



Main Modifications Consultation Summary

West Dorset, Weymouth and Portland Draft Local Plan

February-April 2015

Consultation on Main Modifications to the West Dorset, Weymouth and Portland Draft Local Plan, July-September 2014

Produced by West Dorset District Council and Weymouth and Portland Borough Council

Contents:

The Main Modifications Consultation.....	2
How we consulted.....	2
Representations received	3
Summary of Main Issues Chapter 1, Introduction – MM1-2	4
Summary of Main Issues Chapter 2, Environment and Climate Change – MM3	6
Summary of Main Issues Chapter 3, Achieving a Sustainable Pattern of Development – MM4.....	15
Summary of Main Issues Chapter 4, Economy – MM5-11	35
Summary of Main Issues Chapter 5, Housing – MM12-23	37
Summary of Main Issues Chapter 6, Community Needs and Infrastructure – MM24-30.....	45
Summary of Main Issues Chapter 7, Weymouth – MM31-48	47
Summary of Main Issues Chapter 8, Portland – MM49-52	48
Summary of Main Issues Chapter 9, Littlemoor – MM53-54	49
Summary of Main Issues Chapter 10, Chickerell – MM55-60	50
Summary of Main Issues Chapter 11, Dorchester – MM60.....	55
Summary of Main Issues Chapter 12, Crossways – MM61-65	57
Summary of Main Issues Chapter 13, Bridport – MM66-75.....	61
Summary of Main Issues Chapter 15, Lyme Regis – MM76-78	69
Summary of Main Issues Chapter 17, Glossary	72
Summary of Main Issues Chapter 18, Maps	73
Summary of Main Issues - General	74
Summary of Main Issues – Sustainability Appraisal	76
Appendix A: List of respondents	80
Appendix B: Responses to Household Projections Consultation.....	81

The Main Modifications Consultation

Residents and stakeholders across West Dorset, Weymouth and Portland were asked for their views on Main Modifications to the draft joint Local Plan. The modifications were put forward in response to all the representations since the publication of the Submission Plan (2013) taking into account the round table discussions with the Inspector and other participants at the Examination of the West Dorset, Weymouth & Portland Local Plan.

- The Main Modifications were presented in a [schedule](#).
- Modifications to Chapter 2 were presented in an [appendix](#).
- Modifications to Chapter 3 were presented in an [appendix](#).
- Map changes were presented in an appendix in two parts, [part one](#), [part two](#).

A [Sustainability Appraisal Update](#) and a [Non-technical Summary](#) also formed part of the consultation.

The consultation period ran for a 6 week period from 19 February to 8 April 2015.

During the consultation period, the Inspector also sought views on the implications (if any) of the [household projections](#) released by the Department for Communities and Local Government DCLG on the 27th February 2015.

How we consulted

Hard copies of the consultation material were sent to the district and borough council offices in Weymouth, Dorchester, Sherborne and Bridport, and to all town and parish councils/meetings within the plan area.

Letters or emails providing details of where to view the consultation material were sent to approximately 2,700 contacts and stakeholders including the following bodies, providing a website link and printed copies of the schedule on request:

- Dorset County Council
- All adjoining local planning authorities (in Dorset, Devon and Somerset)
- All adjoining parish councils / meetings
- National agencies listed as “specific consultation bodies” in the regulations (including English Heritage, the Environment Agency, the Highways Agency, the Homes and Communities Agency, the Marine Management Organisation, Natural England and Network Rail. The Coal Authority had previously notified the councils that they did not need to be consulted)
- Utility companies operating in the area (including National Grid, South West Water, Southern Electric, SSE Telecom and Wessex Water)
- Emergency service and healthcare providers operating in the area, including Dorset Police, Dorset Fire and Rescue and NHS Dorset.

The consultation was advertised in the Blackmore Vale, Dorset Echo and the View From newspaper in the week commencing 16th February 2015. A number of further articles appeared in local newspapers during the course of the consultation.

The councils’ joint website www.dorsetforyou.com was updated to include copies of the schedule of Main Modifications, sustainability appraisal update and evidence base. A comments form was placed online along with details of alternative ways to comment. A direct link to the page

<http://www.dorsetforyou.com/localplanexamination/west/weymouth> was promoted through the various methods of publicity.

