

Draft Dorset Local Plan
Appendix I

North Dorchester Garden Community Technical response to the Draft Dorset Local Plan

This Appendix contains the detailed Technical Response to the Dorset Local Plan. It comprises the following four key sections against which Objections are lodged, seeking amendments to ensure the Local Plan can be found sound at Examination:

- a. Central Dorset Strategy
- b. Other Policies
- c. Sustainability Appraisal
- d. Habitat Regulations Assessment:
Nutrient Budget

Draft Dorset Local Plan
Appendix I.a

North Dorchester
Garden Community
Technical response
to the Draft Dorset
Local Plan:
*Central Dorset
Strategy*

This section of the representation sets out the Consortium's comments in relation to the Central Dorset Chapter of the Plan.

Vision and Development Strategy

The Consortium welcomes and supports the vision for Dorchester. The recognition of the role that North Dorchester will play in addressing the development needs of the town (paragraph 23.3.1 refer) and the wider Central Functional Area (paragraph 22.1.4 refer) are supported. The sub-regional importance of this development site is well understood in the Plan.

As recognised in paragraph 23.3.4 of the Dorchester Development Strategy, a key issue for the Town is the potential for development to give rise to adverse impacts on the Poole Harbour protected ecological sites due to excess nutrients from new development. Further details on the nitrate budget is provided in the DOR13 representation, but it is highlighting that the DOR13 development will be nitrate neutral and can provide a net benefit to potentially offset impact for other sites identified in the Plan that may not be able to demonstrate nitrate neutrality, particularly urban and brownfield sites. The Consortium would welcome further discussions with the Council with regards to how nutrient 'credits' might be used.

However, we would recommend that similar emphasis is set out in Section 2 of the Plan – the needs of the County are not fully set out within the overarching spatial strategy.

North Dorchester DOR13

The Consortium is firmly supportive of the identification of the North Dorchester site for mixed use development. However, we have provided our suggested amendments to Policies DOR13 and DOR14 below for the Councils' consideration to ensure the allocation is Effective and Positively Prepared. These changes stem from our evidence base provided in Our Response and Delivery Strategy. It is important that the Policy for North Dorchester is justified by the evidence and moreover, that wording contained within the Policy is precise and in accordance with the NPPF.

DOR13: Land north of Dorchester

- I. Land to the north of Dorchester will be developed in accordance with a masterplan produced for the site, which will reflect garden community principles.
- II. The development will form a mixed-use extension to the town delivering around a minimum of 3,500 new homes, at least a maximum of 10 ha of employment land, and additional school provision for 4 forms of entry across the three tiers of first, middle and high schooling.
- III. A road link between the A35(T) at Stinsford Hill to the A37 (via the B3147 between Weirs Roundabout and The Grove) will be provided as part of the development together with a package of measures for improvements to the strategic and local road networks.
- IV. The homes provided should meet the needs of the town with a focus on the size of homes that meet the needs of families and younger people of working age with a view to supporting the local economy. This should include ~~at least 35% the homes as~~ affordable housing in line with the provisions set out in HOUS2.
- V. Between the new development area and the historic town, at least ~~3~~ two pedestrian and cycle links will need to be provided to facilitate ease of access between the existing town and the newly developed area, with an aspiration for more.
- VI. A local centre with a network of smaller, supporting Neighbourhood centres will also be provided containing small-scale retail units including a small supermarket, to meet the day-to-day needs of local residents. ~~Minimal impact on~~ Compatibility with the vitality and viability of the existing town centre will need to be demonstrated.
- VII. The development should offer opportunities for additional healthcare provision on site in a form that meets the needs of Dorset Clinical Commissioning Group. ~~If needed~~ the development should also include land for a cemetery to meet the needs of the Dorchester area.
- VIII. The development will exploit the existing hedgerow structure to and the principle of tree-lined streets to ensure ~~contain significant~~

- ~~copse planting to break up~~ the built form of the development is softened within views from the AONB. ~~Streets will be tree-lined to create a softer urban form.~~
- IX. The ~~special~~ historic assets environment within which the site ~~sits~~ will help ~~to deliver~~ create local character to within the development. Harm to the significance of designated and non-designated heritage assets, including any contribution made by their settings, should be avoided or minimised, proportionate to their significance. Opportunities exist to enhance and better reveal significance of the heritage assets adjacent to the developable area, including experiences of the literary connections with ‘Hardy’s Landscape’, and these should be utilised within the development.
- X. Areas at risk of flooding from all sources will be avoided. The development will deliver a flood mitigation strategy which makes best use of the opportunities on the site with a viable and deliverable flood mitigation strategy being implemented.
- XI. Proposals will be accompanied by a hydrogeological risk assessment to demonstrate that development will not compromise groundwater quality or its abstraction.
- XII. The development should demonstrate ~~at least~~ nitrogen neutrality. Opportunities for biodiversity enhancement on the site should be considered at the earliest stage and used to form the structure of the development in order to deliver ~~the minimum 10%~~ biodiversity net gain required.
- XIII. A local nature reserve should be provided at the water meadows as a key part of the green infrastructure network for the development. This should incorporate improved recreational access, opportunities for greater appreciation of the areas rich heritage and for heritage-led tourism and biodiversity enhancements and wetland features.
- XIV. Key design requirements for the site will be established through the masterplan. The development should however be grounded in its local context taking design cues from Dorchester and the surrounding villages and make the most of the landmark buildings and features that exist in the area.

On other matters, we would make other small adjustments:

Paragraph 23.6.29 refers to specific occupiers when it is the specific need that should be addressed:

Within the development area is an existing occupied Travelling Showpeople’s site. This site will need to be retained within the development or equivalent re-provision made ~~re-provided-relocated through the provision of reasonable and suitable alternative arrangements that meet the needs of the current occupants.~~

We would make the following correction to paragraph 23.6.33:

Our aspiration is that at least three pedestrian and cycle links between the new development and Dorchester town should be delivered as part of the development along with connections to the National Cycle Network.

Paragraph 23.6.38 should be reworded as follows:

The development of the site will be exempt from CIL with infrastructure being delivered through a mixture of direct provision, Section 106 and Section 278 legal agreements. The main infrastructure required includes but is not limited to: etc

We would make the following clarifications to paragraph 23.6.39:

~~In addition~~ Subject to phasing and delivery requirements as well as the viability of reserves, there may be a need for prior extraction of sand and gravel across part of the site which is located within the Mineral Safeguarding Area (sand and gravel) identified in the Bournemouth, Dorset and Poole Minerals Strategy (2014). The developer will be expected to carry out the necessary site investigations and assessments and conform to the requirements of the Minerals Strategy. Local opportunistic use of sand and gravel will be considered.

We note the suggestion of a site for a Household Recycling Centre at Paragraph 23.6.40. This may not be appropriate owing to the presence of the Source Protection Zone.

