

Joint Local Plan Review for West Dorset, Weymouth and Portland

**SUMMARY OF RESPONSES TO THE
PREFERRED OPTIONS CONSULTATION**

JUNE 2019



The Preferred Options consultation document for the West Dorset, Weymouth & Portland Local Plan Review was produced jointly by West Dorset District Council and Weymouth & Portland Borough Council. On 1st April 2019, these councils ceased to exist and the new Dorset Council came into being.

For the avoidance of doubt, this document summarises the comments made by organisations and individuals in response to the Preferred Options consultation document for the West Dorset, Weymouth & Portland Local Plan Review. The summarised comments do not represent the views of members or officers of Dorset Council.

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1. Introduction

Adopted Local Plan

The West Dorset, Weymouth & Portland Local Plan was adopted by West Dorset District Council on 22nd October 2015 and by Weymouth & Portland Borough Council on 15th October 2015.

Local Plan Review: Initial Issues and Options Consultation

The councils began undertaking a review of the joint local plan and the first stage was public consultation on 'issues and options'. The Initial Issues and Options Consultation ran from 6th February to 3rd April 2017. A summary of the responses made by organisations and individuals was produced in August 2017. The summary document is available online, as is a searchable database of all the responses made.

Local Plan Review: Preferred Options Consultation

The second stage of the review was public consultation on 'preferred options'. The Preferred Options Consultation ran from 13th August to 15th October 2018. This document provides a summary of the responses made by organisations and individuals to the consultation on the Preferred Options consultation document, which was supported by more detail in background papers and evidence. A Sustainability Appraisal report was also produced alongside the Preferred Options consultation document. All documents were made available on the councils' website, at the council offices and in public libraries.

Responses to the Preferred Options Consultation

In total around 900 individuals and organisations responded to the consultation. Just under 58% responded either by e-mail or in writing and just over 42% filled in an online form.

Website, Social Media and Press

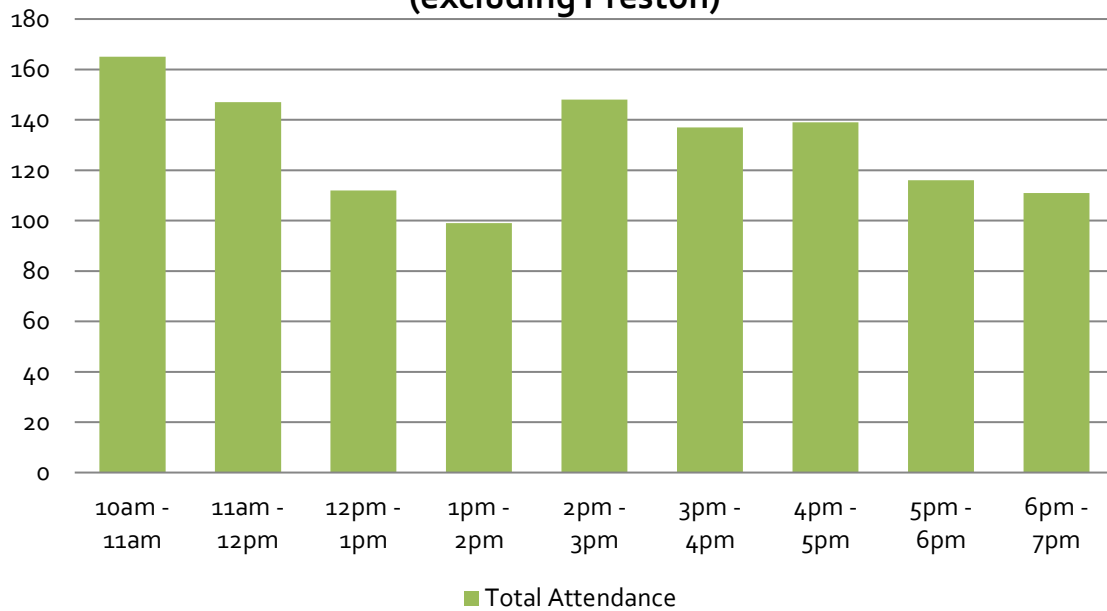
The local plan review documentation was available to view and download online at <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/local-plan-review-west-dorset-weymouth-portland.aspx>. A campaign was run on Facebook with pages raising awareness of the consultation overall and of 'option sites' at the main settlements. Articles and advertisements appeared in the local press including the Western Gazette and Bridport News.

Public Consultation Events

Eleven public consultation events were held between 8th August and 14th September 2018. It is estimated that 1,474 people attended these events.

Location (date)	Estimated attendance
<i>Preston, Weymouth (08/08)</i>	300
<i>Sherborne (29/08)</i>	321
<i>Portland (30/08)</i>	32
<i>Dorchester (31/08)</i>	207
<i>Crossways (04/09)</i>	71
<i>Charminster (06/09)</i>	178
<i>Beaminster (07/09)</i>	76
<i>Lyme Regis (10/09)</i>	55
<i>Weymouth (12/09)</i>	71
<i>Bridport (13/09)</i>	76
<i>Chickerell (14/09)</i>	87
Total	1,474

**Estimated attendance by hour for all exhibitions
(excluding Preston)**



Format of the 'Summary of Responses' Document

This document provides an overview of the responses made to each section of the Preferred Options consultation document.

