for all major developments ... *in order for the impacts of a development on the landscape to be assessed.* [paras 3.5.5 and 3.5.6, P81, Vol1]. Without this, it is impossible to appreciate the extent of the damage to the landscape and the setting of Dorchester caused by the development. Given the successful Garden Communities bid, it is difficult to understand why the LVIA has not already been prepared or at the least referred to as an essential element of masterplanning. The Society's views on masterplanning are set out in Statement 2. Policy ENV 4 [P84, Vol1] deals with 'Other Valued Landscapes', and Policy ENV5 with 'Heritage Assets'. The area of DOR13 associated with the former park and garden around Frome Whitfield House is designated as 'Land of Local Landscape Importance'. This local designation is not referred to. It is not understood how development which harms these valued assets can 'justifiably' be approved, as appears to be the implication of [vii] of ENV4 [P84, Vol1]. As with the Sustainability Appraisal, it is not understood how Cabinet can have come to a decision on 8th December to publish the plan without knowledge of the conclusions of the HIA or the availability of the LVIA.

5.3. Viability and credibility

5.3.1. The plan lacks the Viability/Deliverability Study, Sustainability Study, Infrastructure Delivery Plan, and LVIA for the DOR13 proposal. The Heritage Impact Assessment, which calls into question the viability of the plan, was not published until after publication of the draft plan. These documents are essential if the public is to make any informed comment. Publishing a plan containing a major proposal such as DOR13 without the availability of - or opportunity to fully consider - these studies, casts doubt on the credibility of the whole plan, and leaves it open to accusations of decisions being made to suit the circumstances. It can justifiably be said that the plan's basis appears to be that of the 'call for sites' [and consequently those sites promoted by the development industry] rather than any Council-wide or local spatial strategy and reasoned justification. This situation is wholly unsatisfactory.

5.3.2. The available evidence to date [see Appendix 2] is that the DOR13 proposals are not financially viable, and that the plan is, therefore, unsound. Up to date information on flooding, protection of ground water sources, sewage disposal capacity and other essential services is not publicly available. Further information on viability, including an Infrastructure Delivery Plan, must be provided by the Council.

5.3.3. It is noted that, in the WDDC preferred options consultation, it was stated that DOR13 would ... *deliver an average of around 240 dwellings per year* [Para11.5.3.]. This has now been amended to read ... *When fully operational, the site will deliver around 240 dwellings per year*. However, the Council's 'North Dorchester Annual Housing Trajectory' needs to be adjusted to take account of the local plan programme being two years behind. Therefore, as the first house completion will be in 2025, the number of houses built between 2025 and 2038 will be 2,680, at an average of 191 per year. This further calls into question whether the proposal is financially viable. What measures will be put in place to ensure that the annual target is met? Where is the 'deliverability plan'? More information on the Society's views on deliverability is set out in Appendix 2.

5.3.4. The 'Infrastructure Delivery Plan' is referred to at para 6.1.5 [P218, Vol2]. Apparently, one will be produced for the submission stage of the local plan ... *once infrastructure needs become clearer following consultation*. This is yet another missing document which effectively, and damningly, 'puts the cart before the horse'. If the eventual 'Delivery Plan' demonstrates that infrastructure for DOR13 cannot be delivered at a viable cost, the proposal must fail. What then is the point of this current stage of consultation? This omission only serves to emphasise that the Council is wedded to DOR13 irrespective of the absence of appropriate appraisals and justification following proper planning procedures.

5.4. Affordable housing

5.4.1. 'Affordable housing' to meet the needs of local people is recognised to be an important element of new development, and yet the draft plan's policies are too weak as to ensure its delivery. Para 4.3.7, [P137, Vol2], says affordable housing will merely be 'sought' depending on viability. That viability testing has yet to be carried out. If the development is insufficiently viable to provide for the proposed affordable housing, it has been stated at the 'webinar' on 9th February that, whilst the development would still go ahead, the affordable housing would not be provided: this emphasises why it is essential to carry out the viability assessment prior to allocation. Assessing viability is covered at paras 4.3.17 to 4.3.29, [P140, Vol2]. It is not considered that these policies are adequate to ensure that affordable housing is actually provided. Much depends on assessing viability – one of the fundamental omissions of the plan. The Council cannot, at this stage, justify its intention to ensure 35% affordable housing at DOR13. The plan is, therefore, unsound. What measures will be put in place to ensure that the 35% target is achieved and that developer arguments based on lack of viability are not successful? Furthermore, there appears to have been no consideration given to imposing a policy that gives 'primacy' to local residents in the purchase of homes in order to restrict new property being sold as 'second homes', as already included in the Purbeck Local Plan. More information on viability testing is included in Appendix 2.

5.5. Masterplanning

5.5.1. In spite of past undertakings, Dorset Council has specifically failed, following the August 2018 Joint Local Plan Consultation exercise, to progress work on developing a masterplan for the DOR13 site. The Society sets out its detailed critique of this failure to address the masterplanning issue in Statement 2.

5.5.2. Planning obligations and legal agreements, including a S106 Agreement and S278 Highways Agreement, would be needed for DOR13; therefore, if this is to be included as an allocation, it is essential that details of infrastructure requirements are set out in the site-specific policy [paras 6.2.9 and 10, P 221, Vol2]. These requirements should be clearly stated at this stage as prerequisites for development – they are currently so vague as to inspire no confidence in the ability of the proposal to be successfully implemented. The specific section relating to DOR13 needs to include reference to a S106 Agreement rather than relying on earlier generic references.

