

Matter and Issue number: MATTER 13: DOR10 Park n Ride
Representor reference number: 782
Name: John Stobart, Natural England

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WEST DORSET, WEYMOUTH & PORTLAND LOCAL PLAN EXAMINATION

Natural England Further Statement Relating To Matter 13 – Proposed Policy DOR10 Park n Ride and trunk road service area, south of Stadium Roundabout .

1. Introduction

1.1 The following statement address the question raised by the inspector:

“Do proposals for a park and ride site and trunk road service area south of the Stadium Roundabout (DOR10) represent the best option for providing these facilities given the sensitive nature of the location?”

2. The National Planning Policy Framework

- 2.1 The proposed allocation relates to a park and ride site and a new trunk road service area. The land allocated lies immediately beyond the Dorchester bypass in a green field location within the Dorset Area of Outstanding Natural Beauty (AONB) and within the setting of Maiden Castle, a scheduled ancient monument that contributes significantly to the special qualities of the AONB. Natural England considers that the proposal will have an adverse impact on the landscape of the Dorset AONB, and furthermore it will not be possible to fully moderate those impacts.
- 2.2 NPPF Section 11 paragraph 115 states, “Great weight should be given to conserving landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.” Natural England is concerned that the options appraisals provided in support of the allocation have not applied the sufficient weight required by the NPPF.
- 2.3 Natural England considers the proposed allocation represents a “major” development and therefore should be subject to the provisions of the National Planning Policy Framework (NPPF) Section 11 paragraph 116. Paragraph 116 states that, “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications includes, “the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way”. This consideration is reflected in the inspector’s question.

3. Comments on options appraisal process

- 3.1 Natural England remains concerned that the options appraisals provided in support of the combined park n ride and TRSA allocation have not satisfactorily demonstrated that great weight has been applied to conserving the landscape and scenic beauty of the Dorset AONB.
- 3.2 The submitted Dorchester Park & Ride and Trunk Road Service Area Feasibility Study Update (Buro Happold) concludes that "Of the sites under consideration, Site J (Stadium Roundabout) is considered to be most suitable for both P&R and TRSA, although environmental concerns will require further investigation and mitigation." The same report in Figure 7.5 describes the landscape "risk" for the favoured site as "Medium". Given the sensitivity of the site we disagree with this assessment. We are also concerned that the site selection process was completed prior to the full investigation of the landscape impacts of the proposals. In our view the lack of full landscape assessment, accompanied by only a medium risk assessment for landscape, do not satisfy the NPPF paragraph 115 requirement for applying great weight to the importance of conserving the landscape of the Dorset AONB during the site selection process.
- 3.3 The Buro Happold feasibility study reports that the original 2010 feasibility study listed Site M: Bypass North as a preferred site which was, "feasible from a transport point of view" (ref. section 7.6 Buro Happold report). Yet the Buro Happold study goes on to then dismiss Site M Bypass North, a site in close proximity to the proposed allocation that would not have a significant AONB landscape impact, on the basis that it is likely to increase movements of traffic on the A35. The relative importance of this dis-benefit compared to the considerable advantages of not causing harm to the Dorset AONB is not adequately explained. We would again question whether "great weight", as required by NPPF paragraph 115, has been adequately applied to the protection of the landscape of the Dorset AONB in making this judgement. Natural England is also satisfied that Site M Bypass North would have no significant biodiversity issues.
- 3.4 Other options that have not appear to have been fully explored include the provision of a basic TRSA (i.e. the provision of fuel, refreshments, toilets and HGV parking facilities) through the redevelopment / upgrading of the neighbouring Tesco's facilities. Despite the option being raised previously Tesco's do not appear to have been contacted to discuss whether an appropriate facility could be accommodated on the site. For example, could access provision be improved at the existing petrol station to allow refuelling of HGVs?
- 3.5 The text accompanying the allocation (local plan paragraph 11.6.4) states that the allocation may be "... combined with the provision of adequate roadside facilities for road users of the A35 trunk road, if this can be delivered." The additional services currently proposed represent a significant new built development with a hotel, cafe, drive through restaurant, farm shop etc. In our view there are no grounds for justifying an "exceptional circumstance" for allowing these additional facilities in a location that would harm the protected landscape of the Dorset AONB. It must be stressed that these additional built elements will add significantly to the adverse landscape impacts associated with the development. In our view given the great weight that should be applied to protecting the Dorset AONB the policy should make it clear that in order to moderate adverse impacts on the Dorset AONB any development on the allocated site should be kept to the absolute minimum necessary to meet the stated objectives of providing a Park n Ride and a minimum standard TRSA.
- 3.6 We also remain concerned that the siting of the Park n Ride to the south of Dorchester will harm the viability of existing Weymouth Park n Ride by encouraging commuter traffic on the A354. Options for encouraging the use of the existing Weymouth Park n Ride facility as a means of reducing Weymouth to Dorchester commuter traffic do not appear to have been considered. The failure of the Weymouth Park n Ride to meet its stated objectives also raises questions over the likely success of the Dorchester Park n Ride, which is located very close to town centre parking. It seems unlikely that significant numbers of people will use a facility when doing so is

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likely to increase their journey time and parking remains available in town. Given the risk that the park n ride will not prove attractive to users a minimum and time limited provision for the park n ride would represent a less damaging alternative to the current policy.

4. Summary

4.1 Natural England remains concerned that the site allocation process has failed to apply great weight to the importance of conserving the landscape of the Dorset AONB. In particular, we do not consider that it has been adequately demonstrated that alternative provision for an enhanced park n ride facility and minimum standard TRSA (i.e. facilities that provide fuel, refreshments, toilets and HGV parking facilities) could not be provided on sites north of the stadium roundabout (e.g. a combination of Site M Bypass north and Tesco's site), where they would have no adverse impact on the Dorset AONB, or setting of Maiden Castle, and no significant biodiversity impacts. Natural England can also see no exceptional circumstance justification, as required by the NPPF paragraph 116, for allowing the site to be also used for the development of a new hotel, cafe, drive through restaurant, farm shop etc. as is currently proposed.

5. Recommendation

5.1 Based on the evidence provided Natural England recommends that the Policy DOR 10 is deleted from the local plan on the grounds that satisfactory alternatives have not been fully explored in light of the need to apply great weight to the protection of the Dorset AONB. If on consideration the allocation is approved the policy wording should be amended to ensure adverse impacts on the protected landscape of the Dorset AONB are as far as possible moderated by strictly limiting the scale of the built development to that required to deliver a minimum standard combined park n ride and TRSA facility.