

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

### **Headline Response**

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

We note that further attention has been given to Policy DOR15, with additional caveats relating to affordable housing and infrastructure. However, we remain unconvinced that Policy DOR15 will provide a quality development for Dorchester.

It is recommended that the Town Council resolves as follows:

***Dorchester Town Council objects to Policy DOR15, recognising that this specific site carries a significant level of risk that it will fail to address the local needs of the town, nor will it produce a comprehensive, relevant, viable and sustainable development that supports the area's future rather than destabilising it.***

### **Considerations and Concerns**

#### **1. Site Allocations**

In our submission to an earlier phase of the Local Plan Review, a year ago, we expressed the view that Dorchester was being required to bear the burden of far more housing than is its fair share. We asked that alternative options be fully explored before committing to an approach that places such heavy emphasis on Dorchester.

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

Nor do we believe that other site options within the Dorchester area have been sufficiently explored or considered fully. We feel that the willingness of the landowners within the area covered by Policy DOR15 to see their land developed is the main driver behind the choice of this site.

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

## **2. Affordable Housing**

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

The national definition of ‘affordable’, at 20% below market value, does not deliver property which is genuinely affordable to local young people in Dorset. Consequently, we consider that a discount of nearer 50% is required to deliver locally affordable housing. Genuinely affordable rented housing is also needed for those not ready or able to own property. The issue of “genuine affordability” would need to be specifically addressed within DOR15.

We are not satisfied that the cost of delivering at least 35% of genuinely affordable housing has been properly established. Based on past performance and as evidenced by the prison development, we do not believe that the proposed “at least 35% ... affordable housing” will be adhered to in Policy DOR15.

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

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

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

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

- It will fail to deliver the needed relief for the town centre, against the background of additional traffic due to the development itself
- It will blight the development as through-traffic follows Satnav systems that do not understand that the link road is designed for local traffic only.

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

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

Subsidised public transport has become a first budget reduction option for Councils; such an option cannot be argued for the North Dorchester development. Equally it is unlikely

that the “paid for” journeys from 3,500 homes would be sufficient to support a regular unsubsidised public transport service.

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

Even accepting the principle that one or more new pedestrian/cycle routes could be established from the centre of the settlement across the water meadows and uphill to the town centre, the cost of integrating such a route into the town centre network could be prohibitive at the Dorchester end. The distances involved may be sufficiently long to deter residents from using them regularly, particularly during the winter months. Without a clear visual link, physical link and importantly a strong psychological link, between the new neighbourhoods and the existing town centre, sustainable modes of travel are unlikely to account for many of the travel movements that will arise.

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

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

The disconnected nature of the site, the A35/A37 link issue, and the distance from the town centre therefore risks the development becoming one or more separate communities. If located as far from Dorchester as the indicative layout (page 246 of the LPR, August 2018) suggests, the development might as well be even further adrift of the county town – which returns us to the assessment of suitable alternatives that we do not believe have been fully explored.

#### **4. Education**

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

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

#### **5. Employment**

A new community should be able to access employment within an appropriate distance of their homes, to reduce the need for travel and encourage a more positive work/life balance and reduce the number of commuter cars on the road. We are not convinced that

Policy DOR15 will foster the modern business environments required by residents. Setting aside a block of land for employment purposes (page 246 of the LPR, August 2018) rather than suggesting an integrated mix to reflect modern working practices does not suggest a forward-thinking mixed-use approach has been considered.

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

## **6. Health Services**

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

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

## **7. Landscape and Heritage**

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

A century on, the northern boundary of the town is now the last remaining Hardyean countryside edge; expanding northwards marks a point of no return. Policy DOR15 would ensure the destruction of Hardy's literary landscape. We do not accept that ours should be the generation that fails to pass on a valued legacy to future generations. Policy DOR15 would destroy one of the most stunning features of Dorchester.

The River Frome separates site DOR15 from the town. There is no evidence that this development will not exacerbate flooding as a serious issue, with additional environmental concerns for wildlife habitats. Any additional people movement across the water meadows will impact on a landscape which can be seen but is still relatively lightly used.

We believe that the area's sewerage system is at capacity, and it is anticipated that significant offsite contributions will be required to offset the impacts of development on this scale on Poole Harbour.

## **8. Cultural Infrastructure**

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

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

## **9. Design Quality**

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

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

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

## **10. Timing of Development and the need for infrastructure before development commences**

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

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

## **11. Proving Viability**

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

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

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

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

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

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

## **12. Local Plan Policy and National Planning Policy Framework Requirements**

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

### West Dorset, Weymouth & Portland Local Plan

ENV3. Wildlife Habitats and Species

ENV4. Green Infrastructure Network

ENV5. Heritage Assets

ENV6. Flood Risk

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

ENV11. Pollution and Contaminated Land

ENV12. The Landscape and Townscape Setting

ENV14. The Siting and Design of Buildings

ENV17. Effective and Efficient Use of Land

ECON1. Provision of Employment

HOUS1. Affordable Housing

HOUS3. Open Market Housing Mix

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

COM6. The Provision of Education and Training Facilities

COM7. Creating a Safe and Efficient Transport Network

COM9. The Provision of Utilities Service Infrastructure

National Planning Policy Framework (July 2018)

Para 8. Economic/Social and Environmental Objectives

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

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

Paras 91, 92, 94 and 98

Section 9. Promoting sustainable transport

Section 11. Making effective use of land

Section 12. Achieving well designed places

Section 14. Planning and flood risk

Section 15. Conserving and enhancing the natural environment

Section 16. Conserving and enhancing the historic environment

**13. Additional Note**

The decision to use the word ‘will’ or the word ‘should’ within the policy wording contained in the Local Plan leads to serious concerns about whether certain policy requirement will be delivered, or whether they are merely platitudes. Recent negative experience with development proposals in the District has left Dorchester Town

Council very sceptical about the reality of benefits such as the percentage of affordable housing.

**14. Next Steps**

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