

# **WEST DORSET, WEYMOUTH & PORTLAND LOCAL PLAN**

## **MATTER NO 13: EASTERN LOCALITIES OF WEST DORSET**

**ON BEHALF OF PERSIMMON HOMES SOUTH COAST**

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### 13. MATTER 13 – EASTERN LOCALITIES OF WEST DORSET

#### Dorchester

#### 13.1 Paragraph 11.1.5 [CD/SP1] highlights problems with meeting housing and employment needs in Dorchester towards the end of the plan period. Does the Plan identify sufficient land reserves to provide flexibility?

- 13.1.1 CD/SP1 relates to the Pre-Submission Draft Version of the Plan which was the subject of consultation in June – July 2012. Para 11.1.5 identified that whilst existing and proposed sites could meet the needs of the town for the early part of the plan period, they would fall short of meet the needs for housing and employment in area for the full 20 year plan period. At that time the Council considered that there “no easily deliverable sites for major growth” and therefore proposed development at Crossways, a village to the east of Dorchester. At that time Policy CRS1 proposed at least 7.2 ha of employment land and between 1,200 and 1,500 new homes at Crossways. At the time the plan acknowledged that further investigations would need to be made to land around the Dorchester area.
- 13.1.2 Pegasus on behalf of Persimmon Homes objected to this strategy as it does not address the significant imbalance between jobs and housing that is evident throughout the Local Plan in respect of the wider Dorchester area and its supporting evidence base. The plan is therefore considered to be unsound in respect of the development needs in the Eastern Area. (see representations on Policy CRS1 dated 25<sup>th</sup> July 2012)
- 13.1.3 This paragraph has been altered in CD/SP2 June 2013, and “moved away” from specifically looking at land around the Dorchester area as this is proposed to be deleted and replaced with further investigations in the plan area for the period post 2026. Pegasus on behalf of Persimmon Homes objected to the proposed modification to para 11.1.5 as development should take place at the most sustainable location in accordance with the NPPF. Development at North Dorchester would enable long term future growth needs of the county town to be met. (our representations on para 11.1.5 in October 2013 to the Proposed Modifications drew attention to the Eastern Area Background Paper para 8.2)
- 13.1.4 The town currently also has around twice as many jobs (18,400) as it has economically active residents (9,619). Workers commute in from nearby towns (particularly Weymouth) and from the surrounding rural area.

- 13.1.5 The most recent Further Proposed Changes (Summer 2014) shorten the plan period to 2028 as the Council state that further site allocations to meet the requirements from 2028 - 2031 are not included as the Council considered that the consultation necessary to agree significant further allocations would require a longer period of time and is best done as part of a further review of the plan.
- 13.1.6 This is not a sound approach and does not accord with national government guidance e.g. every effort should be made to objectively identify then met the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. It is considered that the Council's approach does not meet the Inspector's concerns.
- 13.1.7 As set out in our representations to the Further Proposed Changes (September 2014) the issue of accommodating future levels of growth has been widely discussed in the last 7 years and it is not acceptable to justify a reduction in the plan period on the basis that more time is required and that development is extremely controversial locally and it will be difficult to agree additional land allocations. These circumstances are not unique to West Dorset.
- 13.1.8 The Plan still fails to identify sufficient land reserves to provide flexibility; it fails to meet the needs of the county town. It does not take account of the longer term requirements. Neither does it comply with para 12 of the NPPF as the Plan does not positively seek to meet the development needs of the area and meet objectively assessed needs with sufficient flexibility to adapt to rapid change
- 13.1.9 A clear long term strategy is required. It is important to provide continuity for the long term development at the county town of Dorchester after the completion of Poundbury, estimated to be at 2026. However, it is inappropriate to delay investigations on the options for development at Dorchester until the next review of the plan, because of the long lead in times for strategic development, the plan should include provision for development at North Dorchester and provide long term certainty about the future growth of the county town.
- 13.1.10 Our previous representations in response to the Pre-Submission Consultation Draft ( July 2012) have set out at some length the benefits of development at North Dorchester including the key reasons why North Dorchester should be identified as a strategic allocation, these include:
- The availability and suitability of land at North Dorchester for development,
  - A lack of suitable alternative urban extension locations at Dorchester to accommodate housing and employment growth,

