



## **Dorchester Civic Society**

**An Independent Voice**

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**West Dorset District Council and Weymouth & Portland Borough Council  
Joint Local Plan Review**

**Initial Issues and Options Consultation  
17 February 2017**

# **Position Statement**

Approved unanimously at the meeting of the Society's  
Committee on 4 April 2017 following consultation with the  
Society's membership

Dorchester Civic Society exists to stimulate people's interest in the town and its setting; promote high standards of architecture, urban design and planning; safeguard buildings and areas of historic interest; and promote civic pride.



## INTRODUCTION

### ***Whither Dorchester?***

These observations on the Councils' *Initial Issues and Options Consultation Feb 2017* document are set out in three parts. **Part 1** summarises Dorchester Civic Society's main points in response to the Councils' consultation document. **Part 2** considers the issues, principles and criteria by which Dorchester Civic Society (DCS) suggests that the Councils should assess the proposals for further residential development in and around Dorchester. As part of this consideration, a number of questions arise which are set out in the text. **Part 3** comprises the Society's response to the specific questions asked in the Consultation document. The three parts are to be read together.

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## PART 1

### **Summary of the Dorchester Civic Society's main points in response to West Dorset District Council and Weymouth & Portland Borough Council Joint Local Plan Review: Initial Issues and Options Consultation (17 February 2017)**

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#### **1. A Strategy for the Dorchester area.**

The consultation document fails to meet the Inspector's requirement for a strategy to be prepared for the Dorchester area. At the next stage, the Society expects the Councils to present a considered strategy for the wider Dorchester area based on sound planning principles as well as land ownership. The consultation document merely suggests development options immediately adjoining the town without attempting to assess how those developments may help to resolve the town's problems and meet its aspirations.

#### **2. How many houses does Dorchester need?**

The consultation does not set out how many dwellings should be allocated to the Dorchester area vis a vis the other main towns of the plan area. This does not bode well for a 'plan led' approach, but one which could be hi-jacked by the weight of public opposition to development in certain areas and locations, rather than a needs and objectives based strategy. Neither does the consultation comment on how the proposed rate of development can be met, given historically lower annual rates of development.

#### **3. A need for more options.**

The approach of the consultation is one which closes down residential development options at too early a stage, as opposed to looking at the potential of all settlements to contribute to an overall strategy for the area which recognises the local needs of all settlements. The Society believes that other options are available.

#### **4. The role of Dorchester in its hinterland.**

Dorchester is an historic county and market town. It has always served the needs of a wide hinterland. It is not 'self-contained' and never has been. Whilst recognising the need for some growth, particularly to provide for genuinely affordable housing, there is no reason why

that need cannot be met over a wider area given the important functional relationship that already exists with its hinterland - particularly between Dorchester and Weymouth and Portland.

#### **5. Meeting housing needs in the smaller settlements of the Dorchester area.**

Existing 'Defined Development Boundaries' (DDBs) can act as an artificial constraint on development leading to development up to those boundaries rather than sustainable development judged against needs and set criteria. It is suggested that DDBs be reappraised to allow for formal allocations, where necessary, and small-scale development in accordance with community based Neighbourhood Plans.

#### **6. The need for a masterplan approach.**

The needs and objectives of the Dorchester area cannot be met without the prior preparation of a 'masterplan'. This may have three components – an overarching strategy – individual masterplans for each allocation setting out key requirements which will affect land values – and relatively detailed development briefs. Without such an approach, there is a distinct danger of sites being over valued at the outset and developers failing to provide essential physical and community infrastructure and affordable housing, on the grounds of 'unaffordability'.

#### **7. Dorchester's defined boundaries.**

Dorchester has distinct physical boundaries set by the River Frome flood plain and the A35/A37 bypasses. It is difficult to cross these boundaries without detriment to existing valued assets and without providing isolated housing estates with no real connection to Dorchester. Development should only be considered if it can be demonstrated to contribute significantly to meeting the town's needs and overcoming existing problems. A master planning approach is essential.

#### **8. The importance to Dorchester of its surrounding green spaces and links to open countryside.**

In the Dorchester context, 'green infrastructure' is of paramount importance. If the character of the town is to be retained for future generations, it is essential that the River Frome water meadows and their setting to the north are protected from development. If development is to take place to the north of Dorchester, it should only do so to the north of Cokers Frome Lane and in accordance with a strict master plan setting out all infrastructure prerequisites. This must also ensure that the water meadows are retained in a 'rural' condition for their enjoyment by town people, and importantly to maintain that characteristic and historic separation on the north side of the town between town and country.

#### **9. Meeting Dorchester's needs.**

Given that the allocations to be proposed for Dorchester are to meet the town's needs up to 2036, and may well set the trend for many years following – it is essential to get it right. The objectives that the Society has set out must be met and developments required to contribute very significantly to meeting the town's infrastructure and housing needs. Every care must be taken to ensure that development does not simply result in bland housing estates, without facilities, failing to provide for housing need, and failing to provide the means to alleviate

Dorchester's problems. Such development will only be to the detriment of Dorchester, with its heritage sacrificed to meet crude target housing numbers.

#### **10. Above all**

If the opportunities presented by new development are to be realised, the approach advocated by Dorchester Civic Society needs to be followed.

- The starting point must be a broad strategy for the whole of the Dorchester area – as required by the Inspector. Different approaches to fulfilling that strategy need to be fully evaluated against the Town's needs and objectives.
- Only then can draft allocations be put forward with confidence. Masterplans will need to be drawn up for each allocation detailing all infrastructure and community requirements – including how local housing needs are to be met.
- Finally development briefs will set out the approach to be followed for detailed issues such as design, layout, density, and house types. The opportunity to improve Dorchester, rather than simply expand it, must not be lost.

