



Dorchester Civic Society

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Dorchester Civic Society: Position Statement 2 (of 2)

DOR13: Development North of Dorchester - Where is the Masterplan?

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

Some two and a half years after WDDC submitted its successful Garden Communities bid and having received £150,000 from the Ministry of Housing, Communities & Local Government of 'capacity funding to support the delivery of North Dorchester', where is the masterplan for the proposed development - a masterplan that Government guidance states should be developed in parallel with the statutory planning process?

Dorchester Civic Society objects to the Consultation Local Plan and to DOR13 in particular.

If Dorset Council ignores the Society's and other objections to DOR13 and resolves to submit the Local Plan, largely unamended and without a proper masterplan for DOR13, to the Secretary of State (under Regulation 19 of the Town and Country Planning [Local Planning] [England] Regulations 2012), the Society advises the Council to consider the following guidance to Local Plan Inspectors:

The LPA (local planning authority) should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. In particular, they should ensure that it takes full account of all relevant policies in the NPPF and relevant guidance in the PPG. The plan should identify all the matters which need to be planned for, and provide policies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the purpose of preparing a plan is to address all the necessary matters as far as possible, and not defer them to future updates or rely on the Inspector to deal with them at examination.

Dorchester Civic Society believes that the Dorset Council Local Plan cannot proceed to the Regulation 19 submission stage before an adequate masterplan for DOR13 has been prepared and the public have been fully consulted. The masterplan must sit alongside the adopted Local Plan and have the status of Supplementary Planning Guidance.

This statement of objection highlights Dorset Council's failure to develop a masterplan for DOR13 despite undertakings to Government to do so; and it examines three of several unresolved issues affecting any masterplan: (1) the proposed A35(T) – A37 link road; (2) links between DOR13 and Dorchester, in particular pedestrian and cycle links; and (3) the development envelope.

Background to this Position Statement

*'The successes of Poundbury are well known ... it is a unique development closely controlled by the landowner with a clear concept informing a masterplan right from the start.'*¹

*Masterplanning is integral to creating well-planned and designed garden communities. (It) engages the local community and stakeholders in creating a place-making framework for the garden community. (As a) garden community evolves, the development of a masterplan should work in parallel with the statutory planning process.'*²

1. The proposal for large-scale development north of Dorchester will increase the town's population by around 35% over a 15 – 20-year period. This is the largest individual development scheme for the new Dorset Council area and the most significant proposal to affect the former West Dorset District Council area since the decision to develop at Poundbury - around two-thirds the capacity of this proposal - was made some 35 years ago. Regrettably, it is apparent that the Council are promoting the DOR13 development without due diligence in planning terms.
2. Despite Council commitments, made in a bid to central government in Autumn 2018, to prepare a masterplan for DOR13 (then DOR15), to involve stakeholders and engage with the community, and for the masterplan to be adopted alongside the adoption of the Local Plan, the only plan that currently exists is the one described in 2018 as merely an 'indicative layout'. Yet, at the time of the Garden Communities bid, the Council acknowledged that there were several unresolved issues surrounding the site's development and its relationship to Dorchester including a proposed east-west road link, the site's heritage and landscape sensitivity, the challenge of creating pedestrian, cycle and other linkages across the water meadows and the future use and management of the water meadows themselves.
3. Based on all the evidence currently available, Dorchester Civic Society objects to the draft Local Plan as a whole and to DOR13 specifically. The Society is submitting two separate but interrelated position statements. Position Statement 1: highlights the gaps (including particularly the lack of a Council-wide geographically based spatial strategy) and inconsistencies of the plan; challenges the deliverability of DOR13; criticises DOR13's relationship with and impact on Dorchester and its setting; questions the strategy, or indeed lack of a 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. This statement, Position Statement 2: highlights the need for a masterplan to guide development; and challenges Dorset Council's failure to examine the issues, review alternatives and bring forward a masterplan in parallel with the statutory local plan-making process.

Dorset Council's 'indicative layout' or 'strategic framework plan' for DOR13

4. In August 2018, West Dorset and Weymouth & Portland Councils consulted on preferred options as part of a joint local plan review process.³ The proposal (then DOR15 and now DOR13) to develop a mixed-use extension to Dorchester on land north of the town was a key element of the Councils' proposals. The consultation document included an 'indicative layout' in respect of both DOR15 and the nearby Charminster extension option DOR16 (Figure 1): this plan was sub-titled:

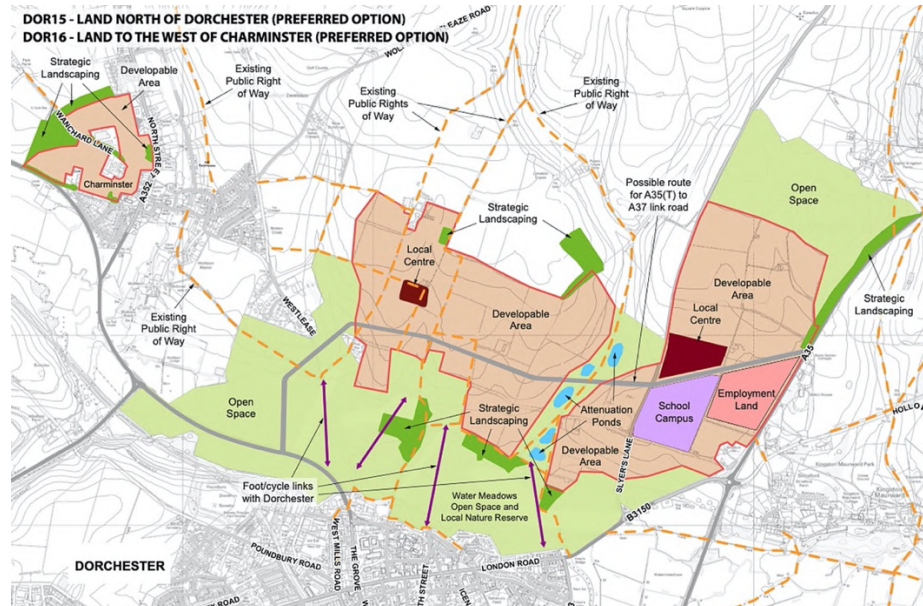
¹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/garden-communities/20181109-garden-communities-bid-submitted-form-redacted.pdf>

