

# Dorset Council Local Plan

# North of Dorchester 2021 Consultation Summary of Responses

# January 2023





Dorset Council Local Plan consultation 2021 summary of responses - Land North of Dorchester

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# **1.** Policy DOR13: Land North of Dorchester

# 1.1. Support for Policy DOR13

### Support for more housing in Dorchester

#### **Persimmon Homes**

• Persimmon Homes supports the proposed allocation at North Dorchester.

### North Dorchester Consortium

- The North Dorchester Consortium (NDC, which includes Persimmon Homes) supports the identification of the North Dorchester site for mixed use development.
- NDC supports the draft Local Plan overall, but objects on the basis that the Council's evidence supporting the plan is incomplete or inconsistent with the Consortium's own detailed evidence. NDC consider that their proposals are consistent with their own evidence and with national policy. Amendments are suggested to the Plan and to the Sustainability Assessment (SA) to deal with these issues.
- NDC's response and delivery strategy shows how North Dorchester could meet Central Dorset's
  objectively assessed needs sustainably, whilst also providing infrastructure for the benefit of the
  town. NDC consider that development at North Dorchester is a justifiable strategy and the only
  one capable of meeting the needs of Dorchester. NDC has also commissioned research to show
  that there is support for further housing in the Dorchester area, particularly amongst younger
  people and those that currently rent accommodation.
- NDC note that the inspector of the joint West Dorset & Weymouth Local Plan (2015) required the Councils to commit to a review to establish a strategy to meet the long-term needs of the Dorchester area. Work on the new Dorset Local Plan confirms a Housing Market Area centred on Dorchester and Weymouth and the sustainability of Dorchester as a location for growth.
- NDC consider the North Dorchester site to be less constrained than other spatial options around the town and to be the only option that can deliver the critical mass of infrastructure (including the transport infrastructure necessary to provide relief to the existing network) in order to ensure Dorchester continues to prosper.
- NDC note that the North Dorchester site is closer to the town centre than other options around the town and that other options also face issues of severance caused by both distance from the town centre and the bypass.
- NDC argue that the 2008 Halcrow Study is inaccurate and unbalanced because it wrongly
  assumes that an allocation at North Dorchester would trigger the need for a northern bypass
  and that other options around the town would not. It also assumed that a grade separated
  junction would be needed as part of the bypass, inflating the infrastructure costs of the North
  Dorchester option (but not others).
- NDC state that the proposed allocation could deliver homes by 2024/25 or earlier. They also argue that a Garden Community at North Dorchester could deliver:
- three new neighbourhoods delivering about 3,500 energy efficient, family homes;
- a substantial park in the Frome Valley providing space for wildlife and people with a new visitor centre and a trail linking places referred to by Thomas Hardy;
- a reduction in the level of nitrates entering the River Frome and further downstream Poole Harbour;

- many new jobs and local shops;
- sustainable transport options within the development and new running, walking and cycling routes linked to the wider countryside;
- a new northern link road to reduce traffic congestion;
- new medical facilities; and
- a school campus including primary and secondary level education.
- NDC has developed a 'framework plan' that shows how the proposed Garden Community would integrate successfully with Dorchester and the wider landscape, including the AONB. The framework plan: groups all neighbourhoods within a 5-to-10-minute walk of a neighbourhood centre; retains dry valleys and an area of parkland east of Frome Whitfield within the development; and proposes development south of Coker's Frome Road, which is considered to be justified by NDC's landscape and heritage analysis and which is considered necessary to better integrate the new development with Dorchester.
- NDC's emerging delivery strategy shows how the development would be deliverable and includes: a housing trajectory indicating that 2,800+ homes would be provided by 2038; a route for the proposed northern link road, together with more detail on its overall design and the layout of key junctions; an outline approach to safeguarding public water supply within the groundwater source protection zone partly within the site; and a discussion of utilities provision.

#### Salisbury Diocesan Board of Finance

- The vision for Dorchester, the vision for the north of Dorchester, the proposed allocation of land north of Dorchester (including land at Higher Burton) and the content of draft policy DOR13 are fully supported.
- Such a development would achieve the positive planning aims set out in the supporting text, including meeting development needs, achieving a more sustainable pattern of development for the town and balancing the location of housing and jobs in the Dorchester travel to work area.
- The land at Higher Burton is deliverable, available now and development would be achievable.
- The Church recognises its role and responsibilities in addressing the current housing crisis in England. The recently published report Coming Home, Tackling the Housing Crisis Together (The Commission of the Archbishops of Canterbury and York on Housing, Church and Community, February 2021) outline the Church's objective to use its land assets to promote more truly affordable homes, through developments that deliver on the five core values of being 'sustainable, safe, stable, sociable and satisfying'.

### Savills on behalf of the Landowner of Frome Whitfield Farm

- Support the inclusion of Land and Buildings at Frome Whitfield Farm, Dorchester, Dorset DT2 7RY (OS grid reference: SY 69054 91650 / SHELAA reference: LA/STLB/001) within the preferred option for development.
- The land is immediately available for development.
- The traditional farm buildings benefit from an extant planning permission for conversion into residential dwellings.
- The traditional farm buildings are no longer fit for purpose with regard to modern agriculture, therefore are redundant.
- The agricultural setting of the site will be significantly reduced by the wider development. The site is located within flood zone 1.
- The site has good connectivity to the town centre on foot via existing public rights of way network.

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### Natural England

• Natural England has no objection in principle to the proposed allocation subject to amendments.

### **Historic England**

 The supporting text on landscape and heritage considerations and key design requirements are welcomed, as are the references to masterplans (Criteria I & XIV), the need to avoid and minimise harm to the significance of heritage assets and their settings (Criteria IX), and utilising opportunities to enhance and better understand and enjoy the historic environment (Criteria IX, XIII & XIV).

### Public response

- The development should go ahead as the country needs more housing. The need for housing growth is the modern way of life.
- The proposed allocation is supported and fits into the Local Plan. The land is suitable for development and the area has good road links. It is the only realistic solution.
- Dorchester is the county town and includes some of the largest employers. It is sensible to provide new housing for people of working age close to places of employment.
- Dorchester has work-related commuters from a wide area and the price premium and high demand for its housing suggests the proposed new builds are a priority.
- We need more housing and DOR13 will make Dorchester a more thriving town. However, plans must include an A37 bypass to stop lorries going through High West Street.
- The development north of Dorchester should go ahead as a larger population is needed to support the current facilities.
- The development north of Dorchester should go ahead to help the rejuvenation around the new museum and along High East and High West Streets.
- The property market in Dorchester is overpriced and impossible for younger people to navigate.
- 4,000 homes are not enough. We need at least 10,000 more homes in the area.

# 1.2. Objections to Policy DOR13

### **Overall Approach**

### **Dorchester Civic Society**

- We object to the principle of DOR13.
- DOR13 should set out the procedures governing development on the site, as has been done in Policy CRS1 relating to Crossways, which refers to the need for a planning agreement prior to granting of planning consent, a masterplan and a legal agreement.
- The DOR13 proposal has been chosen because it is regarded by the Council as an 'easy option'.
- No reasoned justification for the selection of the chosen options is given. The spatial strategy is based on housing markets and the supply of developable sites with little regard, other than acknowledging constraints, to the other factors listed in paragraph 2.3.1.
- The plan stitches together the plans of the former District Councils, with little thought given to whether they remain valid in the context of the 'new geography' of the unitary authority. New opportunities presented by the wider perspective following local government re-organisation have not been considered.
- Previous submissions regarding proposals for development north of Dorchester have been ignored.

• There is no recognition of the adverse impact of the proposed wind farm at Slyers Lane on the AONB and Dorchester.

### **Dorchester Town Council**

- We strongly object to the proposed allocation that will fail to address the local needs of the town. There is a risk that the allocation will fail to produce a comprehensive, relevant, viable and sustainable development that supports the area's future.
- This could just be the start of a larger settlement. There is no clear indication that the settlement will not ultimately extend further north through a future review of the plan, as there is no defined or logical outer limit. Such a piecemeal approach would not be sound planning, especially when the NPPF advocates setting policies for large developments within a vision that looks at least 30 years ahead to take account of the likely timescale for delivery.

### **Chesilbourne Parish Council**

• There are concerns with large-scale housing proposed north of Dorchester.

### Stinsford Parish Council

- Stinsford Parish Council is unanimously opposed to the proposed development on land north of Dorchester as stated in DOR13, which is located within the parish.
- Unclear whether it is planned as a free-standing community or an urban extension. As an extension, it must have easy, quick, non-vehicular access to the town centre. As a free-standing settlement, it should have identity and social cohesion.

### Dorset Wildlife Trust

- Disagree with DOR13 as currently worded.
- This should be a showcase sustainable development and a place with significantly better biodiversity enhancement and access to nature than has been the norm in recent years. We have major concerns about the wording of the text and policy which do not reflect the existing interests on site or the scale of green infrastructure and biodiversity protection and enhancement needed for this to be an exemplar. We would object to any development proposals not meeting this necessarily high standard.

### Salisbury Diocesan Board of Finance

- The overall policy approach for the allocation should be amended to reflect Salisbury Diocesan Board of Finance's aspirations for the site:
- Supporting the delivery of large-scale mixed-use development and infrastructure on the basis that this can broaden the local economy and support economic recovery;
- Provision of a mix and tenure of housing that is genuinely within the reach and affordability of the area's working population;
- Delivery of housing that is suitable for all life stages and makes appropriate provision for disabled people and their carers and those requiring extra care accommodation;
- Achieving high quality links (i) within the development, (ii) between the development and Dorchester, and (iii) to the surrounding settlements and rural area with an emphasis on 'active travel' (i.e., movement on foot and by bicycle);
- Integrating the built environment into a wider landscape framework which links to the countryside and delivers multi-functional green and blue infrastructure;

- High quality placemaking that respects the character and heritage that is special to Dorchester, reflecting the Church's commitment to placemaking through building and nurturing communities;
- Ensuring that the development encourages the widest possible range of commercial activity and homes, which can support a thriving living and working community of all ages and needs;
- The importance of designing the proposal as a well-planned cohesive whole, structured upon linked, walkable neighbourhoods and wider Garden Community principles;
- Consideration right from the start of the function and purpose of the 'link road', to avoid car dominance or severance between the existing town and the development. This should avoid a traditional 'highway engineered solution';
- Ensuring that the distribution of land uses is coherent and does not create conflicts between commercial activity and the living, education and recreation spaces;
- Delivering a step change in both quality and delivery rates whilst building a highly sustainable place; and
- Shaping a viable delivery strategy with alignment of infrastructure provision.

### Save the Area North of Dorchester (STAND)

• The comments made by Dorchester Civic Society, The Thomas Hardy Society, Dorchester Town Council, Stinsford Parish Council, Dorset CPRE (particularly on their challenge to the Government's housing target), and Dorset Climate Action Network are endorsed.

### West Dorset CPRE

• Concern with increased strain on infrastructure, environmental impacts, high land values, and failure to address local needs.

- Object to the proposed north of Dorchester development. The DOR13 'preferred option' should be removed from the Local Plan, so that the site would escape the rapacious clutches of developers such as Persimmon.
- I object to this huge 'housing concrete jungle' to the north of Dorchester. It is immoral, indefensible, and crass irresponsible lunacy.
- The development to the north of Dorchester would be as good as a grave. It perpetuates a mode of living that is leading us to a tipping point past which there is only anarchy, death, and the meaninglessness of our current infrastructure... not to mention all the 'wealth' that was extracted in the meantime. We are, on our current trajectory, doomed.
- I strongly oppose this monstrous half-baked housing scheme. The scheme is crazy and totally wrong. The planners need to think again, to join the real world and to stop living in la-la land. Whoever proposed this ridiculous idea needs their head examining.
- The development constitutes large-scale, irreversible vandalism. This area of Dorset is unique and must be safeguarded. It needs to be treasured, not plundered due to the large housing quota imposed on the area.
- The policy fails to demonstrate that the benefits of the allocation would outweigh the individual and cumulative impacts. There is a lack of detail to explain how the impacts will be mitigated.
- The idea of another massive development on the outskirts is appalling. The north Dorchester proposal is almost a conurbation with Puddletown.
- The development could set a precedent for the future of Dorchester with more and more housing proposed as at Yeovil, which is no longer a rural county town.

- The proposal is at odds with the vision statement for North Dorchester. It will not make Dorchester a great place to live, work and visit.
- The site has been suggested on several occasions in the past and has found not be viable or suitable and has not been supported by Dorchester Town Council or Stinsford Parish Council. A similar proposal was put forward in 2008 and in 2018 and was rejected both times. What has changed and why has it been included now?
- North Dorchester was opposed in 1987 when Poundbury was being allocated and it remains the wrong site now. It is still an important historic and environmentally sensitive landscape with associated watermeadows.
- London overspill was rejected by Dorchester Town Council in the 1960s and there is no justification for it now.
- Past evidence against the DOR13 development covering matters such as viability, landscape and archaeological concerns, has not been considered at all.
- This proposal fails to take account of the reasons for the rejection of other proposals for gravel extraction, solar and wind farms to the north of Dorchester or on Waterston Ridge.
- There is no consistency in planning. In recent years two planning applications for wind turbines were refused on the basis of: landscape significance; visual intrusion; and detracting from Hardy's Dorset, yet now it is proposed to cover the fields with unsightly housing.
- There is no attempt to consider the potential outcomes of Brexit and the Covid-19 pandemic.
- The policy is written as if development has already been agreed.

# **1.3.** Vision for the North of Dorchester

### Figure 23.4: Vision for the north of Dorchester

### **Dorchester Town Council**

• The vision for Dorchester doesn't mention being able to walk to work or to the reach the town centre other than by car. This should be clarified.

### Dorset Wildlife Trust (DWT)

- Placemaking overview The wetland and wildlife functions of the watermeadows should be the primary considerations. Access must be managed to ensure disturbance to wildlife, especially birds, is minimised. Roads, pedestrian and cycle routes should not fragment natural habitat in a way that prevents it meeting its potential ecological value.
- Environmental performance This section should include natural environmental enhancements including natural greenspace, nature reserves and wildlife features within the built environment.
- Integrating North of Dorchester into the landscape This section should refer to natural habitats as well as tree and woodland planting.

### Natural England

- Placemaking overview The proposed allocation includes the floodplain of the River Frome which supports substantive wildlife interest, including otter, an Annex II species and a range of water birds.
- Placemaking overview These interests will be suspectable to increased recreational activity within the water meadows and should be protected and enhanced through the creation of a new nature reserve that includes the entirety of the floodplain within the allocation.

- Placemaking overview The creation of a major new nature reserve should be central to the placemaking vision for the allocation.
- Placemaking overview Within the floodplain nature reserve access to the wider water meadows by people and dogs will need to be prevented through the provision of wet ditch and wetland vegetation alongside the PRoWs crossing the site.
- Environmental performance The drainage strategy and SuDS associated with the development will need to be designed so as to prevent urban runoff, silt and increased phosphorus loads from entering the River Frome SSSI.
- Environmental performance Such features will also play a significant role in ensuring the scheme meets nitrogen neutrality requirements in respect of the Poole Harbour Habitats sites.
- Environmental performance The encouragement for reducing greenhouse gas emissions should be extended to cover the efficient use of water.
- The section should also outline the need to protect and enhance the wildlife interests of the River Frome floodplain while achieving an overall biodiversity net gain for the development.

#### RSPB

- The carbon costs of any new build should be offset and in relation to DOR13, the section on environmental performance should ensure that there are specific measures showing how the climate change implications arising from this major new development would be offset.
- The text on environmental performance should mention of the need for nitrate and phosphate neutrality.

#### Public response

- Vision each of its 3 elements beyond DC's capacity to deliver.
- There is concern with the wording 'a well-planned cohesive whole' and with the difficulties of achieving this.
- 'Modest expansion of Charminster' should be changed to 'the further expansion of Charminster'.
- The proposed link road will result in significantly increased traffic through Charminster.
- There is no reference to street lighting, street furniture, car-parking, traffic calming etc.
- Placemaking Overview premature to say the new development will have 'garden community qualities' as no evidence in draft plan as to what these are, how they will be delivered and how they will be maintained so, and no outputs from the commissioned studies either.
- Placemaking Overview premature to say the new development will have 'garden community qualities' as no evidence in draft plan as to what these are, how they will be delivered and how they will be maintained so, and no outputs from the commissioned studies either.
- The transport component of the vision is contradictory with the DOR13 policy that will amount to putting more cars on existing road infrastructure, and in the town centre.
- Figure 23.4 does not address the issue of second homes.

# **1.4.** Comments on the supporting text to Policy DOR13

### Paragraphs 23.6.25 - 23.6.67

### Public response

• The supporting text in paragraphs 23.6.25 to 23.6.67 comprises a mishmash of substance and aspiration and should be redrafted to sort the rhetoric from the facts.

### Paragraph 23.6.28 - Phasing of development

#### **Public response**

• There are minor errors in this paragraph. Westleaze is on the C12, not the C13. The minor road going west-east via Yalbury Lodge and Coker's Frome and across the B3143 to the Stinsford Roundabout is the D20661, Cokers Farm Road.

### Paragraphs 23.6.30 - 23.6.31 - Quantum of development

#### Dorset Wildlife Trust

• The list of requirements must also include major green infrastructure and natural environment conservation and enhancements.

#### **Public response**

• Quantum of development - little evidence that identified quantum of development is needed, is financially viable and is deliverable in this location and so inappropriate and premature to allocate DOR13 as a 'Preferred Area'.

### Paragraphs 23.6.32 - 23.6.34 - Movement strategy

#### Natural England

• In order to minimise disturbance and sightline impacts on water birds the alignment of the new link road as it crosses the floodplain should ensure the areas of retained water meadows are maintained in as large a block as possible.

#### South Western Railway

• The movement strategy needs to focus on ensuring that it contains a full sustainable transport package, not just walking and cycling links if it is going to be sustainable – including shared transport options such as mobility hubs including shared bikes (ideally e-bikes), car club vehicles and strong regular bus links which should serve Dorchester South station directly and have working real time information.

### Dorset Wildlife Trust

• It is important that roads, pedestrian and cycle routes are planned so as not to fragment natural habitat and in particular the watermeadows in a way that prevents it meeting its potential ecological value. Existing valuable habitat must not be split and enhancements to create a large wildlife area should be considered alongside how people access and pass through it.

#### North Dorchester Consortium

• The text should state that it is 'our aspiration' to provide at least three pedestrian and cycle links between the new development and Dorchester town.

- The proposed link road between A35 and A37 via B3147 may not be viable.
- There is confusion over whether the proposed road is an access road for the development or a link between A35 and A37.
- Movement Strategy / Road network and links provision of northern link road and at least 3
  pedestrian/cycle crossings of the water meadows and floodplains will have adverse
  environmental impacts.
- Figure 23.1 gives an erroneous idea of the proximity of the development site to the town.

### Paragraph 23.6.37 - Type of housing

### Public response

• This paragraph should state that affordable homes 'must' be delivered.

### Paragraphs 23.6.38 - 23.6.40 - Planning obligations

### **Dorset Wildlife Trust**

• Green infrastructure should be included on the list of required infrastructure to clearly indicate that there is a requirement to make this is major part of the development.

### North Dorchester Consortium

- Paragraph 23.6.38 should make clear that infrastructure will be delivered through 'direct provision' as well as through Section 106 and Section 278 legal agreements.
- Paragraph 23.6.39 should state that the prior extraction of sand and gravel may be needed 'subject to phasing and delivery requirements as well as the viability of reserves.'
- Paragraph 23.6.39 should state that the 'local opportunistic use of sand and gravel will be considered.'
- A site for a possible Household Recycling Centre within the development may not be appropriate owing to the presence of the Groundwater Source Protection Zone.

### **Public response**

- This paragraph fails to refer to various provisions referred to in previous and subsequent paragraphs.
- It is not clear why the development is '... exempt from CIL'.
- Income under 106 plus continuing business rates and council tax must be spent on the site and not squandered for other fanciful ideas.

### Paragraph 23.6.42 - Landscape considerations

### Natural England

• Natural England welcomes the proposal for additional broadleaved copse planting and road side tree planting.

### North Dorchester Consortium

- The planting of additional copse areas should only be required where the visibility of parts of the North of Dorchester development would have 'specific, evidenced impacts' on the setting of the AONB.
- Paragraph 23.6.42 should not indicate that the planting of additional copse areas would link the area to the more significant forested area of Thorncombe Wood. It should indicate that 'planting along a grid of roads and green corridors within the development' would 'connect any strategic planting to Thorncombe Wood.'

### **National Trust**

• Add to paragraph 23.6.46: 'Hardy was born in the property now known as Hardy's Cottage, to the north-east of the town'.

### Paragraph 23.6.50 - Heritage considerations

### Public response

• It is not clear how connections with Thomas Hardy will be achieved. Some examples are requested.

### Paragraph 23.6.54 - Flood risk

### **Public response**

- Flood risk premature to allocate DOR 13 as a Preferred Area without more detailed investigation into flood risk and impact on nationally important river and associated wetland habitats.
- Figure 23.1 erroneously shows the floodplain and the River Frome as areas for development which are not viable for any form of building.

### Paragraphs 23.6.56 - 23.6.60 - Biodiversity considerations

### **Dorset Wildlife Trust**

- This section does not fully express the value of the wildlife within the boundary of the site (such as the watermeadows which include a Site of Nature Conservation Interest), the river itself (upstream of the SSSI which is equally valuable chalk stream habitat), the risks to both these and the downstream habitats if the mitigation measures are not right nor the opportunities for enhancement to create a major area of wildlife habitat. We would also suggest the section is titled Biodiversity ('considerations' implies this is optional).
- There are populations of farmland birds on site and many of these species (such as Yellowhammer, Corn Bunting and Barn Owl) have suffered significant declines and are priority species. The reference to 'a range of farmland birds' downplays their importance and we suggest the word 'priority' is added. Parts of the site are significant for winter visiting bird populations.

### Natural England

• Key biodiversity interests for the development site include a number of veteran trees, the wildlife interests if the River From floodplain and a strong farmland bird population particularly along the northern margins of the site.

### **Public response**

• Little evidence to show that DC has applied the draft local plan's environment policies, which have much to commend them, when allocating DOR13.

### Paragraph 23.6.57 - River Frome SSSI

### Dorset Wildlife Trust

• The River Frome is species rich ('considered to be' is inappropriate wording). We agree that there is potential to impact on the SSSI but the river upstream is also species rich and equally vulnerable.

### Natural England

• Welcomes recognition of the sensitivity of the River Frome SSSI and that the scheme will need to be carefully considered and designed to avoid harm to the designated site, particularly from increased phosphorus and silt loads from construction and subsequent urban runoff.

### **Stinsford Parish Council**

• The River Frome is a protected chalk stream (with an SSSI designation downstream from Dorchester) and is a unique habitat globally and worthy of a high level of protection. There needs to be more detail and explanation as to how this development will protect the environment around Dorchester and the downstream habitat of the River Frome, as far as Poole Harbour.