## PART 2

### Issues, Principles and Criteria for assessing future development in, or in the vicinity of, Dorchester

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#### 1 Background and assumptions

- 1.1 The West Dorset, Weymouth and Portland Local Plan 2011-2031 was adopted in October 2015. The Local Plan allocated land sufficient for 14,855 dwellings. The adoption of the Local Plan was subject to the Inspector's Report that highlighted a shortfall in housing provision of 645 dwellings by 2031. The Inspector recommended a review take place by 2021 to provide land, not only to make up the shortfall of 645, but to provide a further 3875 dwellings for the next five years 2031-2036 - a total requirement for 4520 additional dwellings. The two Councils published 'The Joint Local Plan Review initial issues and options consultation' on the 17 February 2017 with a request for observations by 3 April 2017. The document sets out the initial thoughts of the Planning Authorities' options for providing for the additional 4,520 dwellings.
- 1.2 In relation to Dorchester itself, the Inspector in his Report stated:  
*The change requires that a strategy is in place to meet long term development needs at or in the vicinity of Dorchester by 2021 and that a site or sites necessary for its implementation are identified as part of review proposals* (Para 139, Inspectors Report)
- 1.3 The Inspector does not define what he means by the phrase '*... at or in the vicinity of Dorchester...*'. Elsewhere in the Report, he refers to the Councils' proposals for development at Crossways meeting some of Dorchester's housing need. He acknowledges that Crossways, '*... has potential as a sustainable location...*' (Para 136), although he later states '*... without substantial enhancements to transport links I do not consider it is a particularly sustainable option.*' (Para 165)
- 1.4 DCS considers that any development within a six-mile radius of Dorchester, whether by expansion of existing settlements or new settlements, should be considered as being, '*in the vicinity of Dorchester*'.
- 1.5 The Inspector does not state anywhere what quantity of housing should be provided in the vicinity of Dorchester. There may be an assumption that, because Dorchester is the biggest town in West Dorset, it should take a large proportion of this allocation. The DCS has seen no analysis as to how the extra 4520 dwellings will be allocated between the two Council areas or how the required dwellings will be allocated between the various existing settlements or possible new settlements.
- 1.6 Having determined the amount of housing for each settlement, it is not clear what methodology the Councils will use in making specific site allocations. It is vital that a

clear, objective methodology, is set out based on sound planning principles, including meaningful community involvement, to avoid the danger of site allocations being driven by landowner/developer proposals or the protester who shouts the loudest.

- 1.7 The housing requirement is based on an assessment that 775 houses need to be built every year with 35% of those being affordable. In the period 2000-2014, the average number of houses built per year was 666 of which only 18% have been affordable. Two questions arise from this: (1) having allocated sufficient land, what mechanism will be used to ensure delivery especially in view of the comments in the recent White Paper '*Fixing our broken housing market*' (Paras 2.47 – 2.511); and (2) how does the local planning authority intend to strengthen the implementation of its policy on affordable housing policy?
- 1.8 The Society seeks answers to the following four questions:
- **What methodology will be used to allocate the 4520 dwellings to the various settlements, whether existing or new, covered by the Local Plan?**
  - **What methodology does the Councils intend to use in making specific site allocations?**
  - **What investigation have the Councils undertaken to establish that the local house building industry is capable of delivering 775 houses per annum?**
  - **How will the Councils strengthen the implementation of their affordable housing policies?**

## **2 Aims, issues and opportunities**

- 2.1 **There are no easy or obvious options for further growth in and around Dorchester. The choice should be made on the basis of what contributes most to meeting identified objectives whilst minimising demonstrable harm to the many physical, cultural and historic assets in and surrounding the Town.**
- 2.2 The Inspector in his report recognises that a decision on the future expansion of Dorchester is: '*... a crucial, albeit difficult, matter for the Councils to resolve but one which it is vital to address when examining options for future growth.*' (Para 83, Inspectors Report).

### ***Physical characteristics of Dorchester and its setting***

- 2.3 Dorchester has a very distinct physical relationship with its surrounding rural area. To the north, the River Frome and its flood plain forms an unambiguous boundary between the urban area and the rural area: this boundary, established by the Romans, has stood the test of time. To the east, south and west a recent but no less distinct boundary has been formed by the A35 and A37 by-pass.

2.4 There is virtually no 'leakage' of development across these clear boundaries, no ribbon development, no new estates. In this respect there is a clear distinction between Dorchester and its surrounding rural area and villages.

2.5 Within the clearly defined urban area of Dorchester, once the development of Poundbury is completed in the mid 2020s, there will be insufficient land to meet the likely scale of housing required to 2036. New housing development serving Dorchester will necessitate expansion of some or all settlements in the vicinity of Dorchester (see Para 1.4 above) or a new settlement.

### ***Functional relationships***

2.6 Administration and public services

- Dorchester, as the County Town, should remain an important administrative and health centre serving the town, its wide rural hinterland and the County;
- The Town should have an interdependent relationship with the larger villages [local centres] and smaller settlements in its hinterland. For example, people may wish to live in nearby settlements but work in the town and take advantage of its shopping and cultural facilities; *and*
- The Town should continue to have a strong functional relationship with Weymouth. Many people choose to live in Weymouth and work in Dorchester. Provided that there is effective public transport, there is no practical reason for Dorchester to be 'self-contained' in terms of a balance between housing and employment.

2.7 Shopping, culture and tourism:

- The Town's role as a retail and cultural centre should be strengthened in order to provide for the needs of the Town, surrounding rural hinterland, and visitors;
- The variety of shops in the Town centre should be improved; *and*
- The Town should be reinforced as an all year round destination for tourism, with the current investment in the town's heritage and tourism continuing, and the heritage resources of the Town promoted.