² <https://www.gov.uk/guidance/garden-communities/masterplanning>

³ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/pdf/20180802-lpr-preferred-options-main-document-final.pdf>

(The) layout has been produced for each of the proposed new site allocations to give a visual representation of how development could take place. The layouts have been produced to help guide future site design work and show where the main policy requirements for each site could be located. The layouts will however act as a guide only and may be subject to change through the planning process.

Figure 1



5. In its Garden Communities Bid submission in November 2018⁴, the former WDDC stated that as the Joint Local Plan progressed to pre-submission consultation (Regulation 19) a masterplan would be produced to guide development of the DOR15 site:

This masterplan will be produced with the involvement of key stakeholders from the local community. Further community engagement will take place during the production of the masterplan with the views expressed taken into account in the production of the final version. It is likely that this masterplan will be adopted alongside the adoption of the Local Plan. Should the award be granted this will enable more meaningful and detailed analysis of the issues, including the preparation of full design codes and analysis of viability and deliverability, as well as greater public engagement.

6. The Bid was accompanied by a 'North of Dorchester Strategic Framework Plan' (identical to the earlier 'indicative layout' - Figure1); and the supporting statement highlighted several unresolved issues surrounding any development of the site and its relationship to Dorchester: these included, *inter alia*, the need for an east-west road link; the site's heritage and landscape sensitivity; the challenge of creating pedestrian, cycle and other linkages across the water meadows; and the future use and management of the water meadows themselves.
7. The Bid required WDDC to provide details of review mechanisms and tools that would be put in place to secure delivery of the quality aspects of the garden community. In response, the WDDC undertook to produce a masterplan:

... to support the allocation of the North Dorchester development site in the Local Plan Review. This ... is likely to set out detail about the development of the site including land uses and design guidelines and the expectation is that it will be adopted as a supplementary planning document. ... The masterplan ... will be prepared with support from a Design Review Panel, workshops to engage the local community, and with reference to assessment frameworks such as Building for Life and Building with Nature to ensure high quality,

⁴ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/garden-communities/20181109-garden-communities-bid-submitted-form-redacted.pdf>

sustainable design. Preparation of design codes with appropriate review mechanisms will ensure that high quality design is implemented throughout the lifetime of the development. The use of a design review panel and design assessment processes (such as Building for Life, BREEAM and Building with Nature) are specifically mentioned within the Local Plan Review and would be applicable to the North Dorchester development. These approaches are intended to ensure that design, local distinctiveness and place making are addressed from the start, with the council and stakeholders taking a lead and having a strong influence, so that there is a collaborative place-making approach to the development.

8. Addressing the Bid requirement to demonstrate that the planned ‘garden community’ development would be viable WDDC undertook to do a ‘high-level viability appraisal’:
To inform the next stage of the production of the Local Plan Review (regulation 19 pre-submission consultation), the site (and the Local Plan Review as a whole) will be required to undergo a high-level viability appraisal as detailed in the Planning Practice Guidance. This is one of the areas where assistance is requested as part of this Garden Communities bid. 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.

9. In June 2019 Dorset Council was notified of the success of its Garden Communities Bid. However, notwithstanding the undertakings given about masterplan preparation, timing, viability assessment and consultation, the January 2021 Local Plan Consultation document merely states that:

A masterplan will be produced to reflect this vision and ensure that garden communities qualities can be delivered. This masterplan will be adopted as a supplementary planning document and used when considering planning applications for the site.⁵

10. The DOR13 ‘Land North of Dorchester’ policy statement restates that development will be in accordance with a masterplan (i); it lists the core elements of the development (ii – xiii); and concludes by saying:

Key design requirements for the site will be established through the masterplan. The development should however be grounded in its local context taking design clues from Dorchester and the surrounding villages and make the most of the landmark buildings and features that exist in the area (xiv).⁶

11. Central Government Planning Practice Guidance requires that when preparing a Local Plan, strategic developments such as DOR13, should be the subject of a site-specific viability assessment to ensure the proposal is deliverable; and that the cumulative cost of all related policies and proposals should not be of a scale as to render the proposal unviable.⁷

12. In spite of past undertakings, Dorset Council has signally failed to progress work on developing a masterplan for DOR13 beyond the August 2018 Joint Local Plan Options Consultation exercise. Dorchester Civic Society’s criticisms of the indicative plan and a suggested possible alternative approach⁸ have, for example, been ignored; and significantly, the Dorset Council-commissioned 2020 Heritage Impact Assessment (only published after the commencement of the 2021 Local

⁵Para 2.6.27: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/the-plan/pdfs/dclp-jan-2021-vol-2-central-dorset.pdf>

⁶ Ibid, page 169

⁷ <https://www.gov.uk/guidance/viability>

⁸ <https://www.dorchester-civicsociety.org.uk/wp-content/uploads/publications/JointLPR-DCS%20PositionStatement-7October2018.pdf>

Plan consultation) is based on this woefully inadequate 'plan'.⁹ Elements of this plan reveal no appreciation of the site's features, setting and topography; for example, the indicative alignment of the link road.