In respect paragraph 23.6.42 and all other references, these requirements need qualification:

Within the views from the AONB, parts of the North of Dorchester site are visible and development in these locations would have an impact on the setting of the AONB. To minimise ~~this any specific, evidenced impacts,~~ planting of additional copse areas (of native broadleaved species) would break up the urban form and tie the development into the existing character of this area. ~~It would also link the area to the more significant forested area of Thorncombe Wood. In addition to the planting of new copse areas,~~ planting along a grid of roads and green corridors within the development would help to break up the urban form and ~~connect any strategic planting to Thorncombe Wood.~~ This planting should link with new and existing green infrastructure corridors and the wider ecological network.

Town Centre

The Consortium note the Council's objective to support and expand Dorchester town centre, including providing new retail opportunities through redevelopment of sites for retail purposes. The North Dorchester development has been designed to integrate with Dorchester and not compete against it in terms of shopping / retail offer. Being located so close to the Dorchester Town Centre, the North Dorchester development provides genuine opportunities for sustainable modes of transport, including walking and cycling, whilst also providing the critical mass to significantly increase additional footfall and investment in the Town Centre.

Policy DOR4 sets out the Council's proposals for the High East Street/High West Street Area of Dorchester town centre. Criterion i of the Policy makes reference to enhanced pedestrians routes between the town centre and the Frome Valley. As part of the North Dorchester development, the Consortium are developing proposals for a significant new park within the Frome Valley to the north of the Town. The Consortium welcomes discussions with the Council as to how the Frome Valley Park might be able support the implementation of the DOR4 Policy.

Transport

Policy DOR5 makes reference to transport improvements for Dorchester Town. As set out in the supporting text to this Policy (paragraph 25.5.1), traffic

through the Town has increased to levels predating the construction of the Southern by-pass. This is giving rise to air pollution issues, conflict between vehicles and pedestrians and negative impacts on the quality of the town Centre. The implementation of the Northern Link Road proposed as part of the North Dorchester proposal will deflect some journeys away from the Town thereby helping to address these issues alluded to in the Plan.

Continued coordination between the Council's highways proposals and those required for the North Dorchester site will be critical. The Consortium supports and is fully committed to close working with the Council (and other statutory bodies) on highways matters and would welcome opening initial discussions with the Council with regards to agreeing a statement of common ground on highways in advance of the Plan examination.

It would be helpful or user of the Plan if the location of the transport improvements are shown on the Polices Map.

DOR14: Land to the west of Charminster

We consider the reference to complementing development at North Dorchester as unnecessary on the basis they are separate spatial allocations. However, there will need to be some level of coordination amongst all the Dorchester allocations to ensure strategic infrastructure planning e.g. education provision. We therefore propose the deletion of several words from criterion i) and recommend further discussions take place regarding strategic coordination.

- Land to the west of Charminster is allocated for residential ~~development to complement the growth at North of Dorchester.~~ The priority should be to meet the needs of families and the working age population.*

Development Sites Map

As a general point, it is noted that the Proposed Development Sites map at the end of each of the settlement chapters in the Plan appear to shows some sites as being included within settlement boundaries, but others located outside. As the Plan shows proposed allocations, it would be logical for it also show proposed settlement boundaries alongside existing boundaries.

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North Dorchester Garden Community Technical response to the Draft Dorset Local Plan: *General Policies*

This following section of these representations sets out the Consortium's comments in respect of other policies in the draft Plan.

SECTION 2: STRATEGY AND DISTRIBUTION

Housing Needs and Requirements

Policy DEV1 of the draft Local Plan sets out the housing and employment requirements for the Plan area as a whole across the plan period from 2021 to 2038. With regards to the housing requirement, this is based on the Standard Methodology as required by the National Planning Policy Framework. The Consortium is of the view that there are no 'exceptional circumstances' that would justify a departure from the Standard Methodology. The Council should, however, consider whether other factors (e.g. unmet need from neighbouring authorities, affordability and economic growth ambitions, second homes etc.) require baseline housing needs to be adjusted. In this context, the recognition in Paragraph 2.2.6 of the Plan that Council may need increase the housing requirement in DEV1 is welcomed.

Functional Areas

The Consortium welcome the Council's identification of Functional Areas (FAs) in the Plan. The FAs are useful tools for developing the spatial strategy for such a large plan area.

Settlement Hierarchy

Dorchester is identified as 'Large Built up Area' (Tier 1 in the settlement hierarchy). This is welcomed by the Consortium as it reflects the important role that Dorchester plays as County Town in providing for sub-regional employment, housing and retail needs.

Neighbourhood Plans

The Stinsford Neighbourhood Plan (SNP) covers most of the North Dorchester site. Appendix 2 of the draft Local Plan sets out individual housing requirements for each neighbourhood plan area. The housing requirement for Stinsford is 2,348 new homes, which is considerably below the 3,500 dwellings set out in the DOR13 Policy. This seems very low given the extent of the Parish boundary across North Dorchester and the Consortium would need to see more evidence as to how this has been calculated. Whilst the Plan acknowledges that the neighbourhood plan housing requirements are expressed as minimums, we are concerned that any attempt to arrive at precise splits across a Parish boundary is unhelpful this side of the planning process. Increasing the Stinsford Neighbourhood Plan housing requirement should help to avoid any potential conformity issues between the strategic policies of the Local Plan (i.e. the delivery of 3,500 new homes at North Dorchester) and the emerging policies of the SNP.

SECTION 3: THE ENVIRONMENT AND CLIMATE CHANGE

International and European Ecological Sites

Policy ENV2: Habitats and Species sets out that Council's approach to development affecting European ecological sites in Dorset. Criterion ii of ENV2 requires that the impact of excessive nutrients (phosphate and nitrates) on European protected sites are mitigated. As detailed further in Consortium's main representations, the DOR13 development to the North Dorchester site will provide a considerable reduction in nitrates and has the potential to provide considerable nitrate offset for other sites in the Plan. The North Dorchester Consortium welcomes further discussions with the Council with regards to how nutrient 'credits' might be used to cross fund maintenance or capital expenditure within the proposed Frome Valley Park.

The Consortium is examining the feasibility of integrating a phosphate strategy within its Sustainable Urban Drainage Scheme and will make further representations on this matter once it has investigated this matter further.

Biodiversity and Net Gain

Policy ENV3: Biodiversity and Net Gain sets out that proposals should avoid harm to biodiversity. The Consortium supports the principle of this policy, which has been a key influence for the Consortium's masterplan proposals.

Criterion iii of the Policy states that development must deliver a minimum of 10% net gain in biodiversity through the restoration and recreation of habitats. BNG is already part of the National Planning Policy Framework (NPPF, Para 170(d) and Para 175(d)) but the NPPF does not specify a number/percentage for the gain. The forthcoming Environment Bill includes a requirement for all future schemes including the development of land to deliver a mandatory 10% BNG, which will be maintained for a period of at least 30 years. The Consortium expects to achieve 10% Biodiversity Net Gain across its interests within North Dorchester but, without a policy or legislative basis a requirement of 10%, it would be inappropriate for the Council to set this target in the Plan at this stage. Until such time as the Environment Bill has been enacted and National Planning Policy on BNG updated, it is the Consortium's view that Criterion ii of the Policy should be more flexibility worded so that applicants should '...seek to achieve a 10% net gain in biodiversity...' as opposed to this being a mandatory requirement. This can be updated depending on progress of the Bill. The Plan should make clear that open space and mitigation land (for example SANG or nutrient off-set land) can contribute towards BNG.