- A consortium of landowners/developers is working together to promote and deliver a comprehensive development at this location,
- The potential for comprehensive design and planning of North Dorchester as a new neighbourhood of the town,
- The ability to provide phased short, medium and long term delivery options for Dorchester's on-going development needs,
- Lack of high order landscape or ecology constraints (see supporting documentation to these representations)
- The potential to provide good pedestrian and cycle linkage between the site and town centre
- The ability to successfully integrate North Dorchester into the wider public transport network
- The opportunity for an integrated area of enhanced water meadows to be designed into the development to provide quality recreation, amenity and biodiversity benefits to the development and wider public benefit of the town.

13.1.11 If an urban extension is to come forward to meet development needs, it needs to be planned and co-ordinated with infrastructure provision which will require time to be programmed. As well as meeting the Plan's needs this will also provide flexibility to accommodate needs not anticipated in the plan and to allow a response to changes in economic circumstances as required by the NPPF.

13.1.12 Persimmon Homes as part of the North Dorchester Consortium consider that the Plan including the Proposed Modifications remains unsound as insufficient housing is allocated to Dorchester which is the main town in the district and therefore the most sustainable location for development. Land at North Dorchester has the potential for phased growth to contribute to development needs both in this plan period and beyond. Our previous representations in July 2012 have set out the sustainability credentials of North Dorchester.

13.1.13 In addition to the documentation supplied by Persimmon Homes in response to the Pre-Submission Draft Consultation in July 2012, the following documentation was prepared and submitted in response to the consultation on the Proposed Modifications in Summer/Autumn 2013 to confirm the deliverability of land at North Dorchester as a strategic allocation that should be included in the plan.

- Critique of WDDC and WPBC Proposed Housing Requirement

- Review of WDDC Historic Environment Assessment
- Review of WDDC Landscape Visual and Impact Assessment
- Vision for North Dorchester - Concept Framework

13.1.14 The critique of the WDDC and WPBC Proposed Housing Requirement in 2013 has been superseded by our recent submissions in response to the consultation on the Further Proposed Changes Summer 2014.

**13.2 Is the area around Trinity Street an appropriate location for any future expansion of the main shopping area (DOR5)?**

13.2.1 Persimmon Homes have no comments on this question.

**13.3 Do concerns identified in relation to sites at St George's Road (DOR7 and DOR8) and off Alington Avenue (DOR9) undermine the likelihood that these sites will come forward?**

13.3.1 Persimmon Homes have no comments on this question.



**13.4 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?**

13.4.1 Persimmon Homes have no comments on this question.

**13.5 Is Crossways an appropriate location to provide a significant level of housing to help meet some of the needs of Dorchester?**

13.5.1 Pegasus on behalf of Persimmon Homes objected to the identification of Crossways as a location to meet the needs of Dorchester in representations submitted to the Proposed Submission Plan on 25<sup>th</sup> July 2012 (see representations to Policy CRS1 and Policy DOR11) and again in representations on Proposed Modifications to the Plan on 10<sup>th</sup> October 2013)..

13.5.2 The Regional Spatial Strategy for the South West correctly identifies the importance in further strategic housing and employment growth taking place at / around Dorchester (in addition to that already provided for by Poundbury) in view of the sustainability of the settlement and the imbalance between housing and jobs in the area.

13.5.3 The Halcrow Report examined potential areas to accommodate growth and concluded that whilst Dorchester was constrained due to highway capacity and the built and natural environment surrounding the town, land to the north of Dorchester was the only area that could potentially accommodate an urban extension of 3,000 dwellings or greater.