13. National guidance exists on the processes, stages and tools for masterplanning. Homes England (HE), for example, have examined the relationship between the statutory planning process and masterplanning for garden communities. HE's Toolkit¹⁰ includes a table that highlights and amplifies five stages of planning and design: strategic site selection and initial visioning; concept masterplan; framework masterplan; detailed masterplan; and detailed design tools. Figure 2 shows the first three of these levels.
14. At first glance it might be thought that the Council's 'indicative layout' or 'strategic framework plan' can be equated with HE's 'Concept Masterplan.' However, there is a striking mismatch between HE's expectations and Dorset Council's meagre 2018 'indicative layout'. Where is the evidence base for the plan; a site constraints analysis; an options evaluation; a development capacity assessment; a delivery strategy; or a high-level viability assessment? In addition, there is no certainty and clarity about key spatial frameworks, access and movement, strategic urban design principles, the development envelope within the overall site allocation and the 'fit' of the new building in relation to Dorchester and its historic setting.




Typical graphics	Statutory planning process	Design tools	Level of detail required
1. Visioning 	Strategic site selection <ul style="list-style-type: none"> location for a garden community can be identified either through a broad location or strategic site allocation in the emerging Local Plan before a broad location or strategic site is selected for allocation as a garden community in the local plan, a full assessment of alternative sites should be undertaken in accordance with the Environmental Assessment of Plans and Programmes 2004. your appraisal of the plan should include the sustainability assessment of reasonable alternative sites. This work should be fed into the options consultation the reasoning for why alternative locations/sites were discounted and the preferred site chosen needs to be clearly set out. 	Visioning <ul style="list-style-type: none"> appraise the spatial opportunities of each site against the overall spatial strategy and sustainability objectives for the wider plan making area. development of initial vision for the garden community setting out the type of place to be created though this stage focusses more on vision - masterplan optioning and capacity studies can be done to inform a concept plan. 	<ul style="list-style-type: none"> this stage provides a high-level assessment of the opportunities and constraints associated with different growth options. development objectives, an initial vision, and spatial principles should be agreed once you've select a preferred option and site.
2. Concept masterplan 	Establishing the policy basis for a garden community <ul style="list-style-type: none"> collate an evidence base for the site to support site-specific policies in the development plan, either as a broad location or strategic site allocation. test and evaluate alternative options as part of the design process demonstrate the site is viable and deliverable and there is nothing major which could prevent development coming forward in the planned timescale. If a site is to be brought forward early in the plan period then a greater level of detail (and certainty about how it is to be delivered) is likely to be required. 	Concept masterplan <ul style="list-style-type: none"> it reflects the overall spatial vision, development objectives, spatial parameters, design and delivery principles. the concept masterplan document should explain the sites' constraints, opportunities and development capacity. It also sets out high-level spatial parameters which form a framework for development. your masterplan will clarify the critical infrastructure requirements, strategic mitigation measures and includes a viability assessment and a delivery strategy for the site. 	<p>The concept masterplan sets out the key structuring principles of a masterplan for a garden community</p> <p>It would typically provide clarity on spatial parameters (or frameworks) for the following elements of development:</p> <ul style="list-style-type: none"> movement and access land uses strategic urban principles built up areas like community hubs nodes and landmarks green and blue infrastructure key contextual interfaces high-level viability
3. Framework masterplan 	Guidance for garden communities <p>Can take the form of a development plan document (DPD) such as an Area Action Plan; or a Supplementary Planning Document (SPD) which provides more detail on preceding policy.</p> <ul style="list-style-type: none"> DPDs typically follow a broad location allocation in the Local Plan. SPDs would more typically follow a strategic site allocation. due to the site-focused nature they offer opportunities to engage the community and stakeholders in creating the development proposals. 	Framework masterplan <p>A more detailed masterplan framework to support and illustrate a DPD or SPD for a garden community</p> <ul style="list-style-type: none"> this creates further detail on the anticipated layout and development form by identifying a development block structure, a green infrastructure network and street hierarchy and urban design principles. the masterplan framework would provide clarity on the phasing, funding and delivery of social and physical infrastructure requirements to support the development. Where there are multiple landowners this would include setting out proportionate contributions to the site wide infrastructure requirements. can be prepared collaboratively between the council and promoters/developers 	<p>A framework masterplan covers the following areas in a higher level of detail.</p> <ul style="list-style-type: none"> movement and access built up areas nodes and landmarks green infrastructure key contextual interfaces land uses and capacities phasing and viability environmental assets implementation framework

Figure 2

⁹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/north-of-dorchester-heritage-impact-assessment.aspx>

¹⁰ <https://www.gov.uk/guidance/garden-communities/masterplanning>

A critique of the 'indicative layout' of DOR13: some of the unresolved issues

15. Key unresolved masterplanning considerations, for which there is no evidence that Dorset Council has considered, still less evaluated, alternative options as part of a masterplanning process, include:

- The proposed road link between the A35(T) to the A37 via the B3147;
- Pedestrian, cycle and any other links between the 'garden community' and the existing town; and
- The development envelope within the overall site;

In reality, such considerations are interrelated and all will impact on other assessment criteria including the quality of place-making; cost, viability and deliverability; and sustainability.

Issues raised by the Heritage Impact Assessment

16 The starting points for this critique of the 'indicative layout' DOR13 are the findings, conclusions and recommendations of the North of Dorchester Heritage Impact Assessment (HIA).¹¹ In addition, the critique draws on national, regional and local policy statements and guidance; supporting evidence relating to the Local Plan published by Dorset Council; and extracts for earlier Local Plan review submissions and subsequent position statements from Dorchester Civic Society.

