**Advearse Comments on Dorset Council Local Plan 2021 – Draft v1**

**SUMMARY**

Our main concerns as set out in more detail in our response are summarised below.

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| 1 | Consultation  (Page 3) | The Dorset Council Local Plan is not a fair and proper consultation. Specific housing plans are given but here are no options or alternatives for people to choose between. The consultation period should be significantly extended under delegated powers and the LP amended to provide strategic alternatives for people to select/comment on. |
| 2 | Housing  (Page 4, 5,19) | The Local Plan should reflect genuine local housing needs and not be driven by unrealistic and unnecessary government set targets that do not reflect the local situation. Dorset Council should make the case for locally appropriate housing numbers below central targets. |
| 3 | Climate Change/Environmental Protection  (Page 5,7) | The proposed Local Plan is not compatible with Dorset Council’s declared climate emergency, zero carbon commitments and responsibility for protecting the natural environment |
| 4 | Green Belt/AONB  (Page 6) | There is little credible support and no strategic policies for the protection of AONB (Area of Natural Beauty) land. |
| 5 | Flood Risk  (Page 17) | There is a lack of focus on reducing flood risk via Strategic Flood Risk Assessment and avoiding building houses in areas that will increasingly as a result of climate change be at risk of flooding. |
| 6 | Pollution  (Page 14) | Traffic pollution as a result of large scale housing estates is not taken seriously. The Local Plan must accept that where there are legally exceeded levels of NO2 an AQMA (Air Quality Management Area), will be declared (eg East Street, Bridport). |
| 7 | Expectations on developers | A thread running through the plan is a soft approach to developer commitments. Requirements on developers should be mandatory and not optional. |
| 8 | Economy  (Page 21) | This section needs to be completely reassessed as tere is no sense that employment will change radically in the next 20 years. |
| 9 | Transport  (Page 24) | Transport is the biggest contributor to carbon emissions in Dorset, but there is no credible plan for improving vehicle, cycling and pedestrian networks to achieve the essential reduction in carbon emissions whilst increasing the housing stock. |

**VOLUME 1 – STRATEGY & TOPICS**

General Comments about the Local Plan

We have concentrated our examination of the plan on the overview contained in ‘Volume 1 – Strategy and topics ‘along with West Dorset and Bridport (Western Dorset Volume 2).

We support the concept of a Local Plan and if anything would wish it to have greater influence than it currently enjoys. We are pleased that Dorset has undertaken the consultation exercise and that it offered the webinars as a means of allowing us at the time of COVID to hear the Officers speak.

Local Plan Introduction

The introduction is to be commended for its coverage of the challenges facing Dorset, it is particularly important to see Health and transport issues highlighted. We have 2 concerns:

* It is a great pity then that the plan is essentially a Housing Plan. If we are to emerge from COVID and build sustainable towns and communities, there has to be an integrated approach to all services. This plan gives no hint on whether DC is committed to make this happen.
* the plan appears to be based on a business-as-usual model. Yet climate change and the collapse of our retail centres suggest a more proactive approach is needed.

**Sustainable Development** – Para 2.2 We cannot agree with your approach because you have used unacceptable housing target figures. The fatalistic approach that Dorset has to accept national government figures is not shared elsewhere. In western countries populations are starting to fall and we really do question the need for the extra houses. Of course if built, they will be bought by retirees, as second/holiday homes and for letting. That does not equate to need but what it will do is undermine the essential characteristics of West Dorset.

**Functional Areas** – Para 2.4 – We think the idea of functional areas is useful as is the hierarchy of settlements.

The distinction between the words ‘WILL’ and ‘SHOULD’ (Page 3) is honest but worrying. In an age where accountability to public scrutiny has never been weaker there is a danger that all the fine words about protecting the environment will be forgotten as unscrupulous developers force their way through.

**Specific issues based on volume 1**

Local Plan is not real consultation

The Dorset Council Local Plan sets out specific plans with lists of houses to be build and their locations. There are no options or alternatives given for people to choose between. The only consultation available is to agree or object to the plans set out. The expectation is that objections will be quickly discarded to avoid the need to face up to some hard choices and re-work the plan.

Whilst we understand the reasons for the proforma as the means of providing feedback, it none the less is a straight jacket in terms of setting out a detailed response on some key issues.

During the webinar on Housing on 9 February a Dorset Council planning officer stressed that how important it is for local people to have a say on where houses are built. This statement is at odds with a LP that says where houses will be built and how many.

By comparison, Bournemouth, Christchurch & Poole (BCP) and East Devon District Council have both issued consultation documents. The message from East Devon states:

“I am delighted to advise that we are producing a new local plan for East Devon. To start things off we have produced an Issues and Options consultation report. This report highlights some of the major planning issues and challenges that we see for East Devon over the years ahead and some of the potential responses. We would welcome your views on the matters we raise or any additional considerations”

The Local Plan is not easy to assimilate and respond to, particularly for the average local person and non-planning expert.

Major shortcomings include:

The material made available as part of the consultation is enormous, circa 2,000 pages the LP does not contain a list of alternative strategic options to trigger a meaningful discussion with the public and other stakeholders, but instead, in many cases, it just suggests in strategic terms a fait accompli the LP has not challenged inflated central housing targets which are way in excess of any sensible forecast of local housing proposals from the draft local plans of the former predecessor authorities appear to have been merely replicated, without the principles underlying such proposals being reconsidered; the current consultation period is, in the light of the critical omissions identified above and the impact of the COVID-19 pandemic lockdown, far too short.

To rectify the omissions the consultation period should be significantly extended under delegated powers. Also the LP should be much more concise to make it more accessible and provide strategic alternatives for people to select/comment on.

Government imposed housing targets

We believe that the Local Plan should reflect genuine local housing needs and not be driven by government set targets that do not reflect the local situation. The result of the government set targets is that is we will end up being developer led and won’t give Dorset the properties we actually need.

Dorset Council should be ready to justify a Dorset based approach to the planning inspectorate at public examination. This is possible as the National Planning Polícy Framework (NPPF), permits that a planning authority may in ‘exceptional circumstances’ use a different method of calculating the level of housing growth that is needed.

As the CPRE have noted, other councils have successfully made the case for locally appropriate housing numbers below central targets. Dorset needs a Local Plan that is achievable, deliverable and reflects and responds to local need. It is in the interests of the Dorset Council as well as all Dorset’s communities, businesses and residents that a locally relevant and achievable Local Plan is developed.

In 2020 an independent report for Dorset CPRE by ORS showed that the Dorset Council could be forced to plan for excessive numbers of new housing. The key findings were that:

* Central government's housing targets are 47% higher than the existing Local Plans in Dorset.
* The government's housing targets are way in excess of any sensible forecast of local housing need.
* The Government’s targets and algorithm are based on outdated and flawed population and household projections.
* Local authorities should encourage the development of suitable affordable housing for younger households.

