



Bridport Town Council

Foundry Lea Reserved Matters Application

The following comments have been compiled in response to the reserved matters application submitted by Barratt David Wilson Homes (Exeter) Ltd and Vistry Partnerships on land at Foundry Lea, Bridport. BTC has been given an assurance from the Head of Planning that this application will go to Dorset Council Planning Committee and not be a delegated decision.

Council Response

In developing this response, Bridport Town Council (BTC) has taken a policy lead from government legislation, the National Planning Policy Framework (NPPF, revised July 2021), West Dorset Local Plan (2015) and Bridport Area Neighbourhood Plan 2020-2036 (BANP).

BTC has been proactive in seeking engagement in the planning process for Foundry Lea. The development site physically adjoins the built extent of Bridport but is located within the Parish of Symondsbury. BTC has sought a positive working relationship with the developer consortium, Symondsbury Parish Council and others. Establishing a stakeholder working group and engaging proactively with the production of the Foundry Lea Design Code.

Foundry Lea represents a major development in the Bridport Area. The location and scale of the development will have significant impact on the local community during construction and has implications for the functioning of the Town well into the future. With this in mind, BTC considers it essential that every effort is made to bring about the best possible outcomes for the local community.

BTC has consistently pushed for the Foundry Lea development to be a high quality, low carbon development. A modern housing development that sits comfortably with our understanding of the requirements needed to meet governments legally binding target of net zero by 2050. BTCs ambition is that the Foundry Lea development is recognised as being at the forefront of delivering 2050 compliant housing.

A Comprehensive Mixed-Use Development

The outline consent for Vearse Farm was granted on the basis of a single permission for a comprehensive mixed-use development. BTC is concerned that the reserved matters submission for the Foundry Lea element does not sufficiently reference and co-ordinate with those elements of the approved mixed-use development that will be developed by other consortium partners. For example, the employment land, school site, care home and local centre. As such the submission does not provide the detailed information required to fully understand and assess the wider effects and influences of the overall development.

In the absence of:

- A detailed Phasing Plan covering **all** aspects of the approved mixed-use development (Condition 2 of the Outline Permission);
- A Design Code for the **whole** development (Condition 6 of the Outline Permission); and
- Associated information for all elements of the development.

BTC cannot be assured that requirements for a comprehensive mixed-use development have been met. Barratt David Wilson Homes have declared themselves, to the Town Council's Planning Committee, to be the 'master developer' for the former Vearse Farm site. As such there is an expectation that they will co-ordinate and deliver the necessary reserved matters detail to ensure that the original consent for a comprehensive mixed-use development will be achieved.

A Net Zero Carbon Future

The UK has some of the [most ambitious targets](#) in the world to reduce carbon emissions, with a commitment for a 68% reduction in greenhouse gas emissions by 2030 compared to 1990 levels. The government's Heat and Building Strategy (2021) confirms that decarbonising heat is essential to meet net zero goals and that the government's preferred technology, for the foreseeable future, is the heat pump.

The [National Planning Policy Framework](#) expects local planning authorities, when setting any local requirement for a building's sustainability, to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. BANP Policy CC2 recommends that new development should aim to meet a high level of energy efficiency where achievable *by exceeding the target emission rate set by Part L of the 2013 Building Regulations*. Policy CC3 adds that new development is encouraged, where possible, to secure at least 10% of its total unregulated energy from decentralised low carbon sources. Moreover, Policy D9 adds that developers are encouraged to employ modern innovative technologies and methods such as Air Source Heat Pumps. BTC is clear that both embodied and operational carbon emissions from new housing development must be minimised.

BTC welcomes and supports:

- Installation of roof mounted solar PV to meet BANP Policy CC3 minimum requirement to offset 10% of unregulated emissions;
- 'Fabric first' construction; and
- Inclusion of electric vehicle charging points for all detached, semi and end terrace housing.

Outstanding issues with the reserved matters submission:

- We are disappointed that the material palette drawn on for the Foundry Lea development remains traditional, carbon intense concrete, render, brick and re constituted stone – the Material Plan and Sustainable Design and Construction Statement indicates that "*consideration*" will be given to sourcing environmental friendly products. BTC does not accept that only considering environmental options is a sufficient response to the climate emergency. The embodied carbon from large constructions must change and change quickly. BTC would expect to see firm and measured commitments to using low carbon materials in a development of this scale.
- The reserved matters submission sets out 3 phases of housing development, the first two phases set to build out at 2013 standards that will be replaced by higher standards after 2025 – enhanced U-values and higher renewable, low carbon sources of energy will be required by Future Homes Standards. BANP Policy CC2 specifically asks for development to "*exceed*" target emissions rates in Part L 2013 standards. BTC considers that there is a moral and practical imperative to avoid building new homes that will need to be retro fitted by householders to meet future energy sourcing and performance requirements.
- The reserved matters submission includes a Carbon Emissions Statement produced by Sol Environment Ltd. This report explores methods of sustainable heating such as ground source heat pumps (GSHPs) or air source heat pumps (ASHPs) and concludes that they are

'undesirable' or 'unaffordable'. In light of the government's recent Heat & Buildings Strategy (2021) the Sol Environment Ltd report conclusions regarding heat pump solutions are disappointing. BTC would press Dorset Council to challenge the developer consortium to rethink how best to provide low carbon energy solutions for Foundry Lea – This could include considering community energy solutions, micro grids and working with the Bridport Energy Club.