Representations received

Approximately 60 respondents made 214 valid representations during the consultation period. These respondents included developers, landowners, national agencies, town and parish councils and general members of the public. 14 of these representations related to the Sustainability Appraisal. The councils received 4 representations in relation to the consultation on the DCLG household projections. These are shown in full in Appendix B. The council also responded to this consultation this can be found in the following [report](#).

A copy of the consultation responses have been sent to the Inspector along with a copy of this summary. The Inspector will examine all the responses and consider whether additional modifications or further hearing sessions are required, before publishing his final report.

Summary of Main Issues Raised

The following section provides a summary of all the individual issues raised through the consultation on the Main Modifications and the Sustainability Appraisal Update. A table of all the respondents is shown in Appendix A.

Summary of Main Issues Chapter 1, Introduction – MM1-2

Name: Ms Sally Cooke

Representing: **ID:** 75

Main Modification: MM1

Representation: I object to the inclusion of this paragraph which seems likely to be used to justify a derogation from essential environmental standards, on grounds of financial cost. I wish to see it deleted. I do not think this needs stating in the Plan. National policy extant at the time of any future decision will in any case influence the balance to be struck between costs and other considerations.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM1 & MM2

Representation: Natural England has no comment on the proposed modifications to chapter 1.

Name: Mrs Sarah Headlam

Representing: **ID:** 661

Main Modification: MM1 - MM18

Representation: Support and approve all.

Name: Mrs Gill Smith

Representing: Dorset County Council **ID:** 544

Main Modification: MM2

Representation: Dorset County Council supports the proposed change of wording identified in MM2.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM2

Representation: This needs to include reference to local town and parish councils, who provide important services, which need to be considered in any assessment of infrastructure requirements.

Summary of Main Issues Chapter 2, Environment and Climate Change – MM3

Name: Ms Sally Cooke

Representing: **ID:** 75

Main Modification: MM3

Representation: Page 14 (Strategic Approach) - Disappointing to see wording of the Strategic Approach unchanged. This phrasing takes no account of the dynamic process of climate change and our responsibility to participate in managing its causes as well as effects. Climate change will inevitably cause changes to the natural and human heritage, and a merely protectionist approach will not suffice. I would like to see inclusion of phrases like 'High priority will be given to responding constructively to climate change' and adding at the end '(positively contribute towards the local identity of the area) and to the achievement of a zero-carbon District'.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM3

Representation: 2.2.16 - Where mitigation can't fully made the development should not go ahead.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM3

Representation: 2.2.17 - These should be made by an independent body and not paid for by applicant. If they are I expect there to be a bias.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM3

Representation: ENV 8 - The monitoring indicators should be retained.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM3

Representation: ENV2 - vi) Put 'will' back in. Monitoring Indicator: Productivity of heathland birds. Target: no net decrease. Reinstate. Dorset's heathlands are of national importance and contain a large portion of the nations heathlands. Important to protect the heathland's birds.

Name: Ms Sarah Horniman

Representing: ID: 2519

Main Modification: MM3

Representation: 2.2.18 - I object to this.

Name: Ms Sally Cooke

Representing: ID: 75

Main Modification: MM3

Representation: ENV13 & 2.5.27 - I support the explicit list of sustainable design elements included in (new) para 2.5.27. This should be referenced in Policy ENV 13. The shortening of ENV 13 is an improvement; however I would suggest adding: "Factors to be considered in assessing the design of new development will include" and then put in the list from para 2.5.27. And this policy needs at least one monitoring target, e.g. % of new developments which include at least four (five?) of the (7) factors mentioned in the policy.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd ID: 526

Main Modification: MM3

Representation: Support the amendments to Policy ENV 13 and the explanatory text.

Name: Mr John Stobart

Representing: Natural England ID: 782

Main Modification: MM3

Representation: 2.2.15 - 2.2.18 - Natural England supports the proposed modifications.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM3

Representation: ENV 2, vi) - Natural England objects to the removal of the expectation that major development should demonstrate no net loss in biodiversity. The National Planning Policy Framework (NPPF) paragraph 9 requires sustainable development to move from, “a net loss of bio-diversity to achieving net gains for nature”. The provisions of the local plan will not achieve this important objective if major developments are not required to achieve at least a no net biodiversity loss. No net biodiversity loss can be secured through the full application of NPPF policy 118 and draft Local Plan Policy ENV 2 clause iv), namely by ensuring all development, and especially major development, provide appropriate off site compensation measures where on site biodiversity losses are unavoidable. The Dorset Biodiversity Compensation Framework provides one mechanism for securing any necessary compensation and its application would help ensure all major development have the potential for meeting the sustainability principles set out in the NPPF.