13.5.4 The proposal of the Local Plan to alternatively accommodate growth at Crossways is flawed in view of the poor performance of this settlement / development strategy against sustainability criteria and the availability of a more alternative suitable site for major housing and employment growth at North Dorchester.

13.5.5 The development of Crossways will result in low levels of self-containment at Crossways, with increasing out commuting to Dorchester exacerbating the imbalance between housing and employment at Dorchester.

13.5.6 The identification of a strategic allocation in the village of Crossways is considered to be inconsistent with the settlement strategy outlined in Policy SUS 2 which identifies the main town of Dorchester as one of the highest priority locations for new development as it is a larger and more sustainable settlement.

13.5.7 The North Dorchester Consortium commissioned PFA Consulting to prepare an evidence report on transport and infrastructure matters associated with the emerging Local Plan's proposals for Crossways and a proposal to alternatively accommodate these strategic requirements at North Dorchester. This evidence was enclosed with representations submitted in July 2012 as Appendix 1.

13.5.8 The PFA Consulting report identifies significant concerns arising from the Local Plan's proposals for strategic development at Crossways in particular the report states that "The remoteness of Crossways means that the rural roads upon which it relies to link to the strategic highway network will be subject to substantial increase in traffic impact. The scale of these increases can be seen on Figure 10."

13.5.9 The report confirms that a more sustainable and deliverable strategic development option exists at North Dorchester which should be included in the Local Plan in order to meet development needs in the plan period and importantly redress the significant imbalance between housing and jobs in Dorchester.

13.5.10 For Crossways, the key concerns that have been identified by PFA are:

- Crossways is a village in a relatively peripheral location to the housing market area, and it is not considered as a suitable sustainable development location for larger scale strategic development.
- The pre-submission draft Local Plan's proposed strategic development allocation at Crossways would rely upon the provision of a substantial provision of new facilities to attain a degree of sustainability, but will still involve a need for trips to Dorchester to access higher order services and facilities.
- The remoteness of Crossways also means that the rural roads upon which it relies upon to link to the strategic highway network will be subject to substantial increase in traffic impact.
- The level of self-containment of Crossways is low. The village relies upon nearby Dorchester, with 28.6% of journeys to work (all modes) out-commuting to the Dorchester urban area. Vehicular trips travelling from Crossways to/from Dorchester will need to travel through nearby rural villages and cross railway lines at level crossings, all of which will increase highway safety concerns. These rural roads are not conducive to such increases in traffic and the consequential impacts on local residents and the environment within their villages.
- The proposed development at Crossways would only further exacerbate commuting and the imbalance between jobs and homes in Dorchester.

- 13.5.11 The report confirms that a more sustainable and deliverable strategic development option exists at North Dorchester which should be included in the Local Plan in order to meet development needs in the plan period and importantly redress the significant imbalance between housing and jobs in Dorchester.
- 13.5.12 Whilst the Proposed Modifications (Summer/Autumn 2013) sought to reduce the scale of development proposed for Crossways, Pegasus on behalf of Persimmon Homes submitted representations and objected to the strategic scale of development proposed for a village.
- 13.5.13 It is considered that the proposed employment and housing growth at Crossways is predominantly providing for Dorchester's needs and should therefore be re-directed to the county town. The strategic allocation for housing and employment at Crossways should be deleted and development more appropriate to a village and directly related to meeting local needs should be provided for in the Plan. Such development could come forward through the preparation of a Neighbourhood Plan.

**13.6 There is potential for the proposed scale of development (in relation to both the original and alternative proposals) to adversely affect sites of international importance to birds. Can adequate mitigation measures be put in place to minimise the detrimental impact of human intrusion?**

13.6.1 The original proposal in the Pre-Submission Draft of the Plan (July 2012) proposed at least 7.2 hectares of employment land and between 1,200 to 1,500 new homes. In the Proposed Modifications in Summer/Autumn 2013 this was reduced to at least 3.5 hectares of employment land and according to revised Table 3.2 500+ dwellings at Crossways.

