

# West Dorset and Weymouth & Portland Local Plan Examination

STATEMENT FOR MATTER 13

EASTERN LOCALITIES OF WEST DORSET  
CROSSWAYS (CRS1)

9th DECEMBER 2014

FOR WOODSFORD FARMS  
(REPRESENTOR REF: ID933)

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

- 13.5.1 Crossways is an appropriate and sustainable location to focus significant new housing to meet the settlements own needs and some of the needs of Dorchester. However, the level of housing proposed within the Local Plan (“LP”) is now significantly too low to deliver the full contribution new growth at the settlement could make towards achieving sustainable development in accordance with the National Planning Policy Framework (“NPPF”) presumption in favour of sustainable development (paragraph 14).
- 13.5.2 As outlined within our July 2012 representations, the Bournemouth, Dorset and Poole Structure Plan (2001) identified Crossways as a suitable location for housing growth and included it as an area of focus for economic regeneration. Paragraph 3.16 of the Structure Plan confirmed that additional housing growth could be accommodated around the Poole to Weymouth railway line – specifically Crossways.
- 13.5.3 Through an independently examined development plan process, Crossways has therefore already been confirmed as a suitable and sustainable location to meet local and regional needs.
- 13.5.4 The LP strategic approach towards achieving a sustainable pattern of development (LP page 45) states that one of the four key issues influencing the distribution of development is the benefits of concentrating most development in locations where homes, jobs and facilities will be easily accessible to each other and there is a choice of transport modes.
- 13.5.5 The Council’s evidence base (CD/SUS5, paragraph 3.10) demonstrates that out of the 28 rural settlements within the Eastern Area, Crossways is only one of two which has:
- Significant existing populations;
  - Local employment opportunities and
  - A full range of the assessed local community infrastructure and services.
- 13.5.6 The settlement has good quality public transport accessibility to key settlements such as Dorchester. Morton railway station, which is within easy walking and cycling distance to Crossways, is on the London Waterloo to Bournemouth-Weymouth line and provides direct services to Dorchester. Crossways also has an existing bus service to Dorchester. Therefore in accordance with the NPPF (paragraph 29) residents have a real choice about how they travel.

- 13.5.7 Furthermore as explained within our July 2012 representations, development on the Woodsford Farms sites as the potential to deliver a comprehensive package of additional public transport enhancement measures; including new or diverted bus services (including an extension of the service to the railway station) and railway station facility enhancement on Woodsford Farms land adjoining the station.
- 13.5.8 The LP states in paragraph 12.1.2 that due to the relative unconstrained nature of the available land around the village, Crossways has the potential for a significant scale of development. This is confirmed within the Councils' Sustainability Appraisal ("SA") (CD/SA4, page 181) which demonstrates that the level of growth proposed within the Pre-Submission Local Plan ("LP") Policy CRS1 was assessed to be sustainable and appropriate when compared to reasonable alternatives, including these surrounding Dorchester. Furthermore as explained within our July 2012 representations, the Councils' sustainability outcomes under-scored Crossways on a number of social, economical and environmental objectives.
- 13.5.9 Not only is Crossways an appropriate and sustainable location to help meet some of Dorchester's housing needs but also has significant housing needs of its own.
- 13.5.10 Crossways has an aging population trend, which if allowed to continue could have significant economic and social consequences. As explained within our July 2012 representations, the level of growth proposed at Crossways within the Pre-Submission LP would deliver a sufficiently broad range and mix of housing that would attract a diverse mix of new residents – old and young. This would help reverse the settlements aging population trend, creating a more vibrant and sustainable community.
- 13.5.11 As explained within our Statement to Question 13.7, the level of housing growth proposed within the Pre-Submission LP would also be of a sufficient scale to support the viable delivery of new and enhanced local community facilities and services. This would improve settlement containment and its role as a local service centre to surrounding settlements and hamlets.
- 13.5.12 In early 2014 West Dorset District Council resolved to approve the Silverlake redevelopment of Warmwell Quarry (Application: 1/D/13/001112). The Silverlake development will create approximately 450 new permanent FTE jobs at Crossways. As explained within our October 2013 representations, without the level of housing growth proposed within the Pre-Submission LP there will potentially be a significant imbalance between local working age population and local jobs.
- 13.5.13 In addition to the Silverlake development, the Dorset Local Enterprise Partnership Strategic Economic Plan ("SEP") Dorset Green development is located approximately 7km to the south east of Crossways, near Wool. The SEP outlines (pages 197 to 200) that the Dorset Green development has the potential to create 350 new FTE jobs by 2020/21. With the Dorset Green development and