5.5.3. Para 23.6.26 [P150, Vol2] states that the development of DOR13 will bring important benefits to Dorchester, but without stating them. Para 23.6.27 [P159, Vol2] refers to a masterplan. This is indeed essential if the development is to be included in the submission plan, but far more detail is required at this stage by way of specified prerequisites. Masterplan references in other proposals in the plan contain far more detail. Is this because the DOR13 requirements are simply not known? This absence of clarity yet again serves to demonstrate that DOR13 is a proposal looking for a justification. Policies for North of Dorchester are set out at DOR13, [P168, Vol2]. The status of the masterplan [see DOR13 xiv, P169, Vol2] is far from clear. Is it a prerequisite? What must it contain? DOR 13 ix [P169, Vol2] can be interpreted as implying that the historic heritage, including its literary landscape, can be utilised within the development. The Society strongly objects to this wording as it implies the loss of the town's unique and characteristic setting.

5.5.4. Unlike DOR13, tight procedures governing development at Crossways are set out in CRS1 [P226, Vol2], and paras 27.5.4 and 27.5.5 [P225, Vol2]. These refer to a planning agreement prior to granting of planning consent, a masterplan and legal agreement. This is not stated for DOR13 which should include at least the same level of detail as in CRS 1, [P226, Vol 2], CRS2 [P227, Vol2] and Para 27.5.25 [P231, Vol2] relating to road contributions etc. Again, the question must be asked as to why there are these serious omissions for DOR13? This is yet another reason why the Society considers that the necessary planning work to render this proposal 'sound' has not been undertaken, and why DOR13 is not in a fit state to put before the public

5.6. Transport proposals

5.6.1. In Fig 22.4 [P 145, Vol2] there is no A37/A35 link shown. Surely this link [A35 to B3147/A37] is of greater strategic importance than the A353 which is shown? Paras 23.6.32 to 23.6.34 [P162, Vol2] describe the 'Movement Strategy'. This highlights one of the key inconsistencies in DOR13. The primary function of the link road, as set out in para 23.6.32, P162 [Vol 2], is ... *to relieve traffic congestion issues both within the town centre and at junctions around the bypass*. Whilst no traffic data is apparently available, such will be the volume of traffic on the road that ... *the route will be designed to ensure that nearby residents do not suffer unduly from noise from the road and from poor air quality* [para 23.6.32, P162, Vol 2]. This once again illustrates the lack of any coherent transport strategy or examination of reasonable alternatives. There is no evidence that any assessment has been made of the capacity of the existing bypass, or what improvements might be needed to avoid congestion. Nor is there any assessment of the comparative merits, in terms of cost and environmental impact, of possible improvements to the existing bypass as against the A35-A37 link road.

5.6.2. The proposed link road would further undermine the viability of DOR13 as it would slice through the middle of the proposed development, completely undermining the concept of it being a 'garden community'. Elsewhere in the plan, the road is described as little more than a residential distributor road. The Plan should be consistent as to the purpose of the road. Development on the

scale of DOR13 without an effective northern link road would result in a significant increase in traffic in the town and consequent adverse impact on the AQMA. The NPPF [para 102] states that:

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- *The potential impacts of development on transport networks can be addressed;*
- *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;*
- *Opportunities to promote walking, cycling and public transport use are identified and pursued; and*
- *The environmental impacts of traffic and transport infrastructure can be identified.*

The plan is devoid of such considerations to the point of negligence.

5.6.3. Policies for Charminster are at para 23.6.68 [P170, Vol2] onwards, and contain more detailed consideration than those for DOR13. The importance of cycle routes into Dorchester is mentioned at para 23.6.71 [P170, Vol2], whilst omitting the fact that the existing National Route 26 does not reach the centre. Para 23.6.73 [P170, Vol2] is at pains to protect views from Poundbury Camp, but is silent about the much greater negative impact of the link road and its junction with B3147. This is a significant weakness, bearing in mind that the road would presumably be a prerequisite of DOR13. What consideration has been given to the impact of a link road junction with B3147 on Poundbury Camp? Policies for Charminster and north of Dorchester must be considered against the now published Heritage Impact Assessment which examines this issue and states that: *One of the most problematic aspects of the development in general is the proposed link road.* The HIA recommends that the link road should be '*reconsidered*'. The Society's views on the extreme difficulty of satisfactory '*reconsideration*' have previously been set out in its Position Statement on the impact of the link road on Poundbury Camp⁴. It is hard to believe that Cabinet would have approved the plan for publication with knowledge of this HIA statement; this strengthens the Society's view that the plan as a whole should be withdrawn for further consideration until the entire evidence base is available.

Section 6

Other local proposals

6.1. Fig 6.6 [P249, Vol1] shows the Slyers Lane area as suitable for wind energy. This site is visible from Dorchester and would also have an adverse visual impact on both the nearby AONB and that area to the south, and should, therefore, be omitted.

6.2. Viability proposals for Crossways are at Section 27, [P222, Vol2]. The connection to the West Stafford bypass is included [Para 27.3.7, P224, Vol2] as part of improving connections with Dorchester. But the difficulties at the Dorchester end [e.g. at Max Gate junction and crossing the railway] for both cars and cycles [as with the Charminster proposal] are ignored.

⁴ <https://www.dorchestercivicsociety.org.uk/wp-content/uploads/2020/06/DCS-position-statement-impact-poundbury-camp-may-2020.pdf>

Section 7

Proposals for Dorchester Town [Section 23, P146, Vol2].

