

**Response to Dorset Council Local Plan Options consultation – Stinsford Parish Council
March 2021**

1. Introduction

1.1 This document constitutes Stinsford Parish Council's response to the Dorset Council Local Plan Options consultation. Whilst considering the wider plan and consultation process it focusses more specifically on Dorchester and policy DOR13: Land north of Dorchester as the majority of this site lies within the Parish of Stinsford.

2. Comments upon the consultation process

2.1 The draft local plan is potentially unsound because of serious deficiencies in the evidence base. The issues make it all but impossible for residents to enter into informed and meaningful consultation. The weaknesses in the consultation show through in several areas:

- (i) There is a serious data deficit. The National Planning Policy Framework (2019) states that it is essential that there be data on transport, sustainability and viability and a Strategic Housing Land Use Assessment (SHLA). Dorset Council claims that the SHLA is available but what is on the consultation website is an officer database rather than a regularly updated report to allow the public to understand what sites have come forward and the methodology applied to accept them. None of these are present in a meaningful and accessible form. In all there are over thirty gaps in the evidence base where data is essential if an informed response to the consultation is expected.
- (ii) The Dorset Council consultation procedure has failed to open up adequate approaches for residents to address the pure volume of material subject to the consultation. National Planning Policy Framework is clear that it is the duty of the authority to engage the public. Community engagement is about building capacity so as to allow for meaningful contribution. It is difficult to see how Dorset Council has done this. Dorset Council has at best carried out a consultation; at worst instructed residents that this is what is going to happen.
- (iii) There is a potential issue about the time and the scale of the consultation process. The shorter consultation period was introduced for 'small consultations'. Arguably the volume of material on the Dorset Council website relating to the local plan options suggests that this is not a small consultation. This could leave the Council open to legal challenge.

2.2 Equalities - Under the Equality Act (2010) an authority must carry out an equalities assessment (conventionally an equality impact assessment) from the very dissemination of any 'plan, policy or procedure'. This then tracks the development through to continually identify if there are any negative impacts on any of the protected characteristic groups identified in EqA(10) so that unfair detriment can be identified and mitigated. There is no evidence that an equality impact assessment has been undertaken on the documents published to ensure that equalities and accessibility are embedded in the Local Plan and the policies contained within it at every stage. This should not merely be undertaken on the final version of the documents but should be an iterative process.

2.3 Accessibility - Mention is made of the consultation process being accessible but there is no evidence of how this has been assessed and any inequalities mitigated. Again, this needs to be embedded in the Council's approach throughout the development of the Local Plan. The difficulties

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created by the impact of the coronavirus pandemic on the way in which consultation can take place is acknowledged but this should not be used as an excuse to reduce accessible and meaningful engagement with all residents of Dorset and stakeholder groups and organisations. Due to the amount of material, the evidence base is difficult to access and cross-reference online and as libraries are currently not fully open, there are limited opportunities to access this in hard copy.

2.4 Background papers - The background papers published as part of the consultation often rely on older material for their evidence source. This older documentation covers a broad span of time, having been brought together from work carried out under the legacy district councils, and may contain aged data that is no longer relevant. Many of the cross-references made in them, or materials upon which assumptions are based, are no longer available on the Dorset Council website so consultees are unable to interrogate the accuracy of the information on which the proposed options are based. Some background papers have not been published as part of this options consultation and the evidence base is therefore incomplete. The volume of the information published is overwhelming and not presented in a way that assists anyone looking at it in making informed decisions as to how to respond.

2.5 Stinsford Parish Council therefore demands that this consultation is repeated taking into account the comments above and not until the evidence base is complete and made available to the public to consider. This should also take into account the current restrictions on the consultation process created by the coronavirus pandemic and the major issues of accessibility – but also the wider, longer term impact of the pandemic on such issues as retail and employment.

3. DOR2: Future town centre expansion

3.1 Stinsford Parish Council opposes this policy. The proposed expansion is no longer relevant and this policy is based upon proposals borne of a very different economic climate. The loss of a considerable number of key retail stores in the town centre both before and during the coronavirus pandemic – mirrored in other towns which have traditionally provided a greater retail offer, such as Yeovil and Poole – demonstrates the fragility of retail in the 21st century.