The report proposes that Dorset’s local authorities should be prepared to challenge the central housing targets.

The threat of inappropriate and excessive developments that many communities fear is the result of the central housing targets which the Dorset Council is not consulting on. The argument that these housing numbers have to be accepted is not correct. National planning policy (NPPF) states that a local housing need assessment should be based on the central standard method unless exceptional circumstances justify an alternative approach.

During the webinar on Housing on 9 February a Dorset Council planning officer stated that there were no exceptional circumstances. The justification being that “Dorset Council have to allow for people wanting to move to Dorset”.

In the case of Dorset over 50% of the county is within AONBs, many areas are in the Green Belt, while other environmental designations recognise the exceptional quality of Dorset’s landscapes and wildlife. Dorset’s infrastructure also places constraints on substantial developments. For example, some river catchments and harbours are already polluted, limiting further scope for development without remedial action.

The central housing targets are unrealistically high not least because the central algorithm increases assessed local housing need by 40% to reflect high house prices. The apparent justification for this increase in numbers is that if you build more, then prices will come down.

Building more does not inevitably lead to lower prices. Invariably many of these “excess houses” would be bought as investment properties, second homes or holiday lets. The trend for people by second homes in Dorset and other perceived safe areas has been exacerbated by the pandemic. Nor would it necessarily address the need for suitable homes, including affordable one and two bedroom accommodation for young people and older retirees downsizing.

If unrealistic housing targets are set, then the houses might not be built (why would a developer build houses for which there is no demand), the land for such developments would not be brought forward (why would landowners and developers bring forward land that will not be built on) and the Local Plan would then fail the 5 year land supply test.

Climate emergency

For Dorset, with its exceptional landscapes, wildlife and heritage, the assessment of wide-ranging environmental issues is of great importance. The environment is Dorset’s greatest economic asset, and everyone’s future health and livelihood depends on this. We do not believe that the proposed Local Plan is compatible with Dorset Council’s declared climate and nature emergencies and zero carbon commitments.

**Section 2 - The Strategy for Sustainable Growth**

2.2 The need for housing and employment land in Dorset

Para 2.2.1. There appears to be an acceptance that Dorset’s Housing Supply target may have to increase ‘unmet need from neighbouring areas‘. No estimate of what this might be is given and no sense that DC will robustly argue against this. This is one of the most contentious statements in the whole plan. All the proposals for sites could be thrown out by a higher demand.

2.2.1 Dorset Council’s Local Plan Draft states that ‘the level of housing growth that needs to be accommodated in Dorset has been derived from the Government’s ‘standard method’, whilst also taking account of unmet need from neighbouring areas

2.2.2 Also, ‘The Government has recently proposed some changes to the ‘standard methodology’ which would alter the number of homes that are required across Dorset. Once changes have been made to the standard method, they will be reflected through subsequent iterations of the plan and prior to the publication stage’.

2.2.4 Meanwhile Dorset County has had to calculate a figure for annual local housing need that has thereby been set at 1,793 dwellings (30,481 dwellings over plan period). This total may well be reduced thus altering the impact of factors otherwise believed to be more significant that they actually turn out to be.

Recent developments in Britain will affect the projected housing need figures:

a) ONS forecast 25% reduction in projected annual household growth numbers

b) impact of internet shopping on the local retail and businesses;

c) impact of Brexit coupled with any consequent devaluation of sterling will impact on prices, and the level of disposable income, as well as on the likely level of future earnings in an area such as West Dorset;

d) cost of building materials that cannot be sourced from within Britain and therefore have to be drawn into Britain from overseas will have a significant impact on construction costs and therefore on the market prices for newly built dwellings;

2.5 Green Belt

For those of us who appreciate the way the Green Belt system called a halt to ribbon development, the proposal to chip away at the green belt seems wrong and we hope organisations such as CPRE will be listened to on this point.

2.6 The Spatial Strategy for Dorset

Para 2.6.14 ‘There is limited scope for expansion of Beaminster and Lyme both due to their location in the AONB ‘– why does that not apply to Bridport?

Para 2.6.24 Re-use of brownfield sites – We support the use of Brown field sites but feel the loss of wildlife habitats must be considered e.g., bat and swallow roosts.

**Employment Land** – Para 2.8 There is no sense in this section that employment will change radically in the next 20 years – Brexit/ post Covid /Climate change will all play their part. We already have vacant premises in Bridport.

**Neighbourhood Plans** - Para 2.9 It is a great pity that the LP process does not give added credibility to the NP. NPs have to fit in with the the LP but there is little encouragement to the hope that the NP’s could influence the LP. It is a top-down approach.

2.7 Meeting the housing requirement

Much of the discussion in this Section will depend upon how far amendments to the Housing Need are necessary as a result of the changes to be made to Future alterations to the Government’s ‘standard methodology’ referred to at Sections 2.2.2 and 2.2.4. Reduction in the Need makes fulfilment of that Need somewhat easier to satisfy.

Dorset Council has land in the category of Brown-Field sites that should be used for development before any further inroads are made into AONB.

**Section 3: The Environment and Climate Change**

Figure 1 Strategic priority includes:

“We will support renewable energy developments appropriate to Dorset.”

Given this priority it is strange that Dorset Council have shown no support for the Watton Village project. Particularly, given the eco and zero-carbon goals built-into that project. Surely these goals and the approach of Watton eco-Village are necessary for all major developments in Dorset.

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| The strategic priority wording must be far stronger ie “We will give first priority to energy developments appropriate to Dorset. Any planning applications that do not meet zero-carbon goals will be refused”  The role of the Local Plan column includes the following comment:  “The impacts of climate change can be reduced by avoiding areas at risk of flooding and building green infrastructure into developments”.  This statement is simply too weak and reflects the overall lack of urgency in the Dorset Climate and Ecological Emergency Strategy consultation document.  It is not good enough to simply say “…can be reduced…”. The impacts of climate change have to be reduced by avoiding areas at risk of flooding and building green infrastructure into developments. There needs to be a clear commitment here and forceful actions for Dorset Council to play their part in tackling the climate emergency. |

The risk of rising sea levels and increased major flooding events need to be fully acknowledged. This has to then spur the need for serious actions to avoid and mitigate these risks.

For a start Dorset Council must make a commitment to decline all building and housing developments in flood plains and areas at risk of flooding. Where developments have already been consented in flood risk areas Dorset Council must not add more housing onto these developments and must require house builders to build fully future proofed flood defences based on up to date water table and flood risk surveys.