7.1. The Council fails to put forward a credible vision for Dorchester reflecting changing times and the need to take into account the effects of Covid 19. A 'Vision for Dorchester' is set out at para 23.2.1 [P 146, Vol2]. This vision, [particularly in the absence of any spatial or transport strategy for the Dorchester catchment area], is totally inadequate. The vision should embrace concepts such as a 'walking/cycling town' with an emphasis on personal mobility, and offer a realistic and up-to-date view of the town centre which reflects changes brought about by Covid 19 and evolving employment, retail and commercial trends. The Society's vision does not embrace that of an extended developer led urban sprawl as threatened by DOR13.

7.2. DOR13 would, if built, have an adverse impact on the High East Street Air Quality Management Area. There is no evidence that any serious consideration has been given as to how DOR13 could be effectively linked to the town centre all the year round and 24 hours a day other than by car via High East Street. In view of the distance from the town centre and the practical difficulties presented by the Frome water meadows, the Society questions whether a viable solution, which respects the setting of the town, could be achieved.

7.3. The town centre is dealt with at Section 23.4 [P148, Vol2], Para 23.4.5 [P149, Vol2], and includes reference, with no justification, to the need for more retail floorspace. It is noted that this is caveated by reference to the need to understand the impact of the current pandemic, and changes to long term shopping patterns. Given this uncertainty, the policy should be directed to encouraging, not just viable retail uses, but uses, including residential, that will generate activity and footfall and, in particular, highlight the many museums and tourist attractions that exist around the centre – all within walking distance of one another. Para 23.4.9 [P149, Vol2] says a town centre masterplan is being prepared. If this refers to the consultation of some two years ago, that work is rendered even more obsolete by recent changes. A fresh start is required. The Society would support an up-to-date town centre plan focusing on the town's county town status; the Thomas Hardy and other cultural and heritage associations which provide Dorchester's distinctive 'brand'; and the centre's retail consolidation and revitalisation, involving mixed commercial and residential uses.

7.4. In the absence of a local transport strategy and any overall context, it is difficult to comment on policies DOR2 [town centre expansion] and DOR3 [Brewery Square] [P150, Vol2]. If DOR4 [High Street - P151, Vol2] is to mean anything, then the policy should clearly state that, by the end of the plan period, there will be no traffic on the majority of High Street which will become primarily a pedestrian zone. Para 23.5.4 [P152, Vol2] refers to walking links from High Street to the Frome Valley but omits mention of the much-needed cross town cycle links [National Routes 2 and 26]. Opportunities to promote walking, cycling and public transport should be identified and pursued. The 'stadium junction' park and ride proposal is included at para 23.5.6 [P152, Vol2] despite the Society's understanding that it had been abandoned; clarification is required. DOR 5 [P152, Vol 2] refers to the Dorchester Transport and Environment Plan. This document, according to the Council's website, has a long history starting in 2002, and, as the last entry is September 2014, appears defunct. This, once again, illustrates the need for an up-to-date transport masterplan for Dorchester. That transport masterplan needs to be prepared in conjunction with Highways England in order to ensure that there is sufficient capacity on the existing bypass to both obviate any need for a northern bypass and to take through traffic out of High Street. Unfortunately, there remains a situation where transport strategy, and coherent transport policies and proposals are absent.

Section 8 Conclusions

The Society contends that the plan is **unsound** by reason of:

- its failure to be justified by an appropriate strategy based on proportionate evidence and taking into account reasonable alternatives [NPPF, para 35b];
- its failure to test the viability of proposals, including required standards for affordable housing, and transport and other infrastructure needs [NPPF, para 34];
- its failure adequately to consider transport issues [NPPF, para 102];
- its failure to provide clear and convincing justification for harm to heritage assets including conservation areas, protected landscapes and scheduled monuments [NPPF, para 193]; and
- Its failure to underpin and justify all policies with relevant and up-to-date evidence [NPPF, para 31].

All of the above are required by the National Planning Policy Framework. They are not optional.

Appendix 1

Critique of the Sustainability Appraisal: Options Stage (with particular reference to Dorchester)

1 Introduction

1.1. Dorchester Civic Society has neither the time nor resources to undertake a full examination of the Sustainability Appraisal: Options Consultation, Jan 2021 (SA:OC), and the appendices, Sustainability Appraisal: Appendices, Options Consultation, Jan 2021 (SA:A-OC). However, an examination of the overall approach, particularly 'The Development Strategy' (chp.3 SA:OC) and the appraisal of sites in the Central Dorset Functional Area (chp.9 SA:OC), has caused significant concern. There has been no attempt to assess different strategic spatial strategies. With respect to the individual site assessments, many of the judgements appear to be based on inaccurate or incomplete information which calls into question whether the most sustainable sites for development have been selected.

1.2. This note is set out in two parts: the first part looks at some of the issues arising from the lack of any strategic appraisal and the second part looks at particular examples of inaccurate and/or incomplete assessments of some of the sites around Dorchester.

1.3. Given the amount of detail in the Sustainability Appraisal, the Dorchester Civic Society reserve the right to make further representations on this matter.

2. Part 1: Strategic Appraisal

2.1. The methodology used for the sustainability appraisal is set out in chp.2 SA:OC. There is repeated reference to, 'the consideration of reasonable alternatives being an important part of the sustainability appraisal process', (e.g. paras 2.0.1, 2.0.3, 2.1.1). It then goes on at para 2.3.1 to explain how the reasonable alternatives that must be realistic and deliverable should be identified. However far from examining a strategic range of options at para 2.4.2 (SA:OC) it simply states that general areas for growth around the more sustainable settlements were examined as stage 1 and then stage 2 was to look at these sites for development options.