Heritage Assets

Policy ENV5: Heritage Assets sets out how the impacts of development proposals affecting heritage assets will be assessed against the significance of the heritage assets being affected.

Criterion iii of this Policy relates to non-designated heritage assets. The first part of Criterion iii is consistent with national policy. However, the second part of the policy should be deleted as is too restrictive and does not reflect the policy approach set out national policy that requires a 'balanced judgement' by a decision maker when weighing applications that affect non-designated heritage assets.

Design

Policy ENV7 Achieving High Quality Design sets out the Council's policy on achieving high-quality design. The Consortium welcomes and recognises the policy drive at both a local and national level to improve the quality of housing design.

Figure 3.5 of the supporting text sets out the Council interpretation of the principles of good design. Given that these principles are integral to the operation of ENV7, it is suggested that they should be incorporated in the policy wording itself, or deleted from the supporting text and added to the forthcoming Design SPD.

Alongside the emerging Design SPD, the Council is also proposing preparing a masterplan for the DOR13 site. The Council will also be aware that there is national design guidance, and emerging national guidance on producing of design codes. We have explored the basis of a Design Code for North Dorchester within our Delivery Strategy. Environmental Performance

Policy ENV9: Achieving High Levels of Environmental Performance encourages new buildings to achieve high standards of environmental performance. This premise of this Policy is supported, but the Policy lacks detail. For effective decision-making, further guidance is needed as to what constitutes a 'high standard of environmental performance'. Dorset Council will need to test the standards required by this policy as part of its Local Plan viability evidence.

Pollution

Policy ENV12 Pollution Control relates to the impact of development on human health, the natural environment or living conditions. Policy criterion i refers to impact of the pollution (including waste water) on protected ecological sites. As set out in the comments above, the North Dorchester site has the potential to provide nutrient 'credits' that could be used to support other sites in the Plan.

SECTION 4: HOUSING

Housing Mix

Criterion 2 of Policy HOUS1: Housing Mix requires that at least 20% of all dwellings across all tenures should be provided at the Accessible and Adaptable Dwellings. The Consortium do not object to the introduction of these standards providing that the policy is compliant with provisions set out in the PPG (Paragraph: 007 Reference ID: 56-007-20150327).

Affordable Housing

Policy HOUS2: Affordable Housing sets out three geographical zones with differing affordable housing thresholds. The Consortium will make detailed comments on this Policy once housing need and viability the evidence has been published.

Self-build and Custom-Build Housing

Policy HOUS6: Self-build and Custom-Build Housing sets out the Council approach to delivering self-build and custom build housing. The evidence base underpinning the HOUS6 has not been published by the Council. National Planning Guidance is clear that policies for self-build accommodation must be underpinned by appropriate evidence, including evidence on the need for such housing. There are also number of practical issues with providing self / custom as part of large strategic sites that should be considered by the evidence base. Policy HOUS6 has not sought to require a specific quantum or proportion of self / custom plots as part of proposed allocation sites – for reasons set out above this is welcomed by the Consortium.

Second Homes

The Council's Second Homes Background Paper has reviewed the potential for implementing a 'residence' policy to prevent the unacceptable proliferation of second homes across the plan area. This Paper recognises the complexities of restrictive residence policies and concludes that it would not be appropriate for the Plan to impose such restrictions. The Consortium recognises the detailed work that the Council has undertaken and supports the conclusions of the Background Paper

SECTION 5: ECONOMY

Retail Centres

Criterion ii of Policy ECON3: Hierarchy of Centres and the Sequential Test sets out how the vitality and viability of Town, district and local centres will be strongly supported and promoted through planning decisions. Policy ECON3 also sets provision relating to sequential testing of new centre uses and Policy ECON4 provision relates to town centre impact assessment. The Consortium supports the policy objectives, to protect and enhance (and not detract from) existing town centres. Alongside these Policies, Criterion i of Policy COM7: Creating a Safe, Efficient and Low Carbon Transport Network stresses importance of integrating new development with existing facilities and centre. The Consortium recognises the important positive role development can play in supporting centres and high streets, particularly those that are close to, or well connected to, an existing centre. As detailed in the North Dorchester Consortium representation, the North Dorchester development proposal (DOR13) provides a unique opportunity to deliver strategic development in close proximity to Dorchester centre. The extra footfall and additional investment from the North Dorchester development would be of considerable benefit to the Dorchester town centre.

SECTION 6: COMMUNITY INFRASTRUCTURE

Policy COM1 relates to the provision for community infrastructure. Criterion iii of this Policy states that contributions will be sought for site-specific measures necessary to make that development acceptable. The principle of this approach is supported but any contributions that are sought for development must also meet the other tests set out in the CIL Regulations.

Recreation, sports facilities and open space

Policy COM4 sets out the Council approach to provision of new recreation, sports facilities and open space and the retention of existing assets. Figures 6.2 to 6.4 of the draft Plan sets out standards for various built facilities and open space typologies. The Consortium welcomes detailed guidance on standards, but it is unclear what evidence underpins this policy and how the standards have been calculated. Further clarification would be beneficial in regard.

Low Carbon and Renewable Energy and Electric and Low Emission Vehicles

Policy COM9 relates to the provision of infrastructure for electric and other low emission vehicles and Policy COM10 relates to low carbon and renewable energy development. The Consortium supports the inclusion of these policies, provided we have the opportunity to comment on the detail of these policies and any background technical and feasibility/viability evidence.

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North Dorchester Garden Community Technical response to the Draft Dorset Local Plan: *Sustainability Appraisal*

Contents

1.	Representations to the Dorset Council Sustainability Appraisal Options Stage	3
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Client

Persimmon; Grainger

Our reference

PERZ3000

9 Mar 2021

1. Representations to the Dorset Council Sustainability Appraisal Options Stage

Dorset Council Local Plan Options Stage Consultation

1. These representations are made on behalf of the North Dorchester Consortium whom are promoting land for residential led development north of Dorchester.
2. The Local Plan is currently consulting on its Growth Options and has published a Sustainability Appraisal (hereafter referred to as The SA) to accompany Growth Options consultation. The SA has identified the Consortium's land as comprising of three development parcels (01_DOR, 02_DOR, 03_DOR) which collectively comprise the proposed allocation DOR13, Land to the North of Dorchester.
3. Turley Sustainability have reviewed the SA on behalf of the Consortium to identify how The SA has appraised the sustainability of growth within Dorchester and the sites considered to be reasonable alternatives to meet the housing demand.
4. The role of an SA is to promote sustainable development by assessing the extent to which the emerging options (reasonable alternatives), when judged against sustainability objectives, will promote local environmental, economic and social development.
5. The SA process is an opportunity to consider if the proposals in the plan are the most appropriate given the reasonable alternatives. SA can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. It should be applied as an iterative process informing the development of the Local Plan to demonstrate that it complies with the National Planning Policy Framework (NPPF).
6. Within the Dorset Local Plan Review, the SA is a critical evidence base document which should appraise all reasonable alternatives (policy options and site allocations) against the SA framework to determine the sustainability implications of each reasonable alternative. This is then used to select, or guide the development of, the most sustainable policy or site allocation.
7. Having reviewed The SA, the Consortium fully support and endorse the SA, its methodology and conclusions, however, we would like to make a number of suggestions to the Council in order to further enhance the delivery of sustainable development and improve the robustness of the methodology.