For each section it records the total number of responses and the total numbers of comments made, which were either in support, objecting or neutral (i.e. neither supporting nor objecting). It should be noted that the total number of comments made may exceed the total number of responses, where respondents have objected to some parts of a particular section and supported and / or made neutral comments to other parts.

For each section, the specific and general consultation bodies (as defined in the Town and Country Planning (Local Planning) (England) Regulations 2012) that responded are listed. For each section the key landowners / developers that responded are also listed.

The main points made in the responses are set out in bullet point form and those made by the specific and general consultation bodies and key landowners / developers are attributed to them. The full submissions from all consultees are available online.

For the avoidance of doubt, this document summarises the comments made by organisations and individuals in response to the Preferred Options consultation document for the West Dorset, Weymouth & Portland Local Plan Review. The summarised comments do not represent the views of members or officers.

Next Steps: The New Dorset Council

The new unitary Dorset Council became operational on 1st April 2019 and covers the areas previously served by East Dorset, North Dorset, Purbeck and West Dorset District Councils, Weymouth & Portland Borough Council and Dorset County Council.

The Consequential Order for Dorset Council requires the production and adoption of a local plan to reflect the 'new geography' by April 2024. On 25th June 2019, Dorset Council's Cabinet committed to producing a single new local plan for the Dorset Council area by April 2023 and to continue to take forward the local plan review for Purbeck. It also decided not to continue to take forward the other Borough / District local plan reviews, including the West Dorset, Weymouth & Portland Local Plan Review.

Any comments made in response to the Preferred Options consultation document will be taken into account and used to inform the development of the new Dorset Council Local Plan.

Introduction

For the Introduction chapter a total of 177 responses were received. The individual comments were broken down as follows:

Number of comments made: 177

Object: 124

Support: 28

Neutral: 25

Specific and general consultation bodies	Specific and general consultation bodies
<i>Bridport Town Council</i>	<i>Portland Town Council - Planning & Highways</i>
<i>Burton Bradstock Parish Council</i>	<i>Public Health Dorset</i>
<i>Chideock Parish Council</i>	<i>Sherborne and District Society CPRE</i>
<i>Dorchester Town Council</i>	<i>Sherborne Town Council</i>
<i>Dorset County Council (Environment & Economy)</i>	<i>Woodland Trust</i>
<i>Dorset County Council (Flood Risk)</i>	
<i>Dorset County Council (Transport)</i>	Key landowners / developers
<i>Dorset County Hospital</i>	<i>Dorchester Town Council</i>
<i>Dorset CPRE</i>	<i>LVA (South West) LLP</i>
<i>Dorset Local Nature Partnership</i>	<i>North Dorchester Consortium</i>
<i>Dorset Wildlife Trust</i>	<i>Persimmon Homes</i>
<i>Historic England</i>	<i>Persimmon Homes South West</i>
<i>Home Builders Federation</i>	<i>Luxury Family Hotels</i>
<i>Homes England</i>	<i>Portland Port Group</i>
<i>Moreton Parish Council</i>	<i>Symondsburry Estate and The Watton Hill Trust</i>
<i>Natural England</i>	<i>West Stafford LVA LLP</i>
<i>Portland Harbour Authority</i>	<i>Wyatt Homes</i>

General

- There are a number of errors in the plan: numbering errors, reference to buildings which no longer exist and a lack of updating regarding developments which have received planning permission. This does not inspire confidence that the rest of the plan has been thought through carefully.

Responses on Question 1-i: The local plan review will cover the period from 2016 to 2036. The start date reflects when the most up-to-date household projections (2014-based) were published and the end date is as recommended by the inspector of the currently adopted local plan. Do you agree that the local plan review should cover the period from 2016 to 2036?

Support for the Plan Period

- Support a plan period from 2016 to 2036. (Bridport Town Council, Dorset County Council: Environment & Economy, Sherborne & District Society CPRE, Symondsburys Estate and the Watton Hill Trust, Wyatt Homes)
- The 2014 figures provide a robust basis for calculating Objectively Assessed Need (OAN) which reflects the Strategic Housing Market Assessment (SHMA). (Wyatt Homes)
- A plan period to 2036 ensures strategic policies cover the 15-year period on adoption advised in NPPF2. (Home Builders Federation, LVA (South West) LLP)
- The extra period (2031 to 2036) will bring greater stability and enable unplanned development to be resisted. The plan should adhere to a five-year review process. (Portland Town Council: Planning & Highways)

Different Plan Periods

- The Council should be working to the latest (2016 based) household projections and planning for the period 2018-38. This would be more practical, provide greater flexibility and enable long-term development needs to be identified.
- The adjacent Purbeck Local Plan Review, which has implications for Crossways, runs over a different period: 2018 to 2034. (Moreton Parish Council)

Housing Numbers Methodology / Use of 2014 Figures

- The Government's 'predict and provide' policy should be abolished. Local authorities should provide exactly WHAT is needed, WHEN it is needed, HOW it is needed and for WHOM it is needed.
- The 2014 base figures are inflated by the increase in population during school terms by the boarders as the schools in Sherborne.
- The 2014 figures must be updated to 2016 asap. (Chideock Parish Council)
- The plan has not been drawn up using realistic assumptions on Weymouth's current and future housing needs.

