

**WEST DORSET DISTRICT COUNCIL - LOCAL PLANNING – INSPECTORS HEARING NOVEMBER-DECEMBER 2014**

**SUBMISSION BY Barry Bates on behalf of ID 3517: ADVEARSE**

**1. FOCUS OF OUR SUBMISSION – VEARSE FARM**

**4.0 BRIDPORT ISSUES FOR THE HEARING**

4.1 The issues identified by the Inspector for the Hearing are:

(i) Has adequate consideration been given to infrastructure requirements to service the development at Vearse Farm (BRID1) and how its impact on the AONB can be mitigated

**2. CONTEXT**

We have taken account of the National Planning Policy Framework and the West Dorset, Weymouth and Portland Infrastructure Delivery Plan. (Elsewhere we use the initials WDIDP to refer to this plan.) These need however to be applied to the context of the individual town and ‘its needs, size, and roles’.

There are two issues about which any discussion about the infrastructure requirements of Vearse Farm must take account.

• **The Town**

- (a) This is not a large scale development on a purpose designed site like Cranbrook at Exeter or the development taking place just outside Taunton. The latter can be accommodated into the infrastructure of a large county town with excellent motorway and train links, employment possibilities. Bridport is a small market town of 8,500 people whose infrastructure has developed over the centuries.
- (b) It is further complicated by the fact that the summer holiday population puts massive pressure on the existing structure. Bridport simply cannot take the massive demands which an increase of an estimated 20% population from the extra 760 houses would create in such a small timescale. (We will use ‘760 houses’ in this submission although we know that there is no longer an upper limit.)
- (c) The road networks in town are shaped by the river crossings which continue to impact on the infrastructure.
- (d) We have recently initiated an on line petition which states ‘we , the undersigned, call on West Dorset District Council to recognise the widespread opposition to the construction of 760+ houses at Vearse farm and to remove the proposal from the Local Plan. ‘The petition gives those signing the opportunity to comment. Most of the comments refer to the fact that this is development will overwhelm the current infrastructure of the town.

• **Current Planning**

In the recent past we might have put faith in what was known as ‘106 money’ whereby the developers were forced to put money into schemes to improve the infrastructure as part of a major development. As we know from elsewhere in the country e.g. . Seaton in Devon that developers are increasingly finding ways of avoiding these obligations. Vearse Farm will have knock on effects to the infrastructure of the whole town. We have no confidence that sufficient funds will be made available to address the issues we highlight below. There is some expectation in the Local Plan that these can be addressed in collaboration with the developers. We know that this is naive. Vearse Farm is likely to be to the detriment of the town as a whole.

**3. HAS ADEQUATE CONSIDERATION BEEN GIVEN TO INFRASTRUCTURE REQUIREMENTS TO SERVICE THE DEVELOPMENT AT VEARSE FARM?**

**Our conclusion is that the Local Plan has highlighted a number of the key infrastructure requirements but there is inadequate detail as to whether and how these requirements can be adequately addressed. The WDIDP would indicate that no such detailed planning has occurred.**

- **The Challenges of Bridport**

Bridport is 15 miles from the nearest railway. Bus services are being cut and this presents challenges for those who live in Bridport but who have to commute to their place of work.. Road access is difficult from the North and the one trunk road (the A35) running east to west is badly affected by holiday traffic and its accident record is horrendous.

It is unlikely that the local economy will provide jobs for those living in the 760 houses. The Local Plan fails to explain how the provision of houses will be matched by a provision of employment opportunities.

- **A general comment on the Infrastructure Delivery Plan**

(a) The delivery plan is heavily concentrated on Weymouth and Dorchester. It would pay the reader of this submission to take a cursory glance at the Appendix 2. You would be hardly aware that a major development was taking place at Vearse Farm . References to Bridport are strong for cycleways even a skate park. The school investment is a merely the replacement for St Mary's school . The current school is relatively modern and the replacement is based on housing issues rather than inadequacy of building.

(b) We will refer later to the inadequacy of references to the key issues of flooding and traffic management.

- **Flooding**

Vearse Farm already floods. The River Simene has in the past 3 years flooded very quickly in periods of heavy rain. We have attached pictures in Appendix A .The run-off from the new houses will increase both the number of times the area floods and the severity of the flooding episodes. It will be argued that the developers will take measures to mitigate against this threat. To this point we would make the following comments

(a) THE NATIONAL PLANNING POLICY FRAMEWORK states

*' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.19 Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards.*

The Framework also highlights the need to take account of climate change.