3.2 As acknowledged in paragraph 23.4.5, the impact of the pandemic on the needs of the town centre and the potential changes to retail demand in the future is a necessity to inform the next stage of the plan's production. The plan does not deal with the apparent deficit of cultural, social and sports amenities that already exists in Dorchester.

3.3 There is an issue with the four functional zones and the settlement hierarchy. This is central to the spatial strategy but it is unclear how the zones or hierarchy were established. The settlement hierarchy appears to be based on population size and provision of some facilities. It should also look at connectivity not just for work but for family and kinship, leisure, health, education, etc. Through clearly establishing why people travel it is possible to show how self-contained a settlement is and consequently to establish what would be required to make settlements more sustainable. Research would almost certainly show that there is a case for spreading development throughout Dorset rather than allocating large scale development within or in the vicinity of towns.

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4. DOR5: Dorchester Transport and Environment Plan

4.1 DOR5:I states that “Any development that would significantly undermine their delivery will not be permitted.” This is directly at odds with the proposals set out in DOR9 and DOR13 as the residents of the former prison site and 3,000+ homes north of Dorchester will have to enter the town to access facilities, amenities and retail opportunities and will therefore add a great deal more traffic on the roads both into and through the town centre. Acknowledging that planning permission has already been given for the former prison site, this statement in DOR5:I implies that the DOR13 proposals would not be permitted as it would significantly undermine the delivery of the DTEP.

4.2 The Halcrow Report (2008) stated that nothing should be developed on the proposed site north of Dorchester site before a Northern Bypass was built and significant improvement made to the existing strategic and local highway infrastructure. Although this is now 12 years old the only perceivable difference is that there is *significantly more* traffic today making the case for this approach more, rather than less, relevant. The draft local plan proposals and background papers are unclear as to whether it is a bypass or a link road that will be developed. Correspondence from the Council’s planning team has confirmed that this will be a link road meaning that what eventually appears on the ground may well be little more than a residential distributor. This is not acceptable. At the same time the damage that a bypass will cause to the landscape, the environment, archeology and biodiversity is noted. The impacts at the western end could have a significant impact on Poundbury Castle and Wolfeton House.

5. DOR11: Kingston Maurward College

5.1 Stinsford Parish Council welcomes this proposed policy and the engagement that has taken place with Kingston Maurward College to date on the development of its masterplan. However, to ensure that there is synergy with the Stinsford Neighbourhood Plan which is in an advanced state of development, it is requested that this be amended to read:

“The future development and expansion of Kingston Maurward College within the college estate will be supported in accordance with a masterplan agreed by Historic England and Dorset Council and Stinsford Parish Council.”

6. DOR13: Land north of Dorchester

6.1: Do you agree with the allocation of this site?

Stinsford Parish Council is **unanimously opposed** to the proposed development on land north of Dorchester as stated in DOR13, which is located within the parish. The following areas outline the basis of our objection, our concerns about the proposal, the lack of detail in many areas, and our questions around the methodology of the process.

- a. **Case for housing numbers:** The government’s targets for Dorset are based on over-optimistic growth estimates at the local and national level. Even with the Inspector’s report of the 2015 inquiry into the extant West Dorset, Weymouth and Portland Local Plan, it is not at all axiomatic that the extra numbers should be at Dorchester. We believe that Dorset Council needs to provide more evidence to justify why Dorchester needs to grow so dramatically and this number of homes not spread more evenly across the Council’s area. This development

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was proposed as part of the latest draft Local Plan for West Dorset and Weymouth and Portland prior to local government reorganisation and based on employment in the area. The Dorset Council Local Plan will cover the whole of the Council's area and the Parish Council doubts whether Dorchester or Stinsford need this amount of extra housing based on employment within the current wider context. Dorchester has already seen significant development at Poundbury.