#### Public response

- Development will impact on the River Frome Site of Special Scientific Interest (SSSI), one of only 200 chalk streams globally, and a major chalk stream in the south-west with associated flood meadows. These habitats cannot be recreated, and the river is susceptible to chemical and sediment pollution. These changes to the river eco-system may be irreversible.
- There should be an environmental impact assessment looking at the impacts on the River Frome SSSI, which should not be sacrificed.

### Paragraphs 23.6.57 - 23.6.58 - Biodiversity considerations

#### Natural England

• Welcome the recognition of the need for the development to be nitrogen neutral in respect to Poole Harbour Habitats sites. Opportunities for wetlands designated to reduce nitrogen levels in the River Frome should be explored.

#### **RSPB**

 We welcome and support recognition of the sensitivity of downstream SSSIs and Poole Harbour and similarly support the intention to ensure nitrogen levels in Poole Harbour do not increase as a result of development.

### Paragraph 23.6.59 - Biodiversity considerations

### **Dorset Wildlife Trust**

• The Frome Meadows SNCI lies within the allocated site and this should be stated in this paragraph along with a clear commitment to protect and enhance it (not just 'where possible').

### Paragraph 23.6.60 - Biodiversity Net Gain

### **Dorset Wildlife Trust**

- There should be a greater degree of ambition towards biodiversity enhancement. The scale of biodiversity enhancement should equal the scale of the development proposed. The policy should not pin the requirement to 10% net gain for biodiversity. The requirement should not be lower, but 10% may not be a noticeable gain at this scale or what is needed to meet 'garden community' principles around environmental enhancement. It is also completely inappropriate to describe retention of existing features as net gain. Elements of wilding should be considered with an emphasis on creating habitat that is sustainable to manage in the long-run.
- Paragraph 23.6.60 should be reworded to say 'with appropriate design and provision for ongoing management there is the potential to achieve substantive biodiversity benefits at North of Dorchester and development will be expected to deliver a demonstrable and substantial net biodiversity gain in addition to the retention of mature trees, and hedgerows, wetlands, water meadows and other existing wildlife habitat within the development. Net gain will be required to include the creation of wildflower rich chalk downland, new native woodlands and through

the creation of additional wetlands (which should also function for nutrient stripping) and wildlife areas associated with the water meadows. Biodiversity enhancement should be on-site to enable it where appropriate to also form part of a network of major new green infrastructure which will be required as part of this development'.

### Natural England

- Supports the statement regarding the potential for the allocation to achieve substantive biodiversity net gains.
- Key to realising these gains will be the establishment of a new nature reserve within the floodplain of the River Frome, an appropriate mitigation and compensation package for the area's farmland bird populations, along with the retention and creation of habitats on site.
- Wildlife enhancement measures should include a requirement to create species rich grasslands on the schemes new road verges and public open space. Reference to guidance at plantlife.org.uk.

### RSPB

 We welcome and support the suggestion that 10% biodiversity net gain money could be used to create nutrient-stripping wetlands downstream of the development. We would like the plan to go further and commit to this as a specific policy requirement, linked to any nitrate mitigation measures.

### Save the Area North of Dorchester (STAND)

• We are concerned that the development and the actions proposed would not provide biodiversity net gain.

### Public response

- The development offers no certainty that environmental gains will be secured. It is not clear how biodiversity interests will be identified to ensure that biodiversity net gain will be achieved.
- It will not be possible to deliver biodiversity net gain given the likely negative impacts on the chalk stream environment and the associated ecological networks of the River Frome and further downstream on Poole Harbour.

### Paragraphs 23.6.61 - 23.6.62 - Green Infrastructure

### Dorset Wildlife Trust

• This section is worded better in respect of the scale of ambition for green infrastructure provision. The word 'generous' in relation to greenspace provision is often used in definitions of garden communities and this needs to be clearly incorporated in the requirements of this development.

### **Environment Agency**

• Green infrastructure should be incorporated into the site, this should include areas of wildlife habitat, and seek to link up any existing green corridors. Wetland features in the site should be considered where appropriate.

### Natural England

• The scheme should be required to provide a substantive new nature reserve covering the River Frome floodplain, including appropriate provision for its long term management, ideally by a suitable wildlife NGO, or your Council.

- While the designation of the new reserve as a Local Nature Reserve (LNR) should be a requirement if the land is retained by the Council, it may not be necessary if the land is passed to a wildlife NGO for its long term management.
- Improvements in public access to the water meadows will need careful planning to ensure wildlife interests can be retained and enhanced.
- Any new PROW crossing the floodplain to the town centre should prevent access into the wider meadow areas through provision of wet ditches etc, but also be supported by significant provision of green infrastructure with suitable natural habitats off the floodplain.
- The numerus PROW within the allocation site will also need to be protected and enhanced to ensure they are not degraded by the development.

### Public response

• DOR13 does not oblige the development to provide and implement an agreed GI Plan.

# **1.5.** Comments on the criteria of Policy DOR13

### Specific objections to and comments on the criteria of DOR13

Specific objections to the criteria of Policy DOR13 are set out below.

### DOR13 - Criterion I

### **Public response**

• Criterion I should make it clear that development must adhere to a development brief and the process, remit and timescale for the preparation of the brief should be stated in the policy.

### DOR13 - Criterion II

### North Dorchester Consortium

• Criterion II should seek 'a minimum of 3,500 new homes' and 'a maximum of 10 hectares of employment land'.

### DOR13 - Criterion III

### Public response

• There is confusion over whether the proposed road is an access road for the development or a link between the A35 and the A37.

### DOR13 - Criterion IV

### Go South Coast Buses

 There should be a proposed addition to Criterion IV stating that 'the carriageway widths within the new development should be a minimum of 6.5 metres to enable buses to access the main thoroughfares through the site and enable modal shift away from the private car and promote sustainable transport modes'.

### North Dorchester Consortium

• Criterion IV should not specifically seek at least 35% affordable housing but should say that affordable housing should be provided in line with Policy HOUS2.

### Public response

- Criterion IV only says that the homes provided should include 35% affordable housing, but the use of the term 'should' instead of 'must', means there is no guarantee that affordable homes will be built.
- Criteria IV should say that the stated percentage of affordable housing is provided at every phase of the development in order to maximise the opportunity for local, low-waged people to acquire property.

### DOR13 - Criterion V

### **Natural England**

• Add, "The new PROWs should incorporate wet ditch and wetland vegetation to prevent uncontrolled public access to the adjacent water meadows".

### North Dorchester Consortium

• Criterion V should seek at least two (rather than three) pedestrian and cycle links between the new development area and the historic town, 'with an aspiration for more'.

### DOR13 - Criterion VI

#### North Dorchester Consortium

- Criterion VI should seek 'a network of smaller, supporting neighbourhood centres' to meet dayto-day needs, as well as a 'local centre' for the development as a whole.
- Criterion VI should not seek 'minimal impact' on the vitality and viability of the existing town centre but should seek 'compatibility' with vitality and viability.

### DOR13 - Criterion VII

### North Dorchester Consortium

• Criterion VII should only seek opportunities for additional healthcare provision on site 'if needed'.

### DOR13 - Criterion VIII

### Natural England

• The clause should stress the need for the masterplan for the site to be led by the need to moderate impacts on the Dorset AONB – see suggested amendment.

### North Dorchester Consortium

• Criterion VIII should not seek 'significant copse planting to break up the built form' or state that 'streets will be tree-lined to create a softer urban form'. It should say that 'the development will exploit the existing hedgerow structure and the principle of tree-lined streets to ensure the built form of the development is softened within views from the AONB.'

### DOR13 - Criterion IX

### **Dorchester Civic Society**

• DOR 13 IX can be interpreted as implying that the historic heritage, including its literary landscape, can be utilised within the development. We strongly object to this wording as it implies the loss of the town's unique and characteristic setting.

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### North Dorchester Consortium

- The first sentence of Criterion IX, which reads 'the special historic environment within which the site sits will help to deliver local character to the development' should be deleted and replaced with 'the historic assets within the site will help create local character within the development.'
- Criterion IX should state that harm to the significance of heritage assets should be avoided or minimised 'proportionate to their significance'.

### DOR13 - Criterion X

### Dorset Wildlife Trust

 Criterion X should be reworded to say 'areas at risk of flooding from all sources will be avoided. The development will deliver a flood mitigation strategy which makes best use of the opportunities on the site, including habitats that provide natural flood management, with a viable and deliverable flood mitigation strategy being implemented'.

### DOR13 - Criterion XI

### Dorset Wildlife Trust

 Criterion XI should be reworded to say 'proposals will be accompanied by a hydrogeological risk assessment to demonstrate that development will not compromise groundwater quality or its abstraction. The development should be at least nitrogen neutral. The existing biodiversity assets on the site must be maintained and in addition opportunities for biodiversity enhancement on the site must be considered at the earliest stage and used to form the structure of the development in order to deliver significant net gain for biodiversity'.

### DOR13 - Criterion XII

### Natural England

 The clause should include a requirement to protect the River Frome SSSI from urban runoff, including silts and phosphorus loads and include reference to the area's farmland bird populations. See suggested amendment.

### North Dorchester Consortium

- Criterion XII should state that the development should demonstrate 'nitrogen neutrality', rather than 'at least nitrogen neutrality'.
- Criterion XII should not state that the development should deliver 'the minimum 10% [biodiversity] net gain required' but should state that the development should deliver 'biodiversity net gain.'

#### RSPB

• We welcome and support Criterion XII, which requires development to be nitrogen neutral. The policy should make it clear that this is because north Dorchester lies within the Poole Harbour nitrate mitigation zone. We suggest that it should also be phosphate neutral because of the risk of phosphate impacts on the freshwater River Frome.

### DOR13 - Criterion XIII

### Natural England

• The policy should be clearly set out the need to protect and enhance the wildlife within the River Frome floodplain and its water meadows, including form the impacts of uncontrolled access. See suggested amendment.

### **Dorset Wildlife Trust**

• Criterion XIII should be reworded to say 'a local nature reserve of significant size will be required at the water meadows as a key part of the green infrastructure network for the development. This must lead to a significant enhancement for biodiversity and wetlands and also incorporate improved recreational access, opportunities for greater appreciation of the areas rich heritage and for heritage-led tourism. Generous green infrastructure away from the flood plain will also be required'.

### North Dorchester Consortium

• Criterion XIII should not require the local nature reserve at the water meadows to incorporate opportunities for 'heritage-led tourism, biodiversity enhancement and wetland features', but should require it to incorporate opportunities for 'heritage-led tourism and biodiversity enhancements and wetland features.'

#### **RSPB**

• We welcome and support Criterion XIII with the requirement to create a local nature reserve at the water meadows.

#### **Stinsford Parish Council**

• Much emphasis is placed upon the provision of a new Local Nature Reserve at the water meadows. However, it is stated this will be enabled "as far as practical" and unlikely to be delivered.

#### **Public response**

• The meadows should be left alone for wildlife and nature. There is no need for paths, green tracks, signs and walkways, as the creation of a 'green infrastructure space' will increase disturbance of the wildlife by people.

### DOR13 - Suggested new criterion

#### Go South Coast Buses

 There should be a new Criterion XV which states 'the development shall provide funding for infrastructure and improvements to the existing bus service to serve the development and connect to the existing town and surrounding areas for a period of at least seven years from a time to be agreed between the local planning authority and applicant'.

# 1.6. Site Boundary & Omissions

### Objections to the boundaries of the DOR13 site

### Public response

- Allowing this proposal would set a precedent for further development, as it could not effectively be limited to a part or parts of the area. A defensible boundary to the north of the development is needed.
- The northern boundary of the allocation is fluid and as neighbouring landowners are willing to sell, the development will sprawl further north towards Waterston Ridge.
- The North Dorchester development is too close to Charminster. The western boundary of the North Dorchester development at Higher Burton Farm is too close to the Charminster village boundary. Just 1.5 fields is an unreasonably narrow separation between the village and the new development.

### Higher Burton Farm (LA/STLB/005)

### Strutt & Parker on behalf of the Salisbury Diocesan Board

 The boundaries of the allocation need to be softened as part of a landscape-led approach rather than reflecting land ownership. Salisbury Diocesan Board of Finance can make more land available at Higher Burton Farm, if needed, in order to achieve best long-term planning and design solution.

### Stinsford Hill House (LA/STLB/004)

### Enterprise Park 2017 Ltd on behalf of Landowner

- 1.2 hectares at Stinsford Hill House should be included in the DOR13 allocation, or as an extension to the settlement boundary of Dorchester. The site would provide a logical rounding off of the DOR13 boundary.
- The Historic England website does not identify any heritage assets within the site, although it does record a milestone on the adjacent service road, but not in situ.

### 2. Issues Raised

A large number of issues were raised in relation to the proposals for North Dorchester. The key points in relation to those issues are set out below.

# 2.1. Development Strategy

### Comments on evidence to support the Local Plan

### **Dorchester Civic Society**

- There is no up-to-date evidence base across a wide spectrum of issues and consequently the plan's proposals cannot be justified. Although further studies are planned, they may lack objectivity and be biased in favour of decisions that have already been made.
- There is no consideration of the impacts of Covid-19 on ways of working, commuting patterns and the high street. During Covid-19 many Dorset Council and some NHS administrative staff

have worked from home. It is unlikely that in-commuting levels will return to their pre Covid-19 levels, reducing the need for housing in Dorchester. This situation needs to be reassessed.

- Much evidence has not been produced, or was not produced until after publication of the draft plan. These documents need to be available so that the public can make informed comment.
   Failure to make these studies available casts doubt on the credibility of the plan, leaving it open to accusations of decisions being made to suit the circumstances.
- There is no Strategic Market Housing Assessment for the whole of Dorset. One has been commissioned, but will not be available until after the close of the consultation.
- There was no transport evidence base to support the consultation. According to the Council this was still being developed at that time. This means that there is no traffic modelling to underpin either a transport strategy or a credible spatial strategy.
- Up-to-date information on flooding, protection of ground water sources, sewage disposal capacity and other essential services must be provided by the Council.

### **Dorchester Town Council**

• The approach of preparing the plan and subsequently gathering evidence in the hope that it will justify the result is a high-risk strategy, with implications on soundness and deliverability.

### **Stinsford Parish Council**

- The background papers published as part of the consultation often rely on older material for their evidence source.
- SHLAA not clear what other sites were objected.
- More evidence needed to justify why Dorchester must grow so dramatically.

### Save the Area North of Dorchester (STAND)

 Various pieces of evidence and studies are missing including: a detailed Landscape Visual Assessment; evidence to demonstrate viability and credibility; evidence to support the deliverability of the projected housing completion rate; an infrastructure Delivery Plan; measures to ensure that 35% of the homes to be constructed will be affordable; a masterplan, or even a framework for such a plan; any prerequisites for the development, in particular providing for planning obligations and legal agreements; a movement strategy, in particular clarity concerning the exact route and nature of the proposed 'link road'.

- The policy is based on outdated evidence, dubious and incomplete data and guesswork. Information relating to Dorchester is based on desk top analysis and local knowledge is absent. Also, some evidence is based on out-of-date information or contains factual errors (e.g., the LUC 2021 Heritage Impact Assessment).
- Background papers and documents are missing, including: a masterplan (together with a list of any pre-requisites to development for the site); a detailed landscape visual assessment; hydrology reports; a transport strategy; an infrastructure delivery plan; measures to ensure that affordable housing is delivered; a viability report; a deliverability report for the site (to also provide evidence to support the predicted housing completion rate); and an assessment of the alternative sites for development in the Dorchester area.
- A high-level Equalities Impact Assessment should have been done to inform the Council's views on the proposal.
- There is no information provided on the prerequisites for a S106 Agreement.

- The previous SHLAA appraisal excluded the site north of Dorchester. No justification has been provided for how this view has been reversed. A report is needed to justify this change in position.
- All required studies should be carried out as soon as possible and then published on the Council's website as soon as completed. Interested parties should also be informed of their publication by e-mail.
- The consultation should be postponed until all the essential, up-to-date background information can be provided.
- Concern that a masterplan has been started without required studies, assessments, reports, and research.

### Government policy / housing numbers

### Stinsford Parish Council

• The government's targets for Dorset are based on over-optimistic growth estimates at the local and national level.

### Save the Area North of Dorchester (STAND)

- The proposal is conceived to meet the national housing target for the County rather than providing housing county-wide where it is really required.
- There is a lack of justification for the proposed housing number.

- I object to the quantity of houses proposed in the DOR 13 area.
- This beautiful area will be ruined by the Government. North Dorchester has been selected as the easy option simply to meet the Government's inflated national housing targets.
- There is a failure of Government to be held accountable. The validity of Government-set targets has been called into question by members of its own back bench.
- The number of homes proposed is not based on any analysis. It is development for its own sake to satisfy a numerical requirement concocted by central Government.
- The case has not been made for increased housing in central Dorset on the scale proposed. There is no real justification that Dorchester needs all these properties. Dorset Council has just accepted, without any proper challenge, the Government's flawed algorithm for calculating how many properties to build in Dorset and it is easy to put a good 10% of these onto this land.
- The need for 4,000 homes is not proven as the Government figures for housing need in Dorset are over-inflated by up to 50%, according to the CPRE. The addition of 4,000 houses at Dorchester is clearly to meet Government housing targets and not to meet local housing need.
- An increase in the native population of about 3,000 people over the next 15 years is expected.
- The number of homes awaiting construction could be increased to accommodate an additional 3,900 homes in the timescale of the local plan.
- We need a much smaller number of new build homes in the area but not on this site.
- The Government does not know how much and what sort of housing is needed in the area. The proposals are unrelated to local needs and have no regard to what is right for Dorchester.
- The Government's approach is completely flawed as it tells local people how many houses we need based on years' old projections. The plan is the result of unimaginative, bureaucratic pandering to outdated Government targets (and the 'standard method'), which do not recognise that the Covid pandemic has changed the way people live.

- Local people should decide how many houses we need to build. Decisions should not be imposed by people who do not live or work here. Local knowledge and expertise should be used to develop a better response to Government demand.
- Government housing targets should be challenged as too many houses are going to be built around Dorchester, given the constraints in the area. A case for reduced housing numbers should be made in view of exceptional local circumstances, such as the extent of the AONB, Jurassic Coast and other designated areas.
- Housing numbers for Dorchester should be reworked from a post-Covid position and in the wake of Brexit.
- The Council should wait until all current developments are completed before assessing the number and types of houses needed.
- The Local Plan does not provide the housing needed for less wealthy Dorset people as it is underpinned by inflated central Government housing targets which primarily cater for the interests of developers and wealthy outsiders.
- There has been insufficient regard to neighbourhood plans contributing housing.

### Conflict with Government policy

### Dorchester Civic Society

- The draft Local Plan is unsound as it does not have regard to the National Planning Policy Framework (NPPF), in particular: the requirement for plans to be backed by relevant and up-todate evidence; the need to demonstrate how a plan has addressed relevant economic, social and environmental objectives; and the need to avoid significant adverse impacts on these objectives and, wherever possible, to pursue alternative options which reduce or eliminate such impacts.
- The plan is unsound by reason of: its failure to be justified by an appropriate strategy based on
  proportionate evidence and taking into account reasonable alternatives [NPPF, para 35b]; its
  failure to test the viability of proposals, including required standards for affordable housing, and
  transport and other infrastructure needs [NPPF, para 34]; its failure adequately to consider
  transport issues [NPPF, para 102]; its failure to provide clear and convincing justification for
  harm to heritage assets including conservation areas, protected landscapes and scheduled
  monuments [NPPF, para 193]; and its failure to underpin and justify all policies with relevant and
  up-to-date evidence [NPPF, para 31]. All of the above are required by the NPPF. They are not
  optional.

- The policy conflicts with the NPPF and with sustainability objectives.
- The impending climate crisis should be the number one priority for all Governments.
- This local building plan conflicts with the recent environmental plan from central Government. The proposed allocation is contrary to the 'Green Future' requirement to safeguard 'natural beauty as part of our green future'.
- Recent policy change from the Government now recognise that building should focus more on existing urban locations.
- The Council is using out-of-date Government guidelines. The proposal should be delayed until new national housing policy is drawn up.
- This development is superfluous to Government requirements.

### Duty to Co-operate

### Stinsford Parish Council

• The Dorset County area was instructed by government to plan for 30,000 new dwellings. This rose to 39,000 as a result of overspill from Bournemouth, Christchurch and Poole under the 'Duty to Co-operate'. Due to environmental constraints, use the DtC to pass on housing requirement to Wiltshire and Somerset. This could be justified because of existing road and rail infrastructure to London and in many places limited or no environmental constraints.

### **Dorchester Civic Society**

- The plan is deficient in its lack of a 'statement of common ground' with BCP which demonstrates that effective joint working on cross boundary strategic matters has been dealt with.
- It is not clear why 8,800 homes in excess of the standard methodology requirement for Dorset are being proposed. It could be to meet unmet need from the BCP conurbation, or to compensate for the failure of a major allocation, such as DOR13, to come forward.

### **Development not needed**

- The development is not needed as the ONS 2018 report says that population growth has been overestimated by 25%.
- Allowing a massive development in this area is unnecessary. There is plenty of housing in the UK in many cities up north.
- There is no proven need for the development, especially since the housing provisions in the draft Local Plan are far greater than the level for housing in Dorset set by the national formula.
- There is an oversupply of housing in the area and the need is already being met by existing developments. A new development of 4,000 houses is not needed as there are always houses for sale and Poundbury is not selling.
- There is no need for 4,000 homes to meet the needs of Dorchester workers and / or young professionals in the local area.
- There is a lack of need for housing and employment land around Dorchester, which should be reviewed in the light of changes to working patterns and the decline of town centres since Covid-19. People may no longer want or need to live close to work or be able to purchase property for some time following the pandemic. The housing figures for the Dorchester area should be reviewed to reflect the new situation, including working from home.
- There is no need, other than laziness and greed, to try to hit central Government housing targets by lumping them all into one location. The level of need must be questioned following the financial fallout of the Covid-19 pandemic.
- The level of growth proposed goes beyond what Dorchester needs to remain a viable community. This area does not need more housing, which outprices local needs. Poundbury is getting bigger and that is enough.
- Dorchester should not have to make up for insufficient houses being built towards the east of the County. The shortfall in provision should not be made in an area adjoining an AONB.
- Dorchester has already seen growth in the last 20 years and sites like the old prison are proposed for more housing.
- Recent growth at Poundbury and Brewery Square, which have increased the population by 6,000, should be taken into account. Another 4,000 new homes is a very large addition.
- The true need is only 50% of the proposed figure, about 400 homes.

- There is already Poundbury, dwarfing our historic market town, dominating views with its neverending growth, plastic architecture and poor build quality.
- The only real need for housing is for homeless families and those who cannot afford 'affordable' dwellings. The housing 'market' is fuelled by taxpayers whose £26 billion goes to landlords via Housing Benefit.
- The Council should prioritise meeting local need, rather than developers' needs.

### Development of no benefit locally

#### **Public response**

- The development will bring no benefits to the local area / to those for whom Dorchester is home. It would fail to deliver a sense of place or a vibrant community.
- Building on this site serves little purpose for the local area, as like Poundbury there are no jobs, there is insufficient provision for local people, and it is not affordable for the lowest earners or young people. The apartments and houses at Poundbury are not selling.
- Development could have an impact on social inequality by exacerbating the limited opportunities for young people living and working in the area. It is not clear how planning will tackle the increase in income and wealth inequalities, which is contributing to poverty, distress, instability and a lack of social mobility, particularly for some groups in society.
- DOR13 will not satisfy the overriding need for people living, or wanting to live, in the villages.
- Forcing the prices of properties out of reach of normal people will continue to usher in the neofeudalism of our time and will coerce people to work in jobs that do not directly ensure their subsistence.