Name: Mrs Michele Harding

Representing: Burton Bradstock Parish Council **ID:** 955

Main Modification: MM3

Representation: Para 2.4.7 - The removal of reference to the BB flood alleviation scheme in the Environmental & Climate Change chapter. This scheme was agreed by all concerned but has yet to be prioritised for funding. The narrative and policy drafting re the scheme which has been deleted from para 2.4.7 should be reinstated as the scheme is dormant rather than dead.

Name: Ms Susan Green

Representing: Home Builders Federation (HBF) **ID:** 3840

Main Modification: MM3

Representation: Paragraphs 3.5.22, 3.5.23, 3.5.26 and 3.5.27 together with Policies ENV11 (ii), ENV12 (i), ENV12 (ii) and ENV13 should be re-checked for compliance with national policy in particular the Written Ministerial Statement dated 25th March 2015 concerning zero carbon homes and housing standards. Subsequent to this review it is considered that the Councils will have to undertake further work and amend the aforementioned paragraphs and policies accordingly.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM3

Representation: 2.5.22 Please remove 'exceptional circumstance' - only too easy for developers to argue viability. The monitoring indicators should be retained or how will accountability be achieved.

Name: Mr Justin Milward

Representing: Woodland Trust **ID:** 240

Main Modification: MM3

Representation: ENV 2. vi) (SUMMARISED) We remain extremely disappointed to see that previous wording in sub-paragraph VI of Policy ENV 2 ('...through the retention or restoration of habitats and features within the site, the planting of trees and woodlands...') has still not been reinstated in the proposed modification to this sub-paragraph. It is important that this sub-paragraph goes further than just 'conserving and enhancing' biodiversity, so that it also supports creation of new biodiversity as in, for example the Green Infrastructure Network (Policy ENV 3). The removal of the reference to planting woods and trees runs completely contrary to current Government Policy as iterated in the Government Forestry Policy Statement. Sub-paragraph vi) of Policy ENV 2 should therefore read - Proposals that conserve, enhance and create biodiversity should be supported. Opportunities to incorporate, enhance and create biodiversity in and around developments will be encouraged. Development of major sites will should be expected to demonstrate no net loss in biodiversity, and take opportunities to help connect and improve the wider ecological networks through habitat expansion like native tree planting.

Name: Mr Justin Milward

Representing: Woodland Trust **ID:** 240

Main Modification: MM3

Representation: ENV 2. v) - (SUMMARISED) Does not adequately protect ancient woodland. We have consistently raised this issue in the past and it has not been recognised. It is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. This requires absolute protection in accordance with emerging national policy. We would therefore like to see sub-para v) of Policy ENV 2 amended to read: "Development which would result in the loss of Ancient Woodland, Aged trees or Veteran trees will not be permitted".

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM3

Representation: Remainder of ENV2 (not including vi) - Natural England fully supports the remaining modifications to policy ENV2.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM3

Representation: ENV1 iii) - Delete moderate the, reinstate minimise. Moderation is basically the do-nothing option. Measures should be taken to minimise the adverse effects of development on the landscape.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM3

Representation: ENV4 - I object to the downgrading of protection for heritage assets and conservation areas inherent in this change of wording.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM3

Representation: ENV 12 i) - Delete and inclusive. The Local Plan should be capable of being understood by the non-planning citizens of West Dorset. The preceding paragraphs do not provide an easy to understand explanation of what is meant by inclusive design.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM3

Representation: ENV 12 ii) - Delete and accessible. It is not obvious what an accessible home is: Easy to enter? Affordable? Can be reached easily by walking, public transport, or by car?

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM3

Representation: ENV 13 - Supported but there should be a caveat subject to viability in order to be consistent with national policy (see Paragraph: 001 Reference ID: 10-001-20140306). "The National Planning Policy Framework says that plans should be deliverable and that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Understanding Local Plan viability is critical to the overall assessment of deliverability. Local Plans should present visions for an area in the context of an understanding of local economic conditions and market realities. This should not undermine ambition for high quality design and wider social and environmental benefit but such ambition should be tested against the realistic likelihood of delivery."