- b. The Strategic Housing Land Assessment:** It is not clear what other potential sites were offered for development and why they were rejected. The Strategic Housing Land Assessment should have been maintained, a clear methodology explained and made fully accessible rather than merely a website for planning officer use.
- c. Housing purchase and affordability:** Why are only 35% of houses to be affordable? Housing need at a local and national level is for more affordable/social housing and therefore this proposal should be more ambitious in this area. The draft plan needs to define what would be affordable in the local context and what the breakdown would be of types of affordability – rental, part own, part buy, etc. The current government model for projected housing numbers assumes that if prices are above a certain ratio, when compared to average incomes, then building extra houses over and above the normal projected figures will help meet demand and bring down prices. This model has various problems in that developers do not seem to recognise the need for smaller and more affordable homes. What they build will bring more inward migration thus worsening the problem. Much of the house purchasing will be done by outsiders coming in; the house prices are not solely determined by the local market. As we have seen at Poundbury and other developments in Dorchester, building more homes has not reduced house prices. Housing should be provided on a basis of need rather than as an investment priority.
- d. Viability:** In 2008, the Halcrow Report for the Regional Spatial Strategy suggested that it would cost between £72,000 and £118,000 per residential unit in overhead costs (para. 5.2.7) mainly related to infrastructure and environmental mitigation. There is no evidence to suggest that this figure would be any different today. The report also states that nothing should be built before 'significant highways improvements' are required to both the local and strategic highway network before any building could start. This includes a 'northern bypass' with an estimated cost in 2008 of £100 million (para. 5.2.3). Even so there would still be significant environmental, landscape character and flood risk issues to address.
- e. Free-standing community or urban extension?** The whole concept of this development is blighted by indecision about whether this is to be a free-standing community or an urban extension of Dorchester. As an extension, it must have easy, quick, non-vehicular access to the town centre. Clearly, it does not have this. The shape of the proposed development stretching down the A35, dragging Dorchester a long way North and East contorts the town and will make in-town journeys much longer. As a free-standing settlement, it should have identity and social cohesion. It will need community structures and meeting places which have not been included in the proposals to date. As proposed, it will be a soulless mass housing estate with little or no connectivity to Dorchester. There is a need to look at the implications of growth in Dorchester, and particularly the DOR13 option, for the town centre and other settlements.

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- f. **The environmental case:** The government has previously said new build housing in the 2020's should be fossil-fuel free. What real mechanisms are being planned to make this a zero-carbon development, both in its construction and then over the next fifty years when it is lived in?

There is no acknowledgement in this policy of the climate and ecological emergency declared by Dorset Council and how the proposed development would respond to this. This needs to tie to meaningful sustainability rather than a green growth strategy and include important options like re-wilding. Our specific comments on the Sustainability Assessment are attached as an Appendix to this response.

The River Frome is a protected chalk stream (with an SSSI designation downstream from Dorchester) and is a unique habitat globally and worthy of a high level of protection. Disposing of sewage effluent into it is a costly business and existing facilities will require upgrading. Given that the land around Eagle Lodge is the catchment area for Dorchester's water supply, the outfall will have to be routed further downstream. There needs to be more detail and explanation as to how this development will protect the environment around Dorchester and the downstream habitat of the River Frome, as far as Poole Harbour.

Much emphasis is placed upon the provision of a new Local Nature Reserve at the water meadows – but also of the use of these for recreation and movement between the different parts of the expanded town. However it is stated this will be enabled "as far as practical". This is therefore a weak proposal which is unlikely to be delivered.

- g. **Transport, roads rail and connectivity:** The 'Movement Strategy' is inadequate. The A35 is Dorchester's key link from the north and east and is already at or near to capacity, often becoming gridlocked at current traffic levels. The extra 5,000+ vehicles created by the development would gridlock the town and cause traffic queues that would severely reduce the flow on the bypass. The proposal to keep unnecessary traffic from entering the town centre as part of the Dorchester Transport and Environment Plan will further exacerbate the traffic issues on the by-pass and place greater pressure on the rural roads that will inevitably be used as 'rat runs', a problem already experienced when the A35 is impassable due to flooding.

Dorchester has very low levels of commuter cycling. To see cycling as a realistic option would not only require the creation of a fully integrated cycle network within the proposal but also improved connections to Dorchester and within Dorchester. It would also require the creation and promotion of a cycling culture at a local level. The current proposals do not consider increased cycling use adequately.

The new link road between the A35 and A37 must be more than a feeder road for the A35, as it is already fully congested for much of the summer, and the Stinsford Hill, Stadium and Monkey Jump roundabouts are already overloaded. The traffic will increase with 3,000+ new homes and a simple feeder road will not solve the problem. The proposed link road includes an abrupt bend and terminates at an incongruous point on the outskirts of Dorchester. It is necessary for a proper northern by-pass for this site, as recommended in the Halcrow Report and completion of the infrastructure works before the development of the site commences. A comprehensive traffic masterplan for Dorchester and surrounding roads is needed before any increase in housing numbers is proposed.