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| The role of the Local Plan column includes the following comment:  “Through managing where and how development takes place, the Local Plan can minimise the distance travelled and focus travel onto active travel and public transport options”  The term “active travel” is not defined anywhere in the local plan. The impression is that it means walking or cycling. This is obviously commendable, but some recent housing planning applications granted by Dorset Council have been outside the defined boundary for Bridport and in locations where the roads are unsuitable and unsafe for pedestrians and cyclists. These locations also, in common with much of Dorset, do not have public transport options. This leaves these residents with no option other than to use vehicles.  The statement on the role of the Local Plan must be clearer about what active travel is and also that developments in unsafe, unsuitable locations for active travel will be refused. This refusal is not only on safety grounds but also on reducing unnecessary short vehicle journeys which contribute to climate change and are entirely avoidable. |

Figure 3.2: Types of green infrastructure and related policies

Whilst there are positives in this section around the need for cycling routes, tree planting, additions to ecology and strategic project there is unfortunately a fundamental flaw in its approach.

There is no mention in the strategic policies table to AONB. Given that the importance of the AONB designation it would merit at least a reference in the table as being a factor to consider in relation to “green infrastructure”.

The table also includes a reference to “Natural and semi-natural green spaces” and then a reference to “Designated wildlife sites”. These and other terms used infer that the natural environment is a hindrance to the planning process and as long as there is some “green infrastructure”, “designated wildlife sites” and “corridors linking wildlife sites” then the Council can carry on giving developers approval to build over the AONB.

There is then a later reference to “contribute to the character of the landscape”. Building on AONB or green landscape will only damage it. The term “contribute” sounds positive but needs to be replaced with a honest and realistic comment typically used in reference to planning such as “minimise the adverse impact to the character of the landscape..”.

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| Dorset Council need to reset this whole section to prioritise the AONB, green spaces, wildlife etc. The natural environment comes first and building should be accommodated where absolutely necessary and at minimum damage to the environment.  All the subsequent policies should be tested against this requirement. Where they fall short then they should be rewritten. |

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| ENV1: Green infrastructure: strategic approach.  This policy should explicitly promote the ‘brownfield first’ housing policy .The commitment to addressing the climate emergency needs to be made stronger.  Replace “Green infrastructure” with “Natural Environment”. Also make the requirements on developers mandatory and not optional.  The policies would then read:  “The Natural Environment will be protected from the adverse impacts of development…..”  “Developers will incorporate enhancements to the Natural Environment..”  “Any strategic development site will maintain the Natural Environment to serve the site” |

Section 3.5.11. “The council will seek to protect the AONBs from development which is outside the designated areas, but which would cause harm to its landscape character or adversely affect its natural beauty or harm the setting of the designated area (for example because of its visual prominence).”

Given the Vearse Farm scheme with plans to extend this to 930 houses and covering a large swath of the AONB this section rings hollow. It needs to be an honest reflection of reality: Building on AONB (or any green fields) inevitably will cause harm to the landscape. Dorset Council can refer to the many so called protections for AONB but these are meaningless.

But the reality is that AONB protections count for little when:

* the council fail to have a 5 year land supply for housing allowing developers to circumvent so called protections
* with 69% of Dorset being designated as AONB in the council’s view means that you have to build on AONB
* Landscape and Visual Impact Assessment (LVIA’s) are not independent/unbiased as they are paid for by the developer and the companies providing this service may even see themselves as promoting the development scheme.
* Independent bodies such as the Dorset AONB are not truly independent as they are paid for by Dorset Council. They cannot be counted on to oppose development schemes endorsed by Dorset Council.

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| ENVV4: Landscape  This policy is not fairly stated. The policy includes following statement:  “Minor development within an AONB or affecting its setting, will only be permitted if it does not harm the landscape and scenic beauty of the AONB and its setting”  For the reasons stated earlier, building on AONB will by its nature harm the AONB landscape and scenic beauty. This statement needs to be more honest and accept that development will harm the AONB and then give the reasons as to why it will be allowed. |

3.6. Protecting and enhancing heritage assets

The general thrust of this section is positive in terms of the language about protecting heritage assets including Conservation Areas from damaging developments.

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| A particular section that should be amended is Section 3.6.32 which states:  “Recognising that impacts can be positive, the council will encourage development proposals in Conservation Areas, which:  preserve or enhance the characteristics which contribute to the significance of a Conservation Area, such as settlement pattern and the form and use of buildings; and  avoid adverse impacts on and loss of buildings, significant spaces, views, and any elements which make a positive contribution to the character or appearance of a Conservation Area.”  This statement should be amended along with some of the accompanying details, to reflect the need to consider the impact of developments on the setting of the Conservation Area.  Large scale developments close to a Conservation Area will inevitably have negative impacts that conflict with the primary purpose of the designation, this being the conservation and enhancement of the Area’s natural beauty.  Section 3.6.32 should also be amended with a further statement:  “Developments close to and visible from Conservation Areas will only be permitted where the developments do not cause harm to the setting of the Conservation Area.”  “In assessing harm the Council Conservation Officer’s opinion will be accepted without Planning Officers or other council officials or developers placing pressure on them to water down or withdraw their opinion in order to allow the development to go ahead. In short conservation and environmental concerns from experts will be given priority over meeting housing targets” |

3.8. Achieving high quality and sustainability in design

This section has many good and sensible points about housing/building design. Climate change receives only a cursory mention: for example Section 3.8.2 says:

“Good design and place-making has a fundamental influence on the environment, the economy and on people’s lives. They are essential to achieving the aims of sustainable development, resilience to climate change and improvements to health and wellbeing.”

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| Whilst Section 3.10. High standards of environmental performance does mention greenhouse gas emissions this section should have a stronger and more clear reference to climate change being the primary factor in housing design. Also it should include designing carbon zero houses to combat climate change as well as providing resilience to climate change. |

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| The following policy should be added on building design:  “New buildings to be designed to a high quality standard, and sets requirements relating to solar orientation, adaptability and the use of high quality, durable and sustainable materials”  This section needs to include a substantial reference to how Dorset Council will ensure that all future new builds will be made carbon zero. |

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| Policy ENV7: Achieving high quality design includes no reference to climate change and makes this comment:  “Planning permission will only be granted for proposals that are of high quality and that follow the principles of good design and place making.”  The policy needs to have housing zero carbon design clearly referenced. And have the statement above amended to say:  “Planning permission will only be granted for proposals that are of high quality, zero carbon design and that follow the principles of good design and place making.” |

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| ENV14  Wording needs to be clear about developer financial contributions being obtained. All planning applications should include a financial plan to show how maintenance requirements will be satisfied over the lifetime of the development. |

3.10. High standards of environmental performance

This section is extremely important given that the climate emergency is an existential crisis.

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| The Government has confirmed that it will not amend the Planning and Energy Act 2008, which means that local authorities retain powers to set local energy efficiency standards for new homes. The Local Plan should set standards for new homes that go beyond the minimum required by Building Regulations. |

There are many places where the section/policy wording and the intention need to be far firmer. These are noted below.