17. Not only is the HIA based on the Council's 2018 'indicative layout' but, in the absence of any more detailed proposals, the consultants were obliged to assume that development would not impact on any part of the site designated as open space on the indicative plan. Obviously, this will not be the case and, as the HIA notes, works including landscape, drainage, footpaths and cycleways, and lighting etc. will be required in which case the heritage impacts will need to be assessed. The HIA states that its findings should help ... *inform more sustainable options* ... and that its recommendations should inform ... *the next iterations of the masterplan*.¹²

18. In its summary of the effects of the DOR13 proposal on designated heritage assets (scheduled monuments, listed buildings, conservation areas etc.), the HIA includes, for example, the following assessment:

Medium-high effects are possible in relation to Poundbury Camp Scheduled Monument and Dorchester Conservation Area as a result of setting change. The greatest factor affecting the setting of Poundbury Camp (and one of the most problematic aspects of the development in general given the number of assets' significance that it may affect) is the proposed Link Road, which will require further options assessment to see if a less harmful route can be identified. With regard to the Dorchester Conservation Area, it is the proximity of the development (including the Link Road) and the potential increase in activity, noise and light that will result from it that is likely to result in the greatest setting change. The pulling back of the development to the north of the Charminster to Stinsford Road, and reconsideration of the Link Road, would help minimise the predicted effects to the Conservation Area.

19. In its conclusions, the HIA notes that:

(T)he assessment has identified potentially substantial effects to designated assets, and in such circumstances the NPPF states accepting this level of effect should be either "wholly exceptional" or "exceptional"; and that:

¹¹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/pdfs/north-of-dorchester-hia/chp9-conclusions-and-appendices-land-to-the-north-of-dorchester-hia.pdf>

¹² <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/north-of-dorchester-heritage-impact-assessment.aspx>

With this in mind, further work will be required to better understand the level of harm to some individual assets, and to inform subsequent amendments to the indicative masterplan. If changes are made to the indicative masterplan, the effect on those assets identified as experiencing harm will then need to be reassessed. Consideration would then also need to be given as to whether the changes would result in harm to additional assets, which would not experience any under the current iteration of the indicative masterplan.

20. The HIA concludes by making seven recommendations. The first four are:

- a. *The Charminster to Stinsford Road be considered as the southernmost boundary of the development, in order to avoid potential physical effects to archaeology and better preserve the historic landscape and contribution of setting to Dorchester Conservation Area.*
- b. *The route of the Link Road be reconsidered given its harmful interaction with the setting of designated and non-designated assets and physical interaction with archaeological remains (including some of more than local significance). Alternatives to the proposed route need to be carefully considered and would be best informed by accurate visual representations and the results of archaeological evaluation.*
- c. *The siting and use of strategic landscaping should be reconsidered. This can be harmful not only physically to archaeological remains, but also in terms of causing setting change. In particular, the transition from urban to rural surroundings needs to be carefully designed from the outset.*
- d. *A study of potential sightlines is undertaken to help preserve the appreciation of assets that may experience setting change. This will require the production of verified views. It should include consideration of how changes in building height changes across the site may increase or reduce levels of harm to assets. The outcome of this study should be used to inform the layout and design of any development on the site.*

21. Crucially, the final paragraph of the HIA states:

Historic England have recommended that some of the report's recommendations (a-d above) are further considered and used to inform revised masterplanning that tests and refines the options and goes on to illustrate the capacity of the site for development in terms of boundaries, layout, and height (including sightlines); infrastructure (including the link road) and strategic landscape. They consider that this information is needed to inform decision-making about the appropriateness of the site for allocation, finalise a masterplan and to incorporate any specific requirements or criteria in site specific policy.

22. Dorchester Civic Society wholeheartedly agrees with the HIA's conclusions and recommendations. They endorse the Society's own assessment on the impact of DOR13 as set out in the Society's Position Statement in response WD, W&P 2018 Preferred Options Consultation¹³; and its later Position Statement on its impact on Poundbury Camp¹⁴:

The A35(T) - A37 Link Road

23. The consultation draft local plan states (Section 23, p168)

A road link between the A35(T) at Stinsford Hill to the A37 (via the B3147 between Weirs Roundabout and The Grove) will be provided as part of the development together with a package of measures for improvements to the strategic and local road networks.

24. Dorset Council argue this link as essential, not only to accommodate new growth, but also to reduce existing pressure on the High Street and southern A35 bypass. However, the traffic

¹³ <https://www.dorchestercivicsociety.org.uk/wp-content/uploads/publications/JointLPR-DCS%20PositionStatement-7October2018.pdf>

¹⁴ <https://www.dorchestercivicsociety.org.uk/wp-content/uploads/2020/06/DCS-position-statement-impact-poundbury-camp-may-2020.pdf>

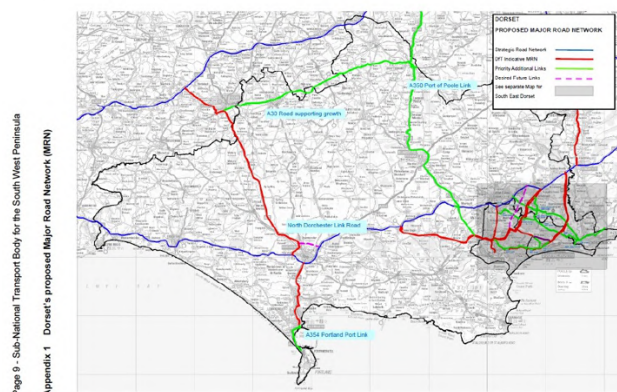
modelling to support this assertion and to confirm the level of benefit to the town is not publicly available if it exists at all. Moreover, there is no evidence, either in or supporting the draft Local Plan, of a transport strategy for the Dorchester catchment area, and of the existence of a Council-wide transport strategy; and no consideration of alternative sustainable transport solutions. Indeed, paragraph 23.6.34 clearly demonstrates the current lack of an agreed 'movement strategy' for Dorchester and its environs:

Any movement strategy will need to consider any associated wider impacts, both from the development itself and from predicted increases in traffic in the area. In particular, the potential need for improvements to the strategic and local road network (including the A35(T)) and the potential need for non-car-based transport improvements within Dorchester (including public transport) will need to be considered.