Plan Period is too Long

- The plan period is far too long for any meaningful strategy.
- Pointless trying to predict how things will be in 2036.

Need for Regular Review

- There should be a commitment to review the plan every five years to ensure it stays up-to-date and relevant.
- The plan should be reviewed regularly to determine if the assumptions made actually play out in practice.
- The local housing need figure calculated using the standard methodology may change when the Office of National Statistics (ONS) updates household projections (usually every 2 years) and affordability ratios (annually).

Local Government Reorganisation

- The plan period might alter once a composite plan is produced for the new Dorset Unitary Authority.

Responses on Question 1-ii: The section on 'the plan context' has been revised to bring it up to date. The revised section draws on much of the contextual information included in the Initial Issues and Options Consultation Document for the local plan review. Does this revised section adequately capture the key environmental, social and economic issues facing the plan review area?

General Support

- Adequate coverage of the issues. (Home Builders Federation)

General Comments

- The draft Plan does not meet the NPPF tests of soundness, as it has not been positively prepared and is not justified, effective or consistent with national policy. (Dorset County Hospital)
- This document fails to identify the key issues facing the area including: social and economic deprivation; low wages and high housing costs; and inadequate roads to support economic growth.
- This section needs major revision and shows that West Dorset and Weymouth & Portland are very different areas with little in common. (Moreton Parish Council)
- This section does not adequately capture the key environmental, social and economic issues facing the area, particularly at Bridport and Vearse Farm.

Duty to Co-operate

- The Preferred Options document makes a very brief statement regarding the council's fulfilment of its Duty to Co-operate at paragraphs 1.2.24 to 1.2.26. Despite this statement, we have not been able to locate an updated version of

- the Duty to Co-operate Statement which was associated with the Issues and Options stage dated February 2017.
- The plan does not consider cross-boundary issues including unmet housing needs from the East Dorset HMA. It does not recognise the functional links between West Dorset and Bournemouth and Poole. A Statement of Common Ground with all neighbouring authorities should be produced to show that all cross-boundary issues have been considered. (Persimmon Homes)
 - The duty to cooperate was not applied to Vearse Farm, which crosses the boundaries of Symondsburry and Allington Parishes and Bridport Town. These councils objected to the Vearse Farm planning application and were ignored, as were objections by residents and people who spoke at Planning Committee.

Level of Growth

- The amounts projected for employment land (60 ha) and for new homes (15,500) are in excess of current statistical analysis and should be updated.
- Disagree with the amount of housing proposed (794 dwellings per annum). Spreading need evenly over the UK is a flawed approach – houses need to be where jobs are. If not, more retirees will re-settle, unbalancing the local population. There is already an imbalance between jobs and economically active residents in Dorchester with lots of retirees at Poundbury and Brewery Square.
- The basis for deciding how many new homes are required needs to be challenged. Agricultural land, SSSIs and green areas need to be protected. Unused land in urban areas should be used with a focus on affordable housing.

Population / Growth Figures

- The population figures for Sherborne in Tables 1.2.4 and 1.2.5 include resident boarding school pupils. About 1,200 should be netted off to give a current population of 8,500. If not done, the disproportionate volume and impact of the proposed housing will not be recognised properly. (Sherborne and District Society CPRE, Sherborne Town Council)
- Paragraph 1.2.11 is not correct as local residents do not live longer. The increase in life expectancy has been slowing down since 2011 and between 2015 and 2017 it plateaued. There is no evidence that it will begin to increase again.
- The turnover in house ownership is greater than the average. People here are older so the death rate is higher than the norm.
- Table 1.1 excludes Crossways, where housing has increased by 119% since 1981. The Preferred Options allocations will result in a 316% increase in dwellings since 1991. Crossways has had and will have the largest percentage increase in dwellings and population of any community in West Dorset since 1991, even though it is a village with limited facilities. (Moreton Parish Council)
- The Purbeck Local Plan Review allocates housing and a care home at Redbridge Pit, which is physically connected to Crossways and close to the 500 house CRS1 allocation in West Dorset. Purbeck's 490 house allocation should be considered

- as growth at Crossways, which increases the total amount of development from 1,114 homes (in Table 3.3) to 1,604 dwellings. (Moreton Parish Council)
- The population figure for the Bridport Area shown at paragraph 1.2.4 should incorporate the parish of Symondsburry, which is also covered by the Bridport Area Neighbourhood Plan. (Bridport Town Council)
 - Table 1.1 shows Beaminster, Lyme Regis and Portland declining in population over the last five years. This needs to be investigated to determine whether this is due to short term factors or is structural in origin.