2.8 Housing and social facilities:

- Housing for local needs should be provided at a cost commensurate with local incomes for all age groups and sections of the local community with an emphasis on ensuring provision for young families and adaptable housing to suit people's changing circumstances; *and*
- Social services and facilities, and formal and informal recreation opportunities, should be enhanced to meet local needs and the Town's hinterland.

2.9 Employment and the local economy:

- Long-term economic growth and job creation should be encouraged alongside diversification of the economy of the Town and its area.

2.10 **The Councils should assess the impact of new development in, or in the vicinity of, Dorchester having regard to the town's assets and constraints. The**

**objective of DCS is to ensure that new development causes no demonstrable harm to existing assets and where possible enhances those assets which make the town a pleasant place in which to live, work and spend leisure time.**

2.11 Physical, cultural and historic assets and constraints:

- The historic and distinct edge between town and country along the River Frome water meadows with uninterrupted views to and from the open countryside to the north;
- The Frome water meadows and their setting should be kept free of development and maintained in agricultural use but with opportunities for informal recreation and with a minimum of 'municipalisation' so as to maintain its current character;
- The views from the north of Poundbury hill fort; and from south and west, including from Maiden Castle;
- Important views out of Dorchester including the views from the Roman Walls, particularly along the northern edge and from Salisbury Fields, and views from Fordington across the Frome flood meadows to the east;
- The literary connections and landscape associated with Hardy and Barnes;
- Heritage - Roman and pre-Roman scheduled ancient monuments, designated Conservation Areas and their settings, Listed Buildings, and Kingston Maurward Registered Park and Garden;
- Landscape - the Dorset AONB, the Dorset Downs Landscape Character Area, the River Frome water meadows, and the valley pastures to the north of the town;
- Agricultural land: the best and most versatile agricultural land [Grades 1, 2 and 3];
- Biodiversity - Sites of Special Scientific Interest, Local Nature Reserves, and Sites of Nature Conservation Interest;
- Flood Risk - the flood plains of the Frome and South Winterbourne; *and*
- Groundwater Source Protection Zone 1, north of the Frome and extending down to the Eagle Lodge borehole.

2.12 The review of the Local Plan is primarily about allocating additional land for residential development. However, on the assumption there is likely to be a substantial allocation in, or in the vicinity of Dorchester, this will have an impact on the centre of Dorchester. There are a number of opportunities and current issues to be addressed. Potential development sites must be assessed against the contribution they could make to address these current issues and fulfill identified opportunities.

2.13 Wherever new development takes place, the following issues within Dorchester need to be addressed:

- The environment of High Street East and West: a solution to current traffic congestion and pollution problems;
- Improved public transport and park and ride facilities, a better environment for walking and cycling into and through the Town;
- Pedestrian links need to be improved between existing and proposed shopping and cultural facilities in High Street East and West, South Street and Trinity

Street and the emerging Brewery Square quarter with its proposed cultural and other attraction;

- Solutions must be found to Charles St, Fairfield, Top o' Town and Trinity Street car parks which make a positive contribution to both the economic vitality of the Town, its townscape and its heritage. Any redevelopment of the car parks will need to provide sufficient car parking and contribute to meeting the town's retail, employment, cultural and local housing needs;
- Highway infrastructure needs to be improved and traffic congestion within the Town reduced; *and*
- The quality of life of town centre residents should be kept under review.

2.14 **Dorchester needs to be seen as the effective County Town and service centre for its hinterland, continuing to play a pivotal role, but one which is interdependent with the towns and villages around it and with which it has strong functional interrelationships.**

### **3 Development strategies**

3.1 'Development Options' are set out in the *'Initial Issues and Options Consultation'* document. The Society considers that the Councils' approach is too restricted. It fails to address two critical questions: what sort of town should we be aiming for by 2036? *and* what is the strategy to achieve that? The consultation document contains a limited selection of sites for possible development adjoining Dorchester: why has development between Charminster and Charlton Down not been considered for example?

3.2 The strategies implicit in the consultation document are, in the view of DCS, too limited. Two further strategies are set out below (Strategy D and E) which should be explored at this initial stage in the Local Plan review process.

3.3 None of the sites identified by the Councils are without problems; all are sensitive, most extremely so. The challenge is to identify the development strategy that best meets planning objectives whilst minimising demonstrable harm to the assets and qualities of the town and its surroundings. It will also be a requirement to ensure that any development is to the overall benefit of Dorchester and surrounding communities.

3.4 The Councils' consultation document suggests what in practice are three strategies to accommodating new housing growth adjoining or in the vicinity of Dorchester, Strategies A, B and C. DCS believes there are two further strategies, D and E, that need to be evaluated at this initial stage.

#### **Strategy A**

Developing within or adjacent to the existing boundaries of Dorchester or nearby villages. This entails development of multiple smaller to medium size sites: e.g. sites

D4 (south-east of Dorchester), D6 (west of Poundbury), and other land perhaps adjoining Charminster.

### **Strategy B**

Creating one or more relatively self-contained 'satellite' neighbourhoods with a mix of housing, employment, open space and other uses. This entails concentrated development essentially in a single location - the Poundbury approach but not necessarily its characteristics.

### **Strategy C**

Predominantly Option B but supplemented by development of one or more edge of town or village sites.

### **Strategy D**

Expansion of selected settlements in the vicinity of Dorchester (see Para 1.4).

### **Strategy E**

Development that enhances the close functional relationship between Dorchester and Weymouth, contributes to improving their connectivity, and fully recognises the potential for both towns to provide housing and employment for a shared catchment area.