(b) It could be argued that the water from Vearse Farm can be held in water meadows beyond the development or in subterranean tanks on it.. In some areas of the country that might be true but immediately below Vearse Farm is the west side of Bridport and West Bay Road. Both areas suffered flood damage in each of the past 3

years. Vearse Farm is just 3 miles from the sea. At periods of high tide the sea gates are shut thus preventing the efficient draining of the River Brit especially in spate. As on the Somerset levels with the situation on the River Parrett there is simply no where for the water to go. Flooding is inevitable and this will affect the businesses which lie at risk.

- (c) The dangers of flooding on this site are well known. We would expect that the Environment Agency be asked to produce a Strategic Flood Risk Assessment before any Local Plan condones the development at Vearse Farm.
- (d) The WDIDP has a whole section on Flooding Risk – section 9. There is no reference to Bridport except 9.2.4 which talks about West Bay
- (e) **HOW CAN WDDC argue that ‘adequate consideration has been given to this key infrastructure issue and one which the NPPF would require it to address?’**
  - **Traffic Management**
  - (a) The current plan sees the main entrance to the development being on West Road. 760 houses plus the industrial units will create significant extra traffic. The bypass was constructed to alleviate the road from an inappropriate level of traffic. The West Road footpaths are narrow and are used to gain pedestrian access to the Medical Centre.
  - (b) **Our conclusion is that the proposed service road has been wrongly located and designed.**
  - (c) The traffic going out of town from Vearse Farm will spill onto the A35 at Miles Cross. The road is already frequently clogged with traffic in summer weekends. The additional traffic caused by the waste transfer station currently under construction will create further times of congestion. This will inevitably create a rat run through town, the Skilling residential estate and West Road. ( see previous note about river crossings) The Miles Cross junction is an accident black spot and major work there will be essential. This will add to the costs mentioned under flooding. National Trust landholding at Chideock would further inhibit the options for improving the traffic problems.
  - (d) The WDIDP

5.3.8 States *‘Traffic in Dorchester is now at the level experienced before the by-pass was opened and residents and those visiting and working in the centre are, as a consequence, facing severance through high volumes of traffic. There are also difficulties for pedestrians at junctions and on narrow pavements due to the high traffic volumes in historic areas; as a result they are unable to enjoy the qualities and attributes of the central parts of the town. The situation is exacerbated on market days due to increased traffic and higher levels of pedestrian activity.’*

These are precisely the points which could be made about the impact on Bridport. Yet by comparison the impact of Vearse Farm on Bridport is given short shrift . We quote...

5.3.2 *In Bridport, junction improvements between West Road and the A35 at Miles Cross together with more localised traffic management in West Allington will be required as a result of development at Vearse Farm*

**WDDC has totally failed to recognise the major traffic issues involved here. No provision has been made in the planning. If significant investment is not identified**

**at this stage it is unlikely that finances will be found once the inevitable crises occur. As now at Miles Cross we can anticipate the costs of lost lives on our roads.**

- **Issues for the Town**

It can be argued that a number of facilities required in the infrastructure will be strengthened by the additional housing – retail, arts venues, schools and the Leisure Centre. We note that these have been picked up in WDIDP .

In two respects we have major concerns. Car parking is already an issue in holiday periods and Saturdays . WDIDP makes no comment on these issues.

The Bridport Medical Centre appears to be running at capacity. WDIDP appears to confirm this – stating in 7.2.1 there is spare capacity for GP services in Lyme but shortfalls in provision elsewhere. Where is the provision for additional GP provision ?

Has any assessment been made of the school places required by 750 houses ?

The Town Council has itself expressed concern about whether a development of this size can be assimilated into the town in such a short timescale.

The West Dorset economy relies on tourism . Is West Dorset Council seriously planning to kill the golden egg by destroying the character of one of its key towns and choking its roads with overdevelopment?

- **Employment**

The Local Plan provides for a massive housing development but does not demonstrate where its residents will find work. Certainly there will be little in the town itself.

- c. What justification is there for the industrial land included for Vearse farm?**

There are plenty of brown field sites within town. The Inspector will be aware of the long standing debate about the use of St Michael’s Estate. What justification can there be for forcing long established businesses to move?