2.2. There then follows sections on the housing requirement and employment land needs, this latter presumably is only included to define the total land allocation for the Council. The key section under the heading 'Spatial Strategy' starts at para 3.1.14 (SA:OC) It starts with the unsubstantiated statement that:

The more sustainable locations tend to be the larger settlements in terms of population size, which have greater existing facilities and are more accessible.

2.3. What then follows is a discussion as to how to resolve the issue of different definitions of the settlement hierarchy used by the five constituent authorities. The assumption is that the smaller the settlement the more unsustainable and therefore all development should be directed to the larger settlements. Nowhere is there any evidence that policies to make unsustainable settlements more sustainable have been considered. This is in itself a major factor in considering the strategy being proposed in the local plan is itself unsustainable as it condemns what is unsustainable now to be unsustainable into the future (paras 3.1.14 to 3.1.22 SA:OC).

2.4. Indeed there is no evidence of any other, let alone reasonable, alternatives being considered other than those based on the existing settlement hierarchy with the assumption that once unsustainable, always unsustainable.

2.5. There is no examination of how groups of settlements may be linked to create a more sustainable pattern for future development: e.g. settlements along river valleys that radiate out from Dorchester or along transport corridors particularly the two rail lines. Nowhere is there an acknowledgement that if more sustainable forms of public transport are to be promoted then linear patterns of settlements are the most appropriate.

2.6. There is a complete lack of consideration of what other reasonable alternative strategies there might be. There is no evidence that the subject of new settlements has been considered on a strategic basis especially given the issue relating to the BCP authority's potential housing needs. Nowhere is there any reasoned assessment as to the most sustainable and strategically logical site for a new settlement. Instead DOR13 is included as it is reasonably close to Dorchester and must therefore be the most sustainable location for a significant new settlement. There is no attempt to examine any other locations for major new development.

2.7. There is no sustainability appraisal for a housing strategy covering the whole area. Instead, the appraisal goes straight to considering the four functional areas which appear to be solely defined by 'housing market areas' which in itself does not seem to have any sustainability justification.

3. Part 2: Central Dorset and Dorchester

3.1. CROS H and DORCH A

3.1.1. In respect of possible major new development to serve Dorchester it is of interest to consider the sustainability appraisal of DORCH A (the site of DOR13) against CROS H, the site north of the railway at Crossways/Moreton put forward for development by Woodsford Estates in 2018 .

3.1.2. Against the eleven sustainability measures considered, CROS H has one 'strong negative', two negative, five neutral and three positive impacts. As for DORCH A there are three strong negatives, three negatives, two neutral and three positive impacts. Yet in the assessment as detailed below CROS H is dismissed for spurious reasons.

3.1.3. Against 'soil' for CROS H it states:

The northern and eastern parts of the area are classified as Grade 2 (Very Good) agricultural land.

This is assigned as a 'strong negative' factor in the Sustainability Assessment: Appendix Options Stage (SA:A-OC p397). Similarly, for DORCH A the comment is:

(T)he eastern side of this area is classified as Grade 2 (Very Good) agricultural land

and is also assigned a 'strong negative factor' (SA:A-OC p333). Yet when these two sites are considered for inclusion as sustainable sites CROS H is eliminated as having 'strong negative' effects (SA:OC p201) with the comment:

(M)ay result in the loss of high-grade agricultural land (SA:OC fig 9.28 p202).

However, whilst DORCH A also has a 'strong negative' effect (SA:OC p173) it is included as a sustainable location without reference to the loss of agricultural land (SA:OC fig 9.3 p174).

3.1.4. What makes this even more inexplicable is CROS H is a safeguarded site for sand and gravel with part of the site allocated for mineral extraction. It is believed that part of the site has permission for quarrying (BCP and Dorset Minerals sites Plan 2019, Policy MS-1 p16 and Fig 8 p68). Therefore, if development were to follow mineral extraction as proposed by Woodford Estates there would be no adverse impact on soil. It also needs to be explained why there is, by contrast, no reference to the loss of agricultural land in the sustainability of DORCH A.

3.1.5. It is also interesting to note that a further reason for rejecting CROS H is, ... *Development beyond the railway line would restrict access to the services and facilities at Crossways.* No mention that the provision of a footbridge(s) would overcome this problem. In contrast, for DORCH A there is

no mention that this greenfield development is to be cut in half by the A35 - A37 link road, arguably a far more dangerous proposition than the railway as far as pedestrians and cyclists are concerned and acknowledged in the draft plan as having potential for noise disturbance and air quality issues for residents. Nor is it mentioned that the route for pedestrians and cyclists across the River Frome water meadows and flood plain presents difficulties, since an all-weather surface above flood levels (possibly lit) would conflict with maintaining the character and natural environment of this area.

3.2. Air Quality - Contrast assessment of DOR13 and DOR15

3.2.1. This is assessed as neutral for DOR13 with the comment:

Close to the Dorchester Air Quality Management Area (DAQMA). A road link would be provided alongside other improvements to the road network, preventing a substantial increase in emissions to air from additional traffic at the DAQMA in the town centre. (P350 SA:A-OC)

3.2.2. For DOR15 Forston Clinic this is assessed as a negative impact with the comment:

May result in additional traffic within Dorchester, affecting air quality within the DAQMA. (P352 SA:A-OC)

3.2.3. DOR13 is a potential development of 3500 homes with the development commencing:

... at the junction of the B3143 (Slyer's Lane) and the minor road running between the C13 at Westleaze and Stinsford Roundabout. (para 23.6.28 P161 Vol2)

3.2.4. At some stage as the development progresses westwards a new east-west link road will be provided. This means that before the east-west link road is provided the only means of access into the town centre will be through the DAQMA. Even once the east west link road is provided the nearest means of access into the town centre for a significant number of households will be through the DAQMA.