3.5 In testing these Options, the following matters must be taken account:

- On the assumption that land is required for another 4520 dwellings over the two Districts, what is the quantum that should be allocated to the Dorchester area?
- The allocation for Dorchester should include any settlement within a 6 mile radius of Dorchester; *and*
- Settlements with 'defined development boundaries' (DDB) should be included in this exercise whether or not proposals go beyond the DDB: settlements with no DDB should also be included in this exercise.

## **4 The need for a masterplan approach**

4.1 Whichever Strategy is chosen, an essential and integral part of the process must be the preparation of one or more masterplans governing how allocated sites are developed. Masterplans will be required whether there is a single main allocation (e.g. Strategy B) or a number of sites in separate locations (e.g. Strategy D).

4.2 Such masterplans should address the following facets of development (see *Creating Successful Masterplans: A guide for clients* (CABE, 2004):

- The quality of the buildings and spaces and their management;
- The ways these come together to create unique places;
- Built form in relation to history, culture and landscape;
- The provision of services;

- The engagement of local people and users in defining and being involved in the process of change;
  - The economic and financial realities; *and*
  - The role of different agencies in delivering investment and change.
- 4.3 Poundbury is an example of master planning. Although opinions differ on aspects of the development, Poundbury is a nationally, and indeed internationally, recognised exemplar of what can be achieved when there is an initial comprehensive vision; an agreed masterplan; a landowner committed to the long term; and rigorous planning and project design, implementation and estate management.
- 4.4 There is no reason why such an approach cannot be applied to a number of sites within one overarching framework for how the selected sites contribute to the objectives of the Local Plan.
- 4.4 A masterplan will be a key document. There should be a policy that, before any development takes place on land allocated in the review of the Local Plan, a masterplan should be prepared and approved by the Councils. Some of the locally specific issues such masterplans should cover include:
- How the development contributes to the identified aims issues and opportunities of Dorchester identified in paragraphs 2.1 – 2.14 of this Position Statement:
  - Provision of housing to meet the 35% requirement for affordable housing;
  - The mix of dwelling types to meet the differing needs of the local population;
  - Local urban form and development density;
  - Building design, Dorset vernacular and materials;
  - Linkages between Dorchester and new developments;
  - The mix of community services and other facilities to be provided in new development in response to local circumstances.

**Part 3** of this Position Statement responds to the specific issues raised in the Councils' consultation document.

## PART 3

### Response to the specific questions asked in the Consultation Document

*This section comprises a response to the specific issues raised in the consultation document. It should be read with the attached 'tests' set out in Part 2 against which the Society considers that future residential allocations in the Dorchester area need to be measured. This response follows the numbering of the consultation document. Paragraph numbers referenced are those of that document. The Councils' questions are in red.*

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#### 1. Chapter 1. Introduction

1.1 The Society notes that the Inspector called for '*... a long term strategy for development in the Dorchester area ...*' (Para 1.10) and clarifies 'area' by referring to '*... in the vicinity of Dorchester*' (Para 7.11).

1.2 Further clarification of what he meant by 'vicinity' can be found in his comments on Crossways which he considered to be a possible sustainable option for meeting the housing needs of the Dorchester area provided that there are substantial enhancements to transport links. Crossways is approximately 6 miles from Dorchester. The Society's comments are, therefore, based on the premise that the Dorchester '*area and vicinity*' comprise an area some 12 miles across including villages and, in particular, '*local centres*' (as referred to in Para 1.15) with good transport connections and community infrastructure facilities, and not solely areas that adjoin the town.

#### 2. Context

The Society notes the need for additional housing in the plan area and supports such provision with an emphasis on local housing needs and meeting the housing requirements of all sections of the area's population, including affordable housing, rented sector, family housing, and flexible housing to meet the changing needs of occupiers. Housing provision cannot, however, be considered in isolation, and needs to be provided in tandem with social and community infrastructure, employment, transport facilities, and with no detriment to the natural and cultural environment.

#### 3. Vision for the area

3-i. **Do you agree with the proposed single vision being used to develop objectives and guide the strategy for development within the Local Plan area?**

The Society agrees with the proposed broad single vision for the plan area, particularly the emphasis placed on the need to capitalise on the linkages between Weymouth and Dorchester, but has put forward in Part 2 of this submission, its views on the issues facing Dorchester and surrounding area that need to be considered when assessing alternative residential allocations. The Society believes that more

emphasis should be placed on the need for additional housing in the rented sector, and ensuring that all settlements with appropriate infrastructure (i.e. 'local centres') have opportunity to develop in a viable and sustainable manner in accordance with an agreed hierarchy (as referred to in Para 1.15).

#### **4. Sustainable Development**

- 4-i. Should more information be included in the local plan to explain what is meant by the term 'sustainable development'?

The Society agrees that more explanation should be included on what is meant by 'sustainable development' in order that development is demonstrated not only to positively contribute to improving economic, social and environmental conditions, but also not to cause any demonstrable harm to these and other important considerations.

#### **5. Level of Growth - Housing**

- 5-i. Do you consider that the figure of 775 dwellings per annum remains an appropriate figure for the objectively assessed need for housing in the local plan area in the light of the 2014-based household projections?

The Society does not specifically object to the 775 figure as it is consistent with the current plan and provides significant headroom. This is subject to the question raised in our Part 2, para1.7 regarding the capacity of the local house-building industry to deliver this number of new dwellings each year. There is also a need to consider density and house types rather than simply house numbers. Other means of addressing local housing need should also be addressed, including reducing the number of vacant and second homes and making the best use of the existing housing stock.

- 5-ii. Do you agree with the level of additional housing provision proposed for the local plan area to meet needs for a further five years (i.e. at least an additional 4,520 new homes in the local plan area on top of that already identified)?