Wool being in close proximity and accessibly by a range of public transport modes further demonstrates the suitability of focusing housing growth at Crossways.

- 13.5.14 There is an urgent and worsening unmet housing need at Dorchester that significant and proactive steps must be taken to address within the early years from adoption of the LP. Crossways is a suitable and sustainable location to help meet some of Dorchester's needs now and over the longer term; particularly given its accessibility by a range of sustainable transport choices.
- 13.5.15 Not only is significant housing growth at Crossways appropriate to meet some of Dorchester's needs, but new housing growth at the level proposed within the Pre Submission LP will also help increase settlement containment and maintain the settlements vitality and viability. Significant growth will also support and maintain the settlement as an important local service centre.
- 13.5.16 Specifically with regard to the Woodsford Farms sites, as the Pre-Submission LP confirms that the Councils' accept the principal of residential-led development on the Woodsford Farms is appropriate and sustainable Given the level of unmet housing need within the housing market area the Councils' must provide evidence to justify the decision to preclude the Woodsford Farms sites as strategic housing allocations to meet some of Dorchester's unmet needs and the identified needs at Crossways.

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

- 13.6.1 In December 2012 we submitted a report to the Councils' (AD/EAST3) setting out how sufficient and appropriate Suitable Alternative Natural Green Space ("SANGS") could be provided to mitigate the impact of residential development on the Woodsford Farms sites.
- 13.6.2 The area of potential SANGS identified is significantly greater than that required to mitigate development on the Woodsford Farms sites (50ha. as opposed to the 10ha. required by Natural England's ("NE") guidelines).
- 13.6.3 The land identified has significant potential to provide a comprehensive and attractive mix of natural and semi-natural landscapes, habitats and vegetation. The SANGS can be designed to fully comply with the NE SANGS guidelines.

- 13.6.4 The potential SANGS identified as part of the Woodsford Farms sites is of a sufficient scale that it could create a regional destination SANGS. An appropriate mechanism could be put in place whereby this SANGS is also used to mitigate wider growth within West Dorset and the region.
- 13.6.5 As referred in our SANGS report (AD/EAST3), in 2010 we undertook a dog-walking survey of users of Tadnol and Winfrith Heath Special Protection Area (“SPA”) and the walking habits of existing Crossways residents. This survey identified the importance of also providing a network of shorter localised walking routes for dog-walkers (walks of up to 20 minutes).
- 13.6.6 The Woodsford Farms Green Infrastructure Plan (Appendix 4 of our October 2013 representations) demonstrates that these shorter walking routes and other green infrastructure improvements can be appropriately incorporated into a comprehensive masterplan for the Woodsford Farms sites and Crossways. This network of shorter routes, linked to the Woodsford Farms SANGS would provide new and existing residents with a comprehensive and safe network of short, medium and long walking routes.
- 13.6.7 Appropriate SANGS can therefore be delivered to directly mitigate development on the Woodsford Farms sites. Furthermore, development on the Woodsford Farms sites also has the potential to create a green infrastructure network around the village that is directly linked to Woodsford Farms SANGS. This new green infrastructure network would have additional mitigation benefits as it would help divert existing residents away from the SPA. Through an appropriate mechanism, the area of potential land available for the Woodsford Farms SANGS could also mitigate other development within West Dorset and the region.
- 13.6.8 Conversely, we understand NE have previously submitted representations raising specific concerns regarding the proximity of Site B (Land to the south of Warmwell Road) to the SPA. The site would have close and direct access to the existing network of footpaths and public rights of way south towards the SPA.
- 13.6.9 As explained within representations and our Statement on Question 13.8, although the SANGS associated with Site B may potentially meet NE’s minimum guidelines in terms of size, it remains wholly unclear as to whether a SANGS could be satisfactory created and delivered to meet NE’s other essential SANGS requirements. For the LP to be justified and effective, the Councils’ must demonstrate that the proposed Site B SANGS area can deliver a suitable SANGS capable of meeting the NE minimum requirements.