### Lack of local support

### Public response

- There is huge opposition to this proposed development, including from organisations including STAND. It is not wanted by the people of Dorchester and Dorset. The majority are against it and we all wish to preserve Dorchester.
- The council is out of touch with what the citizens of Dorchester want. There is no trust in local people as our views have not been listened too. I do not know of any local people who are positive about this plan.
- The needs and views of local people should be taken into consideration. The Council should listen to residents and not wealthy landowners and property developers.
- The development is not supported by local MP Chris Loder.
- The development is not supported by Dorchester Town Council or local parish councils. I support the comments on the Local Plan made by Dorchester Town Council and by Stinsford Parish Council.
- Several local and national organisations, including Dorchester Civic Society, are against this development. I support the comments made on the Local Plan by Dorchester Civic Society, in particular, their conclusions on the unsound nature of the proposal.
- South Walks House offices was built against our will, and we do not need another costly mistake.

### Past / existing developments (including Poundbury)

### Public response

• Dorchester has been disadvantaged from the 1970s county boundary reorganisation when it was effectively taken over by Poole / Bournemouth.

- The County is already covered in developments at Weymouth, Preston, Littlemoor, Chickerell and Nottington and this part of Dorset has seen much development in the past. Thousands of new homes have already been built in the area and enough is enough.
- Dorchester has borne more than its fair share of development in the last 60 years. In the last decade, it has contributed Poundbury and Charlton Down.
- The Council has reneged on a promise it made 10 years ago that Poundbury would be the limit of development.
- There are many failed developments locally. The Brewery Square development has not been a huge success for a variety of reasons.
- Poundbury is still growing, Charminster Farm is being developed and Charlton Down is another large housing estate with more second homes.
- Dorchester has already grown massively thanks to Prince Charles's shambolic site. Poundbury has been allowed to sprawl and has become like a mini-London on the doorstep of a small rural town. When viewed from Maiden Castle it is an unsightly carbuncle.
- Poundbury is a monstrous development and was only allowed because Prince Charles is involved. Any other developer would not be given planning permission.
- Poundbury has drawn in property investors and second home buyers, pushing up house prices beyond the reach of many local people.
- Poundbury is very separate and contributes little to the town. It is an island community and residents do not consider themselves to be part of the wider town.
- Poundbury draws away from and already puts a strain on the town. It lacks infrastructure and did not help Dorchester to get infrastructure either.
- Poundbury is out of scale with Dorchester dominating the town commercially and demographically. More time is needed to complete the integration of that development.
- Poundbury has impacted on the aesthetic of the town with no increase in services and Poundbury homes are unaffordable to local people. It has not helped to restore the balance between people working and living in Dorchester.
- A proposed wind turbine development on the DOR13 site was also found to be inappropriate due to the harm to nearby residents.

### Lack of strategy / development not thought through

### Dorchester Civic Society

- There is no effective Dorset-wide spatial and transport strategy.
- For Central Dorset and the Dorchester catchment area, there is no effective spatial strategy and an absence of a transport strategy.
- Central Dorset lies within the Western Gateway which sets out regional transport proposals which have been endorsed by Dorset Council. The draft plan has no connection with the published Western Gateway Sub-national Body's proposals, as there is no transport strategy.
- There is no sub-area strategy for the Dorchester catchment area against which to examine alternative strategies for the distribution of residential development, which could include an alternative location for major development, or a concept based on the modest expansion of smaller settlements along transport corridors and within towns themselves.
- There is no recognition of the complementary nature of Dorchester and Weymouth as a housing and employment unit. As Weymouth has 'excess' housing and Dorchester has 'excess' employment, one obvious solution would be to improve transport and connectivity between the two. Hence the urgent need for a local sustainable transport strategy.

- 3,500 houses at Dorchester would only cut commuters into Dorchester from 7,000 to 5,000, highlighting the need for traffic / transport data to understand commuting patterns and to encourage more sustainable means of transport.
- Paragraphs 2.6.40 and 2.6.41 simply invite landowners and developers to put forward proposals for new settlements for consideration at some future date. A strategic assessment of the most appropriate locations for new settlements should form part of the overall spatial and transport strategy.

### **Dorchester Town Council**

• It is not clear why DOR13 has been promoted to the exclusion of almost every other suitable site in Dorset.

### **Public response**

- There is no strategic vision / spatial strategy for the Dorchester area (or for the Council area as a whole) and many options have not been explored. There needs to be a clear, progressive, sustainable vision.
- It is not clear why Dorchester has been selected for growth as part of the spatial strategy.
- It is a lazy solution to a complex problem. It is an unimaginative, tired concept which does not reflect the future. It would be just a sterile area of bleak housing estates.
- The Council has opted for a 'quick fix' and has not planned for a 'need-led' development. The site has only been identified because the farmers are willing to sell.
- The proposals do not consider the relationship between Dorchester and Weymouth.
- This project is flawed in concept and has not been properly thought through. No consideration
  has been given to the negative impact this sprawling mass of brick and concrete is likely to have.
  We need to learn from past mistakes and to listen to expert predictions about population, family
  size, well-being, and climate change.
- What is needed for Dorchester is a proper strategic plan covering the whole town and surrounding area, linking any real housing needs with jobs, infrastructure, transport, open spaces, nature, environment, green jobs, green energy, net zero carbon target and forward-thinking vision for the town centre.
- Better to have coordinated strategy for Dorset and south Somerset.

# 2.2. Impacts on communities

### Impact on the local community in Dorchester and surrounding villages

- Dorchester is a larger, historic town, which is not too built up. It is an amazing and lovely community town, where the countryside is an integral part of its identity. The development would change the nature of Dorchester as an ancient market town, and it would lose much of its identity.
- We should protect Dorchester as a small town and Dorset Council should have the beautification and regeneration of its county town as its top priority. Other towns are being protected from over development at the expense of Dorchester.
- The proposed development would be detrimental and would have a huge negative and irreversible effect on Dorchester. It would: change its character; threaten its structure; fracture its heart; decimate the current atmosphere; ruin the attraction; and harm the natural flow of the

town. It would suffocate and destroy the face of Dorchester and change the dynamic of the town, making the town and county an undesirable place to inhabit.

- The policy fails to set out how the impacts of rapid, large-scale growth on Dorchester will be mitigated.
- Development would impact on the lifestyle of existing residents, severely damage the amenity value of the area (including the amenity of existing residents at the edge of the town), and impact on the amenity of neighbours. Too much growth too quickly at this small county town will result in the unwelcome disruption of people's lives.
- The development is not fair on Dorchester residents, as the needs of Dorchester itself have not been considered. It does not have the capacity to absorb the stated percentage of the Government's housing target for Dorset.
- DOR13 would be a separate entity and community, like Charlton Down and Poundbury, not part of Dorchester. It will be a dormitory for the rest of the County, as it is served by A35 and A37. As it will have its own amenities including first, middle and upper schools, Dorchester amenities will not be used by DOR13 residents.
- The site is neither part of Dorchester nor a settlement in its own right.
- North Dorchester would be a new town and another town attached to Dorchester will not enhance its attractiveness. Another large development would be too much, and we would be barricaded in by all this development.
- Development would put pressure on the local community, as the new residents at North Dorchester (as well as those at Poundbury) would be difficult to assimilate. They will change the social structure of the area and will not integrate giving rise to many social consequences, including increased anti-social behaviour.
- Dorchester is one of the top places in terms of quality of life and the happiness of residents. More people crammed in will mean more unhappy people.
- The new development will be emotionally sterile as it will be a large centre that has not evolved organically.
- Too many people with not enough facilities will result in unrest.
- Dorchester will become a ghetto for poor health for children, substance misuse and crime.
- The development will fuel depression, drug, alcohol and suicide rates in the future.
- There will be an impact on surrounding villages from increased population and traffic, including bicycles.
- There will be a negative impact on Dorset villages, as there is no plan to improve their viability through the provision of additional homes. North Dorchester will stretch resources and may accelerate the abandonment of rural communities, resulting in dozens of abandoned hamlets and villages. The settlement hierarchy should be re-evaluated.
- Concern with overcrowding of the town.
- Antisocial behaviour will increase.

### Impact on the character of Dorchester

### Chris Loder MP

• The development would irreversibly change the character of the area.

### **Dorchester Civic Society**

- DOR13 would result in significant and irreversible damage to the town's environment.
- We object to the proposal because of demonstrable harm to the setting of Dorchester. Views from the town out towards the DOR13 site would be harmed. The development would intrude

into the timeless iconic townscape of the distinctive northern edge of Dorchester, which would be seriously harmed by DOR13.

### **Dorchester Town Council**

• The scale and mass of the development will change the character of Dorchester and its wider setting. The scale of the development guarantees that DOR13 will make a historic, step change, impact on Dorchester.

### Public response

- Dorchester is a small country town in keeping with its landscape, history and culture, which will be changed beyond recognition with another 4,000 homes as the scale of housing is out of proportion for a historic small town. The development site contributes to the character of Dorchester and the wellbeing of its inhabitants. The town cannot take 35% extra population without harming its character.
- Development will add even more pressure on Dorchester, which would lose its integrity as a town. It will no longer be a relatively small, quiet historic town with old-world charm and a rural feel. It will become another mediocre urban conurbation.
- The development will destroy the relationship between Dorchester and its historic and natural environment. The proposal will destroy the historic setting of the town, as the link between the town centre and open countryside will be lost. The entrance to Dorchester is magical, coming upon it through fields, and should be highly valued and preserved.
- It will change Dorchester from a beautiful and ancient rural town to a modern jungle of suburbia.
- Dorchester's southern and western flanks have already been significantly altered by development. Development to the north will complete the destruction of the town's setting.
- Development would overwhelm the amenity of Dorchester and result in the loss of its historic atmosphere and local distinctiveness. Development risks unbalancing the town.
- There has not been enough research into the impact on Dorchester.
- Concern with the separation of the town into 3 non harmonious parts :- Dorchester; Poundbury and 'the new town'.
- Concern that development will be in competition with the old atmospheric roman town.
- Dorchester shouldn't become outlying village attached to another development.
- Suggestion that Dorchester is subsumed as it is and cannot sustain yet more housing.
- Dorchester's charm could be affected by loss of town river walk and High Street's distinctive skyline.
- Impact on the peace and tranquillity of the area.

### Impact on Charminster

### **Charminster Parish Council**

• Residents of Charminster are keen to remain a village and do not want to become an extension of Dorchester.

### Public response

• Charminster has grown by 100% with the Charminster Farm development with no community infrastructure to support it. Further development at North Dorchester will cause Charminster to lose its identity and end its character as a village. It will upset the balance of village life.

- There will be a negative impact as creeping urbanisation will encroach upon Charminster and / or will cause coalescence between Charminster and the proposed development.
- Development would impact on the separation of Charminster. It would join Charminster and Stinsford to Dorchester.
- Charminster should not be incorporated into Dorchester. The landscape is important in separating and defining the boundaries of different communities, such as Dorchester and Charminster.
- If North Dorchester goes ahead there will be pressure to join up with the Old Sherborne Road, north of the Sun Inn to create a complete wall of urban sprawl to the north of the town.
- The proposed development of the Strawberry Field at Charminster would be the thin edge of the wedge to the eventual development of North Dorchester.
- The North Dorchester development is too close to Charminster. The western boundary of the North Dorchester development at Higher Burton Farm is too close to the Charminster village boundary. Just 1.5 fields is an unreasonably narrow separation between the village and the new development.
- Land west of the C12 road should be omitted as it relates more to Charminster and is an area of natural and historic importance.
- Development will impact on the quality of life of existing residents at Charminster and will upset its strong social community.
- Charminster's travel links are poor, but the Local Plan has no detail on providing appropriate public transport and active travel.
- The Coker's Frome site was rejected for major development in 1980s. Those reasons for refusal have not changed and it remains an important environmentally and historically sensitive landscape.
- Development will impinge on the ruralness of village of Charminster.

### Impact on Stinsford / other villages

### Stinsford Parish Council

- Impact upon Stinsford parish and other neighbouring areas The focus of this policy is entirely how it relates to Dorchester; there is no recognition of the likely impact on the rest of Stinsford parish and other neighbouring areas such as Charminster, Crossways and Puddletown.
- Increasing pressure on the A35 will result in further use of the mainly single-track rural roads through these areas being used as 'rat runs'.
- There is also a cumulative impact upon Dorchester as the primary hub for facilities and amenities. GP practices and schools will be under pressure.
- There will also be an increase in noise and light pollution from such a significant development placed in a rural landscape and the consequent traffic movement impacting the disparate properties and hamlets which comprise Stinsford parish.

- The development will impact on the amenity of Stinsford residents.
- There will be impacts on villages to the north and east of the development site.

### Impact on Frome Whitfield

### Frome Whitfield Residents

- We collectively oppose any development within the hamlet of Frome Whitfield, which will be destroyed and swallowed up by a massive urban extension.
- Frome Whitfield is a special mix of residential and agricultural uses comprising dwellings scattered along lanes, enclosed by agricultural land and the watermeadows with the historic Frome House at its core.
- The hamlet is beautiful and tranquil and well used by horse riders, ramblers, dog walkers, tourists and Dorchester residents. There are scenic walks across the fields from Frome Whitfield to Cokers Frome and the Blue Bridge is an important local landmark where children gather to play in the shallow river.
- The hamlet has a unique history and archaeology centred around the old Manor House (now Frome House) and farm. It was occupied by Lord Denzil Holles, MP for Dorchester and the historically important Henning family (Sherlock Henning and Thomas Hardy were magistrates together). The old St Nicholas Church that once served the local community is archaeologically significant and the fields are laid out to the Saxon patterns of the Medieval period.
- Some dwellings (Yalbury House, Park and Lodge) are named after local connections to Thomas Hardy novels. 'Yalbury Wood' is thought to be based on Yellowham Wood in Bockhampton and Tess of the d'Urbervilles worked in the Frome valley meadows.
- It is vital to protect land either side of Lovers Lane from development as it: is used for recreation by locals and tourists; passes several impressive trees that create a feeling of tranquillity and natural beauty; provides an unspoilt link into the agricultural landscape north of Dorchester; and features in Thomas Hardy novels.
- The lane between Frome Whitfield and Dorchester, which leads to Lovers Lane, is part of the Frome Valley Walk passing historic Hangman's Cottage.
- Frome Whitfield has many beautiful and ancient trees, including trees in fields between Frome House and Yalbury Park / Cokers Frome Lane, which historically formed part of Frome Whitfield Manor parkland and gardens. There is a scenic wooded effect with near and distant views of mature trees from all dwellings within the hamlet.

### Impact on the existing Travelling Showpeople site

### Public response

- There are concerns about the impacts of the DOR13 development on the existing Travelling Showpeople site.
- The existing Travelling Showpeople site will need to be retained within the development or relocated through the provision of reasonable and suitable alternative arrangements that meet the needs of the current occupants.
- The owners / occupiers of the existing Travelling Showpeople site have no desire to move or to be relocated.
- The existing Travelling Showpeople site should be excluded from the allocation.

### Impact on the County Showground

### Public response

• The DOR13 site should continue to be the site of the Dorchester Show, which is a vital part of Dorset's identity / community / heritage.

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- The County Showground should not be sacrificed to development.
- The development area must be pruned to allow the continued existence of the Dorchester Showground.
- If the development happens, a new venue would have to be sought for the Dorset Showground.

### Impact on Kingston Maurward College

#### **Public response**

- The development will affect Kingston Maurward College as they will lose land they currently farm.
- The development may impact on historic Kingston Maurward causing noise pollution, increased traffic and waste management issues.
- The North Dorchester development will make the Kingston Maurward farming estate unviable.

## 2.3. Masterplanning and Design

### Location of the development

### Charminster Parish Council

• The proposals are already out of date. Working from home is increasing so the need for housing to be located near Dorchester is no longer valid.

#### Public response

- The logic of the location for the development appears sound.
- The development is in the wrong location and should be moved elsewhere. Dorset Council should be looking for alternative sites.
- The need for housing to be located close to Dorchester is no longer valid. The approach in the draft Local Plan takes no account of the post-Covid world.
- It is the wrong place to enlarge Dorchester. The lack of connection between this site and the town centre would increase traffic and parking problems in the town.
- Even with road improvements land north of Dorchester is not the most logical site as it would: degrade the countryside; spoil the view; do nothing to help the traffic flow; create another conurbation with increased traffic and infrastructure requirements; separate an already disparate town; and dwarf Charminster.
- The location of the proposed development is unsuitable as it is on rising ground in the open countryside.
- Too many houses together will make a strange suburb of Dorchester, rather than developing the town.
- Concern with development coming closer to Charminster and Puddletown.

### Size / scale / density of development

### **Dorchester Civic Society**

• DOR13 would increase the town's population by around 35% over a 15 – 20-year period.

#### Public response

• I would support a smaller development, but not a development of this scale. Development should be significantly scaled down to reduce impacts.

- I am concerned about the magnitude of this proposed development. Dorchester has already grown out of all proportion with Poundbury which has increased the population by 25%. The site is unsuitable for the scale of development proposed.
- The need for additional housing in Dorchester is not of the scale proposed. The development is disproportionately large and will turn into a town, like Poundbury, which was supposed to be a village. Poundbury plus North Dorchester would overwhelm the town and turn the area into another Bournemouth / Poole metropolis.
- This is a development nightmare of disproportionate scale, going well beyond what Dorchester itself needs. 61% of the required housing allocation for the whole of the district would go to Dorchester, which is far higher than for other towns. Too many houses are being proposed in too small an area.
- The case has not been made for the siting of a development on this scale to the north of Dorchester.
- The development is too big for a rural county. It is completely out of proportion as it would double the size of the county town.
- It is overdevelopment because Dorchester would get 10% of the overall housing target for Dorset.
- DOR13 would house around 10,000 people, increasing the population of Dorchester (currently 21,000) by nearly 50%.
- 4,000 homes north of Dorchester will swell the population of the town by 35%, which will be too much for the town to cope with.
- 3,500 homes at Dorchester is over the top. The development will be 25% bigger than Poundbury.
- The scale of the allocation north of Dorchester appears to be much bigger than is needed for 3,500 homes, when compared with Poundbury.
- The number of houses is not conducive to the future of Dorchester. It will be a large town with nothing but housing.
- Even at 50% of the proposed plan it would be a disaster.
- The quantum of development should be reduced to 1,500 homes.
- The level of new housing should be scaled back to more manageable levels (i.e., 1,000 homes).
- The north Dorchester scheme is too big by a factor of ten. It only needs to take a proportion of those currently needing a home, say about 400.
- 200-400 houses would be more appropriate.
- The development should be scaled down to allow it to become part of the Dorchester community and to preserve the countryside.
- Dorset Council should acquire the development rights from Persimmon, so that a smaller number of homes could be integrated into a wider plan for the countryside of the area.
- The scale of the development should be minimised, with built development only in the northeastern part of the proposed allocation.
- The Council should focus on allocating a smaller scheme beside the A35.
- Suggestion that 1000 homes in the style of Poundbury, with plenty of social housing, could be acceptable.

### Urban sprawl

### Public response

• North of Dorchester has already become a sprawl as you can see Poundbury and Charlton Down.

- The development will be a huge urban sprawling mass, hitherto unseen in this area. DOR 13 would be a vast soulless urban sprawl with no unique character conspicuously separate from the town.
- The compact nature of Dorchester will be destroyed by urban sprawl.
- Development will turn Dorchester into another faceless, charmless sprawl of vapid housing and bland, boring suburbia.
- This development would effectively join Dorchester to the neighbouring village of Charminster.
- Dorchester, Poundbury, Charminster and Charlton Down will all merge into a huge urban sprawl.
- The northern boundary of the allocation is fluid and as neighbouring landowners are willing to sell, the development will sprawl further north towards Waterston Ridge.

### Timing of the development

### **Dorchester Civic Society**

• The Council has compromised the opportunity to prepare a comprehensive spatial and transport strategy by choosing an adoption date of 2023 rather than the Government target of 2024. The additional 12 months could be used to produce a plan that is technically sound and backed by up-to-date evidence.

### **Public response**

- The development is being proposed at the wrong time. We should finish building Poundbury before adding such a large number of houses.
- It should be put on hold for another 30 years, as by then the Government algorithm that predicts housing need may well have been found to be faulty.
- Given the Covid-19 pandemic now is not the time to be planning 4,000+ houses north of Dorchester. The Council should consider the impact of Covid and the responses from communities before bringing this development forward.
- With the closure of many shops in the town and with empty flats and rooms in the centre of South, Trinity and High Streets, this is not an appropriate time to be exploring such a massive development.
- If the whole time available to create the Local Plan (i.e., an additional year from 2023 to 2024) was used, central Government policy may well have changed to reflect the current situation.

### Garden communities

### **Dorchester Town Council**

• In relation to other Garden Community proposals, planning inspectors have commented on the importance of demonstrating deliverability and the need to deliver the necessary infrastructure. A recent (December 2020) examination of the North Essex Garden Communities deemed the proposals to be undeliverable due to an inability to achieve a viable land price, and a failure to demonstrate that the necessary public transport connections were capable of being provided.

- The Garden Village approach with extensive tree planting to soften the visual impact and improve residents' well-being is supported.
- It is premature to say that the new development will have 'garden community qualities' as there is no evidence in the draft plan as to what these are, how they will be delivered and how they will be maintained.

- The garden village will be developer-led. Garden Village principles cannot be achieved at North Dorchester.
- Other Garden Cities / Towns are soulless and forgettable. The assertion that it will go ahead because Oliver Letwin (former West Dorset MP) got it written into the Government's Garden Communities Programme through the back door and against the wishes of Dorset people simply won't wash.
- This development is neither an urban extension of Dorchester, nor a Garden Village.
- A development of this size will be a village in itself, not an extension to Dorchester as it will have no obvious links.
- 4,000 houses in one area will not create a functioning community.
- Garden villages in other parts of the country are uneconomic.
- It is unclear how Garden Community bid funding (£150K awarded by MHCLG in 2019) has been spent.

### Need for master planning

### **Dorchester Civic Society**

- The Council has failed to progress work on developing a masterplan for the DOR13 site.
- No framework is presented for the preparation of a masterplan for the DOR13 site. No
  prerequisites for development are established, including the basis for all planning obligations
  and legal agreements. The parameters and prerequisites for a masterplan must be set out in the
  plan. Masterplanning has taken a backwards step and there is a threat of an 'anywhere' urban
  sprawl of housing devoid of local character and necessary infrastructure.
- We believe that the Local Plan cannot proceed to the submission stage before an adequate masterplan for DOR13 has been prepared and the public have been fully consulted. The masterplan must sit alongside the adopted Local Plan and have the status of Supplementary Planning Guidance. The issue is discussed in greater detail in a position statement appended to Dorchester Civic Society's submission, raising concerns about a wide range of issues including: the indicative layout of the development, as shown in West Dorset and Weymouth & Portland Councils preferred options consultation document from August 2018; potential impacts on heritage (as discussed in the Council's Heritage Impact Assessment); the role, function and impacts of the proposed northern link road; and the difficulties in providing links between the DOR13 site and Dorchester.

