



Dorchester Civic Society

An Independent Voice

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Joint Local Plan Review for West Dorset, Weymouth and Portland

Preferred Options Consultation: August 2018

Dorchester Civic Society Position Statement

Approved at a meeting of the Society's Committee on 2 October 2018
following an AGM on 18 September 2018

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.



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Part 1

Executive Summary

Executive summary of the Society's response to the West Dorset, Weymouth and Portland Local Plan Review: Stage 2: 'Preferred Options' document published for public consultation in August 2018.

The Society's principal **objections** to the 'Preferred Options' Plan are grouped under five headings:

1. There is no clearly stated spatial or transport strategy for the Dorchester area.

A strategy for the Dorchester area [its 'vicinity'] was requested by the Inspector in reporting on the current Adopted Local Plan (2015). The absence of a local strategy gives rise to several fundamental failings:

- No justification is given either as to how Dorchester fits within the overall strategy for the plan area or for the scale and distribution of new housing in the 'vicinity' of Dorchester.
- There is no analysis of the relationship between Dorchester and nearby towns and villages, and how 'connectivity' between these places, particularly Weymouth and Crossways, can be improved.
- The important functional relationship with Weymouth is not properly considered.
- The complete absence of a transport strategy, in contravention of the National Planning Framework, is likely to result in the plan being considered 'unsound'.
- A transport strategy could perhaps explain the anomaly between the Plan's A37/A35 'link road' and the County Council's current bid to include the road as part of the Major Highway Network.
- There is no evidence given that the local housing industry is capable of delivering the proposed housing numbers.
- Insufficient regard has been given to the potential of Crossways and other settlements in the 'vicinity' of Dorchester to meeting local housing needs and targets.

2. The ‘master planning’ process is unlikely to be successful in delivering essential improvements and infrastructure.

The master planning process, as currently set out, will not achieve the provision of essential physical and community infrastructure such as has been successfully provided at Poundbury. The Society cites the following reasons:

- Insufficient statutory backing in the proposals for master plans.
- The affordable housing policies will prove difficult to implement without a much stronger policy.
- The lack of any clarity on how new development will be integrated - both physically and socially – with Dorchester.

3. The North of Dorchester [DOR 15] proposal will cause harm to the physical, cultural and historic assets of Dorchester.

- The proposal for development North of Dorchester will have a harmful impact on sensitive landscape and the relationship between Dorchester and open countryside to the north.
- The Council’s own Landscape and Heritage Study states, in reference to this area, that “development could potentially degrade or eliminate this functional and historical relationship”.
- The setting of the Conservation Area - including the much loved ‘Ratty’s Trail’ - will be marred with the loss of the ‘clean cut and distinct edge’ of Hardy’s Casterbridge.
- The allocation will not result in an enhancement of the Dorchester area – a lost opportunity to overcome problems in and around the town.

4. The Town Centre proposals for future retail development are unacceptable.

- The proposal for the development of the Fairfield site will be to the detriment of the functioning, viability and vitality of the town centre.
- The new policy to ‘protect’ markets is counterproductive. The charter market should be retained and improved on its existing site.
- The Trinity Street area remains neglected. Its problems must be addressed in the proposed town centre master plan and in the next stage of the local plan.

5. Notwithstanding our objections to Policy DOR 15 [North of Dorchester], we set out our thoughts on how the impact of the development could best be mitigated.

- Pre-requisites for a more acceptable development are defined.
- Using those pre-requisites – an alternative concept for the development is suggested which would protect key views and retain the all important ‘clean cut and distinct edge’ on the north side of Dorchester.

The Society **concludes** by restating its concerns as set out in its response to the previous consultation – namely that there is a real danger presented by the present plan that Dorchester gets its housing target of 3500 homes but without any benefits – including the target amount of affordable housing – for Dorchester. **A wasted opportunity.**

Part 2

Response to the Preferred Options Consultation Documents

In April 2017, the Society agreed a Position Statement which was submitted to the Councils as its response to the 2017 Initial Issues and Options Consultation. The following response to the current consultation flows directly from that initial response and is consistent with it. The Society would welcome continued involvement in the preparation of the Draft Plan and its associated supplementary planning documents.

The Society's principal objections to the current document are:

First, the lack of a clearly stated strategy for the Dorchester area as requested by the Inspector in reporting on the existing local plan. Such a strategy would have set out the Councils' justification for the scale and distribution of housing in the sub area, the relationship between Dorchester and nearby towns and villages, and how connectivity between those places, particularly Weymouth and Crossways, can be improved. [Section 1]

Second, that the master planning process, as currently described, will not achieve the provision of essential physical and community infrastructure such as has successfully been provided in Poundbury. [Section 2]

Third, that the current proposal for North of Dorchester [DOR 15] has a harmful impact on sensitive landscape and the relationship between Dorchester and open countryside to the north. [Section 3]. And

Fourth, continued objection to the town centre proposals in so much as they allow for the development of the Fairfield site to the detriment of the functioning, viability and vitality of the town centre. [Section 4]

Additionally, notwithstanding our in principle objection to policy DOR 15, we set out our thoughts on how the impact of the development could best be mitigated. [Section 5]

1. THERE IS NO CLEARLY STATED SPATIAL AND TRANSPORT STRATEGY.

1.1. It is not clear how Dorchester fits within the overall Plan wide strategy.

1.1.1. The Society's concern in commenting on the previous draft was that all key settlements in the Plan area should take a fair proportion of housing relative to existing population. The preferred options plan's housing numbers have been checked against 2014 population figures. It is evident that Dorchester is expected to take a far higher percentage of the housing target on an existing population basis. Assuming an average occupancy of 2.3 persons, Dorchester's population would increase by 50% by 2036 and by 64% by the time the development is 'built out' [the allocation exceeds the 2036 target]. This compares with 14% for Weymouth [with Portland, Chickerell and Littlemoor], 36% for Sherborne, 18% for Bridport, 20% for Beaminster, and 2.5% for Lyme Regis. Crossway's figure will inevitably be higher. In terms of percentage increase, insufficient housing is allocated to Weymouth and Sherborne. Furthermore, the Plan does not attempt to make allocations for smaller settlements, relying instead on the neighbourhood planning process. This ignores the possibility of larger settlements with community facilities and good access taking a share of the total target – thus leaving locally agreed allocations as a bonus over and above target numbers. These issues need to be addressed in the overall strategy.