3.2.5. In addition to the impact on the DAQMA, the development itself will suffer poor air quality as the A35 – A37 link road goes through the middle of the development. This is acknowledged in the draft plan which seeks to ensure that:

... nearby residents do not suffer unduly from the noise from the road and from poor air quality. (para 23.6.32 p162 vol 2)

3.2.6. A more objective assessment would be that in the first five years it will be a (strongly) negative impact and a negative impact to the end of the plan period.

3.2.7. This assessment can be contrasted to that quoted above for DOR15 Forston Clinic. This fails to recognise that unlike DOR13 this is not a greenfield site but the site of the existing Forston Clinic which has a residential unit for 24 people, clinic and day centre and at Foxbrake House a training centre. It is highly likely that the existing traffic generated by this use is more than would be generated by 90 houses. In addition, the direct access into Dorchester centre avoids the DAQMA. A more objective assessment would therefore either be neutral or positive impact.

3.3. Housing - affordable housing

3.3.1. Against this measure DOR13 is stated to have a, *strong positive impact* from year 1 with the comment:

Development would provide approx. 3,500 homes, including affordable housing, and schools and healthcare provision. (p350 SA:A-OS)

3.3.2. The plan requires 35% affordable housing. This is the same requirement as the current approved local plan. However, the former WDDC in its last year (2018/19) only achieved 14% affordable housing (para 7. 1, Annual Monitoring Report). This is the same as the average performance since 2000/01.

3.3.4. To date the only financial viability appraisal of any development north of Dorchester has shown a negative value (Halcrow Group 2008). The Council itself acknowledges the uncertain position stating:

Recent experience of the Gillingham Southern Extension has highlighted to the Council the need to understand the cost implications of the infrastructure requirements on large scale schemes. Some very broad ideas of infrastructure requirements have been established but not yet costed in detail. These include the need for additional school provision and for a link road as outlined above. (High Level Viability Appraisal)

3.3.5. The Council has yet to provide an up-to-date financial viability study for DOR13. In the absence of an up-to-date study, it is difficult to see how a strong positive impact can be justified. All the evidence to date would suggest that, because of the doubtful financial viability, the first item to suffer will be affordable housing (e.g. Dorchester Prison redevelopment). Given these uncertainties, it is simply untenable at this stage to say that the provision of affordable housing is a strong positive. At the very least it is neutral but arguably, given the Council's track record, strongly negative

3.4. Housing - schools

3.4.1. Against this measure DOR13 is stated to have a, *strong positive impact* from year 1 with the comment:

Development would provide approx. 3,500 homes, including affordable housing, and schools and healthcare provision. (p350 SA:A-OS)

3.4.2. An estimation of the number of school-aged pupils per household based on the 2011 census for Dorchester and Dorset is provided in the attached Table 1. The number of houses to be built at DOR13 is set out in the 'North Dorchester Annual Housing Trajectory'. This has been adjusted to reflect the two-year delay since the Trajectory was published. The total number of pupils per school year at the end of the plan period in 2038 is 67 (see calculation in attached Table 2)

3.4.3. The Council's funding bid to the Government's Garden Communities initiative stated (p3 para3) that the provision of new schools would ... *relieve pressure on the area's already over-subscribed schools*. In respect of first schools this is not true. In a report to the People Scrutiny Committee 7 Jan 2020, Item 8, Para 6 refers to a reduction in pupil admission numbers (PAN) at Manor Park First School from 90 to 60 and St Mary's, Charminster from 42 to 30 for the school year commencing Sept 2021. In addition, the relocated Damers First School has been built to accommodate 120 pupils per year but has a current PAN of 90. For the school year starting in Sept 2021 there will be places for an additional 72 pupils at first schools in Dorchester/Charminster.

3.4.4. This makes the provision of a new first school at DOR13 highly unlikely given that there may only be 67 pupils per year even by 2038. It also is of interest to note that the two middle schools in Dorchester have PANs of 180 (St Osmonds C of E) and 150 (Dorchester Middle School) whilst the only high school, Thomas Hardy, has a PAN of 450. Unless there is a considerable subsidy, the provision of a middle and high school of only four forms (PAN 120) by the end of the plan period is also highly unlikely especially as the number of pupils per year is more likely to be nearer a two-form entry, (i.e. 60 pupils).

3.4.5. This therefore means all pupils will be commuting into Dorchester, certainly for the first five years and probably until the end of the plan period.

3.4.6. A more objective assessment would therefore be (strongly) negative effect.

3.6. Housing – conclusion

3.6.1. From the above examples it is impossible to accept the Sustainability Appraisal's conclusion that this will be a strong positive impact from day one. At best, in the first five years it will be a strong negative/negative, and in the medium term also.

3.7. Community

3.7.1. Against this measure DOR13 is stated to have a *strong positive impact* from year 1 with the comment:

Within 15 minutes of a Tier 1 or 2 settlement by public transport. Development would be mixed-use and would provide a local centre. Cycle links with the town will improve connectivity. Local centre will be delivered.

3.7.2 As already indicated, none of these facilities are going to be available in the first five years so this cannot have an immediate strong positive impact. At best these facilities will be provided at some time during the latter part of the plan period. Initially the impact will be (strongly) negative as people have to travel into Dorchester town centre for all facilities. Whether or not these facilities, including public transport, are provided at any time in the plan period is at least uncertain and at best can be considered neutral.