### North Dorchester Consortium (NDC)

• NDC supports the proposed masterplanning exercise for North Dorchester and has already put forward much evidence to support this process.

### Salisbury Diocesan Board of Finance

• The Council's proactive approach, including in respect of the proposed masterplan are fully supported.

- Allocating the site in this Local Plan should ensure the preparation of a Dorset Council, rather than developer, led masterplan in good time to ensure the necessary employment, education sites etc. are provided where required, with an acceptable northern link road.
- A masterplan should be progressed alongside the local plan.

- When the viability and deliverability of the site become certain then the Council should start developing a masterplan for the site. A community engagement strategy should be developed and implemented while progressing the masterplan. Communities and stakeholders should be involved in the masterplanning of the site. A sense of place and a sense of community is needed.
- There is no masterplan or strategy to deal with infrastructure and layout. There should be a responsive masterplan to take real ownership of what is required.
- There is no clarity as to what the prerequisites for the masterplan are.
- Supplementary information provided by Dorset Council on the 'Governance of the (DOR13) Masterplan' gives little indication of: the decision-making process regarding the production and evolution of the masterplan; how the public will be involved in the plan design and adoption processes; who effectively 'owns' and is 'responsible' for delivering the masterplan; transparency of the governance of the masterplan; and who will be accountable for failures to deliver all the elements of the masterplan within the stated timetable.
- Masterplanning should have been undertaken prior to the proposed allocation of the site.
- There is no indication of how increasing Dorchester's population by a third would be integrated into the town and with services.
- Concern with who will be responsible for setting up the masterplan, ensuring it is adhered to, level of consultation, and payment for the work involved.
- A community engagement strategy should be developed and implemented while progressing the master plan.

### Design

### North Dorchester Consortium (NDC)

- NDC has examined local building traditions, styles and placemaking principles by looking at the
  patterns of streets, squares and other areas in and around Dorchester. NDC's design work
  suggests that different zones within the new development could reflect the character of
  different places locally ranging from higher density at the centre to lower densities at the edges.
  NDC suggest that this design work could feed into the masterplanning process.
- NDC propose to produce an overall North Dorchester design code to define the different character areas of the Garden Community, with more detailed codes for each neighbourhood. NDC state that these codes would be produced in consultation with the Council and the community.

- The development would be another carbuncle.
- There is a lack of clarity about design expectations. The development lacks a design vision and there is no guarantee that proposal will be thoughtfully and sympathetically designed.
- DOR13 should aim to achieve a positive sense of place and should refer to the NPPF policies on good design, National Design Guidance and the Garden Communities toolkit.
- There is a lack of understanding in the policy of the context, history, and cultural characteristics of the site.
- The density of development is too high, resulting in overcrowding. There is a concern that tiny, 'box' like houses will be built.
- The development will not take account of the town it is connected to in terms of appearance. The homes would not fit in with the local vernacular.
- Development on the DOR13 site would destroy three existing homes.

- New homes are not usually built sustainably or to carbon neutral standards. Future housing should be built to Passivhaus standards / should have solar panels on every roof.
- Minimum quality standards should be mandated (e.g., BREEAM HQM).
- Each home should be provided with sufficient ground to grow food.
- The development will involve working with poor quality builders. The homes will be built quickly and cheaply which ultimately completely defeats the point.
- The proposed transport infrastructure links within the site have not been considered to an appropriate level.
- Large building firms do not have an understanding of the special place where they will be building. You must open this project to local building firms and artisans.
- Concern with the reputation of the housebuilder in terms of standards.
- This will present huge challenges in urban design, how to integrate the two areas.

## 2.4. Alternative options

### Alternatives not considered

#### **Dorchester Civic Society**

 Dorset Council should have taken a more strategic approach to examine alternative development scenarios on a Council-wide basis, before opting for DOR13, which is an option that dates back to the mid-1980s. It was rejected in favour of Poundbury at that time and rejected again in the latter 2000s as being unviable.

#### Public response

- We need more intelligent housing solutions, not this. Plenty of other solutions and locations are available that could be developed more sympathetically and intelligently.
- No other sites in the wider area have been considered to see if they would be more sustainable. Other areas should be considered for growth. There is no evidence that this is the best site option in terms of climate, safety and the economy.
- The plan provides no substantive new evidence to suggest why it was accepted as a preferred option.
- The Council should first consider all other options, including brownfield land. Every possible alternative needs to be considered and all potential properties should be assessed.
- We need to build upwards, vertically, with sustainable materials and to prepare the surrounding land to sustain, to a significant degree, our local population.

### Use brownfield sites instead

### Save the Area North of Dorchester (STAND)

• Dorchester's genuine needs should be met by using brownfield sites within the existing urban area, and in retail premises being made redundant by the growth of internet shopping.

### West Dorset Conservative Association

• There is a failure to emphasise the use of brownfield sites and the re-purposing of existing buildings to minimise greenfield development. There are opportunities to do this with changes in demand for retail and commercial space in town centres.
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- The focus should be on infill development in town and local villages.
- The decay of towns needs to be addressed before building on green fields. Towns already have the essential infrastructure to enable quick, environmentally friendly development, even if town centres may be more difficult to re-design.
- Brownfield sites and former retail sites in Dorchester and Weymouth should be developed or repurposed first. A considerable portion of the housing need could be met by re-purposing redundant retail units, including shopping centres.
- Many retail outlets are being converted to residential without sufficient parking provision and this needs resolving.
- The Council should regenerate Dorchester itself as a community. The focus should be on regenerating Dorchester town centre with imaginative projects to blend residential and business opportunities.
- There are plenty of potential brownfield sites in Dorchester including the former prison, County Hall offices, the former tennis courts, industrial estates and empty buildings in Dorchester Town Centre. Modern high-quality eco-housing should replace old buildings that are not fit for purpose to negate the need to build on greenfield land.
- There is a need for appropriately priced housing on brownfield sites and / or for affordable homes for singles, small families, and older citizens to reinvigorate the town.
- South Walks House, Dorchester Prison and unused shops could be demolished and rebuilt as modern energy efficient Council owned and rented housing.
- The South Walks House offices should be used for social housing / affordable flats for young families or converted into flats.
- Dorchester Prison and much of the County Hall site should be joined to make a site ripe for mixed development, which would meet a considerable portion of the local housing need.
- The Council should allow the change of use of accommodation over shops and allow offices to become residential, especially in view of the dramatic decline in shopping since the pandemic, which would help to regenerate the town and save greenfield sites.
- Charles Street should be used to accommodate residents on the Housing Register.
- The empty builder's yard on the corner of Maumbury Road and Damers Road should be built on.
- Sites in Dorchester that are owned by the Army would be better than a satellite town north of the floodplain.
- A considerable portion of the housing need could be met by the re-development of town centre car parks and other internal combustion vehicle infrastructure when these facilities become redundant.
- Small numbers of affordable homes should be built on brownfield sites within the boundaries Dorchester so that local communities can buy houses at affordable prices.
- Only homes within walking distance of the town centre should be permitted.
- The Council should assess the availability of brownfield sites within Dorchester and other settlements, including the Council's own estate and of empty commercial buildings, before any large-scale, development on green space and floodplains takes place.
- The Council should investigate allocating multiple small developments of brownfield sites where there is a demand for affordable housing (i.e., in surrounding villages, Charles Street, Dorchester Prison, MOD land, Church land etc.). A brownfield land inventory is needed.

# Make better use of existing homes / use empty homes instead

### Public response

- Existing housing should be properly utilised for the local population. Every possible alternative needs to be considered, including the conversion of large properties into apartments.
- Every possible alternative needs to be considered, including taking back second homes.
- Empty homes should be used to meet housing needs.
- The estimated 600 empty houses in Dorset should be brought back into use first.

## Build elsewhere at / around Dorchester instead

### Public response

- There should be provision for small-scale housing developments within Dorchester with more focus on the town centre.
- A selection of smaller developments at Dorchester would serve the town more positively.
- There are many alternative sites around Dorchester which have mundane scenery and are of poor agricultural quality.
- Existing sites close to the town should be developed, including the area south of St George's Road up to the railway and Alington Avenue.
- There is plenty of land further north / west along A35 to create a separate development along the lines of Charlton Down, which does not need to be right on Dorchester's doorstep.
- Filling in the space between Charminster and the new development would keep it more compact. The proposals in the Local Plan drag Dorchester too far to the west making the town 5 miles in diameter.
- Develop the area further north as a separate village with all necessary facilities provided.
- Extending Poundbury would be preferable in terms of infrastructure.
- Housing and road access around the east of Dorchester is required.
- Developing land to the south-east of Dorchester would be preferable. The impacts of this development would be worse than the previously rejected Conygar Hill (Came Down) proposal to the south-east of the town.
- It would be better to focus development on the southern A35/A37 fringes.
- The development could be better placed between Dorchester and Weymouth.
- A better plan would be to add a series of smaller developments to the villages around Dorchester.

## Build elsewhere in Dorset instead

### **Charminster Parish Council**

• There are other options for growth. Development in the Crossways area, close to a railway station could bring the facilities Crossways has never had and create a viable thriving settlement in a less sensitive environment.

## **Dorchester Civic Society**

• There is no consideration of alternative patterns of development, including a large-scale allocation (of up to 4,500 homes) at Woodsford on land north of the railway at Crossways. This would be a viable and sustainable alternative to DOR13, which should be part of the discussion of a strategy for delivering housing numbers in the Dorchester catchment area.

## Dorchester Town Council

• The Council should not commit to the North of Dorchester allocation, when work is to be done on potential new settlements across Dorset. Potential locations for new settlements, such as North Woodsford near Crossways, look more sustainable than the proposed allocation.

### Save the Area North of Dorchester (STAND)

• Housing should be spread across the County where it is needed to revitalize dying villages.

- The Council should develop existing communities rather than eroding the identity of Dorchester.
- All the other Dorset towns should have some of the next ten years planned housing development.
- House building should be attached to towns elsewhere in Dorset that have not suffered such huge enlargement as Dorchester.
- Flats should be developed in nearby towns to provide access to jobs and keep cars off the road.
- Smaller sites should be proposed close to employment sites.
- Housing growth should be spread thinly across all communities in Dorset, not dumped in Dorchester or Weymouth.
- Homes should be spread over Dorset where there are needs, not just dumped in one place, which would have an unbalanced number of homes.
- The development needs to be further away from Dorchester to stand on its own with its own identity and infrastructure. Areas around mid-Dorset, which is currently short of significant development, should be investigated.
- With significant transport connections, the Council should focus major development in north Dorset, not north of Dorchester.
- Another site or town should be sought, perhaps Gillingham or Sherborne.
- The surplus homes should go somewhere where they cause the least damage, which would be near Poole and Bournemouth.
- A slightly larger allocation of land in the Weymouth area should be made.
- Why build on green land when there are empty buildings on Portland, which are an eyesore?
- The Council should consider using old gravel workings, especially those near Dorchester.
- Build elsewhere, e.g., Warmwell / Crossways. Crossways has better connections with Dorchester than the DOR13 site. The Council should have considered North Woodsford, near Crossways. Extending Crossways would be preferable in terms of infrastructure.
- Suggestion that Crossways is on much less valuable agricultural land.
- Other sites, such as Holton Heath or Crossways have better connections with Poole/Bournemouth & Dorchester.
- Small towns and villages across Dorset should have smaller numbers built to stimulate their local economies. Strategic proposals to encourage development to revitalize Dorset's rural villages are needed.
- Small-scale development should take place at small towns and villages in the AONB.
- Allocations should be made in Dorset villages with schools to support their school numbers, village facilities, local builders and local trades. There is a strong case for building sustainably in established villages, which has already happened in Charminster with over 100 new homes and a new community at Charlton Down.

- Small developments on the outskirts of villages throughout Dorset would share the impacts on the environment, climate change, local amenities and local people. Villages should grow organically to enable local people to live in affordable housing.
- If necessary, allocate 10 -15 new homes to each rural village and develop brownfield sites in all the main towns.
- Development should be spread across the parishes to help meet affordable housing needs and improve the sustainability of villages. There should be a target for each parish to build 4 dwellings per year, so that 1,000 homes would be built each year without ruining the County whilst also helping to keep local services going.
- A modest number of affordable homes should be built at small towns and villages.
- The Council should build two new houses in every hamlet and village in Dorset instead.
- Small developments should be built in villages in West Dorset.
- The proposed development does not respond to or support the needs of local economies and villages.

# Build outside Dorset instead / other suggested solutions

### Public response

- Dorset should collaborate with neighbouring counties such as Somerset to take some of the housing overload, including from the BCP area.
- Why not add to Poole or Yeovil where added numbers would not have such a significant impact?
- We need to stop having so many children.
- We need to limit immigration.

# 2.5. The Environment & Climate Change

## Environmental damage / sustainability

### **Piddle Valley PC**

• There are concerns over the carbon footprint of the proposed development and over the impacts on the wider environment.

### Stinsford Parish Council

• Concern on environmental impact including that the development won't be zero carbon. The policy should reflect the Climate and Ecological Emergency.

### Save the Area North of Dorchester (STAND)

- The development would not be sustainable due to its environmental impact.
- We are concerned about the impact on the environment at a time when Dorset Council has declared a climate emergency. There is a need to actively prevent harm rather than to rely on untested and inadequate 'mitigations', given the climate emergency.

### West Dorset Conservative Association

• There is no environmental impact assessment.

#### Public response

• Has there been a comprehensive environmental impact assessment? The environmental assessment of the site has been inadequate.

- DOR13 is not a sustainable option in the light of climate change and current approaches to green issues and biodiversity. It does not sufficiently meet sustainability objectives and the carbon impacts of development have not been considered.
- Building 4,000+ houses here would destroy the natural environment and harm the watermeadows and the ancient landscapes to the north. Building on natural assets undermines the point of low impact sustainable development.
- Overdevelopment would be very destructive to the environment. The need to protect future generations from climate change risks, must override short-term profits arising from unwanted development.
- Developing more real estate and cutting down more trees will: speed up global warming; expand the Sahara; acidify the oceans; result in the drying of the continents; and give us wetter, stranger weather that will wash the nutrients from the soil turning it into a silty, rocky, effectively useless medium.
- Building the houses would produce 1 million tonnes of extra CO2, which is utterly preposterous in times of climate change. It is unlikely that development can be delivered in a way that is essentially carbon zero and which contributes to ecological recovery.
- The impact on the environment goes against the Council's acknowledged climate crisis. It is not in accordance with the Climate Change Act 2008 (2050 target amendment) and the carbon emissions would mean that the Council would not be able to meet the environmental targets it has pledged.
- The development would enlarge the carbon footprint by using antiquated building and development techniques. There is no carbon offset that is sufficiently achievable and acceptable on the development site.
- Residents from the development will drive into Dorchester, both for work and other purposes, rather than walk, which would go against the climate change agenda.
- The new roads required would be contrary to the Council's Climate and Ecological Emergency.
- The Climate Emergency means more extreme weather and increased disruption in the provision and drainage of water.
- The Climate and Ecological Emergency Strategy should confine itself to what Dorset Council can do now as a landowner, an employer and purchaser, and identify those areas where Dorset Council can make progress within the current framework of laws and regulations.
- It is not clear what phrases like 'make the most of the surrounding countryside' and 'fully integrate with the high-quality natural environment' mean.
- There is a need for green sink holes for rising levels of greenhouse gases.
- More people will result in more waste.
- Extraction of sand and gravel within Mineral Safeguarding Area will have unknown effect on land/soil settlement.
- The increased urbanisation is against the Dorset Council's declared Climate and Ecological Emergency.
- No gas.
- Need to incorporate thermal ground heating and energy retention, increased electricity supplies to every dwelling for heating and cooking.
- Not building the development north of Dorchester is almost certainly the biggest benefit to climate change.

# Loss of countryside

### Public response

- This plan will have a huge negative and irreversible effect, as a much-loved area of the English countryside, which provides a function in climate change mitigation, would be concreted over and lost forever. We should not be developing areas of countryside during a climate emergency.
- The watermeadows and farmland provide part of the ambiance of Dorchester, as the area is untouched by urbanisation. Development will severely damage the whole calming ambience of the area.
- Building more homes on some of the most beautiful countryside in the UK is a stupid idea.
- The development will urbanise and destroy an important rural area to the north of the town.
- Development will not make the most of the surrounding countryside, including its links with Thomas Hardy, Maiden Castle and Kingston Maurward College as claimed.
- The countryside around Dorchester has a rich heritage and this historically significant countryside would be ruined by development.
- Development will destroy beautiful countryside associated with Thomas Hardy. Views of the countryside, which Thomas Hardy wrote about will be lost.
- The location north of the watermeadows is a worrying precedent in terms of sprawl. Countryside should not be developed when there are sites still undeveloped within the town.
- More visitors in the summer and second homeowners are putting pressure on areas along the Dorset Coastline such as Lulworth, resulting in the destruction of the coast and countryside.

# Loss of Green Belt / green fields

### Public response

- Building would result in the loss of 500 acres of beautiful green belt land that keeps our city unique. Building on green belt land is totally unacceptable.
- There would be the loss of green fields that act as a green belt for Dorchester and the surrounding villages.
- The area north of Dorchester is an important 'breathing space' for the town. It provides a special vibrancy, lungs for the town and enriches our souls. Green space like this is vital to a balanced living environment.
- Putting thousands of houses on this green land is madness. Green spaces should be left alone.
- Local plan allocations for greenfield sites have already been made at LIttlemoor, Weymouth and Vearse Farm, Bridport.
- There is beautiful green land and green spaces in the area, which should be protected at all costs, as they cannot be reinstated once built on.
- There is no proper planning for green spaces and trees. New woodland and copses should be planted within the developed area to provide more green space.

# Wildlife

### **Environment Agency**

- Nutrients loading from the development will need to be addressed, in order to protect and improve the water quality and ecology of the River Frome and Poole Harbour.
- Mobilised sediment from run-off and nutrient input into the River Frome needs to be addressed to avoid negatively affecting ecology of the river and any fish spawning areas downstream.

- Ecological habitat and species surveys and reports will be required, including consideration of otters, water voles and other species.
- The presence and impact of Invasive Non Native Species should be addressed.
- Management of the water environment will be needed, including water levels in the watercourses and associated wetlands, in order to protect species in any created or existing wetland habitat.

### North Dorchester Consortium (NDC)

- NDC's preliminary ecological appraisal shows that there are no designated wildlife sites within the development site, although it supports a variety of habitats. Important habitats would be retained as part of the development wherever possible and incorporated into a Green Infrastructure strategy. It is argued that the sensitive management of these areas, the provision of significant amounts of open access land (particularly within and near the floodplain) and the reduction in intensive agricultural methods would facilitate important biodiversity enhancements.
- NDC's preliminary biodiversity metric assessment shows that, in principle, a net gain in biodiversity could be delivered and the aim would be to deliver 10% net gain as part of the proposals.
- NDC's nutrient budget calculations shows that the development will deliver a nitrate credit of 1,100 homes, even after it has mitigated the development itself.
- NDC argue that the proposals overall would provide an ecological enhancement over the baseline situation, with the proposed Frome Valley Park in particular providing a unique opportunity for enhancement along the River Frome corridor.

### **Chris Loder MP**

• There are concerns over the negative impact on biodiversity. There would be impacts on 2 SSSIs and the habitats of 117 bird species, otters, water voles and bats.

## Save the Area North of Dorchester (STAND)

• The development would damage the biodiversity of the site and of adjacent areas.

- The area is home to a vast array of habitats and wildlife, which are now more important than ever. The State of Nature report highlights the loss of native UK species, which would be placed under additional pressure as a result of this development.
- The flood meadows are already a nature reserve. The watermeadows and landscape beyond already serve as an unofficial nature reserve.
- The wetlands in the floodplain should be preserved as a nature reserve. A Local Nature Reserve should be provided plus other facilities.
- The area could not be considered a nature reserve if it also forms part of the infrastructure network for the development.
- There is a need to work with local wildlife authorities to encourage more outdoor activities, wildlife and wildlife corridors. The green areas are to be landscaped with advice from the Dorset Wildlife Trust, Butterfly Conservation, RSPB and the Woodland Trust.
- Development will destroy habitats of indigenous flora and fauna including wetland ecosystems. Building 4,000 homes on wildlife habitat is a gross misuse of the area's natural resources. Wildlife has already been displaced from Poundbury.

- Development would destroy nature and would have a negative impact on wildlife. Animals' homes would be ruined, and animals would be killed. 3,000 houses in such an environmentally important area would be ecological vandalism.
- The development should be phosphate and carbon neutral, in addition to being nitrogen neutral. It should be obliged to contribute to ecological recovery and provide net biodiversity gains of at least 10% in perpetuity.
- It would be premature to allocate DOR 13 without more detailed investigations into the impact on a nationally important river and associated wetland habitats.
- The chalk hills in the area are a carefully balanced ecosystem for wildlife with pockets of natural woodland. Development will wipe out precious old woodlands, which reduce CO2.
- Development would result in the loss of trees and veteran trees would be affected.
- Foul drainage will cause run-off to the River Frome damaging Salmon, Trout and Sea Trout, coarse fish, other freshwater creatures such as Crayfish and Newts (including Great-crested Newts and Palmate Newts) and invertebrates. The eggs of the Salmon spawning upstream of Dorchester would be killed by sediment pollution.
- The proposed footpath, cycle and road connections to Dorchester will break up the watermeadows into small areas, which will be less attractive to birds. There will also be adverse impacts from dog walking and dog fouling on the watermeadows.
- The provision of a northern link road and at least 3 pedestrian / cycle crossings will have adverse impacts on: the registered common land on West Ward Common; the River Frome and its floodplain, water meadows and associated wetland habitats; the ecosystem services provided by the river and its wetland habitats; and the existing and potential ecological networks identified by the Dorset Environmental Records Centre.
- It is misleading to state that environmental improvements will create wetlands in the floodplain, as there is no evidence to support this. Maintaining a balance between the ecology and recreation will be difficult and the proposed park and playing fields in the floodplain may add to the impact on biodiversity.
- Development will be a threat to hedgerows and footpaths, which serve as vital green corridors for wildlife and support protected species, including birds.
- The area supports Otters, Badgers, Foxes, Hares, Water Voles, Polecats, Moles, Deer, Hedgehogs and Reptiles (including Slow Worms), which would be affected by development.
- The area supports several species of bat, including Brown Long-eared Bats at Yalbury Lodge. The open landscape and trees in the area are vital for their survival. A specialist bat survey should be undertaken.
- The area supports 117 bird species, which would be lost. These include Ravens, Stock Doves, Owls (including Barn Owls), Woodpeckers (including Green Woodpeckers), Pheasants (in wooded parts), Little Egrets, the Large White Crane, Ducks, Kingfishers, overwintering and migrating birds (including Swans) that use the watermeadows and a host of smaller birds (most of which breed in the area). An ecological survey should be undertaken.
- There would be a loss of farmland bird and their habitats, including habitats for Yellowhammer, Skylark, Lapwing, Golden Plover, Song Thrush and Bullfinch. The proposed provision of ponds will not mitigate for this loss of habitat.
- There are fewer Swallows and Swifts over my garden and my allotment, and this would only get worse if North Dorchester is built.
- Wildflowers in the landscape attract butterflies, including rare butterflies. There are fewer insects, including butterflies, over my garden and my allotment and this would only get worse if North Dorchester is built.