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| Case 1  3.10.2. “High standards of environmental performance will be sought in larger developments through a nationally recognised assessment process and for individual buildings through both design considerations and building regulations.”  This is not sufficient. High standards of environmental performance are vital irrespective of size of development. Also “will be sought” is weak. Far better is “will be insisted upon”. Also it should include “Developments will be reused unless high standards of environmental performance are included in masterplan (for large developments) and the detailed planning applications” |

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| Case 2  3.10.3. “For larger developments where masterplans are to be prepared (including new mixed-use communities and single-use developments of a significant size) a nationally recognised assessment of environmental performance (such as BREEAM Communities) should be carried out. Such an assessment should be undertaken in parallel with the master-planning process to ensure that sustainable solutions are worked into the design early on, reducing the need to rework plans at later stages.”  The use of BREEAM Communities assessment is to be welcomed. BREEAM has used worldwide since the 1990s and is being used both by central and local government to ensure that projects meet the highest environmental performance standards. It has been adopted as a requirement by Bristol council.  On this basis section 3.10.3 should be more definitive. So  “For larger developments…………the BREEAM Communities (recognised assessment of environmental performance) will be mandated. Developments will have to achieve an Outstanding benchmark rating. All developers will need to sign-up to using and complying with this standard when submitting for Outline Planning Permission and include this undertaking in the Section 106 agreement”  It should be noted that many Local Authorities have for some years been incorporating environmental standards as part of supplementary and planning guidance, and are mandating BREEAM including within Section 106 agreement. It is only right that Dorset Council should join them. |

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| Case 3  3.10.5. “Energy consumption can be reduced if buildings and layouts are designed to a good standard of environmental performance from the outset. Methods which may be appropriate include: (a list is then appended)”  This is a positive statement and list of methods. It needs to be stronger ie “Energy consumption will be reduced if buildings and layouts are designed to a high standard of environmental performance from the outset. “  The list of possible methods should be compared to the UK housing: Fit for the future? by the Committee on Climate Change (CCC). This report states that new buildings need to be ultra low energy, using close to Passive House levels of heating energy, as of now. It states the factors new homes should include in order to achieve this goal:  excellent airtightness  ventilation with heat recovery  high levels of insulation  triple glazing  timber frame  Section 3.10.5 should be compared to this and the further methods noted by the CCC report included. A further commitment should be included that “New buildings given planning permission will be ultra low energy, using close to Passive House levels of heating energy” |

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| Case 4  3.10.6. “The Government has recently consulted on proposals to increase the energy efficiency of new homes through the Future Homes Standard. This will be achieved through building regulations and is scheduled to be introduced by 2025. The results of this consultation, once published, will help inform how the local plan addresses the energy efficiency of new homes.”  This section implies that the issue of energy efficiency of new homes is going to wait to be addressed until 2025. It needs to be far clearer that this is not the case as it would be a complete dereliction to wait another 4 (or possibly more) years for a standard that will inform the local plan. The statement is a complete misnomer with the climate emergency declaration by Dorset Council in 2019.  So the suggested amended statement is:  3.10.6. “The Government has recently consulted on proposals to increase the energy efficiency of new homes through the Future Homes Standard. This will be achieved through building regulations and is scheduled to be introduced by 2025. It is completely unrealistic to wait a further 4 year for this standard to be introduced and hence this Local Plan includes clear commitments to achieving high energy efficiency standards in all new homes” |

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| Case 5  The policy ENV9: Achieving high levels of environmental performance needs to be far stronger. It is not acceptable to have a policy that simply says “…..are expected to achieve high standards of environmental performance”. In a climate emergency just having expectations of developers is nowhere near good enough.  Instead it should be reworded:  “Planning permission will require all new buildings and alterations / extensions to existing buildings to include and deliver high standards of environmental performance” |

3.13. Pollution and contaminated land

This section sets out the situation regarding air quality;

3.13.2. “Poor air quality is damaging at every stage of our lives. Air quality in Dorset is generally good due to its rural nature. However there are two areas where air quality is recognised as an issue and where Air Quality Management Areas (AQMA) have been designated. These are in Chideock and Dorchester, with both being designated in response to nitrogen dioxide emissions from traffic. Where appropriate, developers will need to consider the implications of their proposals on air quality; where air quality is an identified issue, they will need to take opportunities to improve it and specifically around the actions in the relevant AQMA action plans. The cumulative impacts of developments in or affecting an AQMA will need to be taken into account in decision making.”

Only two AQMA’s are mentioned. But the Dorset Council website (Air Quality in Dorset) states – “East Road, Bridport has also shown exceeded levels of NO2, however, at present there is no intention to declare an AQMA (Air Quality Management Area), although this will be reviewed following consultation.”

This statement was included for many years under the old WDDC website. Going back 4 years the 2017 Air Quality Annual Status Report (ASR) also states: “There is no AQMA in Bridport. Following a Detailed Assessment of nitrogen dioxide in Bridport in 2011, the Council resolved not to declare an AQMA but continue monitoring to check future levels of NO2 here. There are no plans to review this decision at present“

So for 10 years East Road, Bridport has shown exceeded levels of NO2 but has not been declared and AQMA. The WDDC Air Quality report also identified that historically other parts of Bridport Town centre have also had pollution rates on occasion close to the limit requiring an AQMA.

As a result no action has been taken to protect the health of local people using East Road and no proper consideration has been made of developments that add to traffic and therefore increase the NO2 levels and add to the health risk.

Department for Environment, Food and Rural Affairs (DEFRA) undertake appraisals and have repeatedly made this observation:

”Defra’s appraisal of last year’s ASR concluded: Exceedances of the annual mean NO2 objective have also been recorded in Bridport for the last few years; however, no air quality management area has been declared at this location. On the basis of the evidence provided by the local authority the conclusions reached are not acceptable for all sources and pollutants. ”

Local authorities in the UK have a responsibility under Local Air Quality Management (LAQM) legislation to review air quality.  Where concentrations exceed [national objectives](http://www.legislation.gov.uk/uksi/2000/928/contents/made), measures should be put in place to reduce emissions, and be reported in the local Air Quality Action Plan (AQAP). Most such Action Plans are designed to address difficulties in complying with national objectives for either NO2 or PM10. (Note: WDDC or DC have not assessed the later pollutant)

So although there is a past and present pollution risk to the health of Bridport residents the Dorset Council (formerly WDDC) decide to take no action.

Worse the Dorset Council (formerly WDDC) via the Local Plan encourage the use of walking and cycling as a sustainable alternative to cars knowing that this may adversely impact on people’s health when exposed to areas with high traffic pollution such as East Street, Bridport. The risks of road pollution (in particular diesel fumes) are increasingly being recognised as underestimated (eg ashma risk for children, heart impact etc).