1.2. The Plan lacks an overall spatial strategy for the Dorchester area.

1.2.1. The Society considers that the allocations for Dorchester and its catchment do not flow from a clearly defined Dorchester area strategy. Dorchester has expanded rapidly over recent years and further expansion will inevitably threaten surrounding areas of environmental importance. This issue needs to be addressed in a Dorchester area strategy, as requested by the Inspector in his report on the existing plan. He said in relation to Dorchester *“The change requires that a strategy is in place to meet long term development needs at or in the vicinity of Dorchester by 2021 and that a site or sites necessary for its implementation are identified as part of the review proposals”* [Para 139, Inspector’s report]. The Inspector recognises that a decision on the future expansion of Dorchester is *“a crucial, albeit difficult, matter for the Councils to resolve but one which it is vital to address when examining options for future growth”* [Para 83, Inspector’s Report]. The Inspector did not define what he meant by the phrase ‘at or in the vicinity of Dorchester’. But, elsewhere in the report, he refers the Councils’ proposals for development at Crossways meeting some of Dorchester’s housing need. Importantly, he acknowledges that Crossways *“has potential as a sustainable location”* [Para 136], although he later states *“without substantial enhancements to transport links I do not consider it is a particularly sustainable option”*. The Society would argue, therefore, that the Inspector had in mind an area embracing Crossways when referring to “vicinity”, provided that a strategy was developed to demonstrate how the area would function as an interrelated whole – including vital transport links. The Options Plan fails to provide this strategy.

1.2.2. The Society had anticipated that there would be a clear strategy for Dorchester and surrounding area showing how the area worked as a whole and stressing the ‘interconnectivity’ between Dorchester, its catchment settlements, and also Weymouth and Crossways, in line with the Inspector’s request for a long term strategy. The Options plan states at Table 3.2 that *‘Dorchester is the county town and an important service centre, which relies on a much wider area [including Weymouth and nearby villages] for its workforce and economic success.’* This statement should mark the introduction to a sub area strategy, but it does not. Para 3.4.1 refers to an ‘overarching spatial strategy’ for the local plan area, but nothing specifically for the Dorchester area. The spatial strategy is set out in Policy SUS2. The policy refers specifically to Dorchester, Weymouth and Crossways but fails to provide a strategy. The ‘strategic approach’ recognises [para 3.6.8] that *“neighbourhood development plans may bring forward new development.”* The implied strategy would appear, therefore, to be that most development should be in Dorchester and Weymouth, some in Crossways, and perhaps a little in the villages. Para 11.3.2 adds: *“Improving the connectivity of these three and smaller settlements within the vicinity of Dorchester, is a priority to achieve more sustainable patterns of development”*. The Society believes that this falls far short of a comprehensive and coherent strategy for the Dorchester area as requested by the Inspector. As a basis for a Dorchester area strategy, it needs to be taken forward and amplified as justification for policy and allocations.

1.3. The Plan does not reflect Dorchester’s functional relationship with Weymouth.

1.3.1. The Society does not consider that the Options Plan adequately reflects Dorchester’s functional relationship with Weymouth. The Plan notes at Para 1.2.23 that: *“Weymouth has a significant amount of outward commuting to Dorchester for jobs and Dorchester relies on a much wider area for its workforce and economic success.”* Para 1.3 refers to: *“capitalising on the linkages between Weymouth, Portland and Dorchester as the key driver of economic activity in the area”*. Para 11.3.2 states: *“However, the town is*

closely linked to Weymouth and to Crossways both of which supply a significant number of workers for the town. Improving the connectivity of these three and smaller settlements within the vicinity of Dorchester is a priority to achieve more sustainable patterns of developments”.

1.3.2. These three statements are not translated into a strategy or a firm set of proposals based on this ‘connectivity’ between the two towns. The Plan’s proposals cannot, therefore, be said to reflect the functional relationship. Indeed the provision of more housing in the Dorchester area in order to reduce its employment/housing imbalance may result in higher unemployment in Weymouth. On this basis it is not understood why the current relationship between Weymouth, where housing is generally cheaper, and Dorchester is seen as a problem provided that there are good north/south transport links. The Plan needs to do more to adequately reflect and ensure the functional relationship and the positive interdependence of the two towns.

1.4. The Plan lacks a transport strategy for the Dorchester area.

1.4.1. The Society considers that the Plan lacks any form of strategy for transport in the Dorchester area, and indeed, that this can only be described as a ‘gaping hole’ in the Plan. Some of the criticisms made in the previous paragraphs could be answered with the inclusion of a transport strategy covering the ‘connectivity’ of Dorchester with surrounding towns – particularly Weymouth and Crossways - and villages. The Society expects that this information will be included in the next stage of the plan and that it will answer questions such as:

[i]. What is the post 2036 vision for transport in the Dorchester area? What assumptions have been made about train and bus services and their financing?

[ii]. What modelling work has been done on alternative ways of ensuring good ‘connectivity’ [para 11.3.2] between Dorchester, Weymouth, Crossways and other settlements within Dorchester’s catchment and travel to work area? How will transport be improved to provide sustainable connectivity between Dorchester, Weymouth and Crossways?

[iii]. How will development ‘North of Dorchester’ link with the town and help resolve some of its existing congestion problems? What function will the proposed road linking A35 and A37 have? Will it be a distributor road for local traffic or effectively a bypass used as a ‘rat run’? What does modelling show about the effect of a ‘relief’ road on town centre congestion and conditions in the High Street? When do traffic projections show that town centre conditions will become as congested as now? How will the new development link with Dorchester? Will it effectively be a new settlement beyond walking and possibly cycling distance? Why is no park and ride proposed? What bus services are proposed and how will they be financed in both the short and long term?