- The wildflowers in the local landscape (including bluebells, wild honeysuckle and cowslips) attract bees, which return year after year. Bees may not come back if the agricultural landscape is ruined.
- The site supports protected plants and lichens.
- Development will result in the increased number of homeowners pets killing wildlife.
- There has not been enough research into the impact on flora and fauna.
- There should be an environmental impact assessment looking at the impacts on Poole Harbour SSSI. The Local Plan does not say how the impacts of 4,000 extra houses draining into Poole Harbour will be mitigated.
- There is no assessment of the loss of biodiversity and there will still be a residual negative impact, which will not be solved by planting trees to mitigate / screen development.
- Instead of development, some of the land should be rewilded to tackle the climate crisis.
- The area should be preserved if the Council is serious about biodiversity and tree planting.
- Dorset's downland should be used to enrich meadows and enhance carbon sequestration in pasture.
- Lack of understanding of Dasgupta review titled: The Economics of Biodiversity.

# Landscape impact

### Charminster Parish Council

• There would be a significant landscape impact from the proposed development.

### **Dorchester Civic Society**

- The landscape setting of Dorchester on its northern side is of inherent value.
- There is no detailed Landscape Visual Impact Assessment. This is needed in order to assess the extent of the damage to the landscape and the setting of Dorchester caused by the development. Given the Garden Communities bid, it is not clear why a LVIA has not already been prepared.
- Part of DOR13 associated with the former park and garden around Frome Whitfield House is designated as 'Land of Local Landscape Importance' in the currently adopted local plan, but this local designation is not referred to in the draft Dorset Local Plan.

## Dorchester Town Council

- There will be significant landscape impacts from the proposed development and there are concerns with the development impacts of open space and strategic landscaping.
- It is difficult to see how DOR13 will achieve the vision for Dorchester in making the most of the surrounding countryside, including its links with Thomas Hardy, Maiden Castle and Kingston Maurward College. It will clearly adversely impact the landscape qualities of the countryside north of the town and its Thomas Hardy connections.
- The previous Halcrow Study's landscape assessment 'identified several locations where the impact of development [at North Dorchester] upon the existing landscape was considered critical, notably at Maiden Castle, the South Winterbourne Valley and the Frome floodplain'.
- The 2018 landscape and heritage report identified that the site had medium-high landscape sensitivity. It is hard to see how the associated guidelines for new development in that report could be followed in the light of the potential visibility of the proposal.

### North Dorchester Consortium (NDC)

- NDC's landscape appraisal notes that the site is not within the Dorset AONB or any other statutory or non-statutory landscape designation also noting that the previously identified 'Land of Local Landscape Importance', which relates to part of the site, has not been carried through to the new Dorset Council Local Plan.
- The landscape appraisal concludes that the North Dorchester site is the least harmful to the wider AONB landscape and respects and reflects the relationship between Dorchester and the Frome Valley. It is stated that the northern edge avoids the most elevated parts of the higher downland landscape and that the site itself sits lower in the landscape than the higher ground to the west and south of the town (including Poundbury Hillfort, the built-up area of Poundbury and Maiden Castle). It is argued that the site is more cautious in terms of potential landscape character and visual effects than other options and helps to preserve the landmark function that Poundbury Hillfort and Poundbury itself play in the immediate landscape.
- The landscape appraisal states that localised changes in topography, coupled with vegetative screening, offer opportunities to incorporate the valley slopes on the site into the overall masterplan whist taking into account views from Dorchester's Conservation Area, Roman Walls and Town Walks. It also concludes that land south of Coker's Frome Road is capable of accommodating new development, contrary to Dorset Council's published assessments.

### Save the Area North of Dorchester (STAND)

- The Downs overlooking Dorchester are not the right site for such a development, which will have an impact on highly valued landscape both nationally and internationally.
- The area is of local landscape significance. An application to construct wind turbines on the adjacent Slyers Lane site was refused because of the significant harm it would cause both to the setting of the adjacent Dorset Area of Outstanding Beauty and 'to the immediate (and undesignated) landscape'.

- There is insufficient recognition in the Local Plan of the value of this landscape. The beautiful landscapes and views in Dorset are constantly being diminished and replaced with unnecessary oversaturated housing developments on prime wildlife habitats.
- The beautiful natural landscape with remnants of industrial archaeology tells the story of the 'chalk and cheese' economies of the area, appreciated by writers and painters.
- The proposed development would have a negative impact on an ancient landscape and would become a permanent blot on the landscape like Poundbury.
- Development would have an impact on a rural and peaceful landscape.
- The site is of local landscape importance. There will be adverse impacts on other valued landscapes within the site and on the Cerne and Piddle Valleys, and Chalk Downland Landscape Character Areas.
- The development would contradict national planning guidance as this is an attractive nondesignated landscape.
- The site deserves a 'high' rating in the Strategic Landscape and Heritage Study, in terms of landscape impact.
- The new evidence on landscape impact is just a desk top study repeating the work undertaken in 2016.
- There would be intervisibility between the DOR13 site and Dorchester. Development would be visually intrusive and would destroy Dorchester's timeless landscape setting, including the

watermeadows and the views of the chalk downland beyond, which shapes the character of the town.

- Views to the north from Dorchester will be damaged, blighting the northern side of the town with yet more concrete. This will diminish the nature, attractiveness and feeling of the town. The proposed planting is insufficient to screen development and the proposed link road from the AONB.
- The green landscape along the path between Hangman's Cottage and John's Pond, north towards Blue Bridge and beyond is uplifting and should not be taken away from the people of Dorchester.
- The Frome Valley will be compromised, impacting on the watermeadows landscape and their unique atmosphere.
- A thick and substantial screen of trees should be provided along the northern boundary of the watermeadows to protect the rural outlook from the town centre.
- The attractive entrance to Dorchester from the east would be lost. Views of the beautiful countryside as you enter Dorchester from Grey's Bridge will be lost forever.
- Important trees will be lost.
- Large-scale developments can have a disproportionately harmful effect that cannot be absorbed, even with mitigatory measures.
- Concern with proposed tree planting to mitigation countryside impact, and time it take for trees to mature.
- Concern that development would be in conflict with policy ENV4 Landscape.

# **Dorset National Park**

### The Thomas Hardy Society

• The North of Dorchester development site is special and would be included in the Dorset National Park (if designated) so should be protected.

# Dorset AONB

### Dorset AONB

- Concerns were expressed concerning the extent of strategic landscaping contained within an indicative layout produced previously.
- Overall, it is considered that visual effects on the AONB might be addressed through comprehensive mitigation measures. The AONB therefore expects a masterplan to be developed to direct the spatial layout of the site into an acceptable form.
- Presently, the wording of the plan with regard to landscape mitigation measures is quite open to interpretation and it is therefore not yet possible to be confident that the measures to be included in a future Masterplan will be sufficient to assimilate the development.
- Furthermore, this Masterplan will need to demonstrate a suitable balance between protecting the landscape setting of Dorchester and ensuring that development is not thereby displaced to locations that are more impactful in their effect on wider landscape views, such as those achieved from Maiden Castle and the South Dorset Ridgeway.

### **Dorchester Civic Society**

• We object to the proposal because of demonstrable harm to the setting of the Dorset AONB.

## Save the Area North of Dorchester (STAND)

• There will be impacts on views into and out of the Area of Outstanding Natural Beauty.

Dorset Council Local Plan consultation 2021 summary of responses - Land North of Dorchester

### Public response

- The DOR13 site is a place of outstanding natural beauty.
- Development can be placed in the AONB because the whole of West Dorset is within the AONB and that has development.
- Development of this scale should not be in the AONB. The AONB will be lost forever.
- The proposed development could impact on the setting, character, beauty, and experience of the AONB.
- There will be harmful landscape impacts on an area which is outside the Dorset AONB boundary, but of comparable value and character. Guidance is that, if an area affected is adjacent to a designated area, thought must be given to the extent to which it demonstrates the characteristics and special qualities that give the designated area its value.
- There are significant views to the DOR13 site from higher ground within the Dorset AONB as shown by the Zone of Theoretical Visibility in the North Dorchester Heritage Impact Assessment.
- The Dorset AONB should be expanded to protect the site and the whole town.
- The allocation is contrary to the Dorset AONB Management Plan objectives. The AONB Management Plan warns against DOR13 as a clear and present danger to rural character and ecological, environmental, heritage landscapes of great significance.
- The development site has a high scenic, landscape and environmental value, more so than the AONB. It should be given greater protection because it is so accessible and visible.
- Planting of trees on horizon to block views of urban sprawl from AONB seems pointless.

# Dorchester's heritage

### Dorchester Civic Society

 There is no recognition of the damage that DOR13 would cause to Dorchester's historic and cultural setting. DOR13 would result in significant and irreversible damage to the town's heritage setting.

## Save the Area North of Dorchester (STAND)

 There will be an adverse impact on the setting and visual appreciation of numerous important heritage assets, including the Conservation area in Central Dorchester in which are situated numerous important Grade I and Grade II\* buildings, concentrated in the High Street and adjacent side streets.

- Development would change the face of Dorchester and destroy the town's cultural and environmental heritage. There would be an impact on Victorian Dorchester. Development would also harm the archaeological and historical landscape of Dorchester and the surrounding area.
- The site and scale of the development would not be sensitive to Dorchester's heritage, putting it at risk. You can give our heritage away, but no money will ever buy it back.
- The Roman heritage of Dorchester is important, and the northern boundary of the town has been the same since Roman times.
- The development will have an adverse impact on the rural setting and views to and from Dorchester Conservation Area.
- The conservation area south of Dorchester is all that stops Weymouth, Dorchester and surrounding villages being made into a Poole and Bournemouth urban sprawl.

- The LUC 2021 report claims that DOR13 would not be visible from Fordington Church, but the churchyard has a view beyond the watermeadows. The churchyard is visited by Hardy scholars because of the Moule family links and the grave of Horace Moule.
- The Council should be encouraging and embracing the history and heritage of Dorchester. It should preserve and develop its unique heritage so that it is not like every other town in England.

# The heritage of the development site and surrounding area

### Charminster Parish Council

• There would be a significant heritage impact from the proposed development.

### **Stinsford Parish Council**

• The cultural heritage of the area is embedded in the landscape.

### **Dorchester Civic Society**

- There is no acknowledgement of the recommendations of the Heritage Impact Assessment (HIA). The implications of the HIA need to be assessed.
- The HIA concludes that 'landscaping, drainage, paths/cycle routes, lighting etc. will need to be assessed', which could all seriously harm the appearance and character of the watermeadows.

### **Dorchester Town Council**

- The Heritage Impact Assessment for North Dorchester highlights the general visibility of the site, which will be extensive. It also identifies potential high adverse impacts on listed bridges, medium to high adverse impacts on the setting of Poundbury Camp and Dorchester Conservation Area.
- The Heritage Impact Assessment states that the route (and status) of the proposed link road could have a profound effect on the archaeology and on the scheduled monument of Poundbury hillfort. The assessment recommends the realignment of the proposed route and the setting back of the proposed development to the north.
- There are concerns with the impact of development on the Stinsford Barrow Group (within the proposed development area) which may have links to other Neolithic / early Bronze Age henge monuments.
- It is unclear how harm to heritage assets can be justified (in line with para 195 of the NPPF) given the proposed over-supply of housing across the area and potential alternatives.

## **Historic England**

- We are considering our view on the principle of the allocation, given the potential impacts on heritage assets and their settings and the paleoenvironmental and archaeological potential of the site, especially the watermeadows.
- Further work is needed to demonstrate the suitability and capacity of this site in relation to impacts on the historic environment. This work could include an options appraisal for the link road and masterplanning to look at: site capacity; the position of the southern boundary; layout, height and design; strategic landscaping; sightlines and key views.

## North Dorchester Consortium (NDC)

• NDC's archaeology appraisal shows that although the North Dorchester site lies within a wider landscape with significant archaeological interest, there are few features within the area to be developed. Those that are, such as some Bronze Age barrows, will be incorporated into the

design of the development. Due to the wider area's significant archaeological interest, the site itself will be subject to further investigation. Any archaeological features found would be avoided where possible or mitigated where necessary.

- NDC's heritage appraisal notes that there are no designated heritage assets on the site where built development is proposed. There are some assets within areas proposed as open space, but these are listed bridges, walls and sluices, which will be retained, with their settings unchanged within the proposed open spaces.
- NDC's heritage appraisal recognises the potential impacts on heritage assets outside the site, such as Dorchester Conservation Area, the Grade I listed Kingston Maurward House and its Grade II\* Registered Park and Garden, Stinsford Conservation Area and listed buildings within it, Charminster Conservation Area and the Grade II Listed Little Court. It is argued that the heritage appraisal has informed NDC's emerging masterplan and framework and that there is scope for development at North Dorchester, including south of the Cokers Frome Road, that would result in only minimal impact on the significance of the settings of heritage assets in the area.
- It is argued that NDC's heritage appraisal is consistent with the heritage impact assessment undertaken for the Council by LUC. It is argued that any 'heritage harm' caused by the North Dorchester proposals would be at the lower end of the scale of 'less than substantial harm' as that term is defined and used in the NPPF and the accompanying PPG.

### Save the Area North of Dorchester (STAND)

- There will be an adverse impact on the setting and visual appreciation of numerous important heritage assets, including: Charminster Conservation Area; Poundbury Fort and the Roman Aqueduct which are important Scheduled Monuments; Historic England Listed Buildings and Registered Historic Parks and Gardens in the near vicinity, which include Wolfeton House (Grade I), Kingston Maurward House (Grade I) and its gardens (Grade II\*), Kingston Maurward Manor (Grade I), Hardy's Cottage (Grade II) and Little Court and garden (Grade II); and the nondesignated former park and garden of Frome Whitfield House.
- There would be damage to important archaeological remains which are potentially of national significance, as set out in Annex 2 of the representation Understanding Dorchester's Archaeological Heritage by Rodney Alcock and Linda Poulsen dated 11.3.21.
- The is no explanation of the area's extraordinary prehistory, which is comparable to Stonehenge in terms of the richness of its archaeology and the intensity of prehistoric activity.
- Understanding the significance of the archaeological evidence has to take in the wider landscape context, such as the archaeological importance of the area in relation to the Stinsford Barrow Group.
- There is a need to understand the dynamics of the whole valley in terms of its archaeology, including the relationship with the henge monuments in the river valley, and the significance of the River Frome and its tributaries.
- The South Dorset Ridgeway Mapping Project, published in 2011, identified the connectivity of the valley of the River Frome with the chalk downland to the south and north, and identified over 350 new barrows. It is likely that there is considerable potential for the discovery of further archaeological sites.
- There is a need for further expert advice to understand the significance of the Dorchester area and its archaeological potential. Dorset Council's Senior Archaeologist has previously identified a need for geophysical survey and trial trenching on a neighbouring site.
- We would like to see a comprehensive, landscape scale approach to understanding archaeology which would also include Waterston Ridge, but there are concerns that developers legally

cannot be obliged to fund archaeological investigations beyond the fallout from their own development sites.

- It is fatuous to maintain, as the Draft Plan does, that the development would 'enhance and better reveal the significance of the nearby heritage assets' and that the project would somehow 'be an opportunity for creating a sense of place'.
- The LUC 2021 Heritage Impact Assessment was rushed and possibly due to Coronavirus restrictions it is primarily a desk top study. There is no acknowledgement of the recommendations of the Heritage Impact Assessment, which was not published until after the Draft Local Plan was produced.

- There would be a permanent loss of heritage assets.
- The site has a 'high' heritage sensitivity due to the potential for harm to designated assets through change to their settings.
- The setting and visual appreciation of numerous heritage assets in the area would be adversely affected by the development including: Dorchester, Stinsford and Charminster Conservation Areas; registered parks and gardens; listed buildings at Kingston Maurward; Frome Whitfield House and designated former park and garden; and Poundbury Hill Fort.
- The allocation is contrary to the NPPF in terms of the conservation of heritage assets. The approach of minimising harm to heritage assets if it cannot be prevented is not acceptable. There is also lack of information to explain how the design of the new development would minimise harm to the heritage of the area.
- Development will affect archaeology. The DOR13 area is of huge archaeological significance linked to Maiden Castle, Poundbury Hillfort and the four Neolithic Dorchester henges. There have been many prehistoric, Roman and medieval archaeological finds here.
- There are significant views to the DOR13 site from Maiden Castle as shown by the Zone of Theoretical Visibility in the North Dorchester Heritage Impact Assessment. The wider visual impact on scheduled monuments such as Maiden Castle would be invasive.
- Dorset Council's Senior Archaeologist's has advised that the DOR13 site is part of an archaeological landscape comparable with Stonehenge in terms of the richness of its archaeology and the intensity of prehistoric activity.
- The land and archaeology form an internationally important cultural landscape with connections to the poet William Barnes, Thomas Hardy and the painter H. J. Moule. It has inspired, and continues to inspire, artists and this heritage site would be severely impacted by development. The proposal should be removed from the Local Plan on the grounds of impact on a landscape of international literary importance.
- The archaeological richness of the site means that it warrants protection as a heritage asset.
- The area is of great historical importance with many historical structures that should not be disturbed. Heritage damage will be significant and irreversible, as the historical interest can never be replaced and would be lost forever with development.
- There would be a wider visual impact on scheduled monuments, including Maiden Castle and listed buildings around Dorchester. The setting and views from Maiden Castle would be harmed and development would spoil the views from Poundbury Camp. The proposed relief road opposite Poundbury Camp would negatively impact on this heritage asset. There would also be impacts on Wolfeton House and Kingston Maurward.
- Could be detrimental to Maiden Castle as extra families looking for recreational spaces and the castle is an obvious choice.

- The proposed road would have a significant and permanent impact on the inherent historical qualities and setting of both Charminster and Dorchester.
- There would be direct and indirect adverse impacts on the historic village of Charminster and its conservation area.
- The construction of a road through Wolfeton watermeadows would have an adverse impact on this heritage site. The 17th Century watermeadows are of historic importance. The proposal should be scaled down so that historical and cultural importance of Wolfeton House and the watermeadows are better conserved.
- The policy should refer to the Heritage Impact Assessment for the site.
- The North of Dorchester Heritage Impact Assessment states that the proposed link road will have a medium to high negative impact on Poundbury Camp.
- The Heritage Impact Assessment is ambiguous. There is a lack of positive clear, unambiguous heritage policies.
- I disagree with the Heritage Impact Statement regarding the visibility of the site from Dorchester as I can see it from my second-floor bedroom.
- The recommendations in the Landscape and Heritage Study Stage 2 Assessment have not been addressed within the policy.
- The 1998 Inspector's comments regarding the cultural importance of the area have not been taken into consideration in the policy.
- Heritage and tourism deserve respect and to be treated as more than an afterthought.
- There is no information about how the character and design of a development of 3,000+ homes will minimise impact upon the harm to the heritage of the area.
- It is essential that further investigations are undertaken, as there is a lack of understanding of unknown heritage remains and their significance. The archaeology of the DOR13 site should be investigated using ground penetrating methods before any decision is made, as previously recommended in relation to a proposed wind farm on the site.
- Historically in the area proposed there have been mesolithic finds, saddle querns, Romano British pottery, ditches and inhumations.
- The British Geological Society has recognised the ice age terraces in the Stinsford area, the lowest being at Coker's Frome.
- Need for the closest scrutiny, in line with the Heritage Impact Assessment.

## Thomas Hardy heritage

### New Hardy Players & William Barnes Society

• Cultural importance of the site - links to William Barnes and Thomas Hardy.

### **Chris Loder MP**

• There are concerns over the negative impact on the heritage and the landscape, habitats and farmland that inspired Hardy.

### Dorchester Civic Society

• The landscape setting of Dorchester on its northern side is of both national and international importance due to the writings of Thomas Hardy.

### **Dorchester Town Council**

• There will be significant heritage impacts from the proposed development.

- The Heritage Impact Assessment for North of Dorchester downplays the importance of the landscape, as Hardy's works were ultimately fictional, with any landscapes subject to a degree of creative license. It is considered that the allocation would significantly impact on the settings of Hardy's works.
- People travel from all over the world to visit the sites which inspired Thomas Hardy. The development would be 'an act of the most severe literary, historic and environmental vandalism'.

### Stinsford Parish Council

• There are significant heritage and archeological concerns with the nature of the site and proximity to where Hardy lived and wrote. Dorchester and Stinsford have received significant heritage funding for the Museum, Shire Hall and Hardy's birthplace.

### Save the Area North of Dorchester (STAND)

- There is a strong landscape association with Thomas Hardy, as set out in Annex I of the representation The Literary and Artistic Importance of the Landscape from Stinsford Hill to Dorchester by Ian Gosling dated 12.3.21.
- A 1998 Planning Inspector appraised the landscape and its cultural association with Thomas Hardy and the paintings of Henry Moule and identified a need to safeguard its character.

- Development will affect Thomas Hardy's literary legacy as the DOR13 site is part of 'Hardy country', an internationally important cultural landscape, which attracts tourists and is a cultural asset. Part of Hardy's Wessex landscape will be lost and the 'Hardy experience' will not be enhanced by building on the very landscape that so inspired him.
- The land in the Dorchester area is relevant to Hardy in several of his novels, short stories and poems and this legacy should not be destroyed. The landscape inspired: The Three Strangers (probably located near Fiddlers Green); Far from the Madding Crowd (where the wider landscape is the setting for Bathsheba Everdene's farm); Under the Greenwood Tree (where land to the north of DOR13 is the setting for the novel) and Jude the Obscure. The wider area also includes locations mentioned in Hardy's work including Hangman's Cottage, Dorchester Prison and Yellowham Wood.
- Hardy wrote about the landscape of his childhood and permanent damage to this landscape heritage asset will have a negative impact upon the tourist economy.
- Part of Dorchester's heritage are the links with Thomas Hardy. He describes how you can stand in the heart of the town and see the countryside, which would be lost with development.
- Dorchester has a world-wide attraction as Thomas Hardy's 'Casterbridge' and the entrance to the county town is recognisably the same as described by Hardy the town stops abruptly, and the countryside begins with no suburban sprawl. With the development, Hardy's Casterbridge would be unrecognisable. Thomas Hardy would be crushed if he knew what officials were considering for his unique 'Casterbridge'.
- Importance of the entrance of the county town being recognisable as Hardy's Casterbridge.
- The destruction of the countryside, largely unchanged since Thomas Hardy's day would be a crime against future generations. You can still walk in Hardy country and enjoy the beauty of the landscape he walked in and wrote about. The proposal should be scaled down so that the Thomas Hardy landscape is better conserved.