Dorset Council plans for Bridport is to add a number of care homes and further retirement accommodation as well as the large scale Vearse Farm development. VF will result in thousands of additional car movements every day (including the 10+ years of construction transport). Bridport town centre and surrounding roads will be brought to a standstill during busy times and the lack of car parking will result in more queues of cars and more pollution and increased health risk. As a result increasing numbers of people (including many older and more susceptible) will be at elevated levels of risk from air pollution, particularly in or near East Street.

These facts and the totally unacceptable failure by Dorset Council (also WDCC) on declaring Eaat Street, Bridport an AQMA make the comment “Poor air quality is damaging at every stage of our lives..” ring hollow.

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| Policy ENV12 Pollution Control states:  “…….where impacting on an Air Quality Management Area, avoid or mitigate its impact through positively contributing towards the implementation of measures to address the air quality issue including through the provision of green infrastructure and through building design and layout;..”  In the light of the above concerns this policy needs to include the following:  “Dorset Council will declare an AQMA where the air quality has exceeded levels of pollutants NO2 or PM10. If the Council decide not to declare an AQMA they will publish a formal statement prominently on the council website declaring why there is no intention to declare an AQMA.”  “All proposed major developments within a 2km distance of an AQMA or location where there are legally exceeded levels of pollutants NO2 or PM10 (but the council has failed to declare an AQMA) will be refused planning permission”  “All proposed major developments within a 2-3km distance of an AQMA or location where there are legally exceeded levels of pollutants NO2 or PM10 (but the council has failed to declare an AQMA) will have a presumption against planning permission” |

3.14 Flood Risk

Flood risk is a serious concern for many areas in Dorset, particularly those close to the coast.

Every local planning authority in England is required to conduct a Strategic Flood Risk Assessment (SFRA) to assess flood risk now and in the future, taking into account the effects of climate change. The Government requires that local planning policies use the results of the SFRA to direct development away from areas at greatest risk of flooding. The SFRA adopts the precautionary approach and illustrates a theoretical 'worst case scenario' to plan for.

The SFRA will help various parties consider flood risk when making planning decisions about the design and location of any: development and flood risk management features and structures.

The SFRA is therefore a vital planning tool to avoid developments and people living there being put a risk of flooding.

Level 1 SFRA is prepared for areas where flood risk does not pose a significant hazard and where development pressures are low.

A Level 2 SFRA is prepared when land outside flood risk areas can’t appropriately accommodate all the necessary development and the NPPF’s Exception Test needs to be applied.

The Local Plan includes:

3.14.8. “Flood risk is a combination of the probability and the potential consequences of flooding and considers all potential sources of flooding. The council is preparing a Level 1 Strategic Flood Risk Assessment (SFRA) which assesses the risks to the Dorset Council area from flooding. The SFRA also takes account of the effects of climate change on flood risk by identifying those areas that are likely to be at increased risk of flooding in the future. In addition, the Environment Agency publishes data on flooding from different sources.”

Section 3.14.8 raised some key issues in relating to the SFRA:

Given that many councils have already got both level 1 and 2 assessments in place why are Dorset council only now in the process of preparing a level 1 SFRA? Surely given the flood risks and the climate emergency in Dorset the SFRA should have already been prepared.

Also there is no mention of a Level 2 SFRA being prepared. Given that some developments (eg Vearse Farm, Bridport) are being location in/close to flood risk areas there is a need for a Level 2 SFRA to be completed before these major planning decisions are made or progressed.

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| Section 3.14.8 should be updated to reflect the need for both levels of SFRA to be completed and also for related planning decisions to be put on hold until they can be properly assessed for flood risk. The SFRA need to be maintained on an annual basis as the increasing risk from climate change becomes clear over future years. |

Section 3.14.10. includes the following “For sites of one hectare or more, or where development is proposed in an area identified as being at risk of flooding in the SFRA, a site specific flood risk assessment should be undertaken to help inform the development proposal and to enable the council to understand whether the development will be safe over its lifetime.”

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| This section needs to be amended to reflect the fact that the site specific flood risk assessment is invariably carried out by consultants at the direction of the developer. As such any advice or assessment given needs to be carefully assessed by Dorset Council for proper independent and accurate completion. Too often consultants have a vested interest in giving the developer the outcome that they desire.  Also it is essential that Dorset Council obtain their own independent expert advice on the flood risk assessment provided by the developers and this advice is reviewed by the council’s own specialists in flood risk. It is not sufficient to leave council planning officers to assess (if they do) flood risk reports when they have recommended a development and will have invariably bias towards ensuring that the development is not delayed or ruled out. |

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| Section 3.14.14 includes a very important point:  “The onus will be on applicants to demonstrate that there are no reasonably available alternative sites that are appropriate for the development within the relevant search area with a lower risk of flooding”.  Words should be included to ensure that possible alternative sites are properly evidenced with applicants providing a written assessments and the council requesting the public and landowners to make submissions on this. |

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| Section 3.14.17. “In those instances where the risks from flooding cannot be avoided, the council expects applicants to: apply a sequential approach at site level by avoiding development in the parts of the site which flood and by locating the most vulnerable elements of the development in the parts of the site with the lowest flood risk; demonstrate that development will not increase flood risks on site or elsewhere; preparing flood warning and evacuation plans; and Incorporate flood resistance and resilience measures into the design of buildings.”  The section needs to be strengthened. It is not sufficient that the “council expects applicants ….”. The requirements of this section should be exactly that - mandatory requirements. Also there is an onus on Dorset Council to thoroughly and expertly check the flood risk plans and documentation provided by the developer. This needs to be explicitly stated in this section. |

It is also very concerning that the council are contemplating building houses in sites at unavoidable risk of flooding. To be building houses and locating people where you need to have flood warning and evacuation plans just does not make sense. There are many sites in Dorset and elsewhere not at risk of flooding that can be used. Also it is well understood that there are sites close to flood risk areas that will in a few years become also at risk of flooding due to climate change.

**Section 4 Housing**

Section 4.3 Affordable Housing.

Again, this is one of the most important sections and it cannot be stated strongly enough high-sounding phrases are not enough.

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| Para 4.3.17 talks about assessing the ‘viability ‘of developments which have affordable housing. Dorset has hitherto been far too weak in allowing developers to use ‘viability’ as an excuse for not delivering the affordables which were one of the reasons the original plans got passed. This section needs to be more robustly written. |

With the low wage economy in Dorset, affordables (according to the definition) will not tackle the housing need. Local Authority building is required to house those who will never afford an ‘affordable’ house.

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| Our answer to the Page 141 Question is that affordable housing should be delivered by developments at the same rate across Dorset and fixed at the higher 40% rate. |

What is ‘Affordable’?