[iv]. What proposals are there to enable the town to cope with the proposed development in the Dorchester area? Will park and ride or ‘park and stride’ facilities for commuters be provided linked to measures to discourage commuters from parking in the centre and to encourage the freeing up of town centre parking for visitors and shoppers? What will be included in a parking strategy for the town? The Society expects that more policy content will be provided by current studies such as the Town Centre Master Plan and that these will feed into the next stage of the Plan.

[v]. The plan refers to ‘mitigation measures’ for the A35. What is proposed? How will it be financed?

1.4.2. If these questions are not answered in a transport strategy for the Dorchester area, there must be serious doubts about the soundness and sustainability of the Plan. Indeed, it is to be regretted that the Plan does not contain a transport strategy, [as prioritised by Section 9 of the National Planning Policy Framework], which would form the basis for the delivery of development related proposals. Given the scale and potential impact of DOR 15 and other allocations at Charminster and Crossways, the Society considers that the Plan cannot be considered to be sound in the absence of a local Dorchester based transport strategy.

1.5. There is no justified basis for the distribution of new housing both in the whole Plan area and the Dorchester area.

1.5.1. The Society considers that the allocations in the Dorchester area are not based on a clear plan-led, needs and objectives based methodology and analysis. It is technically difficult for the Society to dispute the larger housing supply figures in Table 3.4, but the figures expected from Neighbourhood Development Plans [45] and rural exception sites [66] [both Plan Wide] are spuriously precise and unrealistically small. The Society has previously suggested that there could be more development in the larger settlements which have both infrastructure and good access. An area strategy for Dorchester could name these settlements and put forward targets. Such a strategy should be included.

1.5.2. The list of housing allocations included in Table 3 raises some questions:

- The allocations are now based on ‘new standard methodology’ rather than ‘objectively assessed need’. Where are the latter figures and how do they marry up?
- If the allocations are based on ‘objectively assessed need’, where is the evidence for the Dorchester area?
- Why does Dorchester have a disproportionate amount of housing development compared with other main towns?
- Where is the sub area strategy?
- Why does para 3.3.10 go beyond 2036 in the Dorchester and Sherborne contexts?

1.5.3. It is noted that, in the box headed ‘strategic approach’ under Policy ECON1 [Economy], new retail will be directed to the defined towns of Weymouth, Dorchester, Bridport, Sherborne and Lyme Regis. But only the first two are defined as main towns for housing purposes. This leads to an inequitable distribution of housing. Furthermore, in the Affordable Housing section, para 5.2.2 sets out the areas excluded from the ‘designated rural area’. These include Dorchester and Sherborne. Yet further evidence that the categorisation of Sherborne, in general housing terms, is wrong.

1.5.4. The Society does not consider that the distribution of new housing in the Dorchester area is soundly based. The Strategic Approach is set out in the table following Para 3.1.3, and in Para 3.3.2, but perhaps the closest to an answer is at Para 3.3.6: *“The development strategy in the local plan focuses the majority of growth at the main settlements, taking forward existing strategic allocations and introducing new ones at Dorchester, Sherborne and elsewhere, having regard to all the factors outlined above”*. In other words, the housing figures are based on existing planning applications/allocations and the Inspector’s recommendation that the Councils should identify a long term strategy for development in the Dorchester

area and reappraise housing provision in Sherborne [Para 3.3.5]. Critically, the long term strategy is absent.

1.5.5. Para 3.4.2 relates to Spatial Strategy and describes the four tier settlement hierarchy. The distinction between '*main towns*' and '*market/coastal towns*' is not made clear. There seems little difference in function between Dorchester and other market towns. Combining the two tiers would result in a more equitable distribution of proposed dwellings. Failing this, Sherborne at least should be included as a main town. At present, it would appear that an arbitrary hierarchy is predetermining housing allocations in the absence of a strategy.

1.5.6. Figure 3.2 [Spatial Strategy] lists all settlements with Defined Development Boundaries. SUS2 ii) provides the policy that development will normally be permitted within these boundaries. There are 25 settlements listed that are not in the top two categories including eight in the Dorchester area. The expected dwelling figure for this category is not stated, but the potential may be significant. This could be reflected in more specific targets or allocations. An area strategy for Dorchester could set out the contribution that could be made by catchment settlements such as those listed.

1.6. There is no evidence that the local housing industry is capable of delivering the proposed numbers.

1.6.1. The Society does not consider that the Plan makes clear that the local housing industry is capable of delivering the proposed housing numbers. Policy SUS1 refers to deliverability of the total number of dwellings and the annual rate. It is not considered that any credible information has been put forward that the proposed rate for Dorchester is 'deliverable'. The Society has previously questioned this. Whilst it can be assumed that the local housing industry is capable of meeting existing rates of development, there is no assessment of how it will meet the higher figures now proposed.

1.7. Insufficient regard has been given to the potential of Crossways and other settlements to contribute to meeting housing need.

1.7.1. The current housing allocations are restricted to Dorchester, 'North of Dorchester', Charminster and Crossways. Any development in other settlements will be dependent on unspecified neighbourhood plans, ignoring the potential of larger villages to make a contribution to the overall target and perhaps meet their own needs. The Society does not consider that sufficient regard has been given to the potential of Crossways and other settlements with transport and community infrastructure

1.7.2. The Plan has recognised the potential of Crossways to contribute to the housing target and to create a more viable community. The proposals do not, however, sit within a local strategy explaining how the new development will contribute to the wider needs of the sub area. More detail is required on 'connectivity' with Dorchester. This cannot be left entirely to later master plans. The Society generally supports the policy for development and master planning in Crossways, but more consideration should be given to additional allocations and to connectivity with Dorchester, in line with a sub area strategy. The master plan content needs greater statutory policy content. The Society would also point out that from April 2019 there will be a new unitary authority which will enable Crossways to be comprehensively planned as a location for development serving both West Dorset and Purbeck [including the Winfrith employment site] rather than a settlement on the periphery of both Districts.