Name: Christine Bright

Representing: Beaminster Town Council **ID:** 639

Main Modification: MM3

Representation: ENV 2. iv) - The sentence "Where it cannot be avoided or adequately mitigated, compensation will result in the maintenance or enhancement of biodiversity development will not be permitted" - needs clarification.

Name: Mr James Walker

Representing: The Ernest Cook Trust **ID:** 584

Main Modification: MM3

Representation: ENV4 - The Ernest Cook Trust considers the amendments to Policy ENV 4 largely remove the previously stated inconsistency with the NPPF with regard to the protection of heritage assets. The revised wording of the policy includes reference to balancing the protection of heritage assets and the public benefits resulting from development and is therefore consistent with the requirements of the NPPF in this regard.

Name: Mr Colin Ellis

Representing: **ID:** 4003

Main Modification: MM3

Representation: ENV 4 - The whole of Section 3 relates to the primary legislation the Planning (Listed Building and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979 but Policy ENV.4 is a pointless regurgitation of NPPF guidance. References to PPG's/PPS's were previously deleted from Local Plans and this unnecessary repetition of guidance should be omitted from this draft local plan. Policy ENV.4 should more closely relate to the principal Acts, as originally drafted. Recent judicial decisions have

confirmed the primacy of the legislation, which provides opportunities to provide a 'local' emphasis through an SPD based on the Acts.

Name: Mrs Gill Smith

Representing: Dorset County Council **ID:** 544

Main Modification: MM3 (on form referenced 3.2.8 but clearly relates to the Environment Chapter 2 so correct reference is 2.2.8)

Representation: Para 2.2.8 - Dorset County Council supports the change but wishes to point out the need for a factual correction in that the words "and Strategy" should be removed. The document referred to is the "Bournemouth, Dorset and Poole Minerals Local Plan."

Name: Mr Colin Ellis

Representing: **ID:** 4003

Main Modification: MM3 (reference to 3.3.4 on rep but clearly related to Environment Chapter 2 so correct reference is 2.3.4)

Representation: 2.3.4 - The whole of Section 3 relates to the primary legislation the Planning (Listed Building and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979 but neither are mentioned. This is a significant omission and should be corrected in 3.3.4 and include reference to preserve or enhance the appearance or character. This paragraph should also include reference to providing a Local Conservation Strategy SPD (NPPF126) that helps applicants make successful applications (NPPF153). An amended, updated and WD&WP specific interpretation of Annex B&C of PPG15 that refers to the principal Acts would be a start.

Name: Mr Justin Milward

Representing: Woodland Trust **ID:** 240

Main Modification: MM3 (on form referenced 3.4.7 but clearly relates to the Environment Chapter 2 so correct reference is 2.4.7)

Representation: Paragraph 2.4.7 - (SUMMARISED) We would like to see the amendment to reflect the role that natural land use management, like woods and trees, can contribute to achieving better water quality and flow (flooding) solutions. The Woodland Trust believes that trees and woodland can deliver a major role in these water management issues, such as those resulting from climate change like flooding and also helping achieve the water quality targets of the Water Framework Directive. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, green infrastructure and timber production... Whilst man-made solutions will continue to play a substantial role in many schemes, it is increasingly accepted that natural approaches to water management can also offer significant benefits. What is also clear is that both approaches need to be looked at in

tandem, to address both short and long term risk and to ensure that more affordable and appropriate options are considered alongside costly capital schemes. We would therefore like to see Paragraph 3.4.7 reference the role that trees and woods can play in delivering solutions to water quality and flow issues.

Name: Mr Malcolm Hill

Representing: ID: 677

Main Modification: MM3 (on form referenced 3.5.13 but clearly relates to the Environment Chapter so correct reference is 2.5,13)

Representation: Para 2.5.13 - Delete Developments should be fit for purpose and. This is not a good expression. It is too vague and unless a specific purpose is defined in considerable technical detail, is meaningless. Reinstate a capital letter to start the word 'Consideration'.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes ID: 797

Main Modification: MM3 (on form referenced 3.5.22 - 3.5.23 but clearly relates to the Environment Chapter 2 so correct reference is 2.5.22-2.5.23)

