

Our ref:
Your ref:

Steve Hellier
Planning Manager

Local Plan Review
Planning Policy (North Dorset)
South Walks House
South Walks Road
Dorchester
DT1 1UZ



Via email:
planningpolicy@north-dorset.gov.uk

17 January 2018

Dear Planning Policy Team

North Dorset Local Plan Review - Issues and Options Consultation

Highways England welcomes the opportunity to comment on the Issues and Options consultation document dated November 2017, prepared as part of the North Dorset Local Plan review, extending its period up to 2033 or 2036.

Highways England is responsible for operating, maintaining and improving the strategic road network (SRN), which in the Plan area comprises a short length of the A303 between the B3092 and B3081 junctions, and the A31 between B3075 and Marsh Lane. Despite being in neighbouring districts, the A35 (Purbeck District and West Dorset District), is a route also potentially affected by development positioned within the North Dorset District. It is on the basis of these responsibilities that Highways England has provided the comments that follow in this letter.

We are keen to ensure that transport and land use planning policy is closely integrated. In this respect, we draw your attention to "The Strategic Road Network - Planning for the Future - A Guide to Working with Highways England on Planning Matters", Highways England's Licence issued by DfT and DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development. Consideration should also be given to Highways England guidance on planning and the major road network in England (<https://www.gov.uk/guidance/planning-and-the-major-road-network-in-england>), which describes the approach we take to engaging in the planning system and the issues we look at when considering draft planning documents and planning applications.

We recognise that prosperity depends on our roads, so aim to support growth and facilitate development, based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. In order to constructively engage in the local plan-making process, we require a robust evidence-base so that sound advice can be given to local planning authorities, in relation to the



**INVESTORS
IN PEOPLE**

appropriateness of proposed development in relation to the SRN. This also extends to include transport solutions that may be required to support potential site allocations.

Paragraph 12 of Circular 02/2013 states that *'the preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'*

Paragraph 18 states that *'capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'*

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and NPPG.

We acknowledge that at this stage of the Local Plan Review process, stakeholders' views on the emerging issues and options of distributing and managing future development are requested. Comments regarding this strategy are set out below.

Local Plan Vision

The NPPF advises Local Authorities to review their Local Plan every five years, and the Issues and Options consultation document has been prepared as a first stage of the review process, eventually concluding with the completion and adoption of a new Local Plan.

The Issues and Options consultation document refers to the key issues, challenges and needs of the district, covering housing, employment, the environment and the viability of town centres, etc. A number of these challenges are shared by Highways England in our responsibility for the SRN.

We note that the Issues and Options consultation document does not set out goals and objectives for the new local plan. Highways England has many goals which would also be relevant to the district, for example ensuring new housing development is located in the right place, achieving a better transport system to help reduce CO₂ emissions, extending the cycling and walking network and making improvements to public transport. We therefore consider it appropriate for the new Local Plan to set out its goals and objectives, which should include those mentioned above, as well as any other relevant transport related objectives.



**INVESTORS
IN PEOPLE**

Development Strategy

The Issues and Options consultation document outlines that the latest government guidance on planning for housing ('Planning for the right homes in the right places: consultation proposals', 14 September 2017) proposes a methodology which, for North Dorset, results in a requirement of 366 dwellings per year, greater than the 285 dwellings per year outlined in the existing Local Plan. The Issues and Options consultation document acknowledges that a key aspect of the Local Plan Review will be to consider whether this increased demand can be met by the existing spatial strategy. It is important that potential strategies for distributing future growth, potential locations and supply options are thoroughly investigated at an early stage.

The existing and adopted Local Plan provides a focus on positioning development at Blandford (Forum and St Mary), Gillingham, Shaftesbury and Sturminster Newton, which are identified as the main towns in North Dorset and the main focus for growth, both for the vast majority of housing and other development. Stalbridge and the 18 larger villages are currently identified in the Local Plan Part 1 (LPP1) as the focus for growth to meet local needs outside of the four main towns. Outside the defined boundaries of these towns and villages, the remainder of the District is subject to countryside policies where development will be strictly controlled unless it is required to meet essential rural needs.

In terms of future allocations, the Issues and Options consultation document states that NDDC does not intend to change the thrust of this spatial strategy through the Local Plan Review process, but does wish to consider the potential for Stalbridge, the fifth largest settlement in the district, to accommodate growth.