1.7.3. In the absence of a sub area strategy, it is difficult to know whether the proposed development at Crossways will be sufficient to provide for a sustainable and successful community with adequate connection to Dorchester and areas to the east. It is suggested that further allocations would enable the development of a viable and sustainable community. A comparison could be made with Didcot in Oxfordshire as providing the solution to south Oxfordshire's housing shortage, given the severe constraints [as with Dorchester] on the expansion of Oxford.

1.7.4. Regarding Neighbourhood Development Plans, there would appear to be a mismatch between para 3.6.8, saying that NDPs may allocate additional sites, and the 45 dwellings that are expected to be built as a result across the plan area. There is scope for additional numbers/targets to be included. There appears to be an underestimate of the likely numbers to come forward.

2. THE MASTER PLANNING PROCESS IS UNLIKELY TO BE EFFECTIVE.

2.1. Insufficient statutory backing for master plans.

2.1.1. The Society does not consider that there is an adequate long term approach designed to deliver the necessary infrastructure. The plan, as currently framed, lacks the formal mechanisms [statutory policies and proposals] to deliver any development related infrastructure. More detail – the parameters for development - needs to be translated into statutory policy; it cannot be left entirely to 'master plans' which currently lack that statutory basis. The Society would welcome further involvement in discussions on infrastructure issues [including affordable housing, a 'northern bypass', education, community and health facilities, drainage facilities and flood mitigation, and structural landscaping], and the consequential overall viability of proposed development.

2.1.2. The Plan attempts to set out key infrastructure requirements [including essential physical and community infrastructure, schools, and affordable housing requirements] for each allocation. Taking the land North of Dorchester as an example, Policy DOR 15 sets out infrastructure requirements and affordable housing requirements. These are also covered in Policy HOUS 1 and include a requirement for 35% of the total number of dwellings in West Dorset to be 'affordable'. It also refers to mitigation measures at junctions in and around the town. It does not, however, refer to other possible off site changes that may be required as a result of the development e.g. safeguarding and mitigation for the water meadows/parkland landscape, park and ride, bus services etc. Much is left, if it is to be tackled at all, to the 'master plan' [DOR 15 (i)]. If this is to be the case, there needs to be far greater statutory guidance as to content, method of preparation, and public involvement.

2.1.3. The Society had expected the Plan to contain an overarching masterplan for all the housing allocations relating to Dorchester and its environs, within which individual masterplans would sit. There are several allocations within the area of the town - at Charminster, Crossways and North of Dorchester. There is, however, no requirement included in the Plan for an overarching master plan for these allocations. In the absence of an area strategy, this is particularly worrying. There is a distinct danger that Dorchester will get the development but will not benefit from it. The next stage of the Plan must address this serious deficiency.

2.1.4. The Society does not consider that the Plan contains a sufficiently robust mechanism for the successful implementation and delivery of master plan requirements. The master plan for DOR 15 is referred to in Para 11.5.2 and states that it will be adopted as a supplementary planning document and used when considering planning applications. The content of the master plan, or vision, is included in the remainder of 11.5.2. This is not considered to be adequate as it is not a statutory policy. There needs to be greater statutory content as a basis for the content of the master plan. Without this statutory protection, there is no guarantee that the master plan's requirements will be successfully delivered.

2.1.5. The Society strongly recommends that a Master Plan for DOR 15 be prepared by the local authority with full public involvement and that essential elements of that plan be included in policy in the next stage of the local plan. The master plan must be based on the local authority's own financial valuations to ensure that residual values are correct and that policies deliver both 'affordability' to developers and 35% genuinely affordable housing. This is the only way that targets and infrastructure requirements can be met as they have successfully been met at Poundbury.

2.2. Implementation of affordable housing policies.

2.2.1. The Society is concerned that the consultation draft ignores the clear advice set out in the White Paper 'Fixing Our Broken Housing Market' [Feb 2017] by giving to one developer the housing requirement for Dorchester for the next 25 years. The Society is also concerned that, in practical terms, the affordable housing policies will prove difficult to fully implement without a much clearer and stronger policy. Whilst existing policy is to provide 35% affordable housing, the actual achieved rate is only 18%. The Plan proposes that the affordable housing policies will be implemented through policies DOR 15 and HOUS 1 and the planning application process. Policy DOR 15 repeats the 35% figure for North of Dorchester. This works well with a willing land owner as at Poundbury. Is it realistic to hope that land will change hands at values that reflect **all** the requirements of the plan and thereby negate any 'affordability' arguments? More could be included in the master plan requirements to help ensure that the 35% target is met. The Plan should make clear the repercussions of the recent High Court judgement in Parkhurst Road v the Secretary of State and Islington Borough Council. It must be unequivocally stated that no development on DOR 15 or any other site will be allowed unless it provides 35% affordable housing.

2.2.2. The same concern relates to sufficient affordable housing with a range of housing types being made available to meet local needs. This is particularly relevant in the Dorchester area which has one of the highest disparities between average incomes and house prices in England, making it one of the least affordable areas. The adequacy of affordable housing numbers depends on policy standards being met in real world terms. The Plan refers, at Para 11.5.10, to delivering a wide choice of high quality homes with a focus on housing for families and younger people of working age. The words are there but delivery will be a matter for the master planning and planning application process. The main elements of the master plan need to be stated in policy.

2.3. It is not clear how DOR 15 will connect with Dorchester.

2.3.1. The Society considers that the Plan should include far more on how new development will be integrated [both physical and social connectivity] with Dorchester. What sort of community will DOR 15 be vis-a-vis Dorchester? What proposals are there for the important concept of community building? There is little said on this other than in Para 11.5.8 which is not taken forward as policy. This could have been

included in the missing 'strategy'. Much more needs to be included, particularly on DOR 15 [and also Crossways], and then given greater detail in the master plans.

2.3.2. Regarding community needs and infrastructure, at present some key wording [S106 agreements] is left to the supporting text at para 6.2.6. This should be included in Policy COM1 which is otherwise rather vague. Otherwise this policy is supported.

2.3.3. Regarding the green infrastructure network, Para 2.3.30 refers to master plans but the formal policy ENV4 makes no reference. It would strengthen the master planning role and function if it was given some statutory linkage.