Given the comments above on 5-i, the Society does not accept that 'at least' 4520 houses should be provided. The figure already includes headroom and should be considered a maximum figure. The words 'up to 4520' should be inserted.

## 6. Distribution of Development

- 6-i. Do you agree that the vast majority of the additional growth proposed for the period up to 2036 should be accommodated at Dorchester, Weymouth (including Chickerell and Littlemoor), Beaminster, Bridport, Lyme Regis, Portland, Sherborne and Crossways?

The Society accepts that the 'majority' (not necessarily 'vast' majority) of additional housing requirement should be accommodated at the named towns. Reference to Dorchester should include the word 'area' or words 'vicinity of' in accordance with the Inspector's comments. Given the difficulty of accommodating additional development in and adjoining these towns (for environmental and infrastructure reasons), then reference should also be made to the need to consider additional land allocations in named 'local centres' (the 'tier 3 other settlements' referred to in the consultation document) with the necessary infrastructure to support that development (or where the development will increase the viability of existing or proposed infrastructure) and with transport links to the named towns. At this stage, Defined Development Boundaries (DDBs) should not be considered as a restriction on further development.

- 6-ii. If the local plan review is to consider identifying sites for growth at other settlements, should opportunities be considered: at settlements with populations of more than 1,000; or at settlements with populations of more than 600; or at any settlement with a defined development boundary?

See above comments on 6-i. The Society considers that formal allocations should be considered in the larger villages [local centres] provided that set criteria regarding community facilities and access are met. In the case of smaller settlements, development should only be considered in accordance with locally agreed Neighbourhood Plans. In the case of Tier 3 settlements, it will be necessary to review DDBs in order to accommodate additional development. There appears no logic in DDBs remaining sacrosanct given the environmental and other constraints on the expansion of the named towns. Furthermore, it is considered that the whole concept of DDBs should be critically reviewed in the plan review (see response to question 6-vi below).

- 6-iii. Should Policy SUS2 continue to strictly control development outside defined development boundaries, having particular regard to the need for the protection of the countryside and environmental constraints?

Subject to the answer to 6-ii, once DDBs have been established by the review it is essential that development outside the boundaries is strictly controlled for the reasons stated, and in accordance with a plan led, community based system that seeks to identify sufficient land to meet identified needs. DDBs should only be reviewed again as the local plan is rolled forward.

- 6-iv. Should the supporting text to Policy SUS2 be amended to clarify the other matters that need to be taken into account when applying the policy to market housing developments outside DDBs, most notably: national planning policy; Policy INT1: Presumption in Favour of Sustainable Development; and the Councils' housing land supply position?

The Society considers that Policy SUS2 should not be weakened as suggested. Elsewhere in the Plan it may be relevant to include the need to make exceptions to policy only in the case of failure to meet the housing land supply requirement and then in accordance with sustainability principles. Currently, national policy requires any shortfall in meeting the annual housing target of 775 dwellings to be made up within the five-year land supply. Since the start of the plan period in 2011 there has been a shortfall every year. The current five-year land supply now assumes a building rate of over 1,000 dwellings annually, a rate not achieved in any year since 2000. The Councils must, therefore, consider capping this figure to ensure that the policy remains 'sound', i.e. achievable

- 6-v. Should the following factors be taken into account when determining whether a development proposal in rural areas is "at an appropriate scale to the size of the settlement"? Whether the proposals are of a strategic nature; whether the proposals would help communities to meet their local needs; whether the proposals would change the character and setting of the settlement; whether local infrastructure, including any necessary improvements, could accommodate or be supported by the proposed development; cumulative impacts?

It is agreed that the phrase 'appropriate scale' needs amplification but that the suggested text needs further development. It is considered that criteria 2, 3, 4 and 5 should apply, in the context of West Dorset, to all settlements including Dorchester. Criterion 1 is not understood, as a 'strategic' proposal will be an allocation in the reviewed plan as, for example, in a 'local centre'. SUS2 should not be used to assess strategic proposals. It would be appropriate to differentiate between villages and local centres in the text and also the role of neighbourhood plans. But how would these criteria be used to assess a major land allocation, for example, a development comparable in extent to Poundbury?

- 6-vi. Should different policy approaches apply to settlements with DDBs identified in the local plan and settlements with new DDBs identified through neighbourhood plans?

As the concept of DDBs appears confusing and inflexible, it would be appropriate to redefine its purpose. The answer to this question is therefore neither 'yes' nor 'no' but that a new policy is required. In villages, DDBs should be replaced by policy and criteria governing infill and small development [including exception sites] in accordance with NPs. In larger 'local centres', DDBs may be appropriate but larger developments should take the form of specific allocations.

As already indicated, whether or not a settlement has a DDB should be disregarded in respect of the area around Dorchester and should not be used, at this early stage, as justification for rejecting additional housing land allocation. Neither should the preparation of any neighbourhood plans in the Dorchester area be progressed until the strategic land allocations have been made. Once such allocations have been made, then it will be sensible to prepare further neighbourhood plans and define DDBs accordingly.

#### 6-vii & 6-viii. Portland ... .

No comment.

### 7. **Development at Dorchester**

To fully reflect the Inspector's views on the environmental constraints around Dorchester and the difficulty of expanding without crossing important physical thresholds, the chapter heading should have referred specifically to development 'in the Dorchester area' or 'in the vicinity of Dorchester'. It is noted that the Inspector did not caveat his comments on other named towns in the plan area in a similar manner. This is explained more fully in paras 7.11, 7.12 and 7.16, but it would be helpful to clarify 'vicinity' by reference to some objective criteria such as ease of access, and the functional relationship of local centres within the town's hinterland with Dorchester. For example, many people may be happy to work in the town but live in a nearby centre provided that access is good and that there are essential services such as local shops, primary school, surgery etc. The consultation document fails to respect the Inspector's views as all suggested sites could be described as being 'at' Dorchester.