Review of the Sustainability Appraisal Methodology

8. The Consortium are supportive of the methodology used within the Dorset Council Local Plan Sustainability Appraisal Options Stage, and believe it incorporates the

necessary criteria and themes as required in order to meet the procedural and legal obligations as set out within the following documents;

- The National Planning Policy Framework (2019)
 - The Planning Practice Guidance; and
 - The Environmental Assessment of Plans and Programmes Regulations (The SEA Regulations)
9. Following its review of The SA, the Consortium would like to make a number of suggestions to improve the sustainability and robustness of the document and ultimately, the delivery of sustainable development within Dorset. These suggestions can be summarised as:
- The inclusion of an SA objective ‘ Sustainable Transportation’ that assesses the potential impact and benefits that a policy or allocation will have upon the highways network and sustainable transportation modes;
 - The recognition within the SA of any specific mitigation measures that are assumed to deliver an enhanced sustainability performance against any of the SA objectives.

Inclusion of a Sustainable Transportation Objective

10. The Consortium note that the SA framework does not include an objective to allow for any policy or allocation to demonstrate its sustainability impact in relation to highways and the transport network. This includes criteria to highlight the proximity of the development to specific services and facilities, as well as account for any strategic infrastructure and mitigation that may be in proximity to, or provided as part of a new development.
11. The Dorset Council Plan 2020-24 has strategic priorities which supports the development of sustainable transport including “locating and designing developments to reduce distances travelled” and “focus travel onto active travel and public transport options.”
12. Given the importance of this issue to the built environment and the delivery of sustainable development, we believe that the inclusion of this SA objective would provide for a more robust testing and selection of more sustainable reasonable alternatives.

Inclusion of Mitigation Evidence

13. The Consortium note throughout the SA that there are several references to the provision of mitigation measures to improve the sustainability performance of policies or allocations. With respect to allocations, Figure 9.7 of the SA lists the mitigation measures that are assumed to be delivered for each of the proposed allocations.
14. For Land North of Dorchester, we note that Figure 9.5 of the SA confirms that the site is suitable for allocation and notes that there are significant adverse impacts on SA

objectives for Soil, Water, Climate Change, Flooding and Coastal Change and Historic Environment.

15. Table 9.7 provides the details with respect to the mitigation proposed for Soil and Climate Change however there is no mention of mitigation to address the impacts associated with Water, Flooding and Coastal Change and Historic Environment.
16. To ensure a robust and transparent process we would recommend that the SA identifies the mitigation measures to be proposed for each significant negative effect. The North Dorchester Consortium's Site Delivery Strategy and the technical reports listed in Appendix 2 demonstrate that key planning issues associated with the Consortium land can be mitigated and that the North Dorchester site is a deliverable site.

Evidence to Support Selection or Rejection of Reasonable Alternatives

17. The Consortium fully support the SAs conclusion with respect to the selection and rejection of alternatives within the SA. It is noted however, that some of the reasons for rejection or selection of proposed sites do not cross reference the associated evidence base.
18. For example, the SA concludes the following with respect to the site O6_West of Poundbury,

"Unacceptable landscape and heritage impacts."
19. The Consortium query this conclusion as there is no evidence based referenced which supports the statement. For robustness, ease and transparency, it would be helpful for the Council to make reference to the study¹ upon which this conclusion is based.
20. Furthermore any evidence that Council has used to support the selection or rejection of a site should also be clearly referenced in the SA.

The Assessment of North of Dorchester within the SA

21. Section 9.1 of The SA assesses the reasonable alternatives with respect to the options for growth and allocations for meeting the housing needs within Dorchester. The Consortium have reviewed this section of the SA and are supportive of its conclusions and recommendations however we would like to make a number of recommendations to the Council in order to improve the robustness of the methodology.
22. Firstly it is noted that Figure 9.1 of the SA identifies the areas around Dorchester that were considered for growth. Figure 9.2 and 9.3 show the results of the assessment and the areas that have been selected or rejected by The SA.

¹ West Dorset, Weymouth and Portland Strategic Landscape and Heritage Study, LUC, 2018

23. The Consortium agree with the conclusions of the SA which identify that Area A (North of Dorchester) is a sustainable option for strategic growth. It recognises that whilst development in this area may result in significant impacts upon landscape, heritage assets and water quality, these impacts can be sufficiently mitigated during the design process to reduce these impacts.
24. Following the assessment and identification of the most appropriate areas for growth, The SA then assesses the potential allocations for development around Dorchester with the relevant sites listed in Paragraph 9.1.10 and presented in Figure 9.4.
25. The Consortium fully support the conclusions of The SA which states that Land North of Dorchester is a sustainable option for residential led development however to further demonstrate that North Dorchester constitutes sustainable development and a reasonable alternative for allocation, it has been assessed by Turley Sustainability against the SA objectives of the Local Plan as three individual sites (01_DOR, 02_DOR, 03_DOR) and in its entirety as draft policy DOR13 utilising the latest technical evidence.
26. The Consortium supports and agrees with the conclusions regarding sites 01_DOR (Higher Burton Farm), 02_DOR (North of Dorchester, west of Slycer's Lane) and 03_DOR (North of Dorchester – west of A35) which proposes the three sites as a potential joint allocation. The SA identifies a number of potentially significant positive and adverse effects but states that these negative effects may be adequately mitigated. On the basis of the site specific technical evidence, The Consortium feel that revisions and improvements to the SA scoping could be made.
27. Table 1 of these representations summarise the SA scoring of Land North of Dorchester to which we have included commentary demonstrating how the SA scoring for North Dorchester could be improved against the following SA objectives:
 - SA Objective 1: Provide net gains for biodiversity
 - SA Objective 2: Protect soil quality and conserve geological conservation interests
 - SA Objective 3: Maintain or improve water quality
 - SA Objective 4: Maintain or improve air quality
 - SA Objective 5: Limit climate change and improve resilience to future climate change
 - SA Objective 6: Limit the effects of flooding and coastal change
 - SA Objective 7: Protect and enhance valued landscapes
 - SA Objective 8: Preserve and enhance the historic environment
28. The assessment of the individual sites and draft policy DOR13 by Dorset Council, are demonstrated alongside the independent assessment of the site undertaken by Turley Sustainability.