3. THE NORTH OF DORCHESTER PROPOSAL [DOR 15].

3.1. The North of Dorchester allocation will result in demonstrable harm to matters of acknowledged importance namely the physical, cultural and historic assets of Dorchester.

3.1.1. The allocation will breach Dorchester's defined northern boundary. The DOR 15 'red line' [Figure 1.5 'Dorchester' in Section 2 of the Consultation's Policies Map Amendments document] embraces all land to the '*north of the River Frome*' [including the flood meadows and Land of Local Landscape Importance]. The current DOR 15 proposal expands Dorchester north of the River Frome water meadows. This boundary is of particular historic, cultural and landscape importance. To cross it will be a significant loss to the town and should not be countenanced unless it is proven that there are no alternatives, that there will be significant benefits for the town, and that adverse effects can be mitigated [see section 5 below].

3.1.2. The breaching of the historic northern boundary of Dorchester will cause demonstrable harm to key landscape settings of local, regional, national and international importance. Other than the indicative layout at page LPR 243 of the Plan [DOR15], there is little information within the Plan. Indeed, with regard to DOR 15, the Plan includes all the water meadows and valued landscape within the potential development site [the 'red line']. The concept statement at Para 11.5.2 says that "*... the water meadows will form an important high quality asset for the expanded town creating opportunities for recreation.*" It is assumed [but not stated], therefore, that the water meadows will be safeguarded from development. Importantly, Para 11.5.15 states that: "*Directly adjacent to the northern edge of Dorchester, covering the area to Cokers Frome Road, is designated as Land of Local Landscape Importance forming part of the Green Infrastructure Network.*" Para 11.5.17 states that: "*Within the Land of Local Landscape Importance, the development should respect the character of the area, maintaining the separate form of Charminster village and maintaining the openness of the water meadows.*" Para 11.5.19 states that: "*The Dorchester Conservation Area extends to the River Frome and in places crosses over the former mill stream with the water meadows and transition to open countryside forming part of its setting. The area falls directly between the existing town and the new development of North Dorchester.*" Para 11.5.23 refers to "*the remnants of parkland associated with Frome Whitfield House*" adding "*... a particular character to this area creating an ornamental agricultural appearance which is significant to the setting of Dorchester's Conservation Area*". Para 11.5.24 states that "*harm to the conservation areas ... and their settings should be avoided*".

3.1.3. The Plan is, therefore, stating the importance of the **setting** of the Conservation Area, the water meadows and the Land of Local Landscape Importance up to Coker's Frome Road. It fails, however, to take

this forward as a policy. The Plan should clearly state that there will be no development on the water meadows and LLLI. This omission must be rectified in policy and not left to a master plan. Furthermore, urgent steps should be taken to extend the northern boundary of the Conservation Area to include its setting, in line with current advice from Historic England. It is suggested that this boundary should, at least, embrace all the countryside south of Coker's Frome Road. The absolute importance of extending the Conservation Area due to its historic and cultural importance, is perfectly illustrated by Thomas Hardy in *The Mayor of Casterbridge* written in 1885. *"Casterbridge, as has been hinted, was a place deposited in the block upon a cornfield. There was no suburb in the modern sense, or transitional intermixture of town and down. It stood, with regard to the wide fertile land adjoining, clean cut and distinct, like a chess board on a green table-cloth. The farmer's boy could sit under his barley-mow and pitch a stone into the office-window of the town-clerk; reapers at work among the sheaves nodded to acquaintances standing on the pavement-corner; the red robed judge, when he condemned a sheep stealer, pronounced sentence to the tune of the Baa, that floated in at the window from the remainder of the flock browsing by; and at executions the waiting crowd stood in a meadow immediately before the drop, out of which cows had been temporarily driven to give spectators room."* This **'clean cut and distinct'** edge remains along the line of the north Roman Wall and the mill stream. It has endured for centuries and should not now be threatened by the proximity of suburban housing. Its cultural significance, above even its natural, historic and geographical significance, raises its importance beyond local and to an international stage.

3.1.4. There is, at present, no guarantee that the characteristic and historic separation on the north side between town and country will be maintained. The only policy references in DOR 15 are to recreation uses and pedestrian and cycle links. The policy does refer to *"the special historic environment within the site"*, but this is not defined. If it refers to the water meadows and LLLI, it should clearly say so.

3.1.5. There is no statement or policy to ensure that the River Frome water meadows and their setting are protected from development. This is particularly regretted given the recreational importance of the area to local people. The delights of the area are described in the County Council's leaflet 'Ratty's Trail', [a circular walk around the water meadows] which states *"the view to Dorchester is impressive and reminds us that this is still a very rural area."* The location of proposed DOR 15 development is shown on the indicative layout. It appears inevitable that views from the AONB to the north of the town towards the town will be adversely affected.

3.1.6. Whilst the Plan covers many of the likely impacts of the proposed development on all the assets and constraints listed in paragraph 2.11 of the Society's 2017 Position Statement, the Plan is weak in respect of protecting views out of Dorchester, particularly to the LLLI and valley pastures to the north of the town. This is a highly sensitive area of particular historic, cultural and landscape significance as is clearly recognised in the Council's own commissioned Landscape and Heritage Study which states: *"The panoramic view of the town across the foreground of the water meadows lining the flood plain of the River Frome, with Maiden Castle, the downs and Hardy monument in the background, helps to place Dorchester within its quintessential 'Wessex' setting. To the east, the spire of Stinsford Church [the Melstock Church of Hardy's novels] is clearly visible, enabling the important association of the real landscape with Hardy's fictionalised literary landscape."* *"The extensive system of water meadows lining the Frome's floodplain can be considered to be heritage assets of at least local importance. While they make an important contribution to the setting of Dorchester, they [also] contrast most strongly [with] the rural area to the*

north – and [with] the farms that created them. Development could potentially degrade or eliminate this functional and historical relationship.” “Any new development should:

- Protect the rural, agricultural setting the area provides to northern Dorchester – rising up from the Frome valley to create natural containment of the town.*
- Conserve the setting and integrity of nearby valued heritage assets including Kingston Maurward Registered Park and garden, Poundbury Camp and Stinsford Conservation Area.*
- Preserve the long views from this landscape across Dorchester.*
- Respect and seek to preserve the surrounding rural character and high levels of tranquillity.”*

The Study concludes that *“the extent of potential effects and the numbers of important assets likely to be affected result in a high degree of sensitivity.”* The results of the Study need to be fully reflected in the Plan, including in particular a specific statement that the LLLI should be kept free of development and that open landscape corridors should be retained connecting with open countryside to the north [see section 5 below].