3.8. Land ownership

3.8.1. All the sites around Dorchester have at least one 'strong negative impact'. The area covered by policy DOR13 has three or four 'strong negative impacts'. Only two areas (04 DOR and 01 CHAR) have only one 'strong negative impact'. However, DOR 04 is rejected because ... *land not available for development due to land ownership*. Land ownership is NOT a sustainability issue and should therefore have no part in this appraisal (see Fig 9.5 p176 Sustainability Appraisal Option Stage).

4. Conclusion

4.1. This note is by no means a comprehensive assessment of the Sustainability Appraisal process undertaken by the Council. There is, however, sufficient evidence to show that no attempt has been made to examine the sustainability of reasonable alternative strategic spatial arrangements. Instead, the assumption has been made that only development around existing major settlements is sustainable.

4.2. There has been no attempt to consider where the most sustainable location for a major new settlement in the Council area would be, bearing in mind the possible future requirements of BCP Council.

4.3. At the local, Dorchester, level it has been demonstrated that there has been a lack of objectivity in the appraisal of individual sites, particularly in view of the inaccurate and incomplete information used in the assessment.

4.4. On the above three grounds the sustainability appraisal is unsound and therefore the plan it supports must be unsound.

Table 1
Calculation of number of children of school age based on 2011 census data

Based on the population of Dorchester

Based on the population of Dorchester

population	21082
0-15 yrs	3419
No. per year 3419/16	214
No. of school aged pupils 214*12	2568
No. of households	8449
No. of pupils per household 8449/2568	0.3

Based on the population of Dorset:

population	376480
0-15 yrs	59930
No. per year 59930/16	3746
No. of school aged pupils 3746*12	44948
No. of households	158738
No. of pupils per household 158738/44948	0.3

Whether considering the population of just Dorchester or Dorset it is a reasonable assumption that the number of school aged children per household is 0.3

Table 2
Number school aged children at DOR13

Calculation of the number of school pupils per year using the figures in Table 1 and the 'North Dorchester Annual Housing Trajectory' from the Council's evidence, amended to take account of two-year delay since its publication

	Houses per year	Running total	Total no. pupils	Pupils per school year
2024/25	40	40	12	1
2025/26	120	160	48	4
2026/27	120	280	84	7
2027/28	120	400	120	10
2028/29	180	580	174	15
2029/30	220	800	240	20
2030/31	220	1020	306	26
2031/32	220	1240	372	31
2032/33	240	1480	444	37
2033/34	240	1720	516	43
2034/35	240	1960	588	49
2035/36	240	2200	660	55
2036/37	240	2440	732	61
2037/38	240	2680	804	67

Appendix 2

Consideration of the Deliverability of the proposed development North of Dorchester (Policy DOR13)

1. Introduction

This appendix considers issues around the deliverability of the proposed development. It also considers whether the issue of viability has been considered in the light of the 'Position Statement' on financial viability issued by DCS in July 2020.

2. Housing

2.1. Policy DOR13(ii) states that the site will deliver around 3500 homes. Although the plan period is 2021-2038 it is clear that the Council only expects 2680 houses to be built in this period as set out in the Council's 'North Dorchester Annual Housing Trajectory' as amended to take account of a potential two-year delay since the trajectory was published. At para 23.6.28 it states: *When fully operational, the site will deliver around 240 dwellings per year.* This statement needs to be assessed against what has been achieved in the past locally and the nature of the house building industry.

2.2. The government white paper, *Fixing our broken housing market* (DCHLG Feb 2017) concluded that one of the main reasons for the slow delivery of housing was the dominance of major house builders controlling the market

2.3. The former MP for West Dorset, Sir Oliver Letwin, was commissioned by the government to ... *explain the significant gap between housing completions and the amount of land allocated or permitted (sic) in areas of high housing demand* (para 1.1). In his report 'Independent Review of Build Out Rates, Draft Analysis June 2018, he stated:

The further work we have done since 9 March, and the further evidence we have heard, has done nothing to alter my view that the homogeneity of the types and tenures of the homes on offer in these sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out. Indeed, our further work has reinforced this view. (para4.3)

2.4. It is instructive to see how the above general analysis is reflected in the views of Persimmon Homes, the main housebuilder promoting development at DOR13. In Persimmons 2019 Annual Report it states:

During 2019 the Group's private sales rate per outlet per week was c.0.68. This rate of private sale was a little lower than our optimal rate of c.0.75 of a sale per outlet per week (p24)

2.5. This indicates that Persimmon's preferred rate of construction per site is less than 50 houses per year. However, this has nothing to do with any lack of supply of land as the following statement from the Annual Report makes clear:

At the year end the Group owned and controlled 93,246 plots in its consented land holdings (2018: 99,088 plots) with c.50% previously held by the Group as strategic land. Within these land holdings, the Group owned 46,055 plots on sites with detailed planning consent, all of which are under construction. We have a further 25,887 plots of owned land which are currently proceeding towards achieving full planning consent. The Group owned and controlled c. 15,900 acres of strategic land, including a number of allocated sites, at 31 December 2019. (p25)

2.6. This desire to strictly control the rate of building is reflected in the North Dorchester Consortium observations on DOR15 (Preferred Option) Oct 2018. On delivery targets they made the following observations:

5.6 Paragraph 11.5.3 suggests that the average delivery rate for the site will be ... around 240 dwellings per year. In calculating the potential housing trajectory of the Consortium, a number of assumptions should be made:

- *Construction would commence within one year of adoption of the Local Plan with first occupation of the development occurring within 6 months after commencement of construction;*
- *The delivery rate will total approximately 120 homes per year on Persimmon and Grainger controlled land (60 each) in the early stages;*
- *As development progresses, another two site locations would open allowing delivery to rise to a maximum of 240 per annum; and,*
- *The delivery rates assume good access to finance by potential purchasers and allows for some fluctuation below the maximum build out of 240 per annum.*

5.7 This concludes that the maximum delivery rate will be 240 dwellings per annum. In light of this, we request that paragraph 11.5.3 be re-worded to say 'the site will deliver a maximum of 240 dwellings per year'.