Table 1: Assessment of North Dorchester by Dorset Council and Turley Sustainability

	Dorset Council Assessment												Turley Sustainability Assessment
	01_DOR			02_DOR			03_DOR			DOR13			
	Short	Medium	Long	Short	Medium	Long	Short	Medium	Long	Short	Medium	Long	
Biodiversity	-	-	-	-	-	-	-	-	-	0	0	0	+
Soil	0	0	0	--	--	--	--	--	--	--	--	--	0
Water	--	--	--	--	--	--	--	--	--	0	0	0	0
Air	-	-	-	-	-	-	-	-	-	0	0	0	0
Climate Change	--	--	--	--	--	--	--	--	--	-	-	-	0
Flooding & Coastal Change	--	--	--	--	--	--	--	--	--	0	0	0	0
Landscape	-	-	-	0	0	0	0	0	0	0	0	0	-
Historic Environment	-	-	-	-	-	-	--	--	--	0	0	0	0
Community	++	++	++	+	+	+	++	++	++	++	++	++	++
Housing	++	++	++	++	++	++	++	++	++	++	++	++	++
Economy	+	+	+	+	+	+	+	+	+	++	++	++	++
Preferred Option	✓			✓			✓						
Reason for selecting or rejecting the option	Significant contribution to the supply of housing and employment land. Potential adverse impacts may be adequately mitigated, discounting the western area of 01_DOR where there is the potential for significant adverse heritage impacts.												

++	Strong positive impact
+	Positive impact
0	Neutral or negligible effect
-	Negative effect
--	Strong negative effect

29. The text below presents a more detailed summary to support our revised SA scoring against the Councils SA objectives (*italics*).

SA Objective: Biodiversity

- *Conserve, restore or enhance priority habitats and irreplaceable habitats and promote the protection and recovery of priority ones.*
- *Maintain or restore the favourable conservation status of European and national sites, and avoid significant adverse effects upon local wildlife designations.*
- *Establish coherent and ecological networks where possible, with wildlife corridors which connect designated sites of importance for wildlife to prevent habitat fragmentation.*

30. The site comprises agricultural and arable fields, which are of relatively low ecological value, with an associated hedgerow network, farmland buildings and the River Frome to the south. There are a number of designated site areas present within the vicinity,

including Dorset Riverside Local Nature Reserve (LNR) and Frome Meadows SNCI, as well as the River Frome SSSI, approximately 145m to the south-east. Given the areas of open space to be incorporated within the scheme, it is considered that any recreational pressures on designated sites in the vicinity could be mitigated through provision of this open space.

31. The site has been subject to ecological appraisal, and surveys in respect of protected species are on-going. At this stage, however, based on the current body of evidence, the Consortium is confident that protected species potentially affected by the development at the site can be addressed.
32. The detailed design of the development will include a range of mitigation, avoidance and enhancement measures, to create new habitat opportunities and improve the biodiversity of the site. The current Masterplan for the site has been designed to enhance the Frome Valley area through provision of a new park comprising nature conservation areas, enhancements to designated ecological sites and provision of recreational. There is also the opportunity to deliver net ecological gains – the preliminary biodiversity metric prepared by ECOSA demonstrates that the site is capable of delivering at least a 10% net gain in biodiversity within the red line boundary. The introduction of a suitable GI strategy, and long term management of the site will further enhance the development's positive impact on biodiversity.
33. Green corridors will thread through the development, providing links to the town and surrounding countryside. This will include enhancement to the Frome Valley providing ecology east-west orientated wildlife corridors. North-south corridor links will also be provided through the masterplan; including using the dry valley towards the centre of the site. Ecological enhancement areas will be included throughout the proposal and will allow for the movement of wildlife.
34. Within some areas of Dorset, new developments need to demonstrate nitrate neutrality. A nitrate budget has been prepared for the site by WSP. The budget shows that the North Dorchester development will be nitrate neutral, largely due to the removal of artificially fertilised agricultural land from production. The budget also shows that through development of the site, a net nitrate benefit is produced that can potentially be used to off-site the nitrate impact from other sites. Further nitrate benefits may also be realised as part of the Frome Valley proposals.
35. As such, we believe it is reasonable to conclude that North Dorchester will have a positive impact on the biodiversity SA objective.

SA Objective: Soil

- *Protect the most productive agricultural land to provide food security and achieve sustainable agriculture*

- *Remediate or mitigate the potential impacts of degraded, derelict, contaminated and unstable land where possible*
 - *Minimise harm to geological conservation interests*
36. A large area to the north east of North Dorchester is classified as Grade 2 (Very Good) agricultural land. The development at North Dorchester will account for this and appropriately mitigate the issue.
37. The development may include provisions for local food production through allotments or a community garden, making use of the agricultural land at the site. This will support wider sustainability ambitions of the development through opportunities for volunteering, education and health and wellbeing.
38. The proposed development will additionally address the area of land fill on the development site, with appropriate mitigation and addressing any on-site contamination.
39. It is therefore considered that the proposed development will have a neutral effect on this SA objective.

SA Objective: Water Quality

- *Protect and improve the ecological and chemical status of freshwater, transitional waters and coastal waters*
 - *Ensure that development does not contribute to groundwater quality issues particularly within Groundwater Source Protection Zones*
 - *Ensure that development does not contribute to the groundwater inundation of the foul drainage network*
40. The North Dorchester site falls within the Eagle Lodge Source Protection Zone (SPX). Development at North Dorchester will not compromise groundwater quality, and any potential negative effects will be adequately mitigated. Boreholes have now been installed and data is being acquired to support a drainage strategy that will not compromise the quality of the aquifer.
41. As referred in the Biodiversity section the above, the nitrate budget shows that development of the site can provide a net benefit for water quality of in the Poole Harbour.
42. As such, the development at North Dorchester will have a positive effect against this SA objective.

SA Objective: Air Quality

- *Maintain or improve air quality*

- *Ensure that development does not contribute to air quality issues particularly within Air Quality Management Areas and where exceedances in the concentration of airborne contaminants have been recorded*
43. The development at North Dorchester will minimise any impact on air quality during construction and occupation. Its location in proximity to the road network means that though the development has the potential to increase traffic, mitigation measures will be in place to manage these appropriately and minimise car use. These could include access to public transport, the provision of pedestrian and cycle routes to reduce congestion issues, and reduce the development and users impact on the use of private cars specifically.
44. Furthermore the allocation of Land North of Dorchester will result in the funding of strategic highways infrastructure in the form of the Northern Link Road, a strategic transport infrastructure Link Road that will tie together the A35 and A37 and other northern routes, particularly the A352 and C12 to Sherborne. This infrastructure will help to alleviate congestion, including helping to reducing traffic travelling through Dorchester, thereby resulting in an improvement to air quality.
45. In this context, the development at North Dorchester will have a neutral effect on this SA objective.