3.1.7. The Society understands that it is intended to prepare a master plan for DOR 15 following this stage of public consultation, and that this parallel process will inform the next stage of the plan, making it possible to include greater detail and more statutory content to back up the content of the master plan. The Society would support this process provided that the master plan is prepared by a public body and is publicly accountable through a public consultation stage.

3.2. The DOR 15 allocation will not result in an enhancement of the area.

3. 2.1. The Society does not consider that this allocation will help resolve the Town’s problems and meet its objectives, needs and aspirations. In this regard, the Society is concerned that the proposal will result in additional housing being provided around Dorchester simply to meet targets, with no assurance that the development will help alleviate known problems, e.g. traffic congestion in the town; make good existing shortfalls, e.g. affordable/social housing; and rectify known imbalances, e.g. shortage of housing vis-a- vis employment [all within a sub area strategy]. With appropriate safeguards, additional housing may provide more social/affordable housing and help reduce the commuting imbalance. It will only do so if the Plan sets out a firm policy on infrastructure requirements and percentage of affordable housing to be provided. The first is left for non-statutory master plans to agree. The second is covered at section 2.2 above. Given the lack of formal policies relating to infrastructure, there is a high risk of the Plan merely meeting housing targets and intensifying existing problems.

3.2.2. Similarly, there is no assurance that the proposed development will help enhance the Town’s role as County town and as a centre for shopping, culture, tourism, social facilities, commerce and employment. Chapter 11 [Dorchester] puts forward a vision for the town at para 11.2.1, whilst para 11.3.1 purports to show how development will, in combination, achieve that strategy. But there is no clear link between new housing development and enhancement of the town. That link and the means to achieve it need to be stated in policy.

3.2.3. Again, there is no assurance that the proposed development will help meet the Town’s infrastructure needs, including alleviating town centre traffic congestion and provision of essential public services. The Society does not believe that the proposed ‘relief road’ through DOR 15 will provide other

than limited and short term improvement to town centre traffic conditions. This view now seems to be supported by the County Council as evidenced by its bid to include an A35/A37 link road as part of the Major Highway Network. The plan needs to clarify the purpose of the link road and consequently how it can relate to any future housing in the vicinity of the road. If the road is intended to be a part of the Major Highway Network, the plan should include proposals to restrict through traffic in the town centre. The vision for DOR 15 at 11.5.2 covers *“providing and delivering infrastructure”*. More detail is provided in Para 11.5.12 in the Planning Obligations section. It is not considered that this is sufficient; more needs to be included in policy.

3.2.4. Whilst para 11.5.2 of the Plan refers to *“a package of mitigation measures at junctions in and around the town to minimise the impact on the Strategic Road Network and local roads”*, it is not considered that this is sufficient. There are no proposals to upgrade the A35 bypass or to extend dual carriageway to the Stinsford roundabout. There is no proposal for a park and ride at DOR 15; the Society considers that the development of DOR 15 is the opportunity to provide such a much needed facility at developer cost. This should be stated in policy. .

4. THE SOCIETY BELIEVES THAT THE TOWN CENTRE PROPOSALS, IN AS MUCH AS THEY AFFECT FUTURE RETAIL DEVELOPMENTS, ARE UNACCEPTABLE.

4.1.1. If there is any strategy for the Dorchester area, it is in paras 11.1.1 to 11.3.3. The Society disagrees that Dorchester is a sub-regional town centre, and with the continued reference to Fairfield as a reserve retail site.

4.1.2. Section 11.4 sets out the Town Centre Strategy, and Policy DOR 1 refers to the historic character of the area. Para 11.2.1 refers to the *“character and heritage that is special to Dorchester”*. There is probably little else that can be said in the Plan regarding the protection and enhancement of the heritage of the town. The Society has no comment to make on the section on tourist attractions and accommodation, other than to note that para 4.5.5 incredibly omits Dorchester as an example of tourism. This omission should be remedied.

4.1.3. Policy ECON4 is the general retail policy. Para 4.4.6 says that it is difficult to look beyond five years in planning for retail floorspace and that need will need to be kept under review. Accepting this, is it sensible to include a figure for the period to 2036? Some modification of the Plan is required. The policies regarding the ‘sequential test’ and protection of retail frontages are supported.

4.1.4. The new policy ECON8 to ‘protect’ markets is considered to be counter-productive in that the policy directs new or relocated markets to ‘primary shopping areas’. The Society considers that the policy should be worded so as to protect markets on their **existing** sites. The policy as currently worded does little to further the intention of protecting markets and may even threaten them. The relocation of the market to Charles Street would result in many more trade vehicles and coaches in the town centre on market days and, at the same time, reduced public parking spaces. Furthermore, the provision of market sheds on the Charles Street site would do nothing to enhance the town centre aesthetically. More investment in the Fairfield site and an improvement of facilities is required.