Climate Change and Flooding

- Para 1.2.8 should reference the potential for increased tourism opportunities linked to increasing temperatures relating to climate change (as well as Brexit) and the additional pressures this may bring (Dorset Local Nature Partnership).
- Figure 1.2 only shows main river flooding. All sources of medium / high risk flooding should be shown. (Dorset County Council: Flood Risk)

Nature and Biodiversity

- Among the positive opportunities which development can bring, paragraph 1.2.7 should refer to biodiversity net gain and green infrastructure for wildlife and health and wellbeing. (Dorset Wildlife Trust, Dorset Local Nature Partnership)
- An additional paragraph to highlight the benefits of the natural environment to support the economy (e.g. tourism, raw materials, creative industries) and society in terms of support to health and wellbeing such as opportunities for volunteering and therapy in nature, should be added. (Dorset Local Nature Partnership)
- The need to avoid increased nutrient loads from residential and commercial development entering Poole Harbour and the wider need to reduce nutrient loads from farmland entering the aquatic environment, including nationally and internationally designated wildlife sites, should be mentioned. (Natural England)

Heritage and Character

- Much of Sherborne is built from blue lias and ham stone, quarried locally and blue lias is used in the town more than ham stone (as mentioned in Table 1.2.4). It is the colour contrast between the two with the addition of painted render, wood and brick to the colour palette that makes the town chromatically so attractive. Using stone from outside that small area around the Sherborne area disrupts this heritage. (Sherborne and District Society CPRE)

Design

- The good design sought in Paragraph 1.2.7 will not protect the AONB against major development. 'Great weight should be given to conserving and enhancing

the landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection...'

Economic Context

- The context section ignores Brexit, the rise of the self-employed, part-time working and the changes in retirement age. Dorset's two major industries, farming and tourism will be adversely impacted. (Sherborne and District Society CPRE)
- The decline in employment over the last five years is likely to continue. (Dorchester Town Council)
- There is no reference to the opportunities the area offers within aspects provided by the Industrial Strategy and 'Future Jobs' context and the potential polarisation by the Unitary Authority. (Portland Town Council: Planning & Highways)

Table 1.2.4

- **Weymouth & Portland:** Should mention the financial investment in infrastructure made for the Olympics.
- **Bridport, Lyme Regis & Beaminster:** Should mention the current industries / employment.

Transport

- Paragraph 1.2.12 should recognise that not only is there no motorway in the area, there is only one trunk road, only three rail routes, and few bus services.
- The majority of rural roads are too dangerous for cyclists and pedestrians.
- 19,000 houses with an increase in population of about 42,000 will increase car journeys, but the Local Plan says nothing about upgrading transport infrastructure.
- New development is concentrated at the towns, but when the electric car becomes the norm, development in some villages could be desirable.
- Paragraph 1.2.12 should recognise the importance of accommodating HGV movements for the economy and this being a potential problem for the growth of the economy. (Portland Harbour Authority, Portland Port Group)
- Significant investment in the transport network and other infrastructure is needed. (Dorchester Town Council)

Health

- The plan should highlight local health and wellbeing challenges, including frailty and mental health. The plan should also refer to Dorset's Sustainability and Transformation Plan (STP) 'Our Dorset', which sets out an approach to changing the health and care system. (Public Health Dorset)
- Greater emphasis is required within the context section on the importance of healthcare services within communities. The promotion of both healthy living

and the health service, is fundamental to NPPF Section 8. (Dorset County Hospital)

- There is no mention of inequalities of demand between the elderly and the rest of the population in paragraph 1.2.15.

Housing

- Is there a pressing need for vast-scale house building in West Dorset? The population only remains fairly steady because people move here to retire (and buy second homes, holiday lets, etc.).
- Appropriate development in the right places that sustains existing settlements across the area is needed. This will be influenced by the ageing demographic and the need for local employment opportunities to help reverse the trend of decline and lower-than-average wages. (Persimmon Homes South West)
- So many open market luxury houses will turn West Dorset into a national retirement home. Working people cannot afford these homes.
- There is a need for affordable housing for younger and older people. Retired people contribute much to the local economy, are active in voluntary services and provide unpaid care roles, reducing local authority and NHS care costs.
- The strategic balance between housing need, location and allocation is the key context, but is not addressed. Significant imbalances are not addressed, yet this is essential for a long-term 20-year plan. In this respect the plan fails and is no more than a short term, short sighted 5-year plan. (Chideock Parish Council)
- The increase in population in Weymouth & Portland is due to the number of people retiring to the area and is nothing to do with the need for affordable housing. This distorts projected housing numbers and the need for housing for local people.
- The Plan should restrict affordable housing to local people on lower earnings.

Infrastructure

- Infrastructure should lead development not the other way round.
- The pressure on local infrastructure will be severely detrimental to the quality of life of existing residents.

Vease Farm, Bridport

- The BRID2 developer's masterplan is reticent on the amount of affordable housing that will be delivered; alluding to 'the requirement for 35%'. This is a well-known con: after planning permission is granted subsequent viability reports will then reduce this to much less or even none at all (e.g. the Dorchester Prison site).
- If green belt / AONB land has to be built on, then complete priority should be given to alternative models such as community land trusts, co-housing and schemes with high levels of affordable eco-housing, which would tackle Bridport's housing crisis and reduce the number of households on the register.

- The influx of retirees will require more health and social care services.
- The new population introduced by BRID2 are more likely to have mobility problems, which will limit their ability to use the desperately narrow pavements.
- Car use will increase, as will congestion and parking problems.

Wyke Oliver Farm, Weymouth

- Builders will not develop cheap / affordable housing on allocations like WEY 14. Areas such as between the caravan parks in Preston or brownfield sites would be more appropriate.