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Highways England has stated that junctions should not be too close. It is unclear how this would be addressed because the original proposal for a second roundabout in Stinsford most likely would be too close to the existing Stinsford Hill Roundabout.

Rail links are currently not suitable for the increase in passenger numbers this development would bring. Where are the plans to upgrade rail links and train capacity to and from Dorchester? Both the lines to London and to Bristol need upgrading to allow for fast, easy and affordable travel. There is also a need to relay a small amount of track in an existent cutting just south of Yeovil to allow for direct trains from Dorchester to Exeter.

The final sentence of DOR5:1 states that “Any development that would significant undermine their delivery will be permitted.” The proposal to develop 3,000+ homes north of Dorchester will result in residents having to enter the town to access facilities, amenities and retail opportunities, as well as employment, and will inevitably add a great deal more traffic on the roads both into and through the town centre, significantly undermining the delivery of the DTEP proposals. DOR5 implies that the DOR13 proposals would not be permitted as it would significantly undermine the delivery of the DTEP.

The plan should look to open up pedestrian and cycle routes across the A35. This would open up Waterston Ridge allowing for a rich variety of landscapes associated with the Hardy legacy.

- h. Heritage:** Dorchester and Stinsford have received significant heritage funding for the Museum, Shire Hall and Hardy’s birthplace. These developments take place in and gain meaning from a beautiful but fragile rural context. The cultural heritage of the area is embedded in the landscape. The proposed development would threaten this heritage by significantly upsetting the balance of landscape and settlement. It would also threaten the developing tourism economy of the town as this is largely based on landscape and heritage. There are significant heritage and archeological concerns with the nature of the site and proximity to where Hardy lived and wrote, as referenced in the inspector’s report from 1998 turning down an application to build a fishing lake/gravel extraction quarry north of Dorchester. The DOR13 proposal appears not to consider the 1998 inspector’s comments. It is also at odds with the statement in 23.2, the vision for Dorchester, that this will “Make the most of the surrounding countryside, including its links with Thomas Hardy, Maiden Castle and Kingston Maurward College.” The proposal and background paper fail to take account of the reasons why solar and wind farms have been rejected on Waterston Ridge in the recent past.

In an archaeological context, given the potential significance of the Dorchester area, and comparisons with the rich archaeological landscape of Stonehenge, it is essential that further expert advice is sought to ascertain the impact on archaeological evidence of the significant development proposed north of Dorchester. It is essential that a comprehensive independent expert assessment of the site is made using the latest technologies such as ground-penetrating radar **prior** to any decision being made to include DOR13 in the final local plan.

Paragraph 23.6.50 states that “If harm cannot be avoided the harm should be minimised and there will need to be clear justification for any residual impact”. This is not an acceptable approach as it infers an acceptance that heritage **will** be damaged rather than striving to avoid any harm at all. The lack of value attributed to the heritage and historic environment is further

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demonstrated by paragraph 23.6.51: “The historic environment should not be seen only as a constraint to development but an opportunity for creating a sense of place and making a positive contribution to the character of the development. The design of the development should respond to the historic environment and to local character to create attractive and distinctive places within the site.” There is no information about how the character and design of a development of 3,000+ homes will minimise impact upon the harm to the heritage of the area.

Permanent damage to rural landscape heritage assets will have a negative impact upon the tourist economy in Dorchester. However, the vision for the development states “The town’s tourist economy will be expanded through enhancements to the water meadows and capitalising on the town’s Hardy heritage.” It is difficult to understand how these will expand the tourist economy when the current heritage assets will be damaged or lost. There is no evidence of an impact assessment to evidence this statement.

- i. **Employment:** There is a recognised disparity between work journeys into and out of the town. This is a function of Dorchester’s skewed demographic as its elderly population has created a ‘service-consuming’ economy, thus sucking in workers and consequently traffic. The development of more houses in a free-market environment will further skew this demographic.

DOR13 provides at least 10 hectares of the overall proposed employment land in the Central Dorset functional area where 33.3 hectares are listed including sites with planning permissions. A normal approach is to move people to jobs or jobs to people. The DOR13 proposal is effectively to move both jobs **and** people to Dorchester. As such this potentially contradicts the justification for mass residential build in Dorchester: that Dorchester already has more jobs than houses leading to commuting. The proposal moves both jobs and people to DOR13. There is a risk that this could attract employment away from Weymouth where unemployment is already a greater issue. The Economy background paper suggests that the most substantive growth in business over the next 20 years will be warehousing. Not only does this provide limited numbers of low salary jobs but also has major implications for infrastructure and the environment.