Representation: 2.5.22 - 2.5.23 and Policy ENV 12 - The two new paragraphs refer to Housing Standards Review and importantly acknowledge that changes should be made to reflect the changes. The outcome of the Review has now been announced. The Planning Written Ministerial Statement of 25 March 2015 significantly affects the types of technical standards local authorities can apply to new housing, such as the Code for Sustainable Homes which has now been withdrawn. Some standards are now being taken forward by new optional Building Regulations. The Government has also introduced a national space standard. The Written Ministerial Statement sets out how this new approach affects local plans and planning decisions, and the transitional arrangements. The optional regulations and space standard can only be applied where there is a local plan policy based on evidenced local need and where the viability of development is not compromised. It is considered that the last part of the Policy ENV12 paragraph (ii) which states that "New Housing should meet and where possible exceed appropriate minimum space standards" is going beyond the remit of the government guidance. Policy ENV 12 and supporting text should be amended to reflect the Ministerial Statement. Paragraph 59 of the Housing Standards review (September 2014) states that; "The Government believes that it is right that local communities and neighbourhoods should have the ability to influence the size and type of new housing in their local areas, providing that this does not affect the viability of housing coming forward. However, the Government also takes the view that high quality housing can be more effectively delivered where a single space standard is used throughout England, wherever a local authority decides to introduce such a policy." (my emphasis) The Ministerial Statement 25th March 2015 confirms "The new system will comprise new additional optional Building Regulations on water and access, and a new national space standard (hereafter referred to as "the new national technical standards"). This system complements the existing set of Building Regulations, which are mandatory." The National

CONSULTATION SUMMARY West Dorset, Weymouth and Portland Draft Local Plan, April 2015

Planning Policy Framework says that plans should be deliverable and that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. (Paragraph: 001 Reference ID: 10-001-20140306) As currently wording the policy is not consistent with national policy, effective or justified and is therefore unsound. In which case Policy ENV 12 should be amended to have regard to the Ministerial Statement of 25th March 2015.

Name: Mrs Susan Greene

Representing: **ID:** 650

Main Modification: MM3 (reference to 3.5.28 on rep but clearly related to Environment Chapter 2)

Representation: 2.5.28 - Fifth bullet point should read 'installation of a ground source heat pump'

Summary of Main Issues Chapter 3, Achieving a Sustainable Pattern of Development – MM4

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.2.3 - In summary, as identified in our submission and also within a Statement of Common Ground agreed with other representatives of the development industry, there remain a number of concerns with the evidence presented by PBA summarised as follows (SEE REP). In light of all these concerns and others expressed previously in regard to the soundness of the plan, it is respectfully requested that the Inspector suspend the examination in order to allow the LPAs to undertake a comprehensive redrafting of the evidence to underpin the Local Plan. This would enable proper consideration of dwelling and job growth targets, with reasonable assumptions that are justified, positively prepared, effective and consistent with the NPPF, none of which are currently achieved.

Name: Mr Tim Hoskinson

Representing: Hallam Land Management **ID:** 7

Main Modification: MM4

Representation: Table 3.7 & Figure 3.2 - The housing trajectory in Table 3.7 and Figure 3.2 incorporates the delivery of new homes at the Vearse Farm strategic allocation in line with the Housing Delivery Review prepared by BPB Paribas. This is considered a reasonable and realistic estimate which reflects the developer's intentions for the site.

Name: Christine Bright

Representing: Beaminster Town Council **ID:** 639

Main Modification: MM4

Representation: Para 3.3.22 - modification reads "Overall, over the five year period 2014-2019 there is land for a total of 6,519 homes to meet needs of 5,487. The identified five year supply exceeds the five years' requirement by 1,032 units..." - however a report by a planning officer on Hollymoor Lane Site (determined on 12th March 2015) states "the Council has now published information confirming that it cannot demonstrate a 5 year housing land supply," - which one of these statements is correct?

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.3.23 - That even against the Council's own housing requirement that there is a shortfall in terms of housing supply and therefore additional sites should be included in the Plan consistent with the settlement strategy as set out in Policy SUS 2. The Policy states that "Development will be distributed according to the following settlement hierarchy with a greater proportion of development at the larger and more sustainable settlements. The main towns of Dorchester and Weymouth (of which Chickerell and parts to Littlemoor form outlying parts) will be the highest priority locations for new development...." In this case additional land to the north of Dorchester should