**13.7 Are there adequate measures in place to ensure services and facilities and improvements to essential infrastructure will be put in place?**

- 13.7.1 As explained within our July 2012 representations, the level of growth proposed at Crossways within the Pre Submission LP was of an appropriate scale to viably support the delivery of new and additional services and facilities and improvements to essential infrastructure.
- 13.7.2 Furthermore, the improvements to local community services and facilities generated through the delivery of between 1,200 and 1,500 new homes would also support and enhance Crossways as an important local service centre for the surrounding rural settlements and hamlets.
- 13.7.3 LP Policy CRS1 states that the comprehensive masterplan must ensure adequate provision of community infrastructure and community facilities. However, a development comprising only 500 dwellings is unlikely to be of a sufficient scale to viably support the delivery of new and enhanced local community facilities and services. A review of the Shaping Neighbourhoods; Urban Design Compendium; Urban Task Force; and Approaching Urban Design reports conclude that development of circa 1,200 dwellings plus is the level at which provision of essential new services and facilities become viable and deliverable.
- 13.7.4 The LP states (paragraph 12.1.1) that the provision of local services has not always kept pace with development. The LP is potentially repeating past mistakes again. The LP has not put in place adequate measures to ensure services and facilities and improvements to essential infrastructure will be delivered. As such Policy CRS1 is unsound as it fails to be positively prepared, justified or effective.
- 13.7.5 As explained within our July 2012 representations a comprehensive long-term masterplan for the village comprising between 1,200 and 1,500 dwellings over the period up to 2031 would ensure the viable delivery of appropriate new and enhanced community infrastructure, services and facilities to support the settlements long term future and role of the village as an important local service centre. The Woodsford Farms sites should be reallocated within the LP to deliver the level of housing growth proposed within the Pre-Submission LP.

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

13.8.1 No.

13.8.2 Within the Inspector's 10 December 2013 letter to the Councils' regarding initial soundness concerns, an overarching issue was raised that the LP appeared to have evolved as a reaction and counter-reaction to representations rather than as a well-honed strategy which provides a logical and reasoned means of addressing the difficult issues facing both authorities. This soundness concern is very evident within the changes made to Policy CRS1.

13.8.3 Since the Pre-Submission LP, the Councils' decision-making process appears to have become increasingly irrational and as set out within our Statement to Matter 1, has culminated in the LP and SA becoming unsound and unlawful.

13.8.4 Within the Councils' February 2013 Proposed Changes consultation, Site A (Woodsford Fields) was the only site at Crossways that was included within the Preferred Option and the Alternative Option. Without any material planning consideration justification it therefore appears irrational that the Councils' subsequent iteration of the LP entirely omits Site A.

13.8.5 Given the significant level of unmet housing need, as explained within our Statement on Matter 1, for the LP and SA to be robust, justified and lawful, the Council must provide logical and reasoned evidence to justify its decision to preclude the Woodsford Farms sites, in particular Site A (Woodsford Fields), as strategic allocations at Crossways.

13.8.6 As explained within our representations to subsequent iterations of the LP there are numerous material planning constraints and issues relating to Site B which the Councils' have failed to appropriately consider (individually or collectively). As set out within our Statement on Matter 1, had the Councils', as lawfully required, undertaken SA of the reasonable alternatives, these material planning considerations would be been duly appraised and the outcomes available to inform rational, transparent and logical plan-making decisions.