There is public concern that local authorities do not take sufficient early and appropriate action to secure funding for affordable housing. As we have said in commentaries on previous Local Plans, ‘Affordable Housing’ can mean several different things depending upon the people with whom this topic is raised. For anyone with adequate funds, anything, within reason is affordable. Below that a view can be held that is different depending on the perspective of the observer.

In terms of a significant number of households in the Bridport Town Area, ‘affordable’ means almost the unattainable to those included in the local Housing List. In order to provide these people with housing, more has to be done.

4.3.9 Tenure Split

In order to remove the cost of the land in question from the base used to calculate a discounted price for outright purchase, with or without external financial assistance. The same applies to rental property. The cost of the land has to be removed in some way to bring the rent down to an affordable figure. Furthermore, to deal with the local people on the Housing List, the only way to offer real help is to make radical changes by removing the cost of the land out of the pricing equation and into a totally independent trust, whether charitable or otherwise. Watton Village was to have been one such example.

Securing the Financial Contribution

As regards Local Authorities securing a financial contribution from a developer towards what has euphemistically been called ‘affordable’ housing, an arrangement on the following lines ought to be written into the grant of planning permission, or as a Dorset Council side Condition, and certainly to be added on VF before work begins on site. Note, this is simply to Secure Payment.

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| DC should insist on the developer providing a significant contribution towards the 30-40% of the development assigned for affordable housing. The financial amount should be negotiated at the outset before any work is done on-site. This sum should be written into the conditions attaching to the grant of planning permission agreed to be contributed by payment by buyers of the new houses direct to DC from the sale of the first tranche, or first and second tranches, of newly-built houses on site.  The money has to be paid over directly to DC by each of several private buyers before completion, preferably not as part of the completion process, otherwise during completion meeting additional documents may also be signed so that by the stage at which the sale to buyers is completed, the developer may say that its subsidiary company has already gone into liquidation. These payments to DC need to be done anyway before keys to access each house are handed over by the developer to the buyer or tenant during completion meeting.  Therefore completion of sales cannot take place to be executed by any agent or intermediary who is not the principal developer itself.  Doing this in this order avoids the developer placing the first or first and second tranches of new houses into a subsidiary company that after money had passed from the buyers / tenants to the developer, the subsidiary company is placed into liquidation before any funds reach DC. (Something like this used to be usual practice several decades ago.) |

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| 4.4.8 The statement needs to ensure a mechanism so that affordable housing is lost to the open market. Provision should be contractually made so that affordable houses can only be sold via a housing trust to local people on the housing in need list. |

Page 146 – Community Care Hubs – we strongly support these proposals but it does require a holistic approach. The move to ‘care in the community ‘was motivated by good intentions but starved of resources has left many vulnerable people isolate and lonely. Let us get it right and properly resourced.

**Second Homes** – Strongly support a detailed examination of which model will be best to minimise second home use.

**Policy HOUS7 Isolated homes in the countryside** – Totally disagree especially with the concept of allowing something of exceptional design to be built – These are weasel words to allow the uber rich to intrude on tranquil Britain.

**Policy HOUS1 Housing Mix** – This is a very important section granted the changing demographic – We should be moving away from vast estates of detached housing to more specific housing needs.

**Section 5: Economy**

5.1.2 The Local Plan states: ‘Economic Growth Strategy and Local Industrial Strategy must not come at the expense of the environment.’ We agree with this and add that from this time for the future great attention will be needed on applying techniques that minimise ‘non-Green’ waste, carbon-dioxide waste to arrest climactic changes that have already affected Earth.

Trades and Training

While discussing classes of business that could absorb employment, apart from research, not a word in the Plan mentions or alludes to ‘Training’. Many references are to service industry activities that are fine for marketing and sales, storage, warehousing, entertainment and consumption of food and drink. There will be a need for new industries, new manufacturing processes, the making of objects, parts for machinery, etc. Yet if activities are to be initiated in Bridport that sustain employment at above average local rates of pay, far more thought will be needed as to how this area of Dorset can develop research, training, and learning new techniques (Para 5.3.8) An example might be the design and making of three-dimensional objects in a variety of materials driven by computer printers.

There will be a need for absolutely clean environments for some processes to be viable. New business premises may have to be constructed that are fully eco-friendly, so a need would arise for specialist building and cleaning techniques. In such ways Bridport might be able to attract high value-added work and the employees to manage and work in such businesses. The Town is not really sustainable on the basis of processes drawn from the past.

Imaginative thinking is needed

Several references are made to B.2 and B.8 employment sites (Paragraphs 5.3.3, 5.3.4, 5.3.8, 5.3.9, 5.4.2) involving waste transfer facilities, waste management infrastructure, scrapyards and sewage treatment. It hoped that Bridport is not to become a destination for waste of all types drawn from other parts of Britain. It sounds more of a warning than enlightenment.

Bridport has over 1,000 listed buildings, arising from a variety of architecture and uses. In view of this, Para 5.4.8 rightly emphasises that development of housing and, indeed, industrial premises should not adversely affect the area’s landscape, heritage and built environment. This para adds that any potential increase in vehicle movements generated by development and the impact on the highway network must also be acceptable. This will be particularly relevant for vehicle routes within St Michaels Trading Estate and along B3162 along West Road and West Allington leading to the Town. Development that does not involve, or deliberately excludes, an employment site should necessitate submission to the Council of details of marketing, pricing and offers rejected, as spelt out on the final bullet-point of Para 5.4.12.

Future Town Centre Need Forecasts (Para 5.5.5 and 5.5.6)

Assessment of the need for changes to the Town Centre and the needs of potential employees and members of the community as customers will have to reflect changes of patterns of behaviour such as those derived from the public’s adherence to shopping via the internet, the effects of the Covid-19 pandemic which may affect behaviour for years to come, how Britain manages its trade with foreign countries in the wake of Britain’s exit from Europe, and the effect of changes in motoring habits and consequent parking facilities. It would be retrograde for the Town Centre to be stripped of active outlets where customers have traditionally circulated in favour of ‘out-of-town’ shopping.

The vitality and viability of District and Local centres, listed in Fig. 5.2 and Fig. 5.4, as focus for Town Centre users, must be strongly supported by sustainable planning decisions. With a local population of 13,900, the business activity of such Centres in the Bridport Town area could be severely damaged by the establishment of ‘out-of-centre’ sites. The latter should only be considered if sufficient justification is provided to the Council and the Public for opinions to be gathered whether critical or supportive, so the real consequences of such establishment would be evaluated.

Car Parking

A time may come when some car parking facility should be constructed ‘out-of-town’. That would depend upon the economic activity within the Town Centre becoming really sustainable and robust so that it was clear the Town had surmounted difficulties of Covid-19, Brexit and others mentioned above. At the Summer season, traffic queues build up along West Allington. If changes to provision of car parking becomes a necessity, it would be perfectly feasible to establish a terminal to the NE of the Town off A3066, just beyond Gore Cross and another terminal off Broad Lane just to NE of the A35 trunk road, both linked by a shuttle bus or busses calling at the transport hub needed in Town.