25. The intended status of the Link Road is also unclear. To draw parallels with Poundbury is it, for example: a Peverell Avenue East/West-type road; or a Middle Farm Way-type road as the description in the draft Local Plan perhaps implies; or, as Dorset Council apparently envisage, a route of 'A' road status, forming part of the Department for Transport's Major Road Network.
26. The status and primary function of this road will determine its design and relationship to new development (horizontal and vertical alignments, carriageway width, junction spacing, sight lines, the character and extent of frontage building, etc); its relation to the adjoining street layout and overall movement framework potentially severing different parts of the new community and also the community from Dorchester; its impact on heritage and landscape assets and on existing nearby communities and buildings; and on development costs, viability and deliverability.
27. In 2008, the WDDC-commissioned Urban Extensions Study¹⁵ concluded that the road network infrastructure necessary to accommodate upwards of 3000 additional dwellings in the DOR13 area comprised:

(A) new northern bypass road – single carriageway with junctions at each end (grade separated at eastern end); two roundabout junctions to provide access to development; Major upgrade to Monkeys Jump roundabout; and dual A35 between junction with new bypass and Yellowham Hill.
28. The study costed these works at a £130 million with implementation spread over a ten-year period
29. In 2018, a report to the Shadow Dorset Council in August 2018, included a map of Dorset's proposed Major Road Network (the next level down from England's Trunk Road network) incorporating the 'North Dorchester Link Road'.

Figure 3



¹⁵ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/evidence-base/pdfs/sustainability/west-dorset-urban-extension-study-main-report-halcrow-group-ltd.PDF>

30. The Council is one of several local authorities that together comprise the Western Gateway Sub-national Transport Body. This body's 2019 proposals¹⁶, for Department for Transport's Major Road (MRN) and Large Local Major (LLM) schemes that immediately relate to Dorchester and DOR13, are:
- a MRN scheme: A354/A35(T) Junction Package
Major Junction Improvements/Package of improvements including safety, Use of Smart Technology included VAS. Main arterial route through South Dorset, connecting the SRN with major housing and employment sites in Weymouth and Portland, including Portland Port. This scheme overlaps with the Dorchester Bypass Junction Package including the Stadium Roundabout upgrade and capacity improvements and bus priority measures at A354 Monkton Hill approaching the A35(T); and
 - a LLM scheme: Dorchester Bypass Junction Package
Package of improvements including: Junction Improvements at Monkey's Jump, Stadium and Stinsford Roundabouts, a remodelled Max Gate junction, a new access to the North Dorchester development including link road. Bus priority measures and capacity improvements on the A354 MRN approach to Stadium Roundabout from the South to enable a free-flowing network beyond 2026.
31. This suggests that the Council's priority for the East-West link through DOR13 is for a 'main' road of strategic significance to Dorchester, Dorset and, indeed, sub-nationally.
32. The Heritage Impact Assessment records the damaging impact of any link road, let alone a road and associated junctions designed to 'A' road standards. Likewise, Dorchester Civic Society's Position Statement¹⁷ expressed grave concern at:
- ... the inevitable impact of constructing a link road between the A35(T) and A37 across the water meadows with, in all probability, a roundabout junction with the B3147 at the foot of Poundbury Camp. ... Such a road would have to be constructed on a causeway over the water meadows; all or part of the route would require the usual traffic signage and lighting; the expected levels of traffic would significantly reduce any sense of quietude it is still possible to experience within the Camp; and the Camp's heritage setting would be irreparably lost.*
33. Given the lack of clarity as regards the function, implications and potential impact of the proposed Link Road, it is extraordinary that the Council has not progressed work on a masterplan for the development beyond the 2018 'indicative layout'. Instead, the draft plan merely notes that:
- The development will deliver a link road between the A35 (T) to the east and the A37 (via the B3147) to the west. This will help to relieve traffic congestion issues both within the town centre and at junctions around the bypass. The route will run through the development with the development being accessed from the minimum number of junctions necessary along its route, which should not exceed four. The route will be designed to ensure that nearby residents do not suffer unduly from noise from the road and from poor air quality. The road should be designed to facilitate easy north-south pedestrian and cycle trips and not be a barrier to this whilst still delivering its primary function of relieving congestion at junctions around the bypass (Para 23.6.32)*
34. Such an 'A' class road will inevitably bifurcate the new community through which it will pass and the statements in the Local Plan are simply warm words that paper over the unresolved contradictions posed by a link road, with its primary purpose as a bypass route.

¹⁶ <https://www.gloucestershire.gov.uk/media/2090918/wg-reb-part-3-mrn-llm-priorities.pdf>

¹⁷ <https://www.dorchestercivicsociety.org.uk/wp-content/uploads/2020/06/DCS-position-statement-impact-poundbury-camp-may-2020.pdf>

Links between DOR13 and Dorchester

35. The draft plan states that the build rate for DOR13 will be 240 units. However, the maximum 'absorption rate' for new housing in the town has been estimated to be around 140 units pa and a statement by a senior planner in one of the Council's local plan webinars quoted a figure of around 165 units pa. On the latter figure it is probable that the population of DOR13 will not exceed some 1,500 before the early/mid 2030s.