Mineral Safeguarding

13.8.7 The technical work prepared by D K Symes Associates (Appendix 2 of our October 2013 representations) identifies that there is likely to be a mineral reserve in the order of 0.750 million tonnes under Site B and that this reserve would meet the NPPF mineral safeguarding requirement that significant consideration should be given to avoiding sterilisation.

13.8.8 Conversely the technical mineral work submitted in relation to the Woodsford Farms sites (AD/EAST4) demonstrates that mineral safeguarding is not an issue that would prevent or delay development within the period up to 2031.

Community severance and hub

13.8.9 Development to the south of Warmwell Road would not fully integrate with the existing village as the site is severed by the busy B3390 Warmwell Road. Walking and cycling safety to and from Frome Valley Primary School and other existing local facilities is likely to be a significant issue. The LP itself (paragraph 12.1.4) warns of the issues associated within this main road – ‘the function of the Warmwell Road within the village will need to be carefully considered’.

13.8.10 As explained within our representations and illustrated on the Woodsford Farms Green Infrastructure Network plan (Appendix 4 of our October 2013 representations) a more appropriate direction to focus growth at Crossways is to the north. A new community hub could be logically created around existing and established community facilities, such as the primary school and recreation ground. This community hub could be safely linked to existing facilities through an enhanced green infrastructure network.

Proximity to SPA

13.8.11 As previously referred, we have significant concerns regarding the extent to which the Site B land identified as SANGS is capable of delivering a NE compliant SANGS.

13.8.12 The NE guidelines state that it should be possible to complete a circular walk of 2.3-2.5km around the SANGS. NE has indicated that narrow linear SANGS do not provide good quality circular walks. The majority of the Site B SANGS land is narrow and linear in form.

13.8.13 NE guidelines state that SANGS must be free from unpleasant intrusions. However, as referred below and within our representations, the SANGS at its central and narrowest point directly abuts a waste transfer station. There is therefore potential for significant unpleasant noise and odour intrusions, which could act as a deterrent for dog walkers.

13.8.14 NE guidelines state that SANGS must be perceived as semi-natural spaces with little intrusion of artificial structures. Given the narrow linear nature of the proposed SANGS land which will tightly wrap around urban form it is difficult to understand how a high quality semi-natural space with little artificial structure intrusion can be created.

13.8.15 We also note that a significant part of the proposed SANGS comprises a Site of Important Nature Consideration (“SINC”). Increased recreational could potentially have a negative impact on the SINC.



13.8.16 Conversely as previously referred, the significant area of potential SANGS that could be delivered through the Woodsford Farms sites would mitigate not only development on the Woodsford Farms sites but also wider development and also divert existing local and regional dog walkers from using the SPA.

Proximity to Schedule Monument

13.8.17 As set out within our Statement to Matter 1, the LP (paragraph 12.2.2) indicates that development on Site B will need to mitigate impacts on the earthworks in Bowley's Plantation, which is a Scheduled Monument.

13.8.18 Conversely, there are no known heritage or archaeological assets within or abutting the Woodsford Farms sites.

Proximity to Hybris Business Park

13.8.19 Site B directly backs on to the Hybris Business Park. Use Class C2 activities operate within the business park, including a waste transfer station. C2 activities within such close proximity to residential development could create noise and air pollution issues for future residents and potentially undermine commercial operations and viability of existing business through environmental health complaints from future neighbouring residents.

13.8.20 Conversely, there are no neighbouring uses or activities abutting the Woodsford Farms sites that would create potential noise or air pollution issues for future residents.

13.8.21 The area to the south is therefore not the most appropriate location for future growth given the constraints in this location compared to other locations around the village.

13.8.22 Failure to undertake appropriate SA of reasonable alternative sites demonstrates the Councils' have not made informed logical or reasoned decisions based on evidence. Consequently as explained within our Statement to Matter 1, the LP and SA is neither sound (justified) nor legal. To address these failings, the LP must either be withdrawn, or Policy CRS1 reverts back to that drafted within the Pre-Submission LP.