13.6.2 It is inappropriate for strategic development to be directed to the village of Crossways, which falls within 5km of European protected heathland habitat (SPA), when a suitable alternative exists outside of this zone at the 'top tier' settlement of Dorchester.

13.6.3 In our representations to the Pre-Submission Draft in July 2012 we commented on the Conservation Regulations Assessment and stated that the approach was wholly inadequate. As a very minimum it should be necessary for the Local Plan to identify the location, area and specification requirements for the proposed SANG or SANGs that would be the principal form of mitigation for the Policy CRS1 housing development. It is essential that any greenspace mitigation is confirmed as being suitable and deliverable if the Local Plan is to be found sound. A key issue for consideration will be the availability of suitable additional land within the control of the promoter(s) / developer(s) of land at Crossways to deliver SANGs.

13.6.4 A further point is that the heathland mitigation is stated to be funded through CIL. Due to the legal impact of the heathland issue it is an absolute and thus will be a first draw on the CIL fund having consequences for the funding of infrastructure provision for Crossways.

13.6.5 Unless and until the location, area and specification requirements for the proposed SANG or SANGs for the Policy CRS1 strategic housing development at Crossways is confirmed, and there is confidence that this is deliverable, it is not clear how it is possible to confirm in the Conservation Regulations Assessment that there would be no likely significant effects of European sites that would arise from adoption of the Local Plan.

13.6.6 If SANG provision is required within Purbeck District to mitigate development impact arising in West Dorset, this should be addressed through the duty to co-operate, involving joint policy work that is subject to cross-boundary public consultation.

- 13.6.7 Our representations to Policy CRS1 further explain why Crossways is inappropriate as a Policy SUS 2 'second tier' development location. Crossways is not suitable as a settlement for strategic development, particularly in view of the availability of a more sustainable alternative location for accommodating further strategic scale of growth at North Dorchester.
- 13.6.8 In our representations in response to the Proposed Modifications in October 2013 we objected to the statement that the settlement of Crossways is relatively unconstrained, particularly given the proximity to the Dorset Heathlands. Consequently it does not have the potential for a significant scale of development. Although the housing allocation is proposed to be reduced from 1,200 dwellings to 500 dwellings, this is still considered inconsistent with the settlement hierarchy as set out in Section 3 para 3.3.5.
- 13.6.9 As mentioned in our previous representations on the Pre-Submission Consultation Draft in July 2012 some development in the village of Crossways could be justified to help Crossways meet its own needs, but not the wider needs of the Dorchester area.

**13.7 Are there adequate measures in place to ensure services and facilities and improvements to essential infrastructure will be delivered to minimise the impact of development?**

13.7.1 Pegasus on behalf of Persimmon Homes have objected to the allocation at Crossways, even the reduced allocation, for reasons set out in our representations to the Plan in July 2012 and Summer/Autumn 2013.

**13.8 The recommended changes to the Plan identify the southern area of the settlement as the preferred location for development. Is this the most appropriate area given the various constraints and issues affecting the settlement?**

13.8.1 Pegasus on behalf of Persimmon Homes have objected to the reduced allocation at Crossways. There must be some doubt about the deliverability of this area given the revised text in paragraphs 12.2.2 – 12.2.5 which refers to mitigation of any impact upon the setting of the earthworks in Bowley's Plantation which are a Scheduled Monument. Reference is made to the need for further work in order to properly plan the development, including the necessary phasing of infrastructure.

13.8.2 In addition, there are potentially viable deposits of sand and gravel around Crossways and these will need to be safeguarded from sterilisation by the development. Reference is made to further work being required to establish if any viable mineral deposits will be affected and the possibility of prior extraction. On and off-site provision and contributions to community infrastructure will be sought in line with policy COM 1 and secured through a section 106 legal agreement.

13.8.3 Mitigation will also need to be provided in the form of SANGS and it is not clear what co-operation has taken place with Purbeck District Council.

13.8.4 Our representations have questioned the justification for Crossways and that there is no evidence of joint working to identify the allocation and assessment of its deliverability.