In terms of employment growth, the Issues and Options consultation document states locations within the district's four main towns as potential considerations to place development, as identified in the existing Local Plan. These are:

- Land off Shaftesbury Lane, Blandford Forum
- Brickfields Business Park, Gillingham
- Land south of the A30, Shaftesbury
- North Dorset Business Park, Sturminster Newton

Paragraph 16 of DfT Circular 02/2013 recommends development be '*promoted in locations that are or can be made sustainable, that allow for the uptake of sustainable transport modes*'. This should include locations with good access to transport modes that can substitute travel by private car, when considering the commuting locations that would otherwise travel via the SRN. Access to high frequency bus corridors and rail stations would offer the greatest benefit to limiting car trip generation from newly allocated development sites.

Applying the principles of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a



INVESTORS
IN PEOPLE

section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e. a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact.

These principles are reflected in the NPPF (paragraph 162) which requires that local planning authorities work with other authorities and providers during the Plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands. The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development (NPPF paragraph 181).

Pursuing sustainable development requires careful attention to viability and costs. The sites and the scale of development identified in the Plan should not be subject to such a scale that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as infrastructure contributions or other requirements, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (NPPF paragraph 173).

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion (NPPF paragraph 177).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe (NPPF paragraph 32).

For the Plan to satisfy the requirements of NPPF, it would need to be supported by an assessment of the infrastructure necessary to ensure that traffic impacts are not severe. We would be content with the proposed allocations, if the identified infrastructure satisfied the requirements of Paragraph 9 of Circular 02/2013.

The Local Highway Authority will have their own criteria and it should also be noted that the requirements of the Plan, in terms of providing the necessary housing, may require additional infrastructure to be identified, particularly in relation to existing issues which would be beyond the remit of Highways England to consider.

Strategic Road Network Considerations

We draw attention to the current performance of the SRN within and positioned just outside of the North Dorset District boundary, which will need to be taken into account in the evidence base supporting the new Local Plan. The SRN within the Plan area comprises a short length of the A303 between the B3092 and B3081 junctions, and the A31 between B3075 and Marsh Lane. Despite being in neighbouring districts, the A35 (Purbeck District and West Dorset District) is also potentially affected by development within the North Dorset District.



- A303 - The A303 is a 93 mile trunk road that runs between Basingstoke and Honiton, forming part of one of the main routes from London to the South West of England. It is regularly congested, creating frustration for motorists who try to avoid tailbacks by diverting onto unsuitable local roads, which can impact on local communities too. However, the section within the district is dualled and it is expected that the direction of growth is unlikely to place a significant impact on this part of the SRN.
- A31 and A35 – Both parts of the SRN are forecast to increasingly have operational issues as a result of background growth and proposed development. Depending on the scale and spatial location of proposed growth, mitigation may be required to ensure the safe and efficient operation of the SRN.

In accordance with Paragraphs 9 and 10 of DfT Circular 02/2013, '(9) development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the SRN, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. (10) However, even where proposals would not result in capacity issues, the Highways Agency's (Highways England's) prime consideration will be the continued safe operation of its network.'

It is therefore the case that any development site having a significant impact on a SRN junction, which increases the length of the mainline queue, and potentially increases the period for which mainline queues occur, would be considered as having a severe impact. In such a circumstance, mitigation would be sought. We would expect this mitigation to be identified and agreed at the Local Plan stage to support any development allocations identified. This should take the form of an Infrastructure Development Plan and transport strategy accompanying the new Local Plan.

Conclusion

Overall we are content with the Issues and Options consultation document, acknowledging that as expected, its priorities and vision are 'high level' at this stage. We are generally concerned with the potential for site allocations along strategic road corridors which could significantly increase demand at constrained junctions during network peak periods, resulting in severe safety impacts.

The short section of SRN which falls within the district means that these concerns are relatively limited in relation to North Dorset, although there is the potential for impacts to be felt on the SRN located outside of the district. However, development should be promoted in locations that are, or can be made sustainable, allowing and encouraging the uptake of sustainable transport modes.

With the Local Plan strategy in its initial stages, we recognise that NDDC are continuing to work on a range of evidence base documents that will support the Local Plan, and



that the Issues and Options consultation document is prepared in advance of this evidence base being complete. This will however be required. At this time, an important aim of the Local Plan review from our perspective is the duty to cooperate. We look forward to being closely involved in the evolution of the North Dorset Local Plan going forward. Proposals for new development will need to be supported by the appropriate level of robust transport evidence base, and mitigation to address any severe impacts on the SRN. This evidence base must conform with the NPPF and Circular 02/2013.

We trust that our response is helpful and assists you with your Local Plan review. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely



Steve Hellier
South West Operations Division – Planning & Development



cc: Phil Edwards, CH2M
Graham Stevenson, CH2M