Responses on Question 1-iii: A single vision is proposed for the local plan review area and the local plan's 'strategic objectives' have been re-named 'strategic priorities'. The role of the vision, strategic priorities and strategic approach in plan-making and decision-taking has also been clarified. Do these changes provide a clearer strategic policy direction for the local plan review and any other planning policy documents?

Support

- The vision is supported. (North Dorchester Consortium, Dorset County Council: Environment & Economy) The Vision and Strategic Priorities are supported. (Burton Bradstock Parish Council)
- A strategic commitment to the historic environment and a positive vision for the future of the historic environment are welcomed. (Historic England)
- Support the proactive approach to sustainable economic growth and the positive approach to delivering a mixed range of housing. The emphasis in the vision on utilising investment to deliver brownfield regeneration (particularly on Portland) is supported. (Homes England)
- The proposed vision is supported. The revised approach to give a clearer view of the strategic priorities is welcomed. Support the strategic priorities: to protect and enhance the outstanding natural and built environment; and to reduce vulnerability to the impacts of climate change. (Dorset Local Nature Partnership)
- The top line commitment to focus on environmental quality and landscapes is supported. (The Woodland Trust)
- Agree that development should not undermine the functioning of any centre, or adversely affect its vitality or viability. (Bridport Town Council)

General

- Strategic policies to address the Councils' strategic priorities for the development and use of land should: set out an overall strategy for the pattern, scale and quality of development; and should be clearly written. (Home Builders Federation)
- The Vision is too short-term, more appropriate for a 5-year programme than a 20-year programme. (Chideock Parish Council)

- Strategic priorities need greater prominence in the plan and greater weight given to realistic ways of meeting them. (Dorchester Town Council)
- The vision, strategic priorities and strategic approach need redrafting to reflect future changes that are likely to take place, rather than reflecting past changes. (Moreton Parish Council)
- Specific Priorities / Objectives / Aims / Targets must be set out for each major town in the plan area. This is a major omission and is absolutely essential to avoid piecemeal developer-driven economic activity which otherwise commercially exploits random land availability. (Chidoeck Parish Council)
- The definition of a 'strategic allocation' is given to be 'sites of more than 50 dwellings'. The definition of 'strategic priorities' is not adequate or at all strategic.
- The vision and strategic priorities might change with the new Unitary Authority. (Dorset CPRE)
- There is a missed opportunity in the vision to recognise the value of the villages and rural areas in terms of environmental, economic (in terms of tourism and rural-related industries) and social benefits (in terms of well-being and access to nature). (Dorset Planning Consultant)
- Neither the local plan nor the review make any provision for the investigation of the many alternative brownfield sites available in the plan area.
- No attempt is made to utilise Vacant Building Credit (VBC) grant to assist the building of affordable housing on brownfield sites.
- The DLNP's Vision and Strategy (2014) should be included in the Local Plan Review evidence base. (Dorset Local Nature Partnership)

Vision

- The 20-year vision must address the key issues of jobs / housing / commuting imbalance and the provision of high-quality employment adjacent to local affordable housing. (Chideock Parish Council)
- The specific serious imbalances at Weymouth / Portland / Dorchester and Sherborne Town / Rural must be addressed in a 20-year plan and vision with specific targets. (Chideock Parish Council)
- The vision capitalising on linkages between only Weymouth / Dorchester / Portland is too localised and narrow. A broader vision is essential. (Chideock Parish Council)
- The LPR does not offer a single vision or a clear strategic policy direction, largely because the policy is utterly confused by the fact that it so often contradicts itself in practice, as demonstrated by the nature of the developments proposed.
- The wording that "the rich natural environment [...] needs to be considered and respected, and where possible enhanced" should be much more robust and provide a commitment to "protect and enhance the natural environment and biodiversity of the area." (The Woodland Trust)

Strategic Priorities

- The 'priorities' are too vague and non-specific. (Chideock Parish Council)
- The strategic priorities should refer to regeneration on Portland not only at Weymouth and Dorchester.
- We assume the lack of reference in the strategic priorities to the historic environment is an oversight. A priority should be to protect and enhance the outstanding natural, historic and built environment, including its landscape, heritage assets, biodiversity and geodiversity. (Historic England)
- The proposed development north of Dorchester would be contrary to the fifth strategic priority as this would totally change the rural county town environment, which is highly sensitive to change. It would also be contrary to the strategic approach to environment and climate change.
- The reduction in car use sought by the seventh strategic priority will not happen in rural areas or for families that need a car for shopping / GPs / Hospitals etc.
- A town to match Poundbury to the north of Dorchester would be contrary to the eighth strategic priority as it would destroy the 'distinctiveness' of the area.
- Retaining good agricultural land should be a strategic priority. (Dorchester Town Council)
- We welcome the strategic priority to 'protect and enhance the outstanding natural environment' and the priority to 'reduce vulnerability to climate change'. The protection and restoration of ancient woodland and planting more trees across the plan area will help to deliver on both of these objectives. (The Woodland Trust)
- Climate change mitigation should be explicitly mentioned in the strategic priorities as well as adaptation, reflecting that mitigation is covered by other sections of the Plan. (Dorset Local Nature Partnership)

Strategic Approach: Environment and Climate Change

- There is little detail on climate change mitigation and adaptation under the strategic approach section, other than directing development away from areas at risk of flooding or coastal erosion. It could mention the importance of green infrastructure and trees, green roofs etc. in mitigating and adapting to higher temperatures and the role green infrastructure and ecological networks play in helping wildlife to move in response to climate change. (Dorset Wildlife Trust)
- Who defines what is 'appropriate mitigation'?