36. Research into the relationship between cost and value, by real estate consultants Knight Frank, to support the work of the Building Better, Building Beautiful Commission, included Poundbury as one of several case studies¹⁸. The study noted:

Whilst absorption rates at Poundbury have increased, they remain slow for a development of this scale. This highlights the possibility that sustainable development might not be compatible with delivering at the maximum pace. Sustainable 'good growth' should never be compromised. In particular, nurturing commercial uses takes time and is a limiting factor. Without a landowner that is prepared to adopt a stewardship role over the development, it is likely to be ignored and dormitory housing may result. This is illustrated by the spatial comparison between Poundbury and Elvetham Heath: two developments of a comparable size. The richness of uses, the walkability and sustainability of Poundbury is self-evident. If more housing is needed in a region it would be preferable to have more developments offering slower 'good growth' than fewer developments of more rapid, but less sustainable growth.

37. Inevitably, DOR13's new residents will be wholly dependent on Dorchester's education, health, retailing and other facilities for many years. There is no evidence in the Plan of any assessment of the capacity of Dorchester's existing local roads networks to accommodate the increase in vehicle traffic that DOR13 development will generate. If the local and national environmental and sustainability objectives are to be attained, it is imperative that excellent pedestrian and cycle links, as well as good public transport, are in place from the outset of DOR13's development.

38. Paragraph 23.6.33 of the draft plan states:

Given its location to the north of the water meadows, an important consideration for the development is its connectivity with the existing town. It is therefore important that all opportunities for connectivity are exploited to enable travel to the town including through the provision of public transport routes, pedestrian and cycle links and road connections. At least three pedestrian and cycle links between the new development and Dorchester town should be delivered as part of the development along with connections to the National Cycle Network.

39. National policy and guidance on planning, transport, health and wellbeing, and the environment & sustainability are placing an ever-increasing emphasis on walking and cycling and on prioritising public over personal transport. The National Design Guide (2019) state:

78. Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient and accessible for people of all abilities. These are designed as part of attractive spaces with good sightlines, so that people want to use them. Public rights of way are protected, enhanced and well-linked into the wider network of pedestrian and cycle routes.¹⁹

¹⁸ <https://content.knightfrank.com/research/1930/documents/en/building-better-building-beautiful-commission-cost-value-2020-7017.pdf>

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957233/National_Design_Guide.pdf

40. A Department for Transport Note on shared use routes for pedestrians and cyclists²⁰ sets out the underlying principles, site and route assessment considerations, and general design issues relating to shared use cycle/footpath routes. The key design principles are: convenience, accessibility, safety, comfort, and attractiveness. Figure 4 illustrates the kind of design dimensions and features necessary to meet the needs of all users.

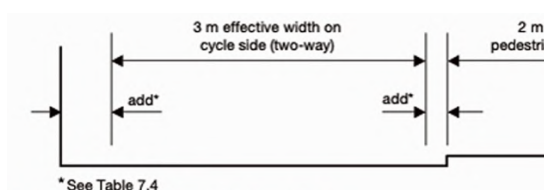


Figure 7.9 Physical segregation example

Figure 4

Illustration of the character and configuration of the kind of shared pedestrian and cycle route necessary to encourage users of all ages at all times of day and in all weathers and seasons.



41. The combined cycle/footpath path (National Cycle Network 26) from Charminster, via the Sun Inn on Westleaze Road) is, arguably, not fit for purpose. Notionally, it is some three metres wide but pinch points coupled with poor maintenance mean that the path is only 2.5 metres at best and narrower for much of its length; sections of the route are also subject to flooding. The route is unlit and being frequently bounded by trees and bushes means some users feel uneasy and insecure and choose not to use the route at times; and the path's design results in increasingly user conflicts – individual pedestrians of varying degrees of mobility, family groups, joggers, dog walkers, silent cyclists, and an increasing use of mobility vehicles.
42. The 'indicative layout' proposes three new cycle/footpaths. The westernmost route passes close to Frome Whitfield House and would join the combined cycle/footpath path (NCR 26) arriving in the town by John's Pond and Hangman's Cottage; the only possible arrival point for the indicative central route terminates at the bottom of Friary Hill; and the eastern route appears to terminate at Grey's Bridge. Figure 5 shows the location of these three 'arrival' points all of which have limitations and constraints. In addition, the plan marks one other potential 'arrival' point for a new combined cycle/footpath linking, via the road entrance to the Casterbridge Estate, to London Road, close to the bottom of High East Street: this possibility was suggested by Dorchester Civic Society in its position statement in 2018²¹
43. Putting aside the very damaging heritage and landscape impact of constructing three new shared-use paths across the water meadows, all three of the Council's indicative 'arrival points' are themselves problematic in practical as well as heritage terms. For example, John's Pond area incorporates the pond itself, listed sluices and a listed building: as the HIA records, these features:
- ... contribute to the special historic and architectural interest and character of the Dorchester Conservation Area and are also an integral component of the historic landscape character.*
44. The proposed easternmost foot/cycle path is shown as terminating, remote from the town centre, at Grey's Bridge: here, the constraints of existing development mean that, as now, the path would finish on the wrong side of the bridge with a single narrow pavement, on a busy road next to a busy signal-controlled junction!

²⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/9179/shared-use-routes-for-pedestrians-and-cyclists.pdf

²¹ <https://www.dorchestercivicsociety.org.uk/wp-content/uploads/publications/JointLPR-DCS%20PositionStatement-7October2018.pdf>

45. Since the HIA's authors were obliged to assume that the DOR13 proposals, as shown by the 'indicative layout' would have no effect on the water meadows they conclude that the John's Pond heritage assets will be unaffected! In reality, for a new combined shared use cycle/footpath to be effective its impact on John's Pond and its heritage setting would be highly damaging.