SA Objective: Climate Change

- *Mitigate climate change by contributing to cutting greenhouse gases*
 - *Adapt to future climate change by ensuring that new development is resilient to future conditions*
 - *Increase the use of renewable energy*
46. The energy consumption per capita will reduce as a result of compliance with national policy including Building Regulations and the Future Homes Standard (FHS) consultation which will mean that, from 2025, all new dwellings and buildings constructed will be circa 75% more energy efficient than those constructed to the existing regulations. Improved u-values and system efficiencies will help to reduce dependency on non-renewable sources and improve overall energy efficiency of new buildings. Ultimately, the scale of the development provides opportunities for strategic scale climate change mitigation and opportunities will be explored during design development, but it is likely that each building will need renewable energy technologies to meet the FHS.
47. The FHS has been introduced by the government to ensure all new dwellings are fully able to support the transition to a net zero economy. Once constructed to the FHS, the government believes that future decarbonisation of the grid will result in dwellings built to the FHS becoming full net zero homes by 2050.
48. In this context and by meeting this standard, North Dorchester will have a neutral effect with regard to this objective.

SA Objective: Flooding and Coastal Change

- *Ensure that development does not expose people and property to the risk of flooding*
 - *Manage coastal change to ensure that environmental designations and local communities are protected*
49. The majority of the North Dorchester proposed site falls within Flood Zone 1 and so is at low risk of flooding. The areas proposed for development areas lie solely within Flood Zone 1. The southern areas, located within the Frome Valley Park area, fall within Flood Zones 2 and 3.
50. The site will be designed to ensure the effective management of flood risk, without increasing the flooding risk elsewhere. This will include the provision of SuDS across the development, to provide both source control and treatment of pollutants, which may include swales, filter strips, filter drainage and permeable paving. All SuDS features will be maintained throughout the lifetime of the development. Surface water runoff will be attenuated on-site for events up to and including the critical 1 in 100 year storm rainfall event plus a 40% allowance for climate change.
51. In this context, the development is considered to have a positive impact in relation to this SA objective.

SA Objective: Landscape

- *Protect and where possible enhance valued landscapes*
 - *Conserve and where possible enhance the Dorset AONB and Cranborne Chase AONB*
 - *Ensure that development is not harmful to the Green Belt*
52. The Landscape Appraisal conducted by Pegasus, and presented in their Landscape Appraisal, indicates that the North Dorchester site is capable of accommodating the proposed development. It would be least harmful to the surrounding AONB landscape and takes advantage of the vegetative screening within the valley floor and on valley slopes to reduce the level of visual effects locally. The site is not located within the AONB, and falls within a non-designated working agricultural landscape. The development's green infrastructure design responds positively to the landscape and visual constraints and opportunities.
53. The proposed site provides opportunities for considerable landscape and ecological mitigation and enhancement measures. The Landscape Appraisal states that the strong field pattern, and existing tree and woodland vegetation provide a strong landscape framework that will help to enclose parts of the proposed development. The envisaged landscape mitigation and enhancement measures include the following:
- Retain strong patterns of hedgerows on the downlands and enhance their structure and condition;

- Introduce hedgerow trees and belts of trees around proposed built form on the higher ground to protect views from the AONB;
- Utilise green valleys as green corridors and recreational asset;
- Frome Valley Park to retain its current character and function as green edge to Dorchester;
- Preserve views towards local landmarks from the valley floor;
- Preserve views towards local landmarks from Coker's Frome Road and channelled views from dry valleys;
- Preserve the sense of openness across the water meadows in the western part of the site;
- Introduce pedestrian/cycle connectivity along the River Frome – part of the Green Infrastructure network.

54. In this context, the development is considered to have a neutral effect in relation to this SA objective.

SA Objective: Historic Environment

- *Preserve the historic environment and its setting, including Scheduled Monuments, archaeological features, Listed Buildings and Conservation Areas*
- *Ensure that new development is sympathetic to local character and history*

55. According to the site assessment undertaken by Dorset Council, North Dorchester will have a negative impact on the historic environment, with site 03 established as having a major negative impact on the SA objective.

56. The Heritage Appraisal prepared by Asset Heritage Consulting (AHC) concludes that there is, in principle and with appropriate mitigation measures, clear scope for development utilising the layout that would result in no 'harm' in heritage terms. This includes the area assessed by Dorset Council, DOR 03, as having a major negative impact on this SA objective.

57. The Preliminary Archaeological Impact Assessment by LP Archaeology states that whilst further investigation will be required, despite the wider landscape's significance for archaeology, the site is relatively unconstrained due to the majority of historic activity being focused on the land to the south of the River Frome.

58. The site will attract heritage tourism via a Hardy Trail, which will traverse the water meadows within the new Frome Valley Park, connecting various literary and literal references to Thomas Hardy, enabling residents and visitors to appreciate the rich history of the Frome Valley.

59. Given the outcome of the AHC and LP Archaeology work, the development will have a neutral effect on this SA objective.

Suggested SA Objective: Sustainable Transport

60. As referred to above, a new objective is put forward by the Consortium that considers sustainable transport. The following section of this report sets out the Consortium's assessment of the site against this objective.
61. The development at North Dorchester Garden Community has an array of measures and features that support sustainable transport. This includes the Northern Link Road, a strategic transport infrastructure Link Road that will tie together the A35 and A37 and other northern routes, particularly the A352 and C12 to Sherborne. The Northern Link Road will help to reduce congestion, and provide pathways for public transport routes. The neighbourhoods have been designed to offer an alternative to the private car, due to the proximity of North Dorchester to the town, and the proposed pedestrian and cycle connections along green corridors across the site will provide easy access to the centre of Dorchester and the surrounding countryside.
62. In light of this, the development would be assumed to have a positive impact on this SA objective.

Summary

63. The assessment of the sustainability performance of the North Dorchester Garden Community has been undertaken utilising the current technical evidence. It demonstrates the mitigation measures that will be integrated into the development, alleviating the negative impacts on the Sustainability Appraisal objectives and ensuring the North Dorchester Garden Community is a highly sustainable option for residential led development.
64. Table 1 demonstrates that the proposed development will have no negative impacts following the implementation of mitigation measures and will have a range of positive and significant positive benefits which include;
- Biodiversity;
 - Flooding and Coastal Change;
 - Landscape
 - Community;
 - Housing;
 - Economy.

The Assessment of Central Dorchester Reasonable Alternatives

65. As part of these representations, other potential allocations within Central Dorchester have been reviewed. A copy of the assessment completed by Dorset Council is provided below, which provides the reasons for the rejection and selection of the alternative sites within Central Dorchester.