Strategic Approach: Achieving a Sustainable Pattern of Development

- Is Bradpole regarded as a rural village or a town in view of its proximity to Bridport? This definition has an effect on rural exception sites etc.
- Will the allocations provide a 5-year housing supply?
- The strategic approach could be rephrased to provide stronger support for brownfield development opportunities within DDBs, in order to be consistent with the strategy for development on Portland. (Homes England)

- The delivery of homes through the change of use of former school sites on Portland should be recognised explicitly in the strategic approach in order to be consistent with the strategy for growth on Portland. (Homes England)

Strategic Approach: Housing

- Para 2 opens “Although the total projected need for affordable housing is not expected to be met in the plan review period...” These words condemn residents to a future of not enough affordable housing. The plan should be aspirational and demonstrate a reduction in the affordable homes shortage over the plan period.

Strategic Approach: Community Needs and Infrastructure

- Without acknowledging the need for supporting the changes to healthcare services within the area, the requirements of paragraph 16 of the NPPF in ensuring Plans should be prepared positively is not met. As currently drafted, the strategic approach does not comply with NPPF paragraph 20, in making sufficient provision for community facilities.

Housing

- Greater weight should be placed on meeting housing needs and significantly boosting the supply of housing through strategic and sustainable growth of all settlements across the district, including rural settlements.
- The strategic priorities only seek to make provision for local housing need. There is no recognition of the likely need for further second homes and tourist accommodation which will affect the overall supply of housing and therefore local need. (Symondsby Estate and the Watton Hill Trust)
- A plan with this time horizon should aim to meet the need for affordable housing, as a priority, and seek the means to achieve it, as sought by the NPPF. (Symondsby Estate and the Watton Hill Trust)
- Since it is likely that the local authorities will not meet their affordable housing target, it is essential that sufficient land to provide open market and affordable housing is provided with the plan. (Persimmon Homes South West)
- The strategic priority to meet local housing needs for all should not be constrained from the outset. The phrase ‘as far as possible’ should be removed. (Bridport Town Council)
- The term 'affordable homes' should be defined and should not include homes priced at 80% of average house prices, as these would not be affordable to people on low incomes. Affordable house prices should be related to the national minimum wage or the average wage of a basket of low paid workers in the area. The Council should release land for these houses or ensure that the price hike between agricultural land and building land is controlled by significant taxation on the profits gained.

- As the second strategic priority aims to meet local housing needs, there should be covenants to prevent those 'not local' (or without a local connection or local employment) from buying new homes.
- Development must be focused where there is housing need, with jobs located as near as possible to those needs in each neighbourhood. Failure to do so will create unsustainable travel needs and car use. (Chideock Parish Council)
- Delivering a higher level of affordable housing, including a quota of at least 45-50%, must be included in the vision and be top of the priority list. A target should be set to require a minimum of 20% of total completions to be affordable housing on a rolling 5-year target, and to link an automatic adjustment of the quota upwards for the forward 5 years if not met. (Chideock Parish Council)
- The 'strategy' will not meet current affordable housing need, but will set in motion a self-perpetuating increasingly worse housing crisis for the future.
- Changes to government policy on second home ownership are required to stop new development becoming simply a conduit for holiday / weekend retreats.
- The impact of second homes and holiday homes, particularly in areas such as Bridport, should be recognised. The plan should take account of the likely increase in these types of home ownership and make additional provision for those requiring starter homes, those on the housing waiting list, and those for whom property prices represent an obstacle to achieving a proper level of housing provision. (Symondsby Estate and the Watton Hill Trust)

Economy

- The vision should reference important local drivers of the economy being: the area's cultural and creative assets; its highly skilled technical industries; its potential to develop further innovative food and farm-based industries; and its potential to contribute through renewable energy technologies and innovation in construction and transport, to a low carbon economy.
- A clear economic vision and strategy should be set out that encourages sustainable economic growth and is aligned to Local Industrial Strategies. Updated evidence on the link between homes and jobs is needed to inform policies. (Wyatt Homes)
- Providing a variety of homes to attract a skilled workforce is key, as recognised in paragraph 1.2.20. (Wyatt Homes)

Transport and Accessibility

- Despite the importance of a viable transport infrastructure, the strategic approach glosses over issues such as the reduction in funding and the likely lack of major road improvements before 2026.
- Transport and accessibility are major limiting factors on the capacity of some settlements to absorb significant additional development.
- The rail links to London and Bristol are slow. Some express trains would be advantageous to facilitate industries / businesses.

- Services continue to suffer drastic cuts and buses are infrequent.
- There are no trains and bus services to and from Bridport. This prevents or severely restricts commuters and any young people from working.
- Retirees will have more mobility problems than average limiting their ability to use pedestrian and cycleways.
- The plan context does not reflect recent reductions in public transport services and the social impact this will have on the mental well being of the older community.