#### Para 7.12. **Environmental Constraints.**

To this list of environmental constraints should be added Grade 1, 2 and 3 agricultural land, and the need to protect the setting of the Dorchester Conservation Area, particularly views across the Frome water meadows and back into the town from the north. Indeed, this historic and visual relationship between the town and the water meadows and adjoining downland is so important that the water meadows and related area should be included within the designated conservation area as an essential part of its setting. Dorchester is almost unique in having open countryside adjoining its centre and Roman boundaries.

#### Para 7.13. **Opportunities.**

To state that, by implication, any 'future growth at Dorchester will help' is clearly incorrect. Growth may well exacerbate existing problems. However 'some' growth in selected locations may help to meet identified objectives in line with stated priorities.

The Society has amplified its view on priorities and objectives against which development sites should be assessed in Part 2. The stated economic, social and environmental 'opportunities' in this paragraph should be recast as objectives which will be used to assess possible development sites.

At a detailed level, local housing need should refer to both affordable and rented housing. Under 'social' should be added '*support the town's cultural and leisure facilities*'. An essential part of informal recreation around the town is the current ability to be able to walk and cycle directly from the centre into open countryside, particularly to the north of the town.

The final point under environmental opportunities makes no sense. It is not possible to protect the important natural environment around Dorchester by focusing growth 'at' the town. The sentence should have been set as an objective for future development in relation to Dorchester's natural environment.

#### **Para 7.14. Possible Development Sites**

The Society does not accept, for reasons stated, that the area of search should be restricted to sites adjoining the town and would expect the next stage to examine, in addition to these sites, sites within the 'vicinity' including local centres within a 6 mile radius. The Society notes the potential implications and development issues but would prefer to see these set against stated objectives relating to potential harm and ways in which existing problems could be overcome as a result of additional development (as contained in embryo form in Para 7.13). See Part 2 of this submission. Comments are set out below under 7-ii and 7-iii.

- 7-i. **Dorchester has grown at an average rate of 175 new dwellings each year over the last 5 years. Should we plan for a lower level of growth, maintain that level of growth, or take a strategic longer term view for the growth of the town?**

The annual rate figure of new dwellings should depend on the chosen Development Strategy and may vary over the plan period due to infrastructure prerequisites. This should be part of a longer term view of future growth provided that there are mechanisms to ensure that development is phased over time and in conjunction with necessary infrastructure – as part of a 'masterplan' (see Part 2). Whether development is concentrated in locations adjoining Dorchester or in several locations in the wider area, it is considered that a 'masterplan' will be essential if a comprehensive concept (as achieved in Poundbury) is to be successfully implemented and all objectives achieved regarding community infrastructure, transport and housing for local people.

- 7-ii. **Are there any issues related to any of the site options that are not mentioned here?**

As the Society has already made clear in its observations, the potential sites identified are too narrowly based at this stage of the plan process. No consideration has been given to possible sites within the 'vicinity' of Dorchester as defined by the Society. The observations below are without prejudice to the suitability of other sites that may come forward as part of the plan process.

The language used in the table following the Consultation document's Figure 7.3, pages 32/33 is too ambiguous for meaningful comments to be made. The Councils need to explain the differences between:

- *'Impacts on landscape, heritage assets and water quality will need to be addressed'* (Area A);
- *'Development is likely to result in unacceptable impacts'* (Areas B and C);
- *'... avoiding the potential impacts'* (Area D);
- *'Potential for significant impacts'* (Area E); and
- *'... potential impacts'* (Areas F, G, and H)

All potential sites should be assessed against constraints and objectives - see our Part 2.

Under the table headed '**Potential Implications**' (following Figure 7.3, page 32 in the consultation document):

**Area A** - refer to potential damage to the setting of Dorchester including the Conservation Area, Scheduled Monuments, water meadows, and the importance of the area for informal recreation of the network of public paths and bridleways. Sites A, G and H are physically separated from Dorchester by the Frome flood plain and it is not easy to see how they can connect any more easily with the town than a more remote site further out from the town.

**Area B** – Agree that this should be excluded.

**Area C** – There is insufficient evidence that the whole of this site should be excluded: there may be a possibility of including a part of the site with Area D without affecting the scheduled monument.

**Area D**- Consideration needs to be given to how this site could be accessed without exacerbating existing bypass traffic congestion and also to how the site would connect with the town given the presence of the bypass.

**Area E** - as Area D.

**Area F** – this site is beyond the current well-defined separation of the bypass and it is not easy to see how it can connect any more easily with the town than a more remote site further out from the town. This comment applies with equal force to sites C, D and E.

**Site G** - See comment under A.

**Site H** - See comment under A.

Under the table headed '**Development Options/ Potential Development Issues**' (following Para 7.17, Page 35 of the consultation document)

**D1.** This area should be considered as two - the west side which could be seen as an expansion of Charminster and the east side which reads better with Site D2. The east side of D1 and west part of D2 are of paramount importance in retaining an open countryside link from the north to the town, and development should be resisted. Given the critical landscape importance of the Frome water meadows and adjoining farmland to the north, no development should be considered south of Cokers Frome Lane. This comment applies equally to D1, D2 and D3.

**D2.** In terms of visual effect on the town, this site has the greatest potential impact and raises serious issues regarding: - access into the town across the floodplain, water meadows and adjoining downland south of Cokers Frome Lane - and the potential prerequisite for an east west highway connection north of Cokers Frome Lane. This latter requirement, unless located well to the north, would have a seriously intrusive visual and noise impact on the quiet enjoyment of the water meadows area and the Walls Walks as well as views from the town.