Table 2: Assessment of Central Dorchester Reasonable Alternatives by Dorset Council

	Dorset Council Assessment											
	04_DOR			05_DOR			06_DOR			DOR13		
	Short	Medium	Long	Short	Medium	Long	Short	Medium	Long	Short	Medium	Long
Biodiversity	-	-	-	-	-	-	-	-	-	0	0	0
Soil	0	0	0	--	--	--	0	0	0	--	--	--
Water	-	-	-	-	-	-	-	-	-	0	0	0
Air	-	-	-	-	-	-	-	-	-	0	0	0
Climate Change	-	-	-	-	-	-	-	-	-	-	-	-
Flooding & Coastal Change	0	0	0	0	0	0	0	0	0	0	0	0
Landscape	-	-	-	--	--	--	--	--	--	0	0	0
Historic Environment	--	--	--	--	--	--	--	--	--	0	0	0
Community	+	+	+	++	++	++	+	+	+	++	++	++
Housing	++	++	++	++	++	++	++	++	++	++	++	++
Economy	+	+	+	+	+	+	+	+	+	++	++	++
Preferred Option	x			✓			x					
Reason for selecting or rejecting the option	Land not available for development due to land ownership			Potential adverse impacts may be adequately mitigated			Unacceptable landscape and heritage impacts					

66. The Consortium note the concerns with regards to land ownership at site 04_DOR (South east of Dorchester) preventing development. North Dorchester in comparison, is in control of two developers, minimising potential issues and ensuring efficient decision making and delivery of the site.

67. Site 05_DOR (South west of Dorchester within the bypass) has been recommended for development, although it is a significantly smaller site than North Dorchester. The consortium do believe that this site will contribute to housing supply within the Central Dorset area, but query the scoring of the site which establishes the site as having a major impact on the housing SA objective. We believe it would be more appropriate to reduce the scoring to having a 'positive impact' on the SA objective given the relatively lower scale of housing delivery compared to Land North of Dorchester.

Conclusion and Recommendations

68. The Consortium fully supports the conclusions of the Sustainability Appraisal Growth Options stage.

69. These representations identify recommendations made by the Consortium. In paragraph 12, it is recommended that the SA should include a sustainable transport objective to ensure the assessment is holistic.

70. As per paragraph 20, the Consortium is also recommend that the Council cross reference the evidence base used to support the conclusions drawn within the Sustainability Appraisal.
71. Finally, via evidence demonstrated in these representations, we respectfully request that the Council amend the scoring for North Dorchester accordingly in recognition of the positive and significant positive effects recorded against the following SA objectives:
- Biodiversity;
 - Flooding and Coastal Change;
 - Landscape;
 - Community;
 - Housing;
 - Economy.
72. As such, North Dorchester is, and should be recognised a sustainable option for development.

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North Dorchester
Garden Community
Technical response
to the Draft Dorset
Local Plan:
*Habitat Regulations
Assessment:
Nutrient Budget*

The additional nitrogen generated through sewage from new housing will impact on the catchment of Poole Harbour. This impact has to be mitigated.

A review of the options for nitrate management across the North Dorchester site looked first at the 'indirect' option of offsetting the nitrogen generated from new development by taking land out of nitrogen intensive uses, e.g. where fertiliser is applied to farmland. This involved calculating the volume of nitrates produced from the urban extension per year. This calculation is based upon Wessex Water, who manage the Sewage Treatment Works (STWs), meeting their requirement to remove 75% of nitrogen from wastewater (Urban Waste Water Treatment Regulations 1994 (Section 5(3)).

A further calculation was then undertaken to ascertain any nutrient betterment that may be provided by the change in land use from agriculture to low input nutrient uses such as the proposed development. A comparison of these two calculations indicated that the nutrient betterment from changing the land use from agriculture to the proposed development for the red line area, outweighs the increase in nitrogen generated through sewage from the new housing. This betterment amounts to a surplus of 78ha of land with its land use changed, that is not 'required' for mitigation. Or put more simply, this equates to the proposed development area being able to mitigate sewage from an additional 1,100 houses.

Further detail of these calculations can be found in the North Dorchester Nutrient Loading Betterment Review Technical Note (WSP, December 2020) as attached. This assessment has been submitted to the EA and Wessex Water to confirm the methodology



TECHNICAL NOTE - NORTH DORCHESTER

DATE	03 December 2020	CONFIDENTIALITY	Public
SUBJECT	FLOOD RISK AND DRAINAGE STRATEGY		
PROJECT	Author	Checked	Approved
70036781	J. Forsdyke	J. Berryman	J. Berryman

Background

Increasing nitrogen levels from sewage and agriculture are contributing to the growth of algal mats in Pool Harbour, restricting the growth, distribution and variety of important food available for wading birds protected under European law and smothering estuarine habitats. The majority of nitrogen is generated from agriculture, but a proportion is generated from human sewage. To conform to the requirements of the Habitats Regulations and the Water Framework Directive, the Council's planning for a growth in population has to be certain that any development has either avoided harm to European protected sites or mitigated the impact to ensure that there is no adverse effect.

The additional nitrogen generated through sewage from new housing in the catchment of Poole Harbour has to be mitigated. Mitigation can be 'direct' through upgrading sewage treatment works and through alternative technologies, e.g. wetlands or reedbeds; or 'indirect' by offsetting the nitrogen generated from new development by taking land out of a nitrogen intensive uses, e.g. where fertiliser is applied to crops.

Nutrient Management Options

WSP have reviewed the options for Nitrate management across the North Dorchester site. Table 1-1 sets out the figures for calculating the volume of nitrates produced from the urban extension per year. This is based upon Wessex Water, who manage the STWs, meeting their requirement to remove 75% of nitrogen from waste water (Urban Waste Water Treatment Regulations 1994 (Section 5(3))). As introduced in the previous paragraph, it is worth noting further betterment could be delivered through alternative technologies that may be available to improve on the removal rate.

Table 1-2 demonstrates how this volume can be offset from changes in land use within the red line boundary.



Table 1-1: Nutrient Production from Urban Extension

	DWELLINGS	MULTIPLIER	SUB/TOTALS
Population			
Number of dwelling multiplied by 2.42 additional people per dwelling	3300	2.42	7986
Amount of nitrogen produced by the development:			
Estimated population of development multiplied by 25% of a person's average		25% load (tonnes/person/year)	Total nitrate load (tonnes/year)
Annual production of nitrates in sewage		0.000875	6.98775

Table 1-2: Nutrient Betterment Provided by Changes in Land Use

PLANNED LAND USE CHANGES:		NITRATE CHANGE	NET CHANGE IN NITRATE
Calculate a credit where a development can provide its own mitigation:	Hectares	(tonnes/ha/year)	(tonnes/year)
Site area changing from agriculture to urban (the housing)	159	0.0214	3.4026
Site area changing from agriculture to low input uses (the SANGs) Flood Zone	82.6	0.0298	2.46148
Site area changing from agriculture to low input uses (the SANGs) Uplands	115.9	0.0298	3.45382
	Subtotal		9.3179
Total amount of nitrogen produced by population growth minus planned land use change			Net change in nitrate
			(tonnes/year)
Row 2 minus Row 3			-2.33015
Amount of land required to offset the nitrogen produced:		Nitrate change	Land required
Row 4 divided by net change in nitrates for conversion of agricultural land to		(tonnes/ha/year)	(ha)
low input uses	-2.33015	0.0298	<u>-78.19</u>