#### **4. INSPECTOR’S QUESTION PART 2 - HOW CAN ITS IMPACT ON THE AONB BE MITIGATED?**

**Our key question here is –‘If it is acknowledged that there is impact here on an area of outstanding natural beauty, why is it being selected in the first place? ‘**

- We would point to the following phrases in the National Planning Policy Framework. (Paragraph: 005 References ID: 8-005-20140306)

##### **AONB**

- *Planning permission should be refused for major development in a National Park, the Broads or an Area of Outstanding Natural Beauty except in exceptional circumstances and where it can be demonstrated to be in the public interest. Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context. The Framework is clear that great weight should be given to conserving landscape and scenic beauty in these designated areas irrespective of whether the policy in paragraph 116 is applicable.*
- Vearse Farm occupies a piece of land highly visible to those passing through Bridport. It is also visible from the neighbouring AONB hills and country side. **We**

**would urge the Inspector to undertake a site visit. It is highly unlikely that any measures would adequately mitigate against the AONB loss.**

- It is further more on one of England's outstanding pieces of Heritage Coast – The Jurassic Coast.

**Again we quote from the NPPF**

- *Local planning authorities should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast. Heritage Coasts are stretches of our most beautiful, undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors. Most of the defined Heritage Coast is covered (on land) by either Area of Outstanding Natural Beauty or National Park designations. Natural England has published [advice on Heritage Coasts](#).*
- In this section we would point out that the proposed development will take place on good quality farm land. Ministers such as Eric Pickles have stressed the need to use brown field sites first.

**Can WDDC produce a compelling argument to build on this green field site? It is simply a highly convenient place to place 760 houses with compliant landowners and the support of speculative builders.**

**5. CLOSING STATEMENT**

We have set out to answer the questions posed by the Inspector but would wish to close with the following statement and questions.

**(a) Sustainable Development**

The government has a presumption in favour of 'sustainable development'. West Dorset District Council has set out its strategic approach to the achievement of sustainable development. In summary it states:-

*In the period 2011-2028, development should help deliver a steady supply of employment and housing land to meet the objectively assessed needs (about 60ha of employment land and about 13,175 new homes across the plan area). The distribution of development will be influenced by:*

- *the needs, size, and roles of the area's settlements, taking into account any current imbalances of housing or jobs*
- *the benefits of concentrating most development in locations where homes, jobs and facilities will be easily accessible to each other and there is a choice of transport modes,*
- *the availability of land, and whether it has been previously developed (brownfield);and*
- *the environmental constraints of the plan area,*

**Question One Who can argue other than WDDC has failed to reflect these key influences in the proposals in its Local Plan for Bridport?**

**(b) Housing Demand**

We accept the national need for a house building programme. We accept the need for sustainable development in Bridport most especially the provision of affordable houses for local people. ?.

The NPPF states that Local Plans should meet an 'objectively assessed need'. We remain adamant that there is no need for such a large development in Bridport. Dorset County Council Research matters August 2013 gives details of population growth in Dorset as themed year estimates. Overall growth was up just 0.4 % with the majority in the Bournemouth area.

The town has been given this allocation by national and West Dorset politicians to meet their own targets encouraged by speculative builders. It would seem that West Dorset District Council has heeded protests about housing development in other areas such as Dorchester, Sherborne and Crossways. These have carried more weight than their duty to protect the AONB which Bridport is part of and surrounded by.

#### **Questions two and three**

- **Surely such protests should not be used as the 'exceptional circumstance' for allowing major development within the AONB? Can WDDC set out the reasons why this is an exceptional circumstance?**
- **In what way has WDDC demonstrated the need for such a large housing development**

#### **(c) An inappropriate scale of development for the town as a whole**

The scale of the development is wholly inappropriate for a town of the size and location of Bridport. (To quote WDDC 'the needs, size and roles of the town') We have seen no convincing argument why Bridport should be expected to accept this allocation. Finally the chosen site Vearse Farm seems wholly inappropriate for the reasons we have outlined.

#### **(d) Vearse Farm is an inappropriate site**

This submission has argued that in 3 major respects the proposed site contravenes national and local planning guidelines

- Risk of flooding
- Traffic management
- AONB and environmental /agricultural issues

#### **(e) Consultation**

Our recent work on the petition has confirmed two key points. Firstly although West Dorset District Council carried out a consultation process, local people do not feel either consulted or informed about the development. Concerns about the consultation process are shared by the Bridport Town Council. Secondly our opposition to the scheme is shared by many others.

**We urge the Inspector to find the part of the Local Plan relating to Bridport as a whole and Vearse Farm in particular 'unsound'.**

**Barry Bates 30 October 2014**

ADVEARS APPENDIX A