Section 5.6 deals with Town Centre Impact assessments

At Para 5.6.3 some circumstances are described for which it would be necessary to submit an Impact assessment. In respect of Vearse Farm should such assessment have been carried out on creating a development ranging from 760-930 or more houses and other infrastructure to and from which much vehicular traffic would necessarily be created. Add that traffic flow to and from the Town to existing and projected increased traffic flows and there would be significant impact on the Town centre itself and on West Allington with the pinch-point between two listed structures at either side of the road (Para 5.6.4).

The traffic difficulties here do not seem to have been addressed adequately. Merely planting an employment site and almost 1,000 houses in Vearse Farm would be very likely to aggravate these difficulties leading to long-standing congestion at the Town Hall junction.

Para 5.7 Management of Town Centres and Primary Shopping Centres

Para 5.7.3 refers to change of use under the new extended Use Class system no longer needing planning permission. This may not seem significant. Yet the scene at ground floor or street level is changing. Internet shopping leads to closure of retail units with former active footfall, because turnover through shop tills is severely reduced. If service trades supplant retails shopping, it is quite likely that, for example, professional service firms take on the premises vacated by a shop-owner and footfall goes right down. In terms of gross income, while a retail owner it might receive from £20-100 on average from a retail customer, the professional service firm may receive an average of £1,000 from each customer. To the public observer that street has overnight, as it were, become far less interesting and the appearance of that unit never alters.

What is going to be the overall impact of several such changes: visitors and tourists would be hard to attract. So a proposal along these lines would need detail consideration before it is permitted.

Section 5.8 Tourism Developments

Para 5.8.7 describes circumstances in which a tourism development that attracts huge visitor numbers annually will necessitate submission of a transport plan with the Town Centre Assessment. There will be examples where buses and coaches entering the Town need to have available a Transport Hub at which to park while visitors walk into Town for their scheduled visit. Bridport has been accustomed to receiving very considerable numbers of large passenger vehicles at the existing coach park. As Dorset Council promises that Bridport will become a favoured destination for tourists, such a Hub must be available in Town. This facility is also needed to support service buses with local routes, private bus companies hired buses, and so on. These activities do continue all year round.

**Section 6 - Community Infrastructure**

Community Infrastructure includes, but is not limited to, facilities and services such as; shops, banks, catering outlets, schools, nurseries, hospitals, surgeries, public offices, museums, emergency service facilities, roads, footways, railways, and communication links.

A local authority is expected to provide or plan for the development of most of these facilities in the Local Plan (LP).

Section 6 of the LP Dorset Council makes multiple references to the strategic priorities but, in the past, has always found ways to circumvent these requirements; a prime example being the enhancement of access to Bridport Medical Centre for pedestrians to the detriment of motorists that has resulted in a dog’s breakfast for both motorists (the pinch point) and pedestrians.

Reference is made at 6.1.5 to the Infrastructure Delivery Plan (IDP) but we are unable to comment as it will be produced when the LP is submitted; because IDP needs will become clearer “through consultation.”

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| Section 6.2.2. Concerns the funding of infrastructure obligations on new developments usually secured through section 106 agreements and contributions through the Community Infrastructure Levy (CIL). 106 agreements must always place an obligation on developers, they should never be qualified with the term “if viable.” |

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| Guidance on sport, recreation and play facilities is comprehensively covered. Developers are obliged to provide play and game facilities according to formulae set out in the LP. Following growing concerns over the loss of playing fields in the 1980s and 1990s the government introduced the statutory requirement to consult Sport England in matters related to playing fields. The LP fails to make any reference to the importance of consulting Sport England in the provision these facilities. |

There is a small section about education and training; it does little more than state the obvious – that new developments should make financial contributions to the provision of educational facilities.

Section 6.7 deals with The Transport, at 40%, the biggest contributor to carbon emissions in Dorset. The current dilemma facing DC is the need to reduce carbon emissions whilst increasing the housing stock. The LP emphasises the need to focus new development “in accordance with the settlement hierarchy.” This means that in order to reduce travel by private car and to encourage cycling and walking, unfortunately the topography of Dorset does not lend itself to the use of active modes of transport.

It is likely that the conflict between the consequences of increased development and the use of the internal combustion engine will be resolved during the life of this plan through the introduction of electric vehicles (EVs). Dorset Council should be prepared to make radical changes to its LP if the take-up of EVs grows rapidly. The LP emphasises safe connection to the strategic road and rail network but says nothing about safe connection to local roads, i.e. the sort that would link a new development to a town centre.

The rural character of Dorset and the lack of public transport mean that the demand for car parking is unlikely to diminish, especially since EVs will replace petrol and diesel powered vehicles. The LP includes much detail on the provision of charging points in both the public and domestic domain. The planning of these facilities appears to be very well covered, even the infrastructure for the installation of future charging points (passive provision) and on-street charging has been included. However, nowhere is the progressive move from fossil fuelled vehicles to EVs taken into account in the planning process.

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| The rural character of Dorset means that there are high levels of car ownership, a reduction of parking capacity would not necessarily discourage their use and is likely to cause concern to the community. Cycling should be facilitated by the provision of adequate parking places at convenient locations. In order to maintain capacity where DC proposes redevelopment of urban car parks it should consider imaginative schemes such as building low-rise multi storey car parks faced with shops and/or apartments in keeping with local architecture. Consideration should also be given to park and ride schemes. |

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| The UK Government passed a law that requires our greenhouse gas emissions to be brought to zero by 2050. Consequently our energy will have to be supplied from renewable sources as listed in the EU Renewable Energy Directive. The challenge facing DC is the need to balance establishment of renewable energy sources with the rural landscape character of Dorset. Small- scale renewable energy sources are likely to be more acceptable than large-scale wind farms. Two maps (north and south) have been prepared that show possible sites for the development of wind energy but the maps do not cover much of West Dorset. DC needs to clarify whether or not wind energy sites have been identified in West Dorset. The LP says that local communities should be consulted over the location of wind energy sites and that planning impacts identified by them should be fully addressed. |

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| At 6.10.1 Utility service providers are required to assure that their services will meet forecast demands. Instead of assurances it would be better if infrastructure needs were made a condition of planning applications. |

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| And again at 6.10.3 self-certification, presumably unverified, of non-ionizing radiation emissions by telecommunication operators, is not good enough. The operator should pay DC to commission an assessment by an independent expert. |

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| 6.10.9. Broadband provision in rural areas remains poor; the Government has allocated funds to support its development in Dorset. However, the reference to new homes and large developments is ambiguous. “Will” is used with regard to new homes; but “should” in the case of developments of 10+ dwellings where developers “should” provide Fibre ToThe Premises (FTTP). If the Government’s priority, as set out in the LP, is to deliver the best superfast broadband network in Europe, then FTTP must be provided to all new homes regardless of the size of the development. |

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**Section 34: West Dorset Functional Area**

**Volume 2 - Western Dorset Response to Section 36**

Para 34.1.2

A range of issues is noted including: a low wage economy; an ageing population; a lack of affordable housing; and, in the case of Lyme Regis and in some villages, a high level of second home ownership.