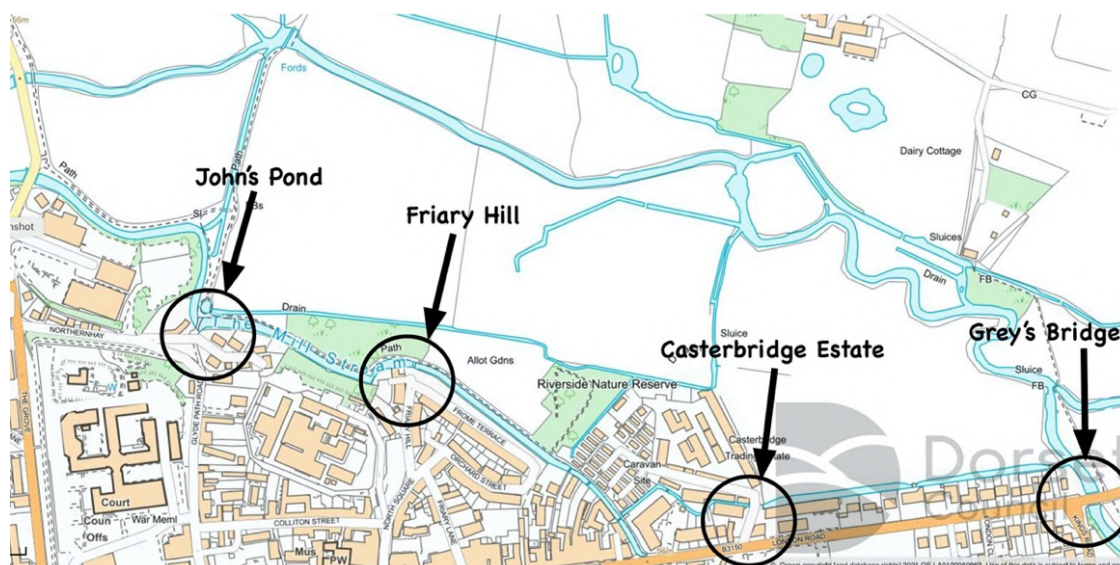


Figure 5



Figure 6

The approach to John's Pond from the Charminster (via NCR 26) and Frome Whitfield (via footpaths S2/12 and S40/16)



Figure 7

A section of footpath S40/16 from John's Pond, north of the Blue Bridge: part of an historic sheep drove from the Downs to Dorchester

The development envelope in the context of the overall site boundary

46. The Society's Position Statement in response WD, W&P 2018 Preferred Options Consultation²² identified two alternative concepts for the development of the DOR 13 site. The first (Figure 8), of which the Council's indicative masterplan is an example, presents a wide development frontage north of the Frome with development south of the Cokers Frome Road; the gap between the proposed development, Charminster (including Little Court, Grade II listed, and other dwellings east of the C12, Westleaze Road), and farmland to the north, is very restricted; and there is an implicit reliance on the use of (and, therefore, an inevitable change of character to) the existing network of footpaths across the Frome.

²² <https://www.dorchester-civicsociety.org.uk/wp-content/uploads/publications/JointLPR-DCS%20PositionStatement-7October2018.pdf>

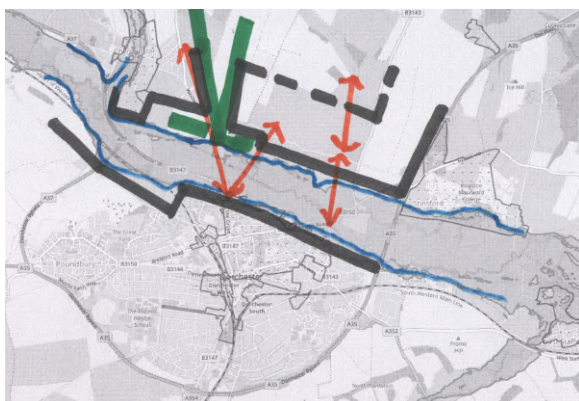


Figure 8:
An example of this 'high heritage & landscape impact' development concept is Dorset Council's 'indicative layout'



Figure 9
Dorchester Civic Society's alternative 'reduced heritage & landscape impact' development concept

47. The alternative development concept (Figure 9) significantly reduces the Frome frontage; there is no development south of the Cokers Frome (Charminster-Stinsford) Road which is essentially retained as a bridle, cycle & foot path affording fine views of historic Dorchester and its several landmarks; there is a significant gap between Charminster, DOR 15 and farmland to the north accommodating all the existing footpaths without the necessity of 'improvement'; and the creating of a new, direct pedestrian and cycle path (perhaps including self-driving mini-buses) across the Frome to London Road/High East Street.
48. In 2018 the Society argued that this second, alternative development concept should be adopted to safeguard the heritage and other assets of acknowledged importance to Dorchester and its setting. Accordingly, the current DOR13 proposal would be modified to:
 - a. Exclude all development south of Coker's Frome Road: this would be retained as a 'green' cycle/pedestrian/bridleway route linking Kingston Maurward/Stinsford with Charminster and connecting national cycle routes 2 and 26.
 - b. Exclude all development west of the line of the north/south gas main, giving protection to the bridleway route out of the town [north from Yalbury House] and providing for farming use to extend from open countryside down to the water meadows.
 - c. Exclude development from the valley area between Slyers Lane and the block of development east of the line of the gas main. This would give protection to the other footpath route out of the town to the north. Together, these two landscape/footpath/bridleway routes would help retain the current links between town and open countryside.
 - d. Provide for adequate connections to the centre of Dorchester by including a proposal to connect with the east end of High East Street via the Casterbridge industrial estate. This would give a more direct and easier connection than those suggested via Grey's Bridge and Blue Bridge/John's Pond. This would also be the opportunity to investigate more innovative forms of transport such as the automated minibuses. The existing footpaths via Grey's Bridge and Blue Bridge could remain more in their rural state thus retaining the town's present links out to open countryside.
49. The Society's belief that development should not extend west of the gas pipeline ([b] above) was confirmed by the Society's assessment of the impact of DOR13 on the setting of Poundbury Camp²³. This assessment drew extensively on West Dorset and Weymouth & Portland-