- Visitors come to discover these landscapes, where the patchwork of locations in the area attracts Hardy fans from all over the world. There would be an impact on tourism due to the loss of Hardy associations.
- There would be an impact on Stinsford (Thomas Hardy's Melstock), Hardy's birthplace and on Stinsford Church.
- A walk should be created in the area to enable pedestrians to walk from Dorchester in a circular route exploring iconic Hardy locations / landscapes to boost tourism in the area.
- I think Thomas Hardy would have questioned the scale and the suitability of North Dorchester. He would be turning in his grave!
- The Local Plan plays down the significance of Thomas Hardy to Dorchester's economy.

# Pollution and land contamination

### **Environment Agency**

- The development area is adjacent to Cokers Frome historic landfiill site, therefore an assessment of the risk of release of contaminants from this site needs to be carried out.
- This assessment should be done prior to the land area being allocated for development. The assessment needs to demonstrate that mitigation to manage the risks is technically feasible and/or viable.

## Watergates Fisheries Ltd

- Risk to River Frome and subsequent impact on wildlife and recreational use (including fishing, pond dipping)
- Risk of increased sediment in River Frome adverse impact on fish spawn sediment pollution has been an issue from other construction sites in Dorset.
- Nitrogen impact on River Frome and Poole Harbour from Dorchester sewage works already occurring.

### **Public response**

- Pollution of all kinds would increase.
- There will be an impact on air quality with air pollution from more traffic.
- Increased traffic will exacerbate shockingly high levels of air pollution in Dorchester High Street.
- The long construction period would result in sediment pollution in the River Frome.
- There will be an increase in light pollution.

# Flooding

### **Dorchester Town Council**

• The potential impacts of development on flooding and groundwater are unknown. A large area of ground is subject to flooding on the northern edge of the town and either side of the River Frome. There is also a lack of evidence to demonstrate that the run-off from the development would not increase the flood risk to infrastructure and dwellings already within flood risk areas on the northern edge of the town, or adversely impact on an important public drinking water supply.

## Environment Agency

• There is an existing flood risk to north east Dorchester arising from the Frome and the Dorchester Mill Stream (note the Mill Stream's offtake upstream closer to development locations).

- Any development and associated wetlands or other plans must ensure that this flood risk is not increased, and potentially decreased.
- There are also currently plans for flood defences and a fish and eel pass along the Mill Stream (with additional high flow reconnection points to the main Frome) and London Road (potential for flood defences and river translocation) which require further Partnership Funding contributions to proceed.
- Developer contributions towards these flood defences should be considered in order to safeguard and improve the wider Dorchester conurbation, infrastructure and environment (the fish and eel pass would open up 85km of the Mill Stream to improved fish and eel passage).
- The road link infrastructure between the A35 and the A37 would need to cross the flood plain level and/ or flow gauging should be an essential part of the design of this infrastructure to facilitate improved flood warnings and climate change modelling for Dorchester in the future. This should be highlighted within the Local Plan and a key part of the road plans.
- Surface water should be retained or held back within the site.
- A Sustainable Drainage Systems approach should be considered. However, these should be located and designed to take account of the sensitive SPZ1, SPZ2 and SPZ3 in the site, as well as any other flood risk/ ecology/ water quality requirements.

## Frome Whitfield Residents

- The Council does not understand the location and frequency of flooding. Parts of roads into Frome Whitfield and the lane and fields into Dorchester flood. The lower meadows flood in winter and water pools around the Lodge House and Frome House, where the Orangery has suffered subsidence.
- Due to flooding, current residents of Frome Whitfield rely on cars (rather than foot) to get to Dorchester, as would be the case for inhabitants of North Dorchester. The flooding of the existing road is a danger and high-density housing would exacerbate problems.

### North Dorchester Consortium (NDC)

• NDC's flood risk, hydrology and drainage study shows that the majority of the site is in Flood Zone 1 and no housing would be in Flood Zones 2 or 3. Sustainable Drainage Systems (SuDS) would be put in place, together with measures to protect watercourses and groundwater from pollution.

### Save the Area North of Dorchester (STAND)

- We are concerned with flooding on low lying land.
- There is a high degree of risk that the run-off of rainwater from the proposed development would overwhelm the water meadows and cause flooding to properties adjacent to them in Dorchester and in sites downstream.

### Watergates Fisheries Ltd

- Catchment scale planning should be undertaken.
- Catchment Flood Management Plan states run off should be reduced wherever possible.
- Increased flooding is damaging to wildlife.
- Existing housing downstream would be more prone to flooding.
- SuDs not sufficient to reduce flood and pollution risk.
- Effect on water run-off resulting in additional flooding and changes to water table subsequent impact on housing and biodiversity downstream.

- There is no assessment of how flood risk from all sources would be dealt with. The impact of flooding both now and projected must be established through analysis by an independent water management expert. It would be premature to allocate DOR 13 without more detailed investigations into flood risk.
- There seems to be a lack of understanding of floodplains and of the vital role they play, and it appears that little thought has been given to drainage concerns.
- Flooding has increased in recent years and will only get worse. The River Frome already floods several times a year, which will increase with climate change.
- The development is proposed on land classed as Flood Zone 3 (a known floodplain) and as such is not a sustainable location. Building 4,000 homes on a floodplain is irresponsible and a gross misuse of the area's natural resources.
- The site is alongside an area prone to flooding. So many houses should not be built close to a floodplain, especially in view of climate change.
- The proposed site for homes is poorly drained. The local drain network is old, which has created loads of extra flooding. Further development will also impact on the drains causing increased flooding.
- The policy does not consider potential floodable areas elsewhere. The eastern edge of Dorchester is a designated floodplain, and the flow of water is restricted where it passes under Grey's Bridge. More run-off from the DOR13 site will increase the risk of flooding further downstream, including in low-lying parts of Dorchester, and could impact existing houses in places like Kings Road, London Road and Lubbecke Way.
- There are existing flooding issues on surrounding roads and roundabouts, including on the A37. Cokers Frome Lane (the road from Stinsford roundabout to Westleaze crossing the B3143) floods regularly at one point. The Dorchester Bypass has also led to increased occurrences of flooding of the water meadows.
- Considerable frequent flooding along sections of the A35 Dorchester bypass.
- The policy does not specify the necessary flood mitigation measures that will be required on site or downstream.
- Paragraph 23.6.55 that seeks to create wetlands in the floodplain to reduce flood risk shows that DOR13 will increase the risk of flooding.
- It is difficult to see how this development 'could incorporate measures to mitigate the impact' of the three sources of flooding when such flooding, especially on the bypass, is currently not contained.
- Flooding will be made worse if the DOR13 site is developed, as it will drain in the direction of the River Frome. Adequate drainage must be provided so that the flood mitigation capacity of the watermeadows is not overwhelmed by run-off from the new development area.
- The development will cause flooding and environmental damage however developers seek to mitigate it. Previous roadshow flood consultants have stated that there is no effective way to manage the development's drainage.
- Buildings and roads on the DOR13 site will increase run-off as there will be less absorption through the chalk pastureland, which is an important soak for local rainfall. It is not clear where the rainwater would go or what interventions to prevent flooding would be put in place.
- The proposed extensive tree planting on the site will further diminish the water retaining capabilities of the chalk soils.
- Development would adversely affect the local floodplain and the watermeadows. This is an important area for flood alleviation as the watermeadows will help to cope with excessive

rainfall as a result of climate change. Increased urban water run-off from the development could lead to flooding, cause changes to the natural flooding and drying phases, result in changes in water tables and possibly also cause pollution, all of which would impact on the River Frome SSSI downstream.

- Increased flooding in the floodplain will result in the loss and diminution of wildlife.
- Increased flooding in the floodplain will adversely affect the proposed pathways into Dorchester.
- The watermeadows frequently flood and so are not suitable for recreation, as claimed. Also, water from the DOR13 site would run off into the watermeadows further decreasing their use as a local recreation area.
- Dealing with flood risk would be uneconomic as the costs associated with flood protection and prevention measures will be prohibitive.
- Surface water flooding because of the chalk downs is inevitable SuDs are possible but not impossible requires largescale investment.
- Concern is that even if they manage to mitigate flooding issues, it will potentially move flooding issue elsewhere potentially in Fordington, this would cause issues for an established part of town.

## Watermeadows

### **Dorchester Town Council**

 The Heritage Impact Assessment for North Dorchester states that there will be impacts on heritage assets within the watermeadows landscape. It concludes that the level of effect is likely to be medium-high but acknowledges that there is much uncertainty about their importance. Additional people moving through the watermeadows (and the infrastructure needed to support that) will have an impact on the agricultural heritage of the watermeadows.

### RSPB

 Recognition of the importance of existing watermeadows in the placemaking overview is welcomed and supported.

## Save the Area North of Dorchester (STAND)

• There would be and impact on the unspoilt nature of the water meadows.

- The watermeadows act as a carbon sink, provide a green lung for the town and provide health benefits, as they are used by residents and visitors to enjoy fresh air and the countryside.
- The floodplain and watermeadows are a sensitive area and a precious resource. They have a high landscape value and are environmentally sensitive.
- The historic 17th Century watermeadows function as a vital floodplain. The housing will damage the watermeadows systems and will impact on their natural water cycle. There will be an impact on the watermeadows from increased run-off extending the period and extent of flooding.
- Making the watermeadows into a Country Park is an abomination. They would not sustain the number of wild species they do now. What people need is access to natural rural landscapes for exercise and recreation.
- Rights of way provide views across the watermeadows, but the proposed cycleways and walkways there would have a negative effect on the wildlife through litter, disturbance etc.
- The watermeadows will be damaged with new building and they will not 'form an important high-quality asset for the expanded town', as claimed.

Dorset Council Local Plan consultation 2021 summary of responses - Land North of Dorchester

- Development will affect the ecology of the watermeadows, which are ecologically vulnerable.
- The watermeadows should belong to the community rather than potential developers.
- The watermeadows should be used to manage increased rainfall.

## Loss of agricultural land

### Save the Area North of Dorchester (STAND)

• The development would destroy valuable agricultural land.

### Public response

- The proposed development will damage farming and engulf farms and villages. There will be a loss of about 1,000 acres of agricultural land in addition to the losses which have already occurred at Poundbury.
- Grade 2 agricultural land will be lost and there is no acceptable mitigation for that.
- Building on farmland is an ecological sin and a regressive move. Good grazing land and pastureland will be lost.
- Over half our food is imported. The land should remain in agriculture to reduce our dependency on imported produce.
- Dorset Council should be protecting farmland for its contribution to the local food supply and to reduce food miles.
- The DOR13 site should be farmed organically in partnership with Kingston Maurward College. It should be developed as showcase for sustainable farming and small rural industries.

# 2.6. Housing

## Housing

- It is recognised that people need homes, including homes for local professionals.
- There is no clear need for more general (as distinct from affordable) housing in the area. People travel into Dorchester to work because the house prices are higher than surrounding areas, not because there are not enough houses.
- The houses will be bought by the more affluent, including people from wealthier areas, and will bump up house prices for local people. There is a concern with the affordability of the new homes which could lead to social deprivation and out-migration. As there is low pay in the area, the focus should be on housing for those on low incomes. We also need to provide a living wage for low earners.
- Local young families and young single people will not be able to afford the houses as developers have said they want at least £75,000 profit per unit.
- There will be an increased need for housing for older people, including communal housing.
- Around Dorchester the focus is on housing for older people with younger people moving out to find employment. Less housing should be built for the older generation with restrictions on 'older' people buying housing stock. In a few years older people will need care and will impact on service and hospital provision.
- The types of housing needed in this area have not been identified accurately or included in the proposals for DOR13.
- There is no assurance that the houses or amenities offered by developers will be provided.

- 65% market housing will make matters worse. The priority should be for local housing for young people and families so that they can afford to remain in the area. Small developments to enable locals to live here affordably are needed. However, Dorset planners cannot ensure that new houses will go to local people.
- The proposed houses would not attract Weymouth residents unless they were subsidised due to the difference in house prices between the two areas.
- Those who work in the health service, education and social care in Dorchester will be unable to afford the homes. New homes should be affordable for these and other public service workers.
- There will be poor provision and no help for first-time buyers in a location with prices comparable to London. There is no guarantee for the amount of low-cost housing.
- There is a need to address homelessness.
- There is no requirement in the Local Plan for developers to build homes suitable for disabled people.
- The provision of care facilities is contradictory to the aim of this development to attract families of working age.
- We need 'not for profit' development to meet the needs of the people already living and working in the Dorchester area.
- Houses should only be for local residents or purchasers / tenants with a DT postcode.
- This scheme will not provide the number of sustainable homes it plans to this justification for the building fails in itself.
- Self-build should be promoted as at Graven Hill, Bicester (<u>https://www.gravenhill.co.uk/</u>) by Cherwell District Council.
- Low impact housing has to be the way forward.
- Any new housing will need to be available at a similar price to that now available in Weymouth, to reduce imbalance.
- Concern that too many houses in one place will not be attractive to buyers.
- Importance of development for young families.
- By building all housing options in one place, it is ignoring long term impact on future generations in West Dorset.

# Incomers / retirees / second homes / holiday homes

### **Dorchester Civic Society**

 No consideration has been given to imposing a policy that gives 'primacy' to local residents in the purchase of homes in order to restrict new property being sold as 'second homes', as already included in the Purbeck Local Plan.

- Most of properties won't be morally utilised.
- This new development would see properties being bought by people from outside the local area. The homes will be inhabited by wealthy Londoners and people from the Home Counties and the Midlands, pushing up house prices.
- Poundbury has many second homes and unoccupied homes and already caters for those from outside the county who wish to buy on the open market.
- Most of the 4,000 new houses will be sold to retirees and will not satisfy a local need. More expensive housing would not attract and retain key workers.
- Dorchester is filling up with second homes and this development will be second homes like Poundbury. The Council should sort out the problem and / or reduce second homes in the area.

No second homeowners should be allowed or restrictions on second homeowners should be put in place.

- Second homeowners and retirees will sooner or later impose an additional burden on local services.
- New homes will be too expensive for local people, so North Dorchester will become a sleeper and occasional usage second home escape facility for persons who work elsewhere.
- Holiday lets should be stopped to free up more homes.

# Affordable housing

### Stinsford Parish Council

• Why are only 35% of houses to be affordable? Housing should be provided on a basis of need rather than as an investment priority.

## **Dorchester Civic Society**

• There are no measures to ensure the promised affordable housing will be provided. The draft plan's policies are too weak as to ensure its delivery, as it will only be 'sought' depending on viability and that viability testing has yet to be carried out. It is essential to carry out the viability assessment prior to allocation to ensure that the proposed affordable housing can be delivered. As the Council cannot, at this stage, justify its intention to ensure 35% affordable housing at DOR13, the plan is unsound.

### Save the Area North of Dorchester (STAND)

• There is no guarantee that the DOR13 scheme will provide any significant affordable housing for local needs.

- The concept of providing an appropriate level of affordable housing in the Dorchester area is supported.
- The planned development could be supported, providing that the required social housing percentage is delivered. The plan would make more sense if 1,200 homes were guaranteed to be affordable.
- The development of homes and social housing should be proportionate.
- Affordable housing needs to be built and run by social landlords. Affordable homes for local people and young people are needed and should be provided.
- All housing should be affordable and there should be affordable housing in every village and town.
- The Council should aim to get everyone on the social housing list in a home, but there is a concern that the development would not meet the needs of people on the housing list in Dorchester, due to unaffordability.
- There will be no affordable homes, as there is no plan to address or meet the need for affordable housing.
- DOR13 will not fully address the affordable housing requirement of the local area. There is insufficient affordable housing to meet the needs of those on lower incomes and only a relatively small proportion will be genuinely affordable to local people.
- There will be a lack of affordable housing, including rentals, as there is no guarantee that social housing will be provided, particularly as the site is not financially viable. The Local Plan does not

show how 35% affordable housing will be achieved. The record for the previous 20-years is only 17%.

- There is no fixed percentage of social / affordable housing for North Dorchester. Is this not against the law?
- The proportion of affordable units is nowhere near high enough, so current residents may leave for more affordable areas.
- The majority of housing (i.e., 50%+) should be affordable and available only to people with a local connection.
- There should be a commitment to at least 40% social housing. 35% affordable housing is insufficient and unambitious. It is too low to significantly ease the problems of those on the waiting list.
- The Local Plan does not include measures to secure affordable housing or to make them deliverable. The Plan should include measures to ensure that at least 35% affordable housing is delivered.
- Dorset planners cannot ensure that a reasonable proportion of affordable homes will be achieved. Safeguards are needed to ensure that developers build affordable housing. The Council should enforce the requirement for developers to include a significant proportion of affordable housing.
- Past developments, such as Stratton House, the former WDDC offices, the Old Gasworks in Icen Way, McCarthy & Stone retirement apartments on London Road and Dorchester Prison have not provided any affordable homes on site and there is no guarantee that they will be provided at North Dorchester.
- Councils in Dorset have sold off sites they own that could have provided affordable housing.
- Dorset Council's Housing Register should be used as a guide for local housing need. It shows the scale and urgency of the need for affordable homes, with 6,017 households on the register (June 2020). The Council should focus on meeting this local proven need, rather than attempting to meet Government target figures.
- The promise of a percentage of affordable housing is always a sop used by developers to sway objectors.
- Developers will try to wriggle out of providing 35% affordable housing. They will find excuses / plead poverty and will be allowed to skip their responsibility by the Council. Affordable homes should not be omitted / reduced because the developer says they are not financially viable to build, due to infrastructure costs or for other reasons.
- Good quality Council owned (not for profit) housing for rent for local people is needed.
- There is a need for affordable first-time homes to rent and buy.
- Homes should be truly affordable for those such as key workers. Genuinely affordable housing should be provided under the Community Land Trust model. The type of housing provided by Housing Associations is not good enough for local people.
- The affordable housing will be too far away from Dorchester town centre.
- Affordable housing is not for people without money in the area.
- Affordable housing does not mean cramped overpriced flats.

# 2.7. Economy

## Jobs and employment land

### **Dorchester Civic Society**

• The provision of an area of employment land is an ambiguity in the strategic argument for DOR13. It is not clear whether this is needed to deliver a high-quality relatively self-contained 'garden community' or whether it is needed as part of the next major phase of growth for Dorchester.

### **Dorchester Town Council**

- The provision of the proposed 10 hectares of serviced employment land is not costed (and was not an element covered in the earlier Halcrow Report).
- North Dorchester would have a lower job: person ratio than Poundbury.

### **Stinsford Parish Council**

- Dorchester already has more jobs than houses leading to commuting.
- Concern that the proposal count attract employment away from Weymouth.
- The proposals have almost nothing to contribute on the rural economy.

- There are not enough employment opportunities in Dorchester to support the number of incomers of working age, especially young people. There are no large businesses or industries locally that would ever support the 7,000+ people coming to live in North Dorchester. The local economy would be unable to cope with such a large number of low-income people moving into the limited job market of Dorchester and wider area of south and west Dorset.
- Employment would not improve in the long term, although jobs would increase during construction. The assumption that new residents would work locally in new businesses may not be true, as businesses may not want to locate to the Dorchester area, especially given Dorchester's location and its poor road and rail links.
- There are few large employment sectors in Dorchester.
- Service industries have been major employers, but this has changed with the closure of the prison, reductions in Council services and the closure of retail outlets. The only people travelling into the area for work are in the care sector, who would not be able to afford these houses.
- There will be a lack of jobs for the extra population. The balanced population at North Dorchester will require more jobs, which are not available and have not been delivered at Poundbury.
- There won't be local jobs for people moving to this proposed development as employment opportunities in West Dorset are not increasing. The proposed housing will not be occupied due to lack of jobs in the area.
- There is no long-term job potential. Existing employment patterns are likely to change as new technologies spread, with a subsequent reduction in available jobs.
- The proposal will not redress the balance between jobs and working age population.
- Residents of the new development will work in Weymouth and Weymouth residents will travel in the reverse direction to work in Dorchester.

- Minimal employment in the area will lead to people travelling to find work. Residents will commute into Dorchester and to places like Bournemouth for work putting pressure on infrastructure, including in the town.
- Dorchester needs more employment land, not houses.
- Imbalance of dwellings and employment opportunities between Weymouth and Dorchester considerable daily commuting between the two.
- Only limited employment land should be provided within this site due to the current imbalance of more jobs than workers in Dorchester.
- Part of the site would be better used to facilitate a business park so that the old and inefficient poor-quality units within Dorchester could be vacated and the sites used for housing.
- Bourne Park, Piddlehinton could serve the DOR13 development as an employment site.
- There is no real assessment or plans to create the additional employment that would be needed. We should focus attention on creating jobs around the rich culture we already have. The vision to enhance Dorchester's role as an economic hub will ruin heritage tourism, which is the main economic asset of the town.
- Homes and employment in the 2016 workspace strategy do not match.
- It has been mentioned that 1.4 million square metres of employment land will be needed, but this is not defined. There is no evidence for this level of demand, especially with thousands of square metres of existing office and industrial space lying empty and in the light of other employment sites being given up for retail.
- There is a lack of justification for 10 hectares of employment land.
- The proposed employment land is remote from the access road and on open land sloping to the south, which will detract from the landscape.
- There will be significant run-off from the proposed industrial development site.
- It is not clear: what specific proposals the Council will put in place to create jobs; what support will be given to industry or business; or which business sectors would be given priority.
- There is a lack of community infrastructure with no community hubs proposed to enable home workers to share skills, knowledge and expertise. Bridport's offer makes it a much more attractive prospect than Dorchester for quality of life.
- The scale and speed of the project will place economic pressures on the region that will cause considerable economic and social strains.
- There is no indication of incentives for businesses to move into the area or any requirement for manufacturing.
- Lack of industry to attract younger workers.
- Dorset is a service industry county, low wage/skill base fulfilment demand should be investigated first.
- Plan does not allow enough employment opportunities, so will become commuter zone.
- Workforce would be near at hand and travel to work minimised.

# Dorchester Town Centre

- Dorchester is just the right size with enough shops, so you never have to leave.
- There is not an adequate high street. There are hardly any shops left as many are empty, with only food being adequately catered for. The town centre will not cope with the further expansion of the town.

- There has been a lack of care and attention towards the town centre, which lacks investment. The town needs investment in the high street, not housing.
- North Dorchester would not help the stricken town centre shopping area. The proposals threaten the revitalisation of Dorchester.
- Another development further out than Poundbury will destroy Dorchester town centre, where the empty shops will make it less attractive for tourists.
- There is no vision for the town and no town centre masterplan.
- The future of the High Street will be different after the pandemic. An assessment of the effects of the pandemic should be made, with a view to taking a different approach and making the town centre a vibrant place again. As many of the shops are empty, there needs to be a rethink on the use of town centre buildings, so that high streets can become multi-purpose locations.
- The vision needs to be altered to allow more housing in the town centre.
- A considerable portion of the housing need could be met by encouraging the creation of small businesses where families live over the shop and trade online using ultrafast broadband.
- Redundant retail and office space could be used to accommodate increases in robotic manufacturing technologies.
- The town centre needs to be made more attractive to young people.
- More money needs to be invested in the town centre to improve shop fronts.
- The transport links to the high street need to be reconsidered.