2.7. It is instructive at this point to note the subtle change in the wording about housing delivery in the current draft plan policy DOR13 from the 2018 preferred options plan which stated at para 11.5.3:

The site will deliver an average of around 240 dwellings per year

to the current consultation document which states at para 23.6.28:

When fully operational, the site will deliver around 240 dwellings per year.

This aligns with the evidence provided by Dorset Council in its 'North Dorchester Annual Housing Trajectory' which indicates that it will take ten years from commencement of development before 240 houses are delivered in a year. This means during the plan period from commencement of development an average of approximately 180 houses per year will be delivered.

2.8. It is also relevant to note that the North Dorchester Consortium (Persimmons and Grainger) own or control virtually all the land proposed to be allocated as shown on the Council's landownership plan under 'evidence' for the proposals. It would thus place the major development proposal for Dorchester in the hands of two major housebuilders confirming the likely problems of slow delivery outlined in the Government's white paper and the Letwin report. It is not at all clear what if any legal means are available to the Council to ensure 240 houses are provided annually.

2.9. Locally the nearest comparison that can be made with DOR13 is the development of Poundbury. According to the latest fact sheet published by the Duchy of Cornwall (June 2019) approximately two thirds of the proposed 2700 homes had been built since the start of development in late 1993. This equates to approximately 70 houses per year. It then goes on to state that the final third will be built by 2025 which implies a more than doubling of the historic building rate to 150 per year.

2.10. Nationally, build out rates have been recently examined in 'Start to Finish. 2nd Edition' (Lichfields, Feb 2020). This found that for large sites (2000+ houses) the average time from planning permission to first completion to be 2.6 years (fig 4). More importantly the average build-out rate for large sites (2000+ houses) was 160 houses per year (fig 7). Furthermore, it should be noted that the average build-out rate was calculated excluding sites that had less than three years of completions.

2.11. All this points to an overly optimistic view of the ability of DOR13 to produce anywhere near the 240 houses per year, even allowing for a build-up period of ten years. This is highly relevant to the consideration of the financial viability of the development. Proposals for three garden communities in the 'North Essex Authorities Shared Strategic (Section 1) Plan', was the subject of a report by a Planning

Inspector in May 2020. The report to the three local authorities questioned the viability of the three garden communities. His conclusion was that two of the three proposed 'garden communities' were financially unsound and therefore not deliverable. Therefore, the draft plan failed the key test of whether it was sound or not. What is of particular importance in the Inspector's analysis of the financial viability of the proposals is his criticism of the unrealistic assumptions being made on behalf of both the Councils involved and the promoters of the 'garden communities'. In particular he specifically refers to unrealistic assumptions regarding build-out rates and the need to account for 'optimism bias' in considering the cost of the infrastructure requirements.

2.12. The question of financial viability of development North of Dorchester was considered on behalf of WDDC by the Halcrow Group in 2008. Their report considered a development period 2008 – 2026. It concluded that by the end of the period the development would have a negative value of £174m. The necessary roadworks to serve the development were costed at £113million.

2.13. In spite of this evidence, the Council has completely failed to provide an up-to-date financial appraisal of the DOR13 proposal. On the Council website it simply states that this will be done:

To inform the next stage of the production of the Local Plan Review.

When this is eventually published, assumptions about the costs of infrastructure and build-out rates will need to be fully justified in view of the above evidence.

2.14. Policy HOUS2 on affordable housing requires that 35% of the houses built on DOR13 be affordable. This requirement is hedged around by reference to assessing viability (para 4.3.17 – 4.3.20). Given that DOR13 will have a near monopoly on the supply of affordable housing for Dorchester and environs for the foreseeable future it cannot be sound policy to promote a draft plan without a viability assessment which clearly demonstrates (without any ifs, buts or maybes) that 35% of the housing will be affordable. This requirement is underlined by the poor record of the former WDDC in securing affordable housing. WDDC policy was to secure 35% affordable housing on all sites, the achievement over a ten-year period was around 17%.

2.15. The requirement to ensure that any proposal is not only financially viable at the outset but can cope with changes in circumstances is detailed in a report by the RTPi on 'The Deliverability and Affordability of Housing in the South West of England'⁵. This concluded:

25. Viability issues emerged as a common theme across all the case studies. These issues can affect a scheme across its life. While the main viability discussion takes place as part of the outline planning permission process, external events later on, (for example the property market downturn of 2007-08), can result in changes in the scheme's circumstances and renegotiations. New phases of development and new (outline) planning applications also tend to lead to renewed viability discussions.

26. Viability issues differed subtly between the case studies, depending on, amongst other factors, affordable housing requirements, public funding availability and infrastructure needs. While different solutions were identified for each case study, they usually involved compromises between the amount and type of affordable housing secured and other infrastructure provided.

2.16. In the assessment of viability as set out in paras 4.3.17 to 4.3.19 (p140 Vol1) it is not at all clear that the Council has understood the full implications of the ruling of the High Court in the case of Parkhurst Rd Ltd v SofSCLG and LB Islington (April 2018). This judgement made it clear that a policy requiring affordable housing was not negotiable by reference to arbitrary valuation figures particularly in regard to land values.

⁵ <https://www.rtpi.org.uk/media/1949/deliverability-andaffordability-of-housing-in-the-south-west-of-england-full-report.pdf>.