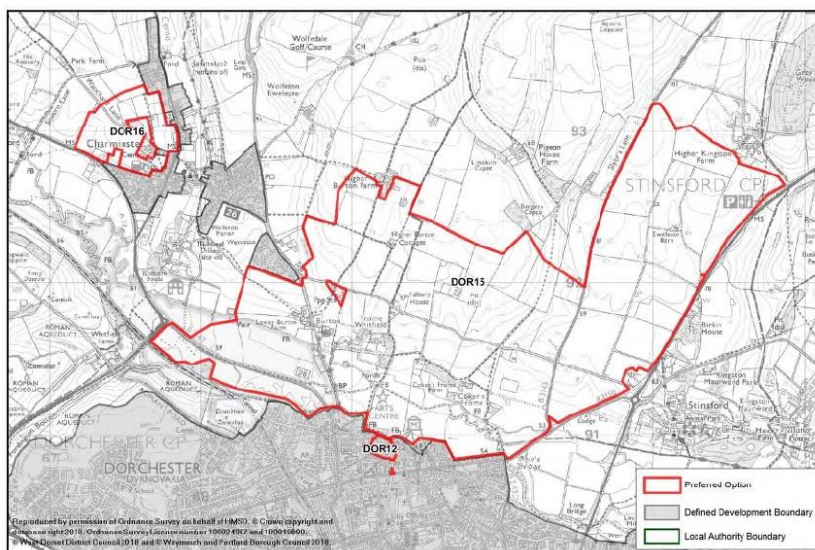
4.1.5. There is much to support in the specific section about retail expansion in Dorchester [particularly its proposals for the Charles Street and Trinity Street car parks], but the intentions are to a large extent nullified by Policy DOR3 – Fairfield. If this policy is included, it weakens other policies and practically

ensures that the proposals for Charles Street and Trinity Street will not be implemented [developers will choose the easy option] and the viability of the centre will be further threatened. Retail development at Fairfield would not only damage some businesses in the present town centre, but would also detract from South Street's function as a strong community hub and historic and cultural centre. DOR 3 should be omitted and replaced with a more appropriate policy aimed at protecting and enhancing the Fairfield market and associated car and possibly coach parking.

4.1.6. The Plan should recognise and highlight the many weaknesses of the Trinity Street area and provide a basis for the Town Centre master plan. The master plan needs as a priority to provide an overall transport plan for the centre and to address the issue of the lack of facilities for buses. As with the master plans for the major allocations, it is important that the Town Centre plan [a critical parallel study] is agreed imminently in order that the results can be fed back into the next stage of the local plan. The Society would expect, as a stakeholder, to be involved in its preparation.

5. REQUIRED AMENDMENTS TO MINIMISE THE IMPACT THE NORTH OF DORCHESTER ALLOCATON [DOR 15] WOULD HAVE ON MATTERS OF ACKNOWLEDGED IMPORTANCE.

5.1. Figure 1.5 'Dorchester' in Section 2 of the Consultation's Policies Map Amendments document delineates an all-inclusive boundary for the DOR 15 Preferred Option; also the boundaries for the DOR 12 (Dorchester Prison) and DOR 16 (Land west of Charminster) Preferred Options. Page LPR243 of the Preferred Options Consultation policy document offers an indicative layout for both the DOR15 and 16 Preferred Options.



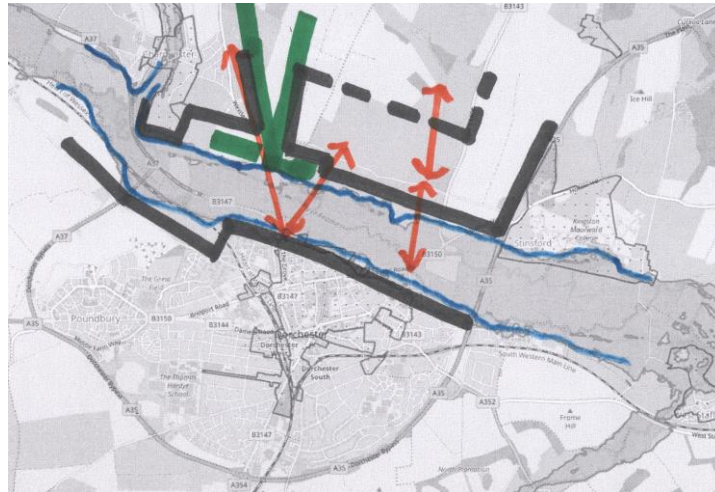
5.2. On the basis that the Society's objections may be overruled and that no viable alternative to DOR 15 emerges, the Society considers that it must put forward comments relating to the indicative layout in order to demonstrate that there is a different way of achieving the 2036 housing numbers and ensure that the proposed development is as good as possible, and that the landscape and other assets which make Dorchester such an attractive place to live, are safeguarded as far as possible.

5.3. The Society believes that there are essential features for a successful DOR 15 development and proposes the following pre-requisites for any development. DOR 15 should be:

- Not simply a satellite or a suburb of Dorchester, but an exemplar of a sustainable neighbourhood drawing from the best of past and current practice and future innovations.
- A development with a distinct character and sense of place: the water meadows retaining their pastoral character and not 'municipalised'.
- Functionally integrated with Dorchester, orientated around a new direct cycle and pedestrian link across the water meadows to the eastern edge of the town centre, and not car dependent.
- A community identifying with Dorchester and sharing all that the town and Frome valley landscape have to offer.
- A product of a genuine and long term partnership of local people, public bodies, developers and landowners, including the management of the water meadows, and
- Different from, but worthy to stand comparison with Poundbury, widely recognised as an exemplar of urban development. And it should:
- Safeguard the landscape and heritage assets that make Dorchester and its setting so attractive, enjoyable and memorable, and
- Provide a balanced mix of housing including a significant proportion of affordable homes.

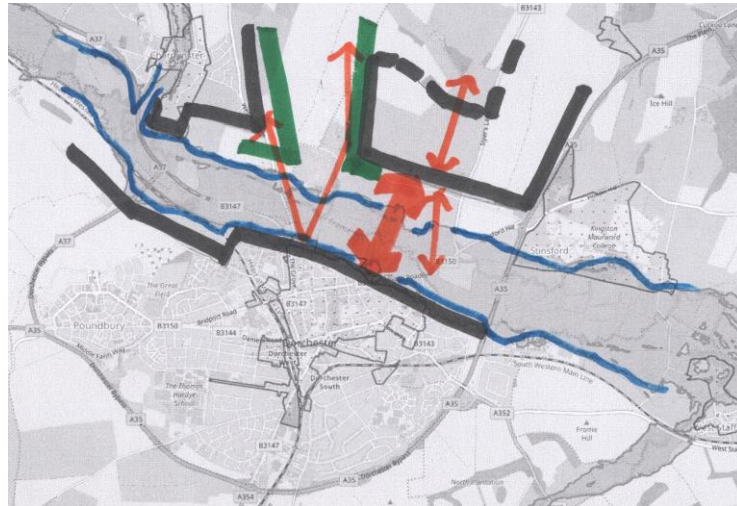
5.4. The Society has identified two alternative concepts for the development of DOR 15. The first (Figure 1), of which LPR 243 is an illustration, presents a wide development frontage north of the Frome with development south of the Cokers Frome Road; the gap between the proposed development, Charminster (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.