Broadband

- Poor broadband coverage in the more rural areas inhibits the development of businesses especially digital / online businesses. South West Internet is able to address some of this problem.

Vearse Farm, Bridport

- Planning massive housing estates in the AONB, without proper justification does not comply with the requirement (para 172) of the 2018 NPPF. Natural England and the Dorset AONB Partnership have objected to WDDC's strategic approach.
- The allocation of Vearse Farm (BRID2) shows that the Local Plan Review contradicts its own strategic priorities.
- Building the most homes ever on one AONB site cannot be considered 'an appropriate scale'. The Plan suggests this is acceptable as it's a 'strategic allocation'. A strategic allocation equals 50 or more houses. This circular logic sets a dangerous precedent, making it perfectly acceptable to build on any rural areas, agricultural and AONB land as long as the development delivers 50+ houses.
- The employment land at Vearse Farm contravenes the 'Economy' section of the strategic approach as it does not take into account existing industrial estates and town centre shops where premises often remain empty or become charity shops.
- BRID2 will 'undermine the functioning' of Bridport town centre and will 'adversely affect' its vitality and viability as it will direct employment and economic development outside of the town centre, requiring travel by car.
- The 2,000 new people at Vearse Farm will put great pressure on existing, already strained and diminishing services and infrastructure, most of which are outside the remit of the heads of the Section 106 agreement. These issues include strain on local NHS services, local roads and cuts to local bus services.
- Vearse Farm was included in the draft LP in 2012 but the brownfield register was not published until 3 December 2017. This is evidence of a lack of due diligence.

Sites in Bridport

- Council-owned brownfield sites in Bridport that have not previously been considered for low-cost and social housing are now being commandeered to accommodate an urgent need for care and nursing home provision.
- Land north of the Crown Inn Roundabout, Bridport is a brownfield site, which provides an excellent opportunity to provide low-cost and social housing for local families. Such a development should be made a strategic priority.
- Part of the Flood Lane site, Bridport has been sold to McCarthy & Stone for retirement development. Any land left over from the council's care home 'village' project could also be sold off, potentially to a large hotel chain.

Crossways

- WDDC's 2008 Rural Functionality Study contradicts statements about Crossways in the Preferred Options. It showed that adding development to larger villages will not make them more sustainable. It also showed that in villages the private car was the dominant mode of transport and bus services (if they exist) are rarely utilized by residents. Also rural employment sites, such as Piddlehinton Enterprise Park do not employ any persons living within 5km of the site. (Moreton Parish Council)

Wyke Oliver Farm, Weymouth

- The document is difficult to understand and confusing. It is inconsistent with the August 2018 SHLAA. This showed the Wyke Oliver Farm site (WEY14) as unsuitable for development, but this is identified as a Preferred Option. The SHLAA also shows land at Wey Valley (Nottingham) as suitable, but this is not identified as a Preferred Option.
- WEY14 should not be called Wyke Oliver Farm as no houses are proposed in the area adjacent to the farm.

West Stafford

- By not allocating a site at West Stafford, the councils are missing a key opportunity to deliver sustainable development in accordance with the plan's strategic priorities. (West Stafford LVA LLP)

Responses on Question 1-iv: The text has been updated to explain: what the Government considers sustainable development to mean; and what the councils are aiming to achieve in terms of sustainable development locally. Do these changes provide sufficient clarity on what is meant by sustainable development?

General Support

- Sustainable development can mean many things to many people but I believe the updated text is as clear as it is likely to be.

- The updated text explaining sustainable development is a welcome improvement. (Bridport Town Council, Dorset County Council: Environment & Economy)
- Welcome the recognition of the interdependencies between environment, economy and society. (Dorset Local Nature Partnership)

Sustainable Development Definition

- The NPPF definition doesn't meet the more recent UN definition which puts more emphasis on effects on the environment. (Dorset CPRE)
- The plan's vision of sustainable development is not sufficiently clear. There are lots of words, but little clarity.
- The Government's emphasis is on economic development and sustainability is a 'joke'. It means just development. (Dorset CPRE)
- 'Sustainable' has become almost meaningless. There are no legal minimum eco standards in construction or long-term energy-saving minimum standards. These should be applied and enforced by local councils.
- Social objective achievements are not always obvious in planning outcomes and with greater emphasis on localism some further thoughts around this should be expanded. (Portland Town Council)
- The provision of 'sufficient clarity on what is meant by sustainable development' is largely irrelevant as much of the development proposed in the Local Plan Review is not sustainable, by any definition of the term.

Biodiversity

- Greater clarity would be achieved if the need for achieving a net gain for the environmental objective were expanded to include, specifically, the need to also achieve a biodiversity net gain. (Natural England)

Healthcare

- The Local Plan will not achieve sustainable development as defined in the NPPF as it does not fully consider the healthcare opportunities for the area. Further development at Dorset County Hospital, will mean additional facilities are added to the hospital with more staff thereby creating more jobs in healthcare and construction. (Dorset County Hospital)

Housing

- The strategic priorities only seek to make provision for local housing need. There is no recognition of the need for further second home and tourist accommodation which will affect the overall supply of housing and therefore local need. (Symondsburry Estate and the Watton Hill Trust)
- A plan with this time horizon should aim to meet the need for affordable housing, as a priority, and seek the means to achieve it, as sought by the NPPF. (Symondsburry Estate and the Watton Hill Trust)

Vearse Farm, Bridport

- The Sustainability Appraisal is a sham as BRID2 is given a landscape impact result of 'strongly positive'.
- The loss of the Grade 2 agricultural land at Vearse Farm is unacceptable, which should be protected for the sustainability of future generations.
- At Vearse Farm, the idea that the loss of an entire actual farm can be offset by the provision of a tiny pretend 'community farm' is absurd.