- With the Bridport Cohousing scheme currently in development we are not short of local sources of inspiration for delivering low carbon domestic energy. Barratt David Wilson Homes could also draw on experience of heat pump installation at their Delamare Park housing development in Nunney, near Frome. The developer's first gas-free site in the UK which includes 30% affordable homes, clearly demonstrating that heat pump installation is a commercially viable option in 2022. BTC urges Dorset Council to press for Foundry Lea to show the same levels of ambition to address the climate crisis.

Housing

Considering the suite of BANP Housing Policies and Housing Needs Assessment, BTC knows that new development in Bridport must address the chronic housing crisis resulting from the growing affordability gap between local incomes and the price of market housing. The BANP HNA identifies a need for social rent housing and work by AECOM on life cycle modelling points to a shortfall of 1 and 2 bed properties.

BTC welcomes and supports:

- The consortiums uplift of the s106 commitment to nearly 40% affordable housing provision;
- Delivering the requirement for 70% of units to be for affordable rent;
- The allocation of 6 units within Foundry Lea for Bridport Area Community Housing Community Land Trust (BACH CLT) housing, locking in social rent in perpetuity; and
- The inclusion of 8 self-build units in line with BANP Policy H7. BTC asks that consideration is given to involving BACH CLT in the delivery of the self-build/self-finish housing.

Outstanding issues with the reserved matters submission:

- Given the defined need for social rent housing to address the affordability crisis in the Bridport area (BANP Policy H1) it would be preferable to see inclusion of more social rented housing;
- As shown on the Affordable Housing Layout, the scheme delivers the quantum of Category 2 accessible and adaptable housing required by the s106 Legal Agreement (5% of the affordable housing within the affordable rented provision). However, Policy HOUS1 of the emerging Dorset Council Local Plan issued in 2021 proposes that 20% of new homes be built to M4(2) accessible and adaptable dwellings standards. BTC would certainly support a higher percentage of accessible and adaptable homes, especially given the demand from older or disabled people living in the Bridport, and
- There is a mismatch between the overall housing mix proposed for the Foundry Lea development and the modelling of future housing need undertaken by AECOM (2019) for the BANP Housing Needs Assessment. The AECOM study highlights a need to increase supply of 1 and 2 bed properties.

Housing Unit size	Foundry Lea Proposal	AECOM Life Cycle recommended guide for new development to meet projected needs by 2036
1 bed	4%	24%
2 bed	27%	45%
3 bed	39%	31%
4 bed	29%	0%
5 bed	1%	0%

Re: [AECOM Lifecycle Assessment](#)

Sustainable Transport

BTC and Dorset Council commissioned [Access & Movement Study \(2021\)](#) clearly shows that the road network in Bridport is operating at, and often beyond capacity without a large, new development adding to the system.

Modal shift to walking and cycling for short journeys must be the priority for any new housing scheme in the Bridport Area (BANP Policy AM1). BTC commissioned a [Cycle Connection Study](#) in 2021 to assess and detail the level of cycling infrastructure associated that will offer the best chance of new residents choosing to cycle to and from Foundry Lea.

BTC has identified the need for a dedicated and segregated cycle link from Foundry Lea to the Town Centre. BTC is keen to work with partners to deliver this much needed infrastructure, but BTC is not in receipt of s106 funding which should be the key financial lever for the proposed cycle link.

BTC welcomes and supports

- The efforts made by the developer consortium to support cycling as a mode of transport;
- The adoption of LT/120 standards for the main Cycle Street specifications;
- Changes to the Eastern Cycle Bridge to bring it up to LT/120 standards in anticipation of linking through to off road cycle provision to the town centre.

Outstanding issues with the reserved matters submission:

- BTC is aware that a proportion of the s106 funding is earmarked for transport infrastructure improvements. BTC requests that funding priority is given to resourcing an LT/120 compliant cycling link to the town centre via the Dreadnought Industrial Estate and Plottingham Field.
- The secondary street cycle connections east/west and north/south are proposed on 3m shared paths. This has the potential for conflict between path users and needs re assessing alongside actions to enable 20 mph residential zones.
- Other than the support for cycling infrastructure, the sustainable transport actions set out in the reserved matters submission appear weak. It is difficult to envisage provision of viable public transport options being provided for Foundry Lea without significant subsidy. A developer contribution should be sought, for example, to assist with extending the BTC round-Bridport Community Bus Service into the development (BANP Policy AM5).

- BTC notes that the Transport Assessment referenced in the reserved matters submission produced by Brookbanks Consulting Ltd for Hallam Land is dated March 2017. The Transport Assessment should be updated before determination of the reserved matters. A revised Transport Assessment should draw on recent studies commissioned by BTC and Dorset Council - [Access & Movement Study \(2021\)](#) and [Cycle Connection Study](#).