Figure 1



5.5. The alternative development concept (Figure 2) significantly reduces the Frome frontage; there is no development south of the Cokers Frome 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.

Figure 2



5.6. The Society considers 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 DOR 15 proposal should be modified so as to:

- Exclude all development south of Coker's Frome Road. Coker's Frome Road should be retained as a 'green' cycle/pedestrian/bridleway route linking Kingston Maurward/Stinsford with Charminster and connecting national cycle routes 2 and 26.
- 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.
- 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.
- Should these three exclusions result in an under provision of housing, it may be possible to extend the western of the two blocks north to Badger Copse, and the eastern to include land to the north.
- Provide for the retention of the showground on its existing site with the possible re-provision of parking on the east side of Slyers Lane.
- 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. This would also give the opportunity to investigate more innovative forms of transport such as the automated mini buses that have, for example, been trialled in Helsinki: these '*small automated buses could fill the niche where human operated transport has proven inefficient with municipal funds*'. A further advantage of this suggestion would be that the existing footpath connections via Grey's Bridge and Blue Bridge could remain in their rural state thus retaining the town's present links out to open countryside.
- Provide for a park and ride facility with a sustainable bus network.
- Clarify the part of the area within the DOR 15 red line that could be actively farmed (para 5.9 below).
- Clarify the role of DOR 15. What sort of community will it be? How will that 'community' be built?

5.7. Figure 3 illustrates the application of these criteria and Figure 4 shows such an alternative development envelope in its wider context.

Figure 3

**Land North of Dorchester (DOR 15)
Dorchester Civic Society's alternative development envelope**

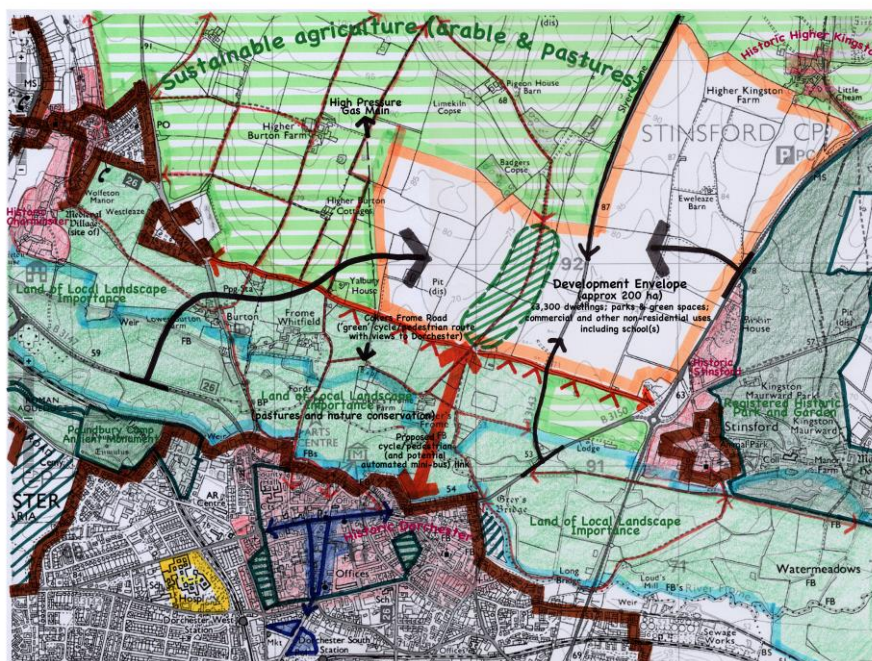


Figure 4

**Land North of Dorchester (DOR 15)
Dorchester Civic Society's alternative development envelope in context**



5.8. Precise details of the DOR 15 proposal will inevitably be included in the masterplan which must address the above issues. Because of this, it is imperative that the masterplan be commissioned by the

Local Authorities. The Society would expect to be involved [as a stakeholder] in the preparation of the masterplan.

5.9. The Society recognises that all the land within the Plan-defined 'red line' needs to be included if there is to be planning control over both the developed area and associated landscape, open space, and road and footpath connections. However, not all this land needs to be designated as public open space [needing long term protection, possibly through a trust, and possible public financing]; a significant area could remain as farmland including conservation and wildlife areas, and retain its present rural character and flavour. This may be a self-financing, viable and alternative approach to 'enhanced' water meadows and urban-minded management of rural parkland. Attention is also drawn to the Strays in York that provide a proven example of how extensive areas of open space adjoining an urban area can be successfully managed.

6. CONCLUSION

6.1. Many of the Society's concerns relate to the absence of any analysis of what the Inspector meant by "in the vicinity of Dorchester". Clarification of the geographic area is essential, not least to consideration of changes and improvements to transport infrastructure.

6.2. This lack of analysis is exacerbated by the complete lack of a strategy [both land use and transport] for the Dorchester area. Without a full analysis of these issues and a strategy to deal with them, it is difficult to see how the proposed plan meets the tests of soundness as set out in the National Planning Framework (2018).

6.3. The Society has serious concerns that the 'master planning' process will be ineffective in achieving essential physical and community infrastructure – with the real risk of housing targets being met but with no benefits for Dorchester.

6.4. The Society believes that there is a different way of achieving the housing numbers proposed in the DOR 15 allocation that would reduce its impact on this valued landscape, help retain the historic 'clean cut and distinct' edge to north Dorchester, and ensure that the development is better integrated with the town. The Society urges the Councils to give serious consideration to this positive alternative.

6.5. Unless the objections and concerns of the Society are addressed in a satisfactory manner before the preparation of the pre-submission plan, it will have no alternative other than to object to the plan for the reasons stated in this document.

DCS – 7 October 2018