Responses on Question 1-v: Policy INT1 and supporting text have been revised to reflect the proposed changes to 'the presumption in favour of sustainable development' set out in the draft revised NPPF. Does revised Policy INT1 (and its supporting text) provide clarity on how the revised 'presumption' in national policy will be applied locally?

General Support

- Revised Policy INT1 provides sufficient clarity. (Bridport Town Council, Luxury Family Hotels) Revised Policy INT1 provides clarity on how the presumption in favour of sustainable development is to be applied locally. (Wyatt Homes)

General Objection

- Disagree with the NPPF 'golden thread' of sustainable development. (Dorset CPRE)
- Policy INT1 has major deficiencies. (Moreton Parish Council)
- The missing elements are: balancing jobs and housing; meeting the local need in each neighbourhood; and enforcing quotas. Past development has been unsustainable because it has delivered against external market need regionally and nationally, and has failed to deliver local, affordable housing in the right locations relative to (higher-quality, higher-paid) jobs. (Chideock Parish Council)
- The process is biased towards the developer. Developments given permission do not represent 'sustainable development', NPPF guidelines are not adhered to and local democracy, representations and objections are ignored.
- The NPPF is the driver not the vision and strategic priorities. Sustainable development that meets the NPPF definition is not necessarily balanced at the neighbourhood, district or even regional level and is often unsustainable.
- Local residents should have an input into the consultation process. It should not just be a dialogue between the council and the developer. Earlier engagement with local residents would help to identify issues. Costs should be being borne by developers, where issues are glossed over or misrepresented in their applications.

Applying Policy INT1

- INT1 should use the same wording as para. 11 of the NPPF. (Luxury Family Hotels)
- The balance between the 'needs of the present', 'of future generations' and of 'local circumstances' should be made more explicit so that developers and local residents have a clearer perspective about what should happen. (Dorchester Town Council)
- INT 1 should include 'Permission will not normally be granted when it is conflict with policies in this document'. (Dorchester Town Council)
- The phrase 'the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits' should have more emphasis to highlight that if the Local Plan is out of date there are factors other than 'sustainable development' as defined in the NPPF that will be considered.
- Although determining 'weight' is difficult, it is not clear how such judgements will be made. It would be helpful to give examples of how such judgements would be made, particularly at the small end of the scale. There should be engagement with the relevant Town or Parish Council, so that local knowledge could help inform these judgements. (Burton Bradstock Parish Council)

Need for Updating

- Policy INT1 should be reviewed in light of the new NPPF.
- The wording of Policy INT1 refers to the draft revised NPPF 2. We assume it will be updated further to reflect the recently adopted NPPF (2018). (Wyatt Homes)

Duplication of NPPF

- Part (iii) of this policy is duplication of the NPPF, which makes clear in para 16 that unnecessary duplication should be avoided. Suggest (iii) is deleted. (Dorset Planning Consultant Ltd)

Habitats Regulations

- The policy should include a specific reference to the fact that the presumption in favour of development does not apply to developments that trigger the need for an appropriate assessment under the Habitats Regulations.

Transport

- It may be useful to set out local standards where the NPPF is unclear. For example, in relation to severe traffic impacts a suggested benchmark is if the cumulative impact of development within the plan puts junctions at over 85% reference flow / capacity (RFC) then this will be deemed severe and mitigation will be sought. (Dorset County Council: Environment & Economy, Dorset County Council: Transport)

Housing Targets

- The plan is based on national, government-set housing targets, rather than providing for objectively assessed needs. A blanket approach to housing targets has been applied, rather than planning housing where there are documented needs, the best employment opportunities, and the best transport infrastructure. The NPPF protected area provisions override that need, unless significant and demonstrable benefits outweigh the harm done.

Sherborne and Crossways

- The development principles that have been applied in the Local Plan Review do not accord with the definition in paragraph 1.4.23. An example of this failure is highlighted by the way in which development at Sherborne and Crossways has been considered. (Moreton Parish Council)

Vearse Farm, Bridport

- The inclusion of Vearse Farm as a development site was not in accordance with national policy, as the exceptional circumstances and public interest tests were not met. Natural England, Dorset AONB Partnership, WDDC's Conservation Officer and Landscape Officer all objected to it on the basis of the substantial harm it would do to the AONB landscape and heritage assets.
- Policy INT1 requires that the NPPF protected areas designation 'provides a clear reason for refusing development proposals' but, with respect to Vearse Farm (BRID2) this was disregarded.

Comments on Monitoring and Review

Vearse Farm, Bridport

- AONBs remain protected against major development, but WDDC has failed to fully examine all other reasonable options. In relation to para 1.5.1's requirement that the 'councils will consider what implications changes to national policy may have on the effectiveness of the local plan review', WDDC should no longer approve harmful development.