# Shops

### Public response

- Dorchester needs more shops, not more houses. The provision of quality retail space is needed.
- More business and retail premises are not needed / are unlikely to be needed at North Dorchester when so many lie empty in Dorchester and at Poundbury following Covid.
- Future retail options have not had regard to the structural changes in the UK economy as a result of Covid-19 and Brexit. Recent trends in retail and the high street, such as the shift to online shopping, have not been considered and these trends will not reverse.
- There will be a lack of local shopping facilities in the new development. New residents will shop elsewhere, usually at the nearest biggest mall.
- DOR13 will attract retailers back to the town centre.
- The proposed local centres at North Dorchester could contribute to the town centre decline. Premises in the town will empty with more retail in the new development.
- The community would be better served by encouraging / facilitating the occupation of existing empty shops in the town centre. We should be considering re-establishing independent shops.
- A development of this size will require its own shops. Therefore the centre of Dorchester which really needs more footfall will not benefit.
- Loss of major retailers from the high street.

# **Cultural facilities**

### Stinsford Parish Council

• There is a need for a comprehensive review of cultural facilities, sports facilities and publicly accessible green space.

### Public response

- There is a lack of community infrastructure, and no arts centre is proposed. Bridport's offer of three theatres, the Scientific and Literary Institute and its cultural quarter makes it a much more attractive prospect than Dorchester for quality of life.
- The plan does not address the shortfall in cultural amenities that already exists in Dorchester. The town badly needs a new arts centre after its original building was deemed inadequate.
- Provision of a theatre in Dorchester is needed.
- An arts / cultural centre, as was proposed for Brewery Square, is needed before any new houses are built.
- The development should include artwork and sculptures from schools and communities.

# Tourism

### Save the Area North of Dorchester (STAND)

• There will be impacts on our landscape, heritage, cultural assets and thus on our tourism industry.

### **Stinsford Parish Council**

• The scheme will threaten the developing tourism economy of the town which is largely based on landscape and heritage.

### West Dorset Conservative Association

• It is not clear how development on an area of landscape and heritage interest will drive tourism in the area.

### New Hardy Players & William Barnes Society

• Importance of tourism in relation to town's culture.

- The development would irreparably damage or destroy the economic well-being of our heritage and tourism industry. Cultural centres like Dorchester and the economies they support will become more important in the future as a result of the decline of High Streets.
- The development will have an adverse impact on tourism, with implications for Dorchester and Dorset as a holiday destination for both UK and foreign visitors. It will impact tourism spend, growth and employment. Insufficient consideration has been given to the long-term economic impacts.
- The Local Plan must support tourism strategies and activities within Wessex, ensure that the visitor economy works effectively with other sectors to deliver wealth, and position Central Dorset as a place to live, work, invest, and visit.
- The development could damage the Dorset 'brand', which is based on the County's smaller scale towns and villages, the importance of its farming and food production, arts and crafts and the opportunity for greener lifestyles.
- Dorchester is a historic town with potential for tourism and the Town Council is currently working on a heritage tourism strategy. This development would detract greatly from the town's tangible appeal and the ambiance of the area. Dorchester would no longer be an attractive place for visitors if it is a commuter town surrounded by crappy housing with little infrastructure to support it.
- It would harm Dorchester's tourist economy which is partly based on our connections with Thomas Hardy and William Barnes, our rich history and our local distinctiveness. Development

would not capitalise on the town's Hardy heritage as claimed and would also deter other visitors including history lovers, vineyard seekers, walkers and beachgoers.

- Dorset Council should provide significant investment to promote the DOR13 site's tourism potential for people interested in archaeology, Thomas Hardy and wildlife. Its role as a cultural / archaeological / ecological hub should be enhanced through improved accessibility, particularly pedestrian access from Dorchester, Stinsford and Charminster.
- Development would result in the loss of one of Dorchester's valued features, threatening the environmental and heritage assets that might help to support a modern tourist-driven economy.
- It is not clear how a development which compromises the watermeadows would expand the tourist economy.
- The development will be detrimental to tourism due to more traffic. Tourists will not want to visit a place where there are traffic jams and where they cannot park.

# 2.8. Community Infrastructure

# Infrastructure

### Chris Loder MP

• The development would put strain on amenities.

### **Charminster Parish Council**

• A 35% increase in population would have an impact on Dorchester's infrastructure.

### **Dorchester Civic Society**

• DOR13 would place an unsustainable burden on the town's infrastructure.

### **Dorchester Town Council**

- There has been a lack of engagement with infrastructure providers to determine what infrastructure is needed to support growth through local plan policies.
- The capacity of utilities and the need for further provision is not clearly reflected in any evidence.

### **Dorset County Hospital - NHS trust**

• Shortage of public charging stations in Dorchester.

- Increasing Dorset's population with 30,481 homes (about 74,000 people), would have huge infrastructure implications, requiring maybe ten primary schools, two secondaries and a sixth form college. Each community would also need a (village) hall and other infrastructure.
- The scale of development at North Dorchester is too big for the infrastructure of the town. Infrastructure, including schools, doctors, hospitals, roads, supermarkets, quality childcare, local jobs etc., is already under strain and could not cope with this number of new homes.
- The infrastructure of Dorchester would have to be completely reconstructed, but there are no adequate proposals for the extra community infrastructure that would be needed.
- Increasing the town's population by up to 50% (7,000 or 10,000 new residents), would place enormous pressure on infrastructure, which is unable to cope. Poundbury has already had impacts on the demand for facilities and services and there are no plans to improve amenities in the town.

- Dorchester itself cannot accommodate more infrastructure without considerable funding increases.
- No thought has been given to the supporting infrastructure required to make this development a functional and vibrant community. Social demands have not been considered and infrastructure has been inadequately planned.
- The infrastructure proposed to support the development will not be sufficient. There are constraints on infrastructure.
- Education, health provision and other local services, including social care, need to be improved to support an increase in the population.
- The Local Plan does not deal with the deficit of cultural, social and sports amenities that exists in Dorchester.
- The is a lack of community infrastructure as no citizen's advice bureau is proposed. Bridport's offer makes it a much more attractive prospect than Dorchester for quality of life.
- There is no guarantee community infrastructure or community venues will be provided, hence more pressure on schools, the hospital, GPs and emergency services.
- It will take many years before services such as shops, schools, doctors' surgeries and leisure facilities would be built.
- DOR13 does not oblige the development to provide and implement an agreed Green Infrastructure Plan. A 'Green Infrastructure Plan' must be implemented from the outset, with long term funding provided through a S.106 Planning Obligation.
- Lack of proposals to improve infrastructure in the immediate future.
- Need for development of infrastructure prior to housing otherwise the site will be a dormitory settlement to Dorchester.
- Need for the extension of utilities i.e. sewerage, water supply, electricity.
- Will need need a lot of small privately run facilities (local shop for sudden needs, newspapers plus elderly care, and more).

# Healthcare

### **Dorchester Town Council**

• The policy gives no clear indication of the healthcare that may be needed, with no response from the Clinical Commissioning Group to the previous 2018 consultation.

## **Stinsford Parish Council**

• The mechanism for the delivery of GP surgeries serving Dorchester and its surrounding areas must be identified.

- The development will further overload the NHS, including local primary and secondary healthcare systems. There will be pressure on health and social services and emergency services. There is no increased medical and hospital capacity in the local plan and no increase in funding to pay for it.
- Dorset County Hospital was at full capacity before the pandemic and will not be able to cater for 4,000 more families. It is already struggling to cope, even with an extension. It has a 3-year backlog of standard appointments due to the Covid-19 pandemic. A new hospital will be needed.
- GPs are already under pressure. There are queues outside GPs and pharmacies for appointments and to pick up prescriptions.

- Dentists are already under pressure. More NHS dentists will be needed. You can't find an NHS dentist for love or money.
- The increased elderly population would put strain on the hospital and health and social care services.

# Recreation / rights of way

### **Public response**

- The development may provide scope for greater walking / cycling linkages along the River Frome corridor.
- The watermeadows and landscape beyond are already extensively used by the public for walking and cycling and should be there for future generations. The countryside should be used for recreational use, not housing.
- This area of countryside, which is enjoyed by walkers, is a valued leisure amenity and is important for mental health, would be lost. The Public Rights of Way in the area currently provide options for enjoyable, circular, countryside routes.
- Beautiful walks around the edge of Dorchester and along the River Frome will be destroyed.
- The DOR13 site is one of the few accessible areas of open countryside close to Dorchester. Beautiful countryside within 15 minutes-walk would be taken away from us. Once developed, anyone living in the north of the town would only be able to reach the countryside by driving.
- Public rights of way and footpaths in the countryside, which serve as vital green corridors for people, will be lost.
- Large sections of footpath and bridleways, which are popular for walking, running, cycling and exercising pets will be lost.
- Rights of way may be diverted or extinguished or incorporated into urban sprawl, which is not a healthy option.
- There will be an impact on local freshwater fishing.
- Green areas are needed for people to enjoy the open space, to get fresh air, to experience nature and for mental and physical health.
- People come to Dorchester to get out of cities and the bigger towns and to be with nature.
- More recreational space is needed, otherwise Thorncombe Woods will be overwhelmed.
- The DOR13 area should be made into a country park instead, which would be an asset for the whole community, including the younger generation and would be very accessible from tourist attractions.

# **Sports provision**

### Sport England

- The recreational needs of the residents of Dorchester should be considered.
- There needs to be provision either on-site or off for indoor and sports provision.
- Sports provision must not be on the floodplain.

- The plan does not address the shortfall in sports amenities provision that already exists in Dorchester.
- Our leisure complex is bursting at the seams.

## Allotments

### **Public response**

- The provision of new allotments is required.
- Land that has been used for allotments should be replaced with a suitable alternative.
- Need for an allotment site to encourage people to grow their own produce and attract wildlife, as modern houses provide small garden areas.

# Schools

### Stinsford Parish Council

• The mechanism for the delivery of education on site must be identified.

## **Dorchester Civic Society**

- As there is significant spare capacity at three local first schools (5-9) it is not clear at what stage a primary school will be needed on the DOR13 site.
- In respect of a middle school (9-13) and high school (13-18) a four-form entry school is unlikely to be viable as the average size of a secondary school (11-16) is 986 pupils, equivalent to 6 or 7 form entry.
- There will be no new schools on the DOR13 site for many years with children of all ages travelling into Dorchester. This means links for siblings will be established at existing schools and make the establishment of a new school more unlikely

- Schools are already overflowing. New family homes will require bigger schools and / or several new schools.
- It is not clear whether consideration has been given to the current three-tier educational system in the Dorchester area, as new schools at all levels will be required.
- New schools, including a senior school, will be needed. This should not be a mixed age school as suggested in the early proposals.
- Currently the middle schools in Dorchester are full. Dorset Studio School is also oversubscribed.
- There will be no support for the school network with reliance on existing upper schools. Thomas Hardye School is under a lot of pressure and will not cope with the extra numbers. It is already busy with larger classes than average.
- The new residents will want to access Thomas Hardye School rather than any new school putting pressure on this existing facility.
- The development would have a dramatic effect on access to Thomas Hardye Secondary School for the wider community which is attended by pupils from as far afield as Bridport and Portland. Based on a policy of proximity existing residents may lose out.
- It is unlikely that another senior school will be built, putting stress on Thomas Hardye School.
- The increase in the secondary school age population will overburden one school but will not be sufficient for another school without doing damage to the first.
- There is not adequate planning for educational needs. Sufficient secondary school places should be allocated, but it is not clear whether new school provision will be delivered.
- Any delay in building new schools would put great pressure on existing facilities.

# Child / youth activities

### Public response

- There are extremely poor child / youth activities right now for the under-fives and teenagers, which are lacking in Dorchester as a whole.
- There is a lack of community infrastructure, with little in the way of youth provision. Bridport's offer makes it a much more attractive prospect than Dorchester for quality of life.
- Need for play areas for children of all ages.

# 2.9. Transport

## Transport / movement

### **Dorchester Civic Society**

- The draft Local Plan does not begin to address transport issues and there is a gaping hole relating to transport evidence. This has resulted in a lack of joined-up thinking and a failure to examine more sustainable development alternatives and transport solutions.
- There is an inadequate 'Movement Strategy' which is confused about the role of the 'link road', and offers no examination of alternative traffic scenarios.
- There is no acknowledgement of the difficulties in providing effective transport connections into Dorchester from the Crossways and Charminster proposals.

### **Dorchester Town Council**

- There is no indication of how the proposed development would deliver sustainable transport as sought by paragraph 104 of the NPPF. There has been no assessment of the transport issues.
- There is no indication that the proposals have been prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.
- There is no indication that the mix of uses on the site would minimise the number and length of journeys needed for employment, shopping, leisure, education, and other activities.
- There is a lack of information to show that the critical infrastructure needed to widen transport choice and realise opportunities for large-scale development could be delivered.
- There is no indication that the development could provide the high-quality walking and cycling networks and supporting facilities, such as cycle parking. The development will arguably be less well connected than Poundbury due to the barrier created by the floodplain.

## North Dorchester Consortium (NDC)

- NDC's sustainable transport statement shows that the location of the development meets with the sustainable development objectives of the NPPF. It is argued that the mixed uses on the site and the proximity of facilities in Dorchester make it well-situated to reduce the need to travel. As an urban extension to Dorchester the site will be accessible by walking, cycling and public transport, providing genuine alternatives to the car. It will also benefit from walkable neighbourhoods, new local facilities such as a secondary school and employment.
- The sustainable transport statement also shows that a new northern east / west link road would provide relief to the town centre and part of the A35. It would reduce traffic levels on High West Street which is an Air Quality Management Area.

### Save the Area North of Dorchester (STAND)

- There is no overall transport strategy.
- The development would increase car dependency.

### South Western Railway

- Needs to be a strong emphasis on high quality travel planning that will bring all the physical investment together and promote it to residents including financial incentives to try public transport and shared transport options.
- Development needs to be held up as a sustainable demonstrator but at the moment it appears to have been designed as a means of securing a road across the northern part of the town with minimal thought given to making all aspects sustainable and minimising its carbon impact.
- Too much reliance is placed on simple proximity to services and it cannot ignore the fact that people will still need to travel for work and leisure beyond Dorchester.
- Need for mobility hubs including shared transport facilities.

### West Dorset Conservative Association

• There is inadequate analysis of transport and the quality of the environment in Dorchester as a result of the DOR13 proposal. There is a lack of detail on the traffic implications, as people will not walk or cycle to the town centre.

- It is not clear whether the transport situation has been taken into consideration.
- There is no transport strategy to avoid gridlock (and pollution) in Dorchester town centre.
- There is no transport strategy for the Dorchester area or for the Council area. This is needed to
  plan for cycling, pedestrianisation of towns, rail and bus services and car use. An independent
  Traffic Plan for consultation should be commissioned. A sustainable movement strategy will
  need to include shared transport options such as mobility hubs including shared bikes (ideally ebikes), car club vehicles and strong regular bus links which should serve Dorchester South station
  directly and have working real time information.
- A strong emphasis on high quality travel planning is needed that will bring all the physical investment together and promote it to residents. This should include financial incentives to try public transport and shared transport options.
- The development needs to be held up as a sustainable demonstrator, but it has been designed as a means of securing a road across the northern part of the town with minimal thought given to making all aspects sustainable and minimising its carbon impact.
- A transport hub and links will be needed.
- The Local Plan's approach to travel does not provide adequate data on which to base the viability of new developments. It does not take account of: people working from home; households where people work in different towns; shopping online; or the changes resulting from the Covid-19 pandemic.
- Proposals for access routes to the developments do not address the impacts they will have.
- All use of private cars should be excluded.
- Suggestion that transport for children is a major issue.

# Traffic

### **Dorchester Town Council**

- There are concerns about the impacts of additional traffic on the local road network, on the approach roads into Dorchester and within the town itself, including further pressure on the town centre car parks. The difficulties inherent in providing good transport (and other) connections will result in more car-borne traffic.
- The A35 is already experiencing significant delays at local peak times as well as during the summer period and there is significant queuing along London Road / Stinsford Hill backing up to Grey's Bridge.
- There are concerns about higher levels of traffic on High East / High West Street, which is an air quality management area due to the high levels of nitrogen dioxide which are above the national annual mean objective.

### **Stinsford Parish Council**

• The 'Movement Strategy' is inadequate. The A35 is Dorchester's key link from the north and east and is already at or near to capacity. The proposal to keep unnecessary traffic from entering the town centre as part of the Dorchester Transport and Environment Plan will further exacerbate the traffic issues on the by-pass and place greater pressure on the rural roads.

### Piddle Valley Parish Council

• There is no detail on how traffic will be managed, including traffic and HGVs running through the Piddle Valley.

### Save the Area North of Dorchester (STAND)

• Development will give rise to additional traffic in the town centre and have polluting impacts.

### West Dorset Conservative Association

• There are congestion issues in Dorchester, for example at the Top of Town roundabout.

- Dorchester is not a commuter town, but the lack of local jobs means that it would become one. We should be building homes closer to where people work.
- People from DOR13 will commute to work damaging everything, including the atmosphere. The causes of commuting should be analysed, and policies developed to reduce car use.
- Those who work in Dorchester but cannot afford to live in the new development will continue to commute from Weymouth.
- There are already issues with accessing Dorchester due to current levels of traffic caused by an increasing population, visitors and an inadequate bypass. There are capacity issues surrounding schools and traffic issues on London Road.
- It is unlikely that the proposals would prevent in-commuting to Dorchester from Weymouth as this did not happen during the pandemic. Increased traffic will impact on roads to Weymouth and Portland, where the bypass is already congested, roads in Dorchester with the growth of Thomas Hardye School and local roads in Charminster.
- The early years of the local plan are likely to encourage commuting, requiring new road infrastructure. However, this will later become obsolete with the advent of self-driving cars and driverless taxis etc.
- Dorchester has few shops so cars will travel further afield to larger shopping centres and for work.
- There will be an increase in road traffic in Dorchester. Residents of the new development will use their cars to go into Dorchester because it will not be attached to the town. If 50% of new residents from 3,000 homes drive into Dorchester in the morning, there will be another 1,800 cars on the roads, causing congestion, air pollution and contributing to CO2 emissions.
- More short car journeys to access employment, services, supermarkets etc., in Dorchester will make gridlocked roads worse and increase road traffic danger.
- Traffic impact and congestion will cause pollution, decreasing the air quality of Dorchester. Pollution levels in the town centre are unacceptably high and development will add to this problem.
- North of Dorchester will increase traffic on the A35 and at Stinsford and Monkey's Jump roundabouts, which are already gridlocked.
- The employment land component will add heavy traffic requiring the duelling of the A35 from Ringwood to Honiton and the A37 from Dorchester to Yeovil.
- HGVs and large modern tractors are already a significant hazard on Slyers Lane (B3143). Risks are likely to increase with greater volumes of traffic.
- There will be an increase in traffic through Dorset villages, Hardy Country and historic farmland.
- There would be rat-runs through local villages to avoid delays resulting in danger, pollution and unnecessary blight to local villagers.
- Impact on the Greys Bridge and its traffic light system.
- Need for a one-way system.

# Roads

- Northern ring road is desperately needed to reduce traffic in the surrounding villages.
- The roads in the area are not adequate as they are single carriageway and already gridlocked in the summer. They are not suitable to sustain extra traffic and 4,000 homes (with 7,000 extra cars) would increase congestion and cause parking problems.
- The road improvements incorporated in the Local Plan are grossly inadequate. Significant road improvements are needed to make the development acceptable.
- Increased commuting to and from Weymouth would have adverse impacts on A354. The wording of DOR13 should set out the justification for a relief road to take the strain off the Tesco Roundabout for traffic coming from Weymouth.
- Improved transport links between Weymouth and Dorchester would remove the need for development at North Dorchester.
- The lack of connection between this site and the town centre would cause an increase in traffic and parking problems.
- Development would choke Dorchester, making it impossible to get in, out or through the town due to the increase in traffic. Traffic congestion in the town centre should be reduced by deterring through traffic and by improving cycling opportunities for people who are not confident cycling on roads with existing levels of traffic.
- There are only two vehicular routes between the DOR13 site and the town: via Grey's Bridge; and a new road to the north-west of the town. The Grey's Bridge route is already heavily polluted.
- The strategic road network requires significant investment even to support modest levels of development. Proposed provisions to ease the congested ring road and other roads are inadequate. The primary task of development is to build a trunk road.

- Improvements to the A35 and A37 are needed. The A35 from Yellowham Hill to Monkey's Jump needs to be dualled prior to development starting.
- The A35 at Stinsford needs to become a dual carriageway as planned and the Stinsford roundabout needs a rebuild.
- The Highways Agency has not planned to make any investment in the bypass or any other road provision in and around Dorchester.
- The road and junction at the Sun Inn are narrow and there is a dangerous junction at Grove Loders / Lidl / Car dealership.
- Green bridges under or over busy trunk roads need to be improved. A green wildlife bridge is needed over the Weymouth Relief Road.
- More traffic will mean more roads and the widening of existing roads, destroying even more countryside. Road improvements will have an adverse impact on the rural character of the area.
- Traffic increases in the town centre will impact on air quality. Children in Dorchester will choke and die from increased atmospheric pollution from traffic fumes.
- The narrow stone bridges around the town are part of the local character and will not cope with the additional weight and volume of traffic.
- East Hill and West Hill Roads, which serve Charminster village are very narrow and windy. The existing road through Charminster, via Weastleaze should remain clear from development.
- A new section of road from A352 near Charlton Down linking through to the A37 near Wrackleford is needed.
- There will be rat-runs through local villages as road users try to avoid delays caused by additional traffic.
- There will be an increase in traffic on rural roads stretching to the Piddle Valley, including on Slyer's Lane and through Druce and Waterstone in the Piddle Valley.
- No works should be commenced until all new roads are built and ready for use.
- Concern with additional pressure on Slyers Lane and highways in the town London Road, High East & West Street, etc.

## Northern link road

## Stinsford Parish Council

- The new link road between the A35 and A37 must be more than a feeder road for the A35, as it is already fully congested for much of the summer, and the Stinsford Hill, Stadium and Monkey Jump roundabouts are already overloaded.
- The proposed link road includes an abrupt bend and terminates at an incongruous point on the outskirts of Dorchester.
- A comprehensive traffic masterplan for Dorchester and surrounding roads is needed.

## **Dorchester Town Council**

• The basis for downgrading the single carriageway northern bypass to a link road is unclear, as are the likely impacts on traffic flows through the development and around Dorchester. The traffic modelling work that has been undertaken so far has not been made available and was not available to inform the strategy.

## **Charminster Parish Council**

• The proposed link road whilst possibly relieving traffic in the village, will damage the environmentally sensitive watermeadows.

## Chideock Parish Council

• The new road link will be developer built and as such will not ease the flow of traffic on the A35 which is unfit for purpose.