**D3.** Similar comments as D2 apply. Add access issues both in relation to the existing A35 (a new junction is likely to be required) and to and from the town. Essentially this would need to be treated as a 'new village' with appropriate local facilities.

**D4.** Add reference to access issues, connection into the town, impact on bypass, and flooding problems. Given the close proximity of the bypass, this site would represent a very poor residential environment.

**D5.** No comment.

**D6.** There are serious issues relating to access to the town and over- elongation of the town in landscape terms particularly when viewed from surrounding vantage points such as Maiden Castle.

**D7.** As with D1, this site would need to be considered sensitively as an expansion of Charminster and be seen as a separate 'satellite' of Dorchester with its own improved community infrastructure and improved access into the town.

Many of the above points are touched on in Paras 7.16 to 7.18 and the Society would welcome the opportunity of working with the Councils to evaluate possible combinations of options against known constraints, infrastructure requirements, access issues and a vision for the town which sets out priorities and objectives – as detailed in Part 2.

**7-iii. What are the infrastructure requirements for the development of the site options, individually or in combination with others?**

Infrastructure has been referred to under 7ii above. If a decision is made to develop sites north of Dorchester, they will need to be treated as separate settlements as regards day-to-day community infrastructure. Critically, development of all the sites would require major investment in an east west highway link which could have a disastrous effect on the setting of the town and the quiet enjoyment of the flood meadows and related landscape. A masterplan would be a necessity.

**Chapters 8, 9, 10, 11 & 12: Development in settlements outside the Dorchester area**

It is not considered that the Society should comment on settlements outside the Dorchester area.

**13. Development at Crossways**

The Inspector has commented that Crossways should not be considered to be a particularly sustainable option for meeting the longer term needs of the County Town without substantial enhancements to transport links. Presumably, therefore, he would consider it a sustainable option with improved links. There is already a rail service, the bus service could be improved, and the West Stafford bypass could be completed to connect with the B3390 in conjunction with development which had this connection as a prerequisite. Crossways (unlike Dorchester) is relatively unconstrained in landscape and defined 'edge of town' terms, and is recognised (Para 13.3) as a dormitory for Dorchester which relies on the town for many higher level services. It should, therefore, be regarded as being within the 'area and vicinity' of Dorchester as regards potential for meeting the needs of Dorchester which cannot be met elsewhere.

**13-i. Crossways has grown at an average rate of 14 dwellings a year over the last 5 years with the development rate expected to rise to around 60 dwellings per year as the current allocation is built. Should we plan for a lower level of growth than the 60 dwellings per year, maintain that level of growth or should a strategic longer term view for the growth of the village be planned?**

A strategic long-term approach to Crossways should be adopted working with Purbeck District Council to help meet the housing needs of the Dorchester area. Development would need to be sufficient to finance identified infrastructure improvements including the completion of the West Stafford bypass to the B3390. This strategic approach would imply a higher rate of development.

**13-ii. Are there any additional issues related to the development of any of the site options?**  
No comment.

13-iii. What are the infrastructure requirements for the development of the site options, individually or in combination with others?

There would be a need to complete the West Stafford bypass together with making good deficiencies in community infrastructure. Infrastructure requirements would need to be considered as a package as part of a masterplan and prerequisite for a combination of developments.

**17. Affordable Housing**

As a general comment on affordable housing, have the Councils done any analysis of why the requirement for 35% affordable housing in Dorchester has been so badly missed (apart from in Poundbury) and what policy changes are required to ensure this target will be met in future? In particular, whether there are sufficient local circumstances such that an argument can be made to disapply national policies which seem to exempt so much development from providing affordable housing?

17-i. Should Policy HOUS1 be revised to apply the optional lower threshold in national policy and guidance within 'rural areas' as shown in Figure 17.1 (rather than the national 10-unit threshold), so that affordable housing contributions would not be sought on sites of 5 units or less in these areas?

Yes. However the provision of affordable housing [both low cost and to rent] needs to be coupled with a policy to ensure that any such housing goes to meet local needs. Without such a policy, there is nothing to stop low cost housing being bought for investment purposes or retirement from outside the area.

17-ii. What should the priorities be for the provision of different types of affordable housing in the local plan, such as: affordable rent; social rent; shared equity; elderly persons' affordable housing (including extra care); key worker accommodation; and specialist accommodation (for example for disabled people).

Given the White Paper and the difficulty of providing low cost housing suited to first time buyers in the Dorchester area, the focus may well need to be on housing for rent as opposed to provision of starter homes or shared equity arrangements.

- 17-iii. In the light of the expected statutory requirement to provide a proportion of starter homes on all reasonably sized housing sites, should the focus for the provision of other types of affordable housing be primarily on: affordable housing to rent; or affordable housing to buy or part-buy (for example, under a shared equity arrangement); or meeting the needs of particular groups (such as the elderly - including extra care housing; key workers; or people with specialised needs, including disabled people)?

The evidence from the Councils' Strategic Housing Market Assessment 2014, Part 2 (SHMA) is that a discount of 20% on properties costing no more than £235,000 is unlikely to provide many, if any, affordable homes in the Dorchester area. The Councils, using SHMA data, should carry out an analysis of exactly who would benefit from this policy and, if as seems likely, it does not benefit those in housing need, it should propose an exemption from the policy.

- 17-iv. Should Policy HOUS2 allow market homes to cross-subsidise the provision of affordable housing on exception sites?

The basis of exception sites is that land is provided at a price substantially below market value. Any provision of market houses will only serve to raise the value of the land thus negating the purpose of allowing exceptions to meet local need. The affordable housing policy requires 'in perpetuity' clauses and therefore any market housing should be resisted in principle. In practice, there may need to be exceptions but these should be dealt with on a case-by-case basis.