The local plan demonstrates a flawed view of Dorchester as an employment ‘hotspot’ as Dorchester’s two largest employers face difficult and retrenching futures. Local government budgets have been cut by 30% and face further rounds of austerity. The Health Service has a future of reorganisation and cost reduction. The case for the extra numbers of houses is published in the inspector’s report of 2015 that indicated that West Dorset needed more employed people to counter the number of retired people already here and continually migrating in. As stated before, the 2015 numbers require reassessment in the light of changing employment levels, work patterns and demographics.

Whilst local government and the NHS remain the largest employers in Dorchester, employment patterns are likely to change on a permanent basis following the coronavirus pandemic with a shift towards more people working from home and commuting less.

- k. **Duty to co-operate:** The Dorset County area was instructed by government to plan for 30,000 new dwellings. This rose to 39,000 as a result of overspill from Bournemouth, Christchurch and Poole under the ‘Duty to Co-operate’. This additional 9,000 is also having an

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impact on the proposals for Dorchester although this is arguably not sustainable. The 'Duty to Co-operate' agreement should be made available with the planning consultation documents but it is not. When looking at environmental constraints mapping for Dorset and the scale of development that has taken place in North Dorset over recent years it may be the case that Dorset Council could look at the duty to co-operate to pass on housing to south Wiltshire and Somerset. This could be justified as a result of existing road and rail infrastructure to London and in many places limited or no environmental constraints. In turn this could potentially reduce pressures on much of Dorset including Dorchester.

6.2 Is there anything not covered within the policy that should be considered in relation to the site?

6.2.1 Climate and ecological emergency - Since the initial inception of this policy in 2018, the global climate and ecological emergency has progressed, prompting Dorset Council to make a declaration at its inaugural meeting. There is a lack of acknowledgement of this emergency and the need to address this in policy DOR13. The proposal to add a development of this size on a greenfield site, resulting in a loss of agricultural land and biodiversity, flies in the face of the Council's own declaration. This policy – together with all others set out in the Options consultation – should demonstrate how the climate and ecological emergency will be addressed and any negative impact mitigated.

6.2.2 Water supply – The demand for water resources required for a development of this scale will be significant and yet there is no information in the plan as to how these needs will be met, especially in a changing climate where we can expect a long-term decline in groundwater. There needs to be more than an assumption that the current supply near Eagle Lodge will be sufficient to serve 3,000+ homes. DOR13 will also potentially have implications for underground water resources on which Dorchester's water supply is dependent. It could also lead to greater flooding in lower Dorchester by reducing soakage for ground water. There is a desperate need for independent data on this issue.

6.2.3 Impact upon Stinsford parish and other neighbouring areas – The focus of this policy is entirely how it relates to Dorchester; there is no recognition of the likely impact on the rest of Stinsford parish and other neighbouring areas such as Charminster, Crossways and Puddletown.

Increasing pressure on the A35 will result in further use of the mainly single-track rural roads through these areas being used as 'rat runs' – and this impact will be felt as soon as work begins on the development of the north Dorchester site. Road mitigations would therefore need to be in place **in advance** of the commencement of any development.

There is also a cumulative impact upon Dorchester as the primary hub for facilities and amenities arising from proposed development in these areas in addition to the land north of Dorchester; GP practices and schools will be under pressure as soon as new families begin to populate the proposed development.

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There will also be an increase in noise and light pollution from such a significant development placed in a rural landscape – and the consequent traffic movement - impacting the disparate properties and hamlets which comprise Stinsford parish.

6.3 Are there any community infrastructure needs within the area that should be considered?

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

6.3.2 Dorchester has very low levels of commuter cycling. To see cycling as a realistic option would not only require the creation of a fully integrated cycle network within the proposal, but also improved connections both to and within Dorchester. It would also require the creation and promotion of a cycling culture at a local level. The current proposals do not consider increased cycling use adequately.