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Appendix A – Nitrate Betterment Area Review

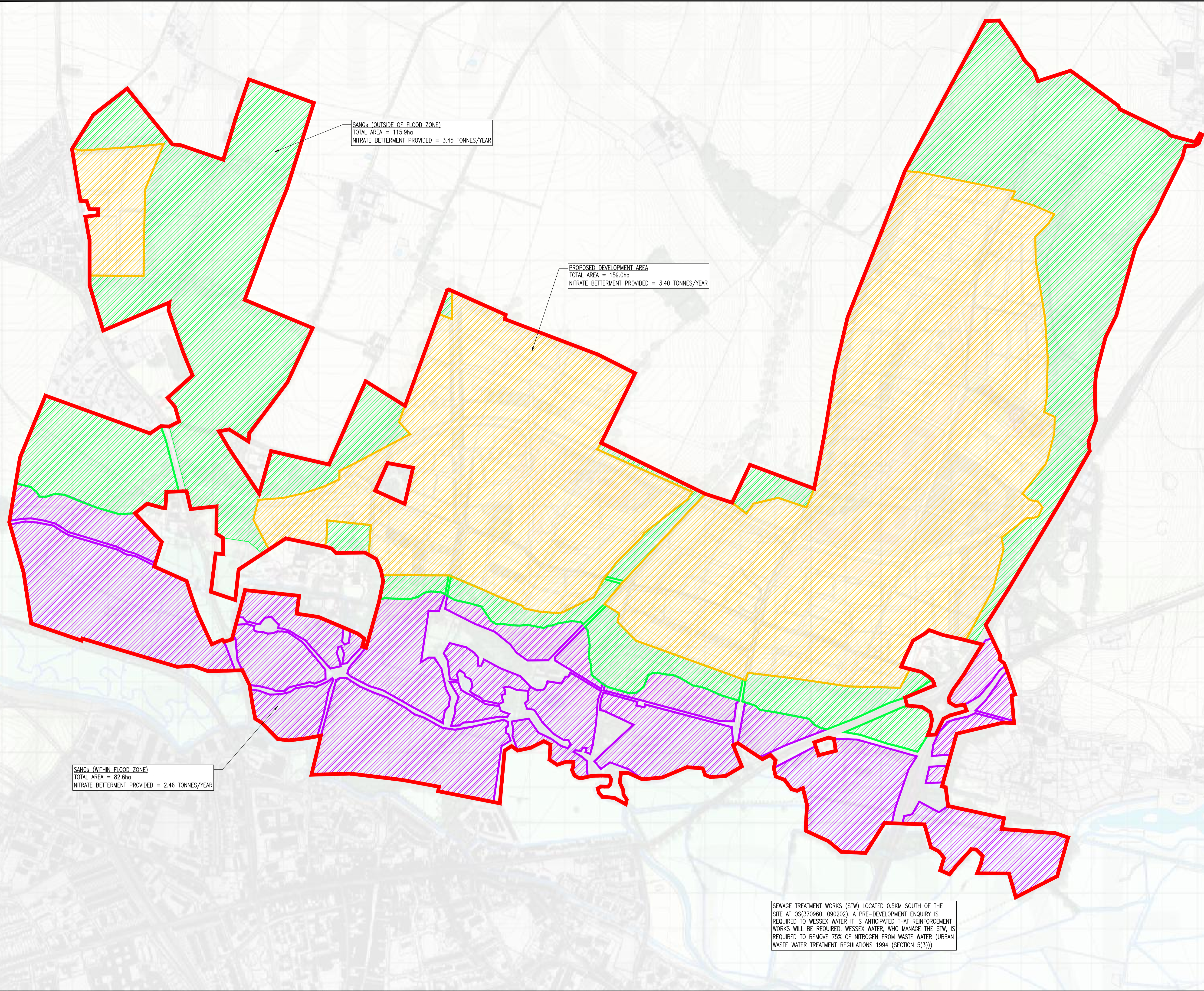
DO NOT SCALE

NOTES

1. ALL LEVELS ARE IN METRES AOD UNLESS OTHERWISE SPECIFIED.
2. SITE MASTERPLAN TAKEN FROM DRAWING WITH SERIAL NUMBER 129438 RECEIVED FROM TURNBERRY ON 28/03/2018.
3. FLOOD ZONE INFORMATION WAS TAKEN FROM THE EA FLOOD MAPS FOR PLANNING.
4. NITRATE BETTERMENT CALCULATED USING EXAMPLE A: SETTLEMENT EXTENSION FOUND IN APPENDIX A OF THE NITROGEN REDUCTION IN POOLE HARBOUR SUPPLEMENTARY PLANNING DOCUMENT (APRIL 2017).

KEY

-  SITE BOUNDARY
-  PROPOSED DEVELOPMENT AREA
-  SANGs (OUTSIDE FLOOD ZONE)
-  SANGs (WITHIN FLOOD ZONE)



PROPOSED DEVELOPMENT AREA
TOTAL AREA = 159.0ha
NITRATE BETTERMENT PROVIDED = 3.40 TONNES/YEAR

SANGs (OUTSIDE OF FLOOD ZONE)
TOTAL AREA = 115.9ha
NITRATE BETTERMENT PROVIDED = 3.45 TONNES/YEAR

SANGs (WITHIN FLOOD ZONE)
TOTAL AREA = 82.6ha
NITRATE BETTERMENT PROVIDED = 2.46 TONNES/YEAR

SEWAGE TREATMENT WORKS (STW) LOCATED 0.5KM SOUTH OF THE SITE AT OS(370960, 090202). A PRE-DEVELOPMENT ENQUIRY IS REQUIRED TO WESSEX WATER IT IS ANTICIPATED THAT REINFORCEMENT WORKS WILL BE REQUIRED. WESSEX WATER, WHO MANAGE THE STW, IS REQUIRED TO REMOVE 75% OF NITROGEN FROM WASTE WATER (URBAN WASTE WATER TREATMENT REGULATIONS 1994 (SECTION 5(3))).

PO1	23/04/2018	JAF	FIRST ISSUE	JWB	JWB
REV	DATE	BY	DESCRIPTION	CHK	APP

DRAWING STATUS: **S0 - WORK IN PROGRESS**



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CLIENT: **NORTH DORCHESTER CONSORTIUM**

ARCHITECT: **TURNBERRY**

SITE/PROJECT: **NORTH DORCHESTER**

TITLE: **NITRATE BETTERMENT AREA REVIEW**

SCALE @ A1:	CHECKED:	APPROVED:
1:5000	JWB	JWB
PROJECT NO:	DESIGNED:	DRAWN:
70031079	JAF	JAF
	DATE:	April 18

DRAWING No: **1079-D-03** REV: **P01**

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