- 17-v. How should the provision of market homes on such sites be controlled to ensure that the emphasis remains on meeting local affordable housing needs and significant unplanned growth adjoining settlements is avoided?

Market homes on exception sites should remain contrary to policy.

## 18. Self Build Housing

- 18-i. Should serviced self-build plots be delivered to meet the demand identified on the local Self-build Register through: Current approach; Land allocation; Housing mix; Exception site; or a mixture of the above.
- 18-ii. Should proposals for Low Impact Dwellings that meet a set of criteria, be considered more permissively than conventional market housing to increase the supply of self-build homes?
- 18-iii. Is there an alternative mechanism that can be used to meet the demand for self-build and custom housebuilding?

It is considered that self-build housing makes little contribution to meeting local housing need and provision could detract from the main focus on the provision of genuinely affordable housing. The current approach should be maintained.

## **19. Level of Growth - Employment Land**

- 19-i. Do the figures in the revised workspace strategy provide an objective assessment of the overall need for employment land in the local plan area, especially in the light of national and local aspirations for economic growth?

Yes, but employment provision needs to be flexible in order to allow for new employment forms/types of working and recognise the decline of older employment models based on traditional industrial or trading estates. For example Poundbury provides a model based more on pepper potting suitable employment uses throughout the area.

- 19-ii. Do you agree with the assessment that there is no need to allocate any additional employment land in the local plan area in order to meet overall employment needs in West Dorset and Weymouth & Portland in the period up to 2036?

Yes, but there is a need for a flexible approach to employment uses within other land uses as well as traditional single use employment allocations.

- 19-iii. Is there a need at any of the towns (or other locations) in the local plan area for additional employment land to be allocated in order to meet particular local employment needs or encourage greater self-containment?

In line with the above comments, it would be sensible to design policies that allow for mixed uses and a pepper potting arrangement of employment uses.

## **20 Protection of Employment Sites**

- 20-i. Are there “key employment sites” listed in figure 20.1 that should no longer be given the higher level of protection afforded to “key employment sites”? Please tell us which ones and why.

No comment other than to allow for some flexibility.

- 20-ii. Are there any additional sites which should be added to the list of “key employment sites” listed in figure 20.1 and given a higher level of protection? Please tell us which ones and why.

No comment

## **21. Retail and Town Centres**

### **21-i. Are there any other factors in defining a retail hierarchy that the councils should consider?**

The retail hierarchy should be extended to include 'smaller' local centres such as Crossways, Broadmayne, Puddletown, and Charminster. The definition of 'small parades of shops' could be extended to include, as a further sub group, village shops which do serve as centres for their village and are in need of protection for sustainability purposes. It is recognised that commercial viability is difficult for the planning system to address.

### **21-ii. Using the draft definition of local and town centres, do you agree with the centres named under each category?**

See previous comments about smaller local centres and village shops.

## **22. Green Infrastructure**

### **22-i. Do you think the definitions of Green Infrastructure above offer a suitable framework for identifying green infrastructure types?**

These comments are from a Dorchester perspective. It is important at some point in this section to make reference to the role of 'green wedges' in connecting town and country and enabling people to connect with the surrounding landscape. Further emphasis should be placed on the role of green infrastructure in helping to protect the setting of historic towns such as Dorchester. Existing Policy ENV3 should be strengthened to provide a sound basis to judge developments around Dorchester which may harm the established green infrastructure by masking the existing well-defined separation of the Town and its rural setting. In Table 22.1, the section on 'green corridors' should be extended to include their potential function as green wedges interconnecting the town and country. Local character areas need to acknowledge the important views both to and from the town across the Frome water meadows and related area. Under 'other', it is pointed out that Dorchester has its unique Walls Walks including Salisbury Field.

### **22-ii. Is there anything missing from the categories?**

No, provided that the need to protect views which are of more than local significance, e.g. around Dorchester's Town Walls, is recognised.

## 23. Design

- 23-i. Should modular housing play a more important role in meeting housing needs within the area?

In principle, there should be no objection to more modular housing provided that it can meet accepted design standards.

- 23-ii. Should there be a requirement to provide a proportion of new houses at the enhanced accessibility and adaptability standards? or

- 23-iii. Should the requirement for enhanced accessibility and adaptability standards in new housing apply in certain site specific circumstances only? For example sites in town centres or sites with level access to facilities most suitable for people with reduced mobility.

There is a need for a range of house types to suit all sections of the community. In order to encourage 'downsizing' there is a particular need for smaller adaptable housing to suit the newly retired over time, e.g. on no more than two floors and provision for a ground floor bedroom and bathroom.

It would be sensible to have a greater proportion of enhanced accessibility housing in town centre locations close to other facilities.

- 23-iv. Should a requirement for a proportion of new houses to be suitable for wheelchair users be included within the Local Plan?

This should not be a requirement but a greater proportion of houses should enable easy adaptation.

- 23-v. Should a requirement for new homes to be suitable for wheelchair users be introduced in certain site specific circumstances? Examples might be sites in town centres or sites with level access to facilities.

Response as per 23-iii.

- 23-vi. Should there be a requirement for new housing to comply with nationally described space standards?

Yes. Adequate provision should also be made for gardens, storage and recycling facilities.

- 23-vii. Is there any evidence not considered above which would support the inclusion of enhanced standards for water efficiency within the local plan?

It is generally sensible to make the best use of water and to make houses as 'water efficient' as possible.

**24. Coastal Change.**

No comment.

**25. Wind Energy.**

25-i. Should the councils allocate suitable sites for wind energy through the local plan or rely on locally led initiatives such as neighbourhood plans?

No comment