6.3.3 The new link road between the A35 and A37 must be more than a feeder road for the A35, as it is already fully congested for much of the summer, and the Stinsford Hill, Stadium and Monkey Jump roundabouts are already overloaded. The traffic will increase with 3,000+ new homes and a simple feeder road will not solve the problem. The proposed link road includes an abrupt bend and terminates at an incongruous point on the outskirts of Dorchester. A comprehensive traffic master-plan for Dorchester and surrounding roads is needed before any increase in housing numbers is proposed.

6.3.4 The mechanism for the delivery of education on the site and growth of other facilities such as GP surgeries serving Dorchester and its surrounding areas must be identified and committed to in advance of the development – not left until afterwards when the demand is already placing existing facilities under pressure. As has been seen in many other developments nationally, those community infrastructure aspects which are the hardest to deliver are often abandoned and never come to fruition. These need to be recognised as a necessity from the outset and not a ‘nice to have’ which is then left for a cash-strapped local authority to be unable to provide.

6.3.5 The proposals have almost nothing to contribute on the rural economy. There is a strong case for building sustainability into the established villages by providing appropriate public transport and active travel links along with meaningful facilities, rather than building a brand-new settlement.

Stinsford Parish Council reserves the right to comment further if and when further information or evidence becomes available. Any comment on any part of the Options consultation does not imply acceptance.

Appendix - Review of Sustainability Appraisal

ISSUE 1:

Page 2 of the Non-Technical Summary – 2.0.4 states, “The difficulties in undertaking the assessment included:

- assessing the alternatives at a very early stage when the strategic nature of the issue and at times lack of detail made it challenging to form a judgement about the likely impacts;
- providing a balanced judgement on the overall net effect when an impact may be partly positive and negative effect.”

COMMENT 1: These statements suggest that this assessment cannot be relied upon. It therefore brings into question key arguments for proposing DOR13.

ISSUE 2:

This extract from p. 22 of the Non-Technical Summary sets out the many negative impacts of the proposed development North of Dorchester (01 is Higher Burton Farm, 02 is North of Dorchester, west of Slyer’s Lane, 03 North of Dorchester (west of A35).

	01_DOR	02_DOR	03_DOR
Biodiversity	-	-	-
Soil	0	--	--
Water	--	--	--
Air	-	-	-
Climate Change	--	--	--
Flooding & Coastal Change	--	--	--
Landscape	-	0	0
Historic Environment	-	-	--
Community	++	+	++
Housing	++	++	++
Economy	+	+	+
Preferred option?	✓	✓	✓

Furthermore, detailed information in the full appraisal (p. 173) points to all these negative impacts being short-, medium- and long-term.

COMMENT 2: How can sites with such significant potential environmental impacts be taken forward as ‘preferred’ options, especially when the corresponding impacts to other sites in the functional area that were rejected appear to be less.

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ISSUE 3:

The reason for the selecting DOR13 as a preferred option is explained as follows on p. 194 of the full appraisal:

Area	Decision	Reason for decision
A		Whilst development has the potential for significant impacts upon landscape, heritage assets and water quality which must be addressed, it may be possible to mitigate these impacts sufficiently to consider development in this area.

It states that it MAY be possible to mitigate the impacts.

COMMENT 3: There is no evidence in any document that these impacts have been sufficiently considered and no adequate mitigation is proposed. Given that the appraisal itself expresses some doubt about the mitigation potential, surely this is an essential prerequisite to taking forward this site?

ISSUE 4:

Page 8 of Dorset Council’s Sustainability Appraisal (the full document) sets out decision-making criteria used when assessing objectives. One of these is: **“Protect the most productive agricultural land (grades 1 and 2) to provide food security and achieve sustainable agriculture.”**

A large area of this proposed development land (DOR13) is accepted by the council as being grade 2 agricultural land. Page 23 of this Non-technical Summary proposes the following mitigation:

Policy	Sustainability Appraisal recommendation
DOR13 Land to the North of Dorchester	A large area of the northeast of this allocation is classified as grade 2 (‘Very Good’) agricultural land. The policy could require the provision of facilities for local food production in the northeast of the site, perhaps by providing allotments or a community garden which would provide opportunities for volunteering and education. This would enable healthy lifestyles and promoting wellbeing, in addition to encouraging social interaction and a more inclusive society.

COMMENT 4a: The loss of this grade 2 agricultural land is contrary to the council’s own decision-making criteria.

COMMENT 4b: How can it be considered an adequate replacement to replace ‘very good’ agricultural land with ‘allotments’ or a ‘community garden’?