²³ <https://www.dorchester-civicsociety.org.uk/wp-content/uploads/2020/06/DCS-position-statement-impact-poundbury-camp-may-2020.pdf>

commissioned strategic landscape and heritage assessment for Dorchester and its setting (2018²⁴). The Society concluded that:

The proximity and high degree of inter-visibility between the scheduled monument and the south-facing slopes in the western part of the proposed site (broadly, all the land between Lower and Higher Burton Farms and Westleaze, Yalbury House and Frome Whitfield) mean that development here will inevitably have a very harmful effect on the Camp's setting. The essentially open and exposed character of the site situated on rising ground mean that there is little possibility of mitigating to any great degree the development's impact on the landscape setting of Poundbury Camp.

Dorset Council's own landscape and heritage study assessment concludes, in respect of this part of the proposed development site, that:

'Development within the area is likely to give rise to harm to the setting of Poundbury Camp through loss of / intrusion into the rural agricultural setting that contributes to the understanding of the fort's location with regard to topographic features, and an appreciation of the rural hinterland that the asset is likely to have controlled.'

50. Inevitably, a reduced development envelope would affect the capacity of the site in terms housing numbers, the amount of employment and other land uses, or all of these. To date, the Council's capacity assessment of the 'indicative layout', in terms of housing numbers, has been elastic: 4000 new homes in the Garden Community Bid; 'around' 3,500 homes in the Consultation Plan! However, minimising the heritage and landscape impact of any development North of Dorchester, should it come to pass, must be the paramount consideration.

Conclusions

(A) masterplan will be produced with the involvement of key stakeholders from the local community. Further community engagement will take place during the production of the masterplan with the views expressed taken into account in the production of the final version. ... (T)his masterplan will be adopted alongside the adoption of the Local Plan. Should the award be granted this will enable more meaningful and detailed analysis of the issues, including the preparation of full design codes and analysis of viability and deliverability, as well as greater public engagement.²⁵

51. Some two and a half years after WDDC submitted its successful Garden Communities bid and having received £150,000 from the Ministry of Housing, Communities & Local Government of 'capacity funding to support the delivery of North Dorchester', where is the masterplan for the proposed development - a masterplan that Government guidance²⁶ says should be developed in parallel with the statutory planning process?
52. When submitting its 'North of Dorchester Strategic Framework Plan' (previously called the 'indicative layout') unresolved issues such as the link road, the site's heritage and landscape sensitivity, and the challenge of creating pedestrian, cycle and other links across the water meadows were all highlighted. None of these matters have been resolved; alternative development envelopes and options have not been identified and tested, still less the subject of consultation. The only 'plan' is, in reality, little more than a cartoon: an amalgam of proposals previously submitted to the council by the North Dorchester Consortium coupled with arbitrary

²⁴ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/pdf/evidence/dorchester-stage-2-assessments.pdf>

²⁵ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/garden-communities/20181109-garden-communities-bid-submitted-form-redacted.pdf>

²⁶ <https://www.gov.uk/guidance/garden-communities/masterplanning>

and nonsensical arrows and lines representing potential paths over the water meadows and a link road. Yet, this same 'indicative layout' is the basis for the Heritage Impact Assessment. The 'indicative layout' and the supporting policy statements are an inadequate basis for assessing deliverability and viability, and for demonstrating the 'soundness' and appropriateness, in planning terms, of the DOR13 proposal.

Dorchester Civic Society objects to the Consultation Local Plan and to DOR13 in particular.

53. Development of the DOR13 site will cause demonstrable harm to heritage assets, many of national significance, and to the landscape setting of Dorchester. There is no evidence in the Local Plan and related papers that alternative sites or strategies for major new development in Central Dorset have been examined. The Council has failed to show that the proposal for DOR13 will create the least demonstrable harm to matters of acknowledged importance. In the absence of such evidence, Dorchester Civic Society objects to the principle of DOR13.

54. However, if Dorset Council resolves to submit this Local Plan, largely unamended, and without a proper masterplan for DOR13, to the Secretary of State (under Regulation 19 of the Town and Country Planning [Local Planning] [England] Regulations 2012), the Society advises the Council to consider the following February 2021 guidance to Local Plan Inspectors²⁷:

1.1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. In particular, they should ensure that it takes full account of all relevant policies in the NPPF and relevant guidance in the PPG. The plan should identify all the matters which need to be planned for, and provide policies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the purpose of preparing a plan is to address all the necessary matters as far as possible, and not defer them to future updates or rely on the Inspector to deal with them at examination.

Dorchester Civic Society believes that the Local Plan cannot proceed to the Submission stage before an adequate masterplan for DOR13 has been prepared and the public have been fully consulted. The masterplan must sit alongside the adopted Local Plan and have the status of Supplementary Planning Guidance.

²⁷ Procedure Guide for Local Plan Examinations, Planning Inspectorate, February 2021.