3. Education

3.1. DOR 13 requires the provision of a four-form entry school across the school age range (5-16). Given there is currently significant spare capacity at three local first schools (5-9) it is not at all clear at what stage a primary school will be needed (see data in Table 1, Appendix 1).

3.2. In respect of a middle school (9-13) and high school (13-18) a four-form entry school is unlikely to be viable in providing the range of subjects and facilities expected at this level. The average size of a secondary school (11-16) according to the DfE web site is 986 pupils, which equates to 197 pupils per school year or 6-7 form entry. It must also be recognised that for a number of years after the development commences there will be no school and thus children of all ages will be travelling into Dorchester. This means links for siblings will be established at existing schools and make the establishment of a new school more unlikely.

4. Transport

4.1. There is a conflict between the desire to create a 'garden community' and provide a link road between the A35 and A37. The plan makes it clear that the primary function of this road is to act as a 'northern by-pass' to Dorchester (para 23.6.32) ... *delivering its primary function of relieving congestion at junctions around the bypass.* In design terms this includes the need to have a maximum of four junctions, and to ... *be designed to ensure that nearby residents do not suffer unduly from noise from the road and poor air quality.*

4.2. The provision of this 'by-pass' conflicts with the 'Vision for DOR13' set out in fig 23.4 where it states:

The comprehensive development of land North of Dorchester will be designed to reflect garden community qualities. It will have a high standard of place making and design that respond to local distinctiveness and will create areas with innovative and bespoke character special to Dorchester and the surrounding villages.

4.3. The North Dorchester Consortium Observations on DOR15 (Preferred Option) Oct 2018 had a different view of this road:

5.18 We believe that the reference to a design outcome similar to Middle Farm Way, Poundbury is inaccurate for the development of North Dorchester as it does not serve Poundbury, rather it bypasses it. The link road serving North Dorchester must not only provide a link between the A37 and A35, but also provide access and a sense of 'place' for the future residents of North Dorchester. It should also be an integral part of the development, and will also need to accommodate walking, cycling and public transport. Therefore, in some locations the road may resemble Middle Farm Way, but a different approach may be required in other locations. The Draft Local Plan will therefore need to be flexible on this point until further traffic modelling and design work has completed.

4.4. There are three different views of the nature of this 'link road' and what highway standard should be used in determining its design. The three views are incompatible and therefore undeliverable. A road as described by para 23.6.32 and illustrated by the Council on the plan in their evidence for DOR13 is completely contrary to 'garden community' principles. A road as described by the North of Dorchester Consortium will not be able to act as a strategic link between the A35 and A37.

4.5. Underlying this confusion is a complete lack of any traffic survey data. It has never been clear whether the Council seeks to justify the provision of the A35-A37 link regardless of whether development takes place as proposed by DOR13 or whether the additional traffic generated by DOR13 makes the provision of a link road essential.

4.6. The proposals include at least three footpath/cycle links into the town centre across the water meadows. If these are to be attractive all-weather routes then it is difficult to see how they will be made compatible with maintaining the character and nature of the water meadows.

4.7 There is no recognition that this link road severs not only the new community but also six public footpaths and one of the local roads linking Charminster to Dorchester. For all the fine words, for example, ... *opportunities for easy access to the town for pedestrians and cyclists will form an integral part of the development layout* (p160 vol2 Environmental Performance) ... this amounts to a fundamental obstacle discouraging local residents from Charminster walking or cycling into Dorchester and, furthermore, it cuts off a large section of the countryside from the residents of Dorchester.

5. Employment

5.1. The provision of an area of employment land within DOR13 illustrates another ambiguity in the strategic argument for DOR13. On the one hand to meet the vision of a 'garden community', it needs to present a mix of uses including employment land so that, as a new settlement, it can claim to be sustainable. On the other hand, the justification for the development is to provide additional housing to redress the imbalance of employment and economically active people in Dorchester. This is illustrated further by DOR13 being alternatively described in the bid for Garden Community Funding a ... *a high-quality new environment and community. ... At this scale it will be relatively self-contained ... and ... It will be the next major phase of growth for Dorchester.*

5.2. This ambiguous approach is driven by the lack of a strategic appraisal of wider relationship between Dorchester and Weymouth as outlined in text of Position Statement 1

6. Phasing

6.1. There is almost a complete lack of any information as to how DOR13 will be phased. There is one reference to the commencement of development which gives cause for concern.

Development of the site should commence at the junction of the B3143 (Slyer's Lane) and the minor road running between the C13 at Westleaze and Stinsford Roundabout. Development should progress westwards from this point to facilitate the provision of a new east-west link road connection between the A35(T) and the A37 at the earliest opportunity. (para 23.6.28 p161 Vol2).

6.2. What this means is that the development will have to rely on the existing road network and in particular all access into Dorchester will be via High East Street the centre of the Dorchester Air Quality Management Area. The progression of the development westwards to ... *facilitate the provision of a new east-west link road ...* is yet another example of pious words instead of firm policy. It begs the question as to whether and when the two most expensive parts of the road, the link onto the A35 at the eastern end and onto the B3147/A37 across the water meadows at the western end will be built.

7. Conclusion

7.1. There is clear evidence to suggest that the number of houses built will be nearer 160 per year rather than 240, that there is no justification for a new school in terms of pupil numbers and that there is a lack of a clear timescale for the construction of the A35-A 37 link road. In view of these uncertainties about the deliverability of key components of DOR13 and a lack of viability testing, we would argue that the evidence base on which this strategic housing allocation is proposed remains unproven and therefore unsound.