## **Dorchester Civic Society**

- There is confusion about the role of the link road presumably undeliverable at the standard required to serve any intended strategic road network function. Whilst its primary function is stated in para 23.6.32 as being 'to relieve traffic congestion issues' it will pass through the new development and will be designed to ensure that nearby residents do not suffer unduly from noise from the road and from poor air quality. If the road is only designed as a residential distributor road, it would not be an effective northern link road and would result in a significant increase in traffic in Dorchester with a consequent adverse impact on the AQMA.
- There is no evidence that any assessment has been made of the capacity of the existing bypass, or what improvements might be needed to avoid congestion. Nor is there any assessment of the comparative merits, in terms of cost and environmental impact, of possible improvements to the existing bypass as against the A35-A37 link road.
- No consideration has been given to the damaging impact of the proposed link road junction on views from Poundbury Camp. This is mentioned in paragraph 23.6.73 in relation to development west of Charminster (DOR14), but is not mentioned in relation to Policy DOR13, where the proposed link road and its junction with B3147 is likely to have a much greater negative impact.
- The proposed link road would undermine the viability of DOR13 as it would slice through the middle of the proposed development, completely undermining the concept of it being a 'garden community'.

## Frome Whitfield Residents

• The new link road will cut through the northern part of Frome Whitfield dissecting and destroying the integrity of the hamlet and the natural beauty and tranquillity of the area. It will pass immediately north of Yalbury House, which will be detrimental to its residential amenity. It will also slice through a footpath.

## West Dorset Conservative Association

• There is concern that the Northern Bypass has been downgraded to a Link Road as this is essential for minimising the impacts of additional traffic. It is essential that the road is completed and operational ahead of housing delivery.

- A relief road joining the A35 and A37 is supported.
- A new ring-road north of the River Frome is needed but what's proposed is not fit for purpose, as a minor through route will not alleviate congestion. The Council cannot hide behind climate change as reasoning. A northern by-pass is needed to cope with existing and future traffic, but the Local Plan fails to commit to one.
- The route of the A35 A37 link road is uncertain and there is a lack of clarity about what is being proposed.
- The proposed link road should leave the A35 east of Stinsford Roundabout and run to the west of Monkey's Jump Roundabout and should be designed to be a scenic feature.
- A road running through the estate is being proposed because a proper bypass cannot be afforded.

- If a by-pass was achievable, the costs would trigger pressure for large-scale expansion of development up to edge of the new road along its entire length.
- There is confusion about the purpose of the proposed A35/A37 link road. It is neither a 'northern bypass' nor appropriate for a residential area, where it would pass by a new school, and is likely to be a rat-run, including for heavy lorries and the like. No one will want to live next to the proposed northern link road.
- The proposed link road should have plenty of crossings to provide access to Dorchester town centre.
- The link road (and the river) will act as a barrier between Dorchester and the development meaning it will not be part of the town.
- The link road will provide tourists with a quicker route to bypass Dorchester. The carbon impact of this needs to be considered.
- Building yet another road would damage the natural environment and is not the answer. The proposed road will be environmental vandalism and prohibitively expensive, in view of the works needed to avoid flooding.
- The link road will result in the loss of habitats. The westerly connection to the A37 will be over vital wetland and very close to the ancient monument of Poundbury Fort.
- There is no recognition in the plan of the impact of the proposed link road junction on views from the Poundbury Camp ancient monument.
- The proposed link road is a threat to archaeology but there is no obvious alternative route.
- The proposed link road will have a noise polluting impact, including on the AONB.
- The proposed link road will have an air polluting impact.
- The proposed link road will cause litter.
- The new link road will provide an alternative route to the existing southern bypass and facilitate the closure of High East Street and High West Street to traffic.
- The new link road would not reduce the strain on the town centre.
- The proposed new link road would not prevent people from using the existing roads as shortcuts. There are no plans to improve access from the north, east or west.
- The money for the link road could be better spent on public transport provision.
- The proposed road from the A35 to A37 has not been through the proper statutory procedure.
- The link road will not be built until many houses have been constructed putting an impossible burden on local road infrastructure. Any delay in building new roads would put great pressure on existing facilities.
- No works should be commenced until the link road is built and ready for use.
- The local plan should require the link road between the A37 and A35 to be constructed in full as part of the first phase of development.

# Parking / park and ride

## Dorchester Town Council

• Proposals for the park and ride site to the south of the town in the draft plan give no consideration to the North Dorchester proposal. Despite being in the currently adopted Local Plan since 2015, the park and ride site has not progressed.

- Parking in the town is inadequate. There is not enough. As a result of the development, the residential streets in Dorchester will be packed with parked cars.
- Parking in Dorchester is already a thorny issue on the north-east side of town.

- The lack of connection between the DOR13 site and the town means that people will use their cars, with the resultant impact on parking. Extra parking will be needed in Dorchester town centre to cope with the impact of the development.
- There is nowhere suitable for more parking space save for the 'park and ride' adjacent to Weymouth Avenue at the Football Stadium.
- There is a need for an adequate park and ride site to serve the new development.

## Public transport

## **Dorchester Town Council**

• Sustaining an uneconomic bus service is not a long-term solution, and the commercial viability of any routes connecting the North Dorchester extension are likely to be challenging.

## **Stinsford Parish Council**

• Rail links are currently not suitable for the increase in passenger numbers. Where are the plans to upgrade rail links and train capacity to and from Dorchester?

## Go South Coast Buses

- A single development can rarely support new stand-alone services.
- The development would be dominated by car travel and reliant solely on high-cost highway infrastructure improvements. The policy does not take account of the need for sustainable transport and does not mention the need to facilitate bus connectivity to and within the development.
- Bus operators need to be involved in the layout of housing estates to enable them to be better served by bus. Transport connectivity beyond the development site also needs to be considered.
- Local bus service improvement funding should be prioritised above new strategic road connections.
- Engagement with bus operators is essential and we are happy to help shape developments and advise on what infrastructure is required to facilitate commercial bus operation in the medium to long-term after initial 'pump priming' using Section 106 funds.

## South Western Railway

• Developer contributions should include contributions to improvements at Dorchester South station including car parking expansion, accessibility (i.e., lifts), station building improvements and a mobility hub for e-bikes and car club vehicles.

## West Dorset Conservative Association

• There is a lack of commitment to the provision of public transport to and from the site.

## **Yellow Buses**

- There is a requirement for a bus route connecting to Dorchester, which could also link to the Charminster area.
- A half-hourly bus timetable will require £650,000 over 4 years and should then be self-sustainable.
- The medical centre and shopping provision should be made next to the distributor road so they can be served by buses.
- Bus provision is required to transport students to secondary schools.

## Public response

- Public transport is almost non-existent. Services are not well connected, infrequent and slow. Investment is needed for improved public transport, including between Dorchester and Weymouth.
- There is a lack of detail regarding public transport and the provision of active travel links and meaningful facilities.
- The development would not provide suitable access to Dorchester's train stations. A cross town journey would be required, generating extra traffic and putting further pressure on car parking.
- There need to be bus and cycle links from the development to both Dorchester railway stations. Developers should also make contributions to improvements at Dorchester South railway station.
- The bus services that currently operate are underused.
- Bus services in Dorchester have been cut (including the electric bus to Poundbury) and are no longer a viable option for most people.
- A cheap and / or electric bus service is required, but there is no commitment in the local plan to provide bus services.
- Suggestion that Dorchester is not a commutable town by train, due to the length of time/journey to any major town or city.

# Foot / cycle links to Dorchester

## **Dorchester Town Council**

- It is unlikely that residents of the new development would walk into Dorchester given the distances involved. If the walking / cycling routes across the watermeadows are well-lit, they will damage the ecological and heritage significance of this area, but without adequate lighting these routes will not be safe and attractive outside daylight hours, significantly limiting their effectiveness for work and school journeys during the winter months.
- The cost of integrating new pedestrian / cycle routes into the town centre network could be prohibitive at the Dorchester end.

## Stinsford Parish Council

- The current proposals do not consider increased cycling use adequately.
- The plan should look to open up pedestrian and cycle routes across the A35. This would open up Waterston Ridge allowing for a rich variety of landscapes associated with the Hardy legacy.

## Save the Area North of Dorchester (STAND)

• Making proper connections with the town of Dorchester will be impossible, given the frequent flooding in the valley, and thus an increase in car dependency and traffic problems.

## South Western Railway

• There need to be clear, well defined high quality cycle links from the development to both Dorchester stations.

- The site is not connected to Dorchester and is too far to walk to the shops and only cyclable if good routes are provided.
- Residents will use vehicular transport to access the town centre. A high proportion of trips will be made by car and the development will not increase walking and cycling, as national policy seeks.

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- People should live within walking or cycling distance wherever possible.
- Walking and / or cycling is not a realistic option for some.
- There is no proper planning for cycleways and there is a lack of safe cycle routes now. Future cycling provision is likely to be ineffective. I do not believe there will be easy cycle access to the town centre.
- Links between the DOR13 area and the town will be difficult to achieve across the floodplain given the need to cross the watermeadows and the need to not interfere with the flow of water. Access to the centre of Dorchester would require new bridges across the river.
- The proposed transport infrastructure links into Dorchester have not been considered to an appropriate level. No detail of the links to Dorchester is provided.
- The pedestrian / cycle links to the town centre will be unlit footpaths and therefore a barrier to pedestrians in the winter months and evenings and during times of flood.
- It is impossible to envisage where two of the three foot / cycle links will be provided as there is no obvious place to join into routes on the north side of the town.
- The footpaths should be created and made useable before development is carried out.
- Existing footpaths to Dorchester are flooded during the winter months.
- Argument of being able to walk to town but winter months are dark and cold.

# 2.10. Utilities

# Energy

#### Public response

- Infrastructure to provide power to the site is required. There should be a renewable energy allocation to power these homes.
- The DOR13 site should be sold for green energy production, CO2 sustainable capture projects, and organic farming.
- The anaerobic digester at Bourne Park, Piddlehinton has expansion scope, which could provide green energy for the site. This could help towards energy self-sufficiency and has immediate availability.

## Water / Sewerage / Drainage

## Dorchester Town Council

• The groundwater underlying the whole site is safeguarded for providing a public supply of drinking water and a Zone 1 inner source protection area exists within the site.

#### **Stinsford Parish Council**

- The demand for water resources required for a development of this scale will be significant and yet there is no information in the plan.
- DOR13 will also potentially have implications for underground water resources on which Dorchester's water supply is dependent.

#### **Environment Agency**

- Hydrological risk assessment should be done before the site is allocated.
- A significant proportion of the site is in SPZ1 for Eagle Lodge boreholes, which is a public water supply.

- Other sites for development may need to be considered depending on the outcome of the hydrogeological risk assessment.
- We note the plan would require upgrades to the water and sewerage network to serve the development.
- It must be ensured prior to allocation of this site that any required upgrade is feasible and that there would be sufficient capacity to accommodate the wastewater flows from, and water supply to, the proposed development.

## Save the Area North of Dorchester (STAND)

• There is a high likelihood that development would compromise ground water and its abstraction from the adjacent Source Protection Zone and that it would increase the nitrogen flows into Poole Harbour.

## Wessex Water

- We have a strong objection to the proposed allocation. The scale of the development will contribute to water shortages.
- An initial desktop appraisal indicates (if development is permitted to occur) the total development would need to be served direct from one of our service reservoirs. This would involve the laying of a new water main of approximately 3km in length.
- The allocation is within a Drinking Water Source Protection Zone. Residential development in this area could result in harm to the drinking water source.
- There is a need for a Hydrogeological Risk Assessment prior to the allocation of this site in the Local Plan. This issue should be identified as an 'environmental constraint'.
- There are concerns with deferring a Hydrogeological Risk Assessment to the development management stage. This is not acceptable and could result in uncertainty in the cost and effectiveness of any mitigation measures. There is a threat to the local water supply through proximity to the Eagle Lodge borehole. It will threaten the aquifer in the area and the quality of potable drinking water and there is no evidence that this will be safeguarded.
- If the development required connection to the existing public sewer network, improvements will be required at Dorchester sewage treatment works.
- Development must not be permitted close to Dorchester sewage treatment works restricting its capacity to expand to support approved development in the catchment (this also includes Crossways).
- There are existing apparatus crossing the site which will require protection. Any damage to our apparatus by third parties will result in compensation claims.

## West Dorset Conservative Association

• The constraints at wastewater treatment facilities are not mentioned in the policy.

- The town's water supply is already under pressure and consideration must be given to how it could be enhanced. Increased levels of abstraction from the aquifers to supply this new development may compromise the existing supply to Dorchester.
- Water supply for the new development will mean more boreholes draining the chalk aquifer and reducing the flow in the Frome and Piddle rivers. The increase in demand for water from boreholes would not be sustainable.
- A hydrological risk assessment should be completed.

- There will be a lot more sewage to deal with. The sewage and drainage system cannot cope now at Louds Mill. Sewage from all recent building has not yet been accompanied by improvement to sewage processing facilities.
- The present sewage facilities are struggling to cope. The development will overwhelm sewerage systems and there is no provision for increases in sewage treatment. Any new developments should contribute towards funding expansion of the sewage treatment works.
- There is a risk of pollution to the River Frome from run off and sewage, particularly during heavy storms.
- This amount of concrete will not be mitigated by drainage plans.
- The approach does not provide evidence that the important groundwater resources at the Eagle Lodge 'Source Protection Zone' can be safeguarded in the long term.
- The Inner Source Ground Water Protection Zone is a very important issue and an important development constraint.
- Concern with potential sewer outfall spills in the town centre and River Frome.

## Waste disposal / recycling centre

#### Public response

• There is a need for a new household waste disposal site. A household tip / recycling centre must be added to the masterplan.

# 2.11. Delivery

## Deliverability / housing trajectory

## Dorchester Civic Society

- No thought has been given to how the DOR13 proposal could be made to work. Difficulties in making the DOR13 proposal work are highlighted in the Heritage Impact Assessment.
- There is no Infrastructure Delivery Plan. If the eventual 'Delivery Plan' demonstrates that infrastructure for DOR13 cannot be delivered at a viable cost, the proposal must fail.
- There is no evidence to support the deliverability of projected housing completion rates. The Council's 'North Dorchester Annual Housing Trajectory' has not been adjusted to take account of the local plan programme being two years behind. This will reduce the total number of houses built between 2025 and 2038 calling into question whether the proposal is financially viable. Appendix 2 of the submission considers the issue of deliverability in more detail suggesting that housing delivery will be nearer 160 dwellings per year, rather than 240.
- There is almost a complete lack of information on how DOR13 will be phased. This gives rise to concerns that the development will rely on the existing road network, including roads within the Dorchester Air Quality Management Area for many years.
- It is not clear whether and when the two most expensive parts of the proposed new link road, the link onto the A35 at the eastern end and onto the B3147/A37 across the water meadows at the western end, will be built.

## **Dorchester Town Council**

• There are concerns around deliverability, as there is a lack of clear evidence that the allocation would be deliverable.

## Origin3 on behalf of Obsidian Strategic

- The allocation is supported, but the housing trajectory for the site needs to be realistic and
  reflect the challenging constraints. The site cannot deliver 3,500 dwellings and there is likely to
  be a shortfall of at least 140 620 dwellings due to: flood risk; some land being within a minerals
  safeguarding area; the need for a strategic road link between the A35 and A37; the need for
  nitrate neutrality; and the need to relocate the Cokers Frome Showground, which is used for the
  Dorset County Show.
- The housing trajectory suggests that the site will start yielding completions next year, which is highly unlikely as the site does not have outline planning permission and there are many stages to go through before completions will be realised. It could take 4-5 years before the first completions are realised, which would increase the stated number of homes to be delivered each year.

## Public response

- There is a lack of detail on implementation. There are too many key issues in the plan yet to be investigated / considered, which may affect the viability of the plan itself.
- The site might potentially be developed in a piecemeal fashion.
- The multiple ownerships of the site may make it difficult to provide the infrastructure improvements that are required.
- It may not be possible to secure the funding for the infrastructure improvements that are needed.
- There is a need to improve services before any allocation or expansion takes place.
- The proposed supermarket, doctors and dentist surgeries and schools need to be in place by the time the first phase of the development is completed. Phasing is needed to ensure that people can access services without needing to travel into Dorchester.
- The phasing of development is likely to mean that infrastructure will not be provided until after the houses are built.
- Building at a rate faster than 100 dwellings a year is excessive.
- Support for the allocation need to build fast.

## Impacts during construction

## Frome Whitfield Residents

 We fear that any development in and around the hamlet will make it difficult to access our properties, with constant construction traffic using the existing road which is single track in places and already dangerous. No part of Frome Whitfield should be used as a construction depot.

## **Public response**

- The creation of a 'satellite town' will take 35-40 years to complete.
- The disruption to the local area with the building works would be immense for years.

## Viability

## **Charminster Parish Council**

• The financial viability of the scheme is questioned. Will a quality scheme be delivered with the correct infrastructure and enough affordable housing?

## Stinsford Parish Council

• Concern over viability. Highlighting the proposed northern bypass with an estimated cost in 2008 of £100 million.

## **Dorchester Civic Society**

- There is no evidence to demonstrate the viability and credibility of DOR13. Without viability evidence, the plan must be considered unsound.
- No work has been done to test viability, deliverability and overall credibility. Previous studies showed that the DOR13 proposals would not be financially viable, so it is extremely unlikely that viability could be demonstrated.

## **Dorchester Town Council**

- A high-level viability assessment for the site has not yet been undertaken. Paragraph 67 of the NPPF stresses the importance of planning policies taking viability into account in identifying suitable sites.
- The previous Halcrow assessment concluded that the scale of development proposed on this site would not fund the necessary infrastructure. With 35% affordable homes, the Halcrow report concluded that the Dorchester North Option would have a significant negative residual value.
- The significant infrastructure required for an urban extension north of Dorchester could not be funded by developer contributions and would require in the order of £72,000 to £118,000 per dwelling supplement. Updated information in relation to house prices, house building costs, the level of affordable housing provision and proposed education provision do not indicate a change in the affordability of the scheme.

## Save the Area North of Dorchester (STAND)

• We are concerned about the viability of the scheme and the impact on Dorchester's services.

## West Dorset Conservative Association

• The Local Plan does not adequately address the relationship between infrastructure costs and the impact on viability of delivering affordable housing and key services. There is a need to further investigate viability and infrastructure, and to share the outcomes with the wider community.

- An increase of 4,000 houses is not viable in the area. Previous evidence shows that the development is not deliverable. The previous Halcrow assessment stated that development of that scale would not fund the necessary infrastructure.
- No evidence has been provided to show the financial viability and deliverability of the development.
- Viability concerns would make it impossible to deliver the 35% affordable housing required by the plan.
- It would be impractical to rely on S106 funds from the development to meet traffic needs.
- There is no evidence to show that the development is sustainable and deliverable. The site would not be financially viable because of the requirements for significant infrastructure and environmental protection measures.
- Extraction of sand and gravel within Mineral Safeguarding Area will be costly.

• After several decades of research to demonstrate that the DOR13 site is not viable the council has decided to completely ignore the findings and failed to provide any new evidence to the contrary.

# 2.12. Sustainability Appraisal

## Comments on the Sustainability Appraisal (SA)

## **Dorchester Civic Society**

- The assessments of DORCH A (the site of DOR13) and CROS H, the site north of the railway at Crossways / Moreton put forward for development by Woodsford Estates in 2018 are inconsistent and CROS H is dismissed for spurious reasons.
- CROS H is dismissed due to the strong negative effect on soil due to the loss of Grade 2 agricultural land. DORCH A also has a strong negative effect for the same reason, but is included as a sustainable location. However, as CROS H is a safeguarded site for sand and gravel with part of the site allocated for mineral extraction, development after mineral extraction would cause no adverse impact on soil.
- CROS H is also rejected because the railway line would restrict access to the services and
  facilities at Crossways. However, there is no mention that the provision of a footbridge(s) would
  overcome this problem. In contrast, for DORCH A there is no mention that this greenfield
  development would be cut in half by the A35 A37 link road, causing severance and having the
  potential for noise disturbance and air quality issues. Also, the difficulties of providing routes for
  pedestrians and cyclists across the River Frome watermeadows and floodplain are not
  mentioned.
- The assessments of DOR13 and DOR15 (Forston Clinic, Charminster) in relation to air quality are
  inconsistent. The SA indicates that the additional traffic from the DOR15 site may affect air
  quality in the Dorchester Air Quality Management Area (DAQMA) even though the site already
  generates a certain amount of traffic from the existing uses and the direct access into
  Dorchester centre avoids the DAQMA. The SA argues that adverse impacts on air quality in the
  DAQMA would be avoided with DOR13 through the provision of a link road through the
  development. However, this route would not become operational until many houses had been
  built and even then, the nearest means of access into the town centre for a significant number
  of households would be through the DAQMA.
- It is difficult to see how a strong positive impact for affordable housing provision at the DOR13 site can be justified since the evidence to date suggests that the site may not be viable which would impact on the level of affordable housing provided. It is untenable at this stage to say that the provision of affordable housing is a strong positive.
- In terms of school provision, DOR13 is stated to have a strong positive impact. However, analysis shows that there is some capacity at local first and middle schools, which makes it very unlikely that new schools will be provided on the DOR13 site. This means all pupils will be commuting into Dorchester, certainly for the first five years and probably until the end of the plan period.
- The SA should not show that the provision of community facilities would have an immediate strong positive impact, as they would not be available in the first five years of the development. At best these facilities will be provided at some time during the latter part of the plan period. Initially the impact will be (strongly) negative as people have to travel into Dorchester town centre for all facilities. Whether or not these facilities, including public transport, are provided at any time in the plan period is at least uncertain and at best can be considered neutral.

• One of the sites around Dorchester (DOR 04) was rejected because it was not available for development due to land ownership. Land ownership is not a sustainability issue and should have no part in this appraisal.

## North Dorchester Consortium (NDC)

- Much of NDC's evidence was not relied on for the Sustainability Appraisal (SA) of the draft Dorset Plan. NDC argue that the site performs much better than the SA suggests and have suggested many amendments to the SA to deal with these issues.
- NDC consider that the SA overstates the potential impacts on nearby wildlife sites including the River Frome SSSI, Frome Meadows SNCI, Higher Charminster Meadows SNCI and Grey's Wood SNCI. It is argued that in some cases, potential impacts could be reduced through appropriate design and / or mitigation.

## Stinsford Parish Council

- Page 2 of the Non-Technical Summary paragraph 2.0.4 identifies several difficulties with undertaking the assessment which bring into question the argument for proposing DOR13.
- With reference to North of Dorchester (01 is Higher Burton Farm, 02 is North of Dorchester, west of Slyer's Lane, 03 North of Dorchester (west of A35) on page 22. How can sites with such significant potential environmental impacts be taken forward as 'preferred' options, especially when the corresponding impacts to other sites in the functional area that were rejected appear to be less.
- With reference to the reason for selecting DOR13 on page 194. There is no evidence that these impacts have been sufficiently considered and no adequate mitigation is proposed.
- With reference to the SA recommendation on page 8. The loss of this grade 2 agricultural land is contrary to the council's own decision-making criteria. How can it be considered an adequate replacement to replace 'very good' agricultural land with 'allotments' or a 'community garden'?

- There is a lack of a robust sustainability appraisal.
- The sustainability appraisal for North Dorchester is severely flawed.
- Alternative options have not been considered in the sustainability appraisal.
- The SA assumes that many people will walk or cycle into Dorchester across the floodplain and in all weather conditions, when the reality is that the vast majority of residents will drive.
- The SA underestimates the difficulty of dealing with surface water run-off and consequential impact on land and settlements downstream.
- It is not clear how the infrastructure enhancements essential to implement this proposal will be provided.
- A transport impact assessment is required.