In the case of Bridport it is noted that the low wage economy gives rise to a particularly high level of need for affordable housing. However, the housing options included in the LP are all based on open market houses being built to fulfill the need for affordable housing. This is a failed model since houses that are not needed will be built to try to ensure that the affordable houses are provided. There is also a clear risk that developers will use viability assessments to avoid building the affordable houses. The LP should include soley or largely affordable housing led projects. A good example is the Watton Village eco housing project.

The housing planned for Bridport totals 1,139 which is 75% of all the houses included in the plan for West Dorset. Given the area this is a huge focus on a small market town.

The BRID2 Vearse Farm Urban Extension for Bridport has been approved at 760 houses. At the 2020 Judicial Review this was noted as the largest development in AONB. The intention is to add a further 170 houses on top of this single largest AONB development. The extra 170 houses were known about and intended when Vearse Farm development received outline planning permission in November 2017.

At the planning committee when the building of additional houses was raised the Planning Officer said that this was not for discussion as the OPP was only considering the VF application.

The representative of the landowner had referred to the land between Dreadnought Trading estate on Magdalene Lane and Vearse Farm across which the VF plan had a path and bridge connecting the VF development to Bridport. The representative said the landowner would only grant access across his land if he was given permission to build houses on it. At no stage was it made clear to the committee that this access was crucial to the delivery of VF development. The minutes of the OPP meeting did not refer to either the request from the landowner representative or the ‘future application’ status of the 170 houses.

The development of this adjourning land then was included in the 2018 LPR and was described: ‘These areas are integral to the delivery of the wider scheme.’

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| It is clear that the additional 170 should have been considered at the 2017 OPP as they are integral to the VF scheme and the planning committee members were effectively misled by being directed to ignore this intention. These houses and the extension of the existing VF plan should be removed from the Local Plan. |

Para 36.4.8

This section notes:

“The provision of public car parking close to the town centre is important to its continuing success, and therefore any development on these sites will need to take this into account. Policy AM4 Car Parking Strategy of the BANP also seeks to achieve this. If car parks are redeveloped a broadly equivalent amount of public car parking should be provided within close proximity”

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| This only suggests replacing car parking space taken up for development for retail. But with the plan for well in excess of 1,000 houses with an increase in population of up to 3,000 there will be demand for more car park space – not the same. Particularly as a majority of the houses are likely to be bought be retirees from outside Bridport who will rely more on vehicle transport. |

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| In terms of community infrastructure needs that should be considered, the principle is road improvements due to extra traffic and action to reduce the accompanying pollution. |

Para 36.5.3.

This section notes that:

“The whole Vearse Farm site could deliver around 930 new homes. This includes about 760 on the main consented part of the site with around a further 170 homes on three residual sites, namely: land at Vearse Farmhouse; land west of Coronation Road; and land to the west of Pine View.”

Para 36.5.6

The risk to flooding on the Vearse Farm site remains high despite the plan for the floodplain of the River Symene and other areas prone to surface water flooding being kept clear of development.

After the recent heavy rain there has been (as usual) some flooding on the VF site. Whilst much of this has been on areas that have not been designated for housing, it clearly demonstrates the potential for serious flooding impacting not just the Vearse Farm site but also run off into West Road.

We have contacted the Environment Agency (with copy to Dorset Council and Bridport Council) asking a series of questions about flood risk. In particular, we asked for an update on recent water table surveys.

We believe that these surveys will show that the site has a high water table and so imposes an increased risk of flooding. This may well mean that any house builder will have to invest considerably more in suitable flood defenses with the extra costs resulting in a Viability Appraisal being used to reduce the developer S106 costs and most likely a reduction in the provision of affordable houses.

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| The Local Plan should include provision for further independent flood risk assessments on Vearse Farm. |

BRID2 Policy

The policy statement should reflect that additional housing provides for growth in the entire Local Plan area and not just Bridport.

The policy refers to:

“The main employment area will be designated as a key employment site and should be accessed directly from the B3162 West Road. The development will deliver highway improvements necessary for the development to go ahead, including improvements to the Miles Cross junction of the A35 with the B3162 West Road.”

With the plan for close to 1,000 houses plus employment facilities, care home and school there will be a huge increase in traffic on B3162. This will be exacerbated by the plan to have all entrances/exits to the Vearse Farm site on West Road.

No significant road improvements have been identified for West Road. The only reference is to enhanced road markings at the West Allington junction. The reality is that West Road will see an increase in the risk to pedestrians and cyclists. In places the footpaths either do not exist or are very narrow.

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| A new traffic/transport assessment is needed as the one used previously is out-of-date. |

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| The Vearse Farm Masterplan and supporting evidence are no longer fit for purpose and will impose serious transport and infrastructure pressures on Bridport Town Centre. The Masterplan needs to be reassessed. Specific points in relation to references to the Masterplan are noted below. |

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| There is a reference to the masterplan:  “.. should ensure that the design and layout relates positively to the surrounding area and does not have an adverse impact on the surrounding landscape, nearby heritage assets and the setting of the town”  The wording is disingenuous. A large building development on AONB land will by its very nature have an adverse impact. To pretend that it is possible to not have an advearse impact is nonsensical. At least amend the wording to reflect that in reality there will be an adverse impact and that the aim is to minimise this impact. |

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| There is a reference to the masterplan:  “…the layout allows for at least two points of vehicular access into the development from the public highway, and for a bus route through the site. Primary vehicular access should only be from the B3162, West Road (with the exception of emergency vehicles / public transport)”  It is not clear where buses will enter the site. Also will there be an increase in bus services which have been repeatedly cut over recent years. |

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| There is a reference to the masterplan:  “strategic planting around the south and west perimeters of the site is carried out in advance of the site being developed. Existing hedgerows should be retained where possible and provision for their future retention and management put in place”  This paragraph should be made clearer - what level of planting is being envisaged (ie mature trees?) and how long and too what degree before the site is developed. |

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| There is a reference to the masterplan:  “The floodplain of the River Symene and the rising land to the south of the site will remain undeveloped and be managed appropriately for the long-term benefit of the local community and wildlife”  Is there a guarantee that this land will not be developed? Also what does managed appropriately mean? Have the land owners agreed to this and how will it be enforced? |