Ecology

BTC is keen to ensure that the Foundry Lea development is integrated into the western edge of the existing built up area and does not become a separate, closed extension to the town. Coherent and connected green spaces, available to the whole community, are an important part of this drive to ensure a connected urban extension.

BTC welcomes and supports

- The consortium's efforts to ensure removal of hedgerows is minimised and that existing trees and hedgerows are protected during the development phase;
- The commitment to green space provision as part of the development; including sports pitches, allotments, orchard, and new circular walks; and
- Woodland and hedgerow planting commitments.

Outstanding issues with the reserved matters submission:

- BTC requests that it be included in discussions around the future management of the green spaces provided by the Foundry Lea development. BTC is keen to ensure access to green spaces remain open and welcoming to the wider Bridport community when the development is completed. BTC offers community accountability as well as significant experience of managing open spaces, playing fields and allotments.
- BTC is aware that the Environment Act includes requirements for 10% Biodiversity Net Gain. BTC is impressed by the consortium claims for biodiversity net gains from the development - 14% gains habitat units and 33% gains hedgerow units. BTC requests that Dorset Council confirm that the consortium calculations of biodiversity net gains are in line with Defra Biodiversity Net Gain 2:0 metric using pre-development baselines and post-development evidence.

Open Spaces & Sports Pitches

Outstanding issues with the reserved matters submission:

- The Land Ownership Plan shows the allotments and sports pitches as being in the ownership of the parish council. BTC is not aware of any formal agreement regarding the future ownership and management of the open spaces within the Foundry Lea development.
- BTC notes the comments from Sport England regarding the sports field – drawing 10042-FPCR-XX-ZZ-DR-L-0048 Rev P01. BTC shares the concerns raised by Sport England, in particular “*the absence of a management and maintenance plan for the sport pitch or MUGA*”. BTC would want to be consulted on the detail required to produce a comprehensive Sports Pitches Scheme in line with the s106 Legal Agreement.

- BTC is not aware that a detailed plan for the maintenance and management of the open spaces; allotments, sports pitches, MUGA etc has been finalised. BTC wishes to be fully engaged with the consortium partners in finalising maintenance and management arrangements for allotments, sports pitches and other open spaces to ensure that the management of open spaces at Foundry Lea provide the best outcomes for the local community(BANP Policy CF2).

Other Comments

BTC welcomes and supports:

- The proposal, outlined in the reserved matters application, for provision of a Skills Academy and the intention to connect with a similar local initiative to help deliver BANP Project 10 - A Timber Fabrication facility.

Outstanding issues with the reserved matters submission:

- BTC recognises that Wessex Water find the plans for onsite management of water and foul sewage to be acceptable. However, concerns remain regarding the capacities of the wider sewage system serving Bridport. Recent discussions with Wessex Water suggest that further upgrading work will be required in the near future. BTC is not aware that plans are in place to ensure that these necessary works are completed in a timely manner.
- A condition of the outline approval for (the then named) Vearse Farm site was that a Construction Traffic Management Plan (CTMP) must be submitted to and approved in writing by the local planning authority before the development commences. BTC requests that statutory consultees, public, local landowners and other interested parties and groups are consulted ahead of approval of the CTMP. The potential for significant and long-lasting disruptions to transport and inconvenience to residents during construction are high and BTC would want full involvement in agreeing mitigations. BTC can also bring much-needed local knowledge to the development of the CTMP.

Overall, considering the entirety of the reserved matters submissions, there are a number of positive aspects that BTC welcomes and supports: the uplift to provide 40% affordable housing; enhanced cycling specifications; solar PV to achieve 10% non-regulated energy from decentralised, renewable sources; electric car charging points; and the overall improvement in the visual style of the housing and green spaces.

However, BTC considers that the development, in terms of reducing embodied and operational greenhouse gas emissions, falls short of what we understand is required to reach a net zero carbon future.

There are a number of assurances and commitments BTC would want addressed as a priority ahead of determination:

- **A condition that ensures that the Foundry Lea reserved matters submission is part of the co-ordinated delivery of a comprehensive mixed-use development as consented at the outline stage (the Town Council understands that a supplementary S106 Agreement may be one means of addressing this), with a schedule for delivery of the shortfall in detail concerning the affordable employment land, school site, care home and local centre;**

- That the provision of domestic heat energy be reconsidered with a view to increasing the percentage of energy from renewable sources;
- That the 2017 Transport Assessment be updated and revised to include the detailed requirements for a LT/120 compliant cycle/walking route connecting Foundry Lea to the centre of Bridport, as detailed in the [Cycle Connection Study](#).
- That detailed plans for the maintenance and management of the open spaces; allotments, sports pitches, MUGA etc are finalised prior to granting consent, and that BTC is fully engaged with the consortium partners to ensure the best outcomes for the local community.

Bridport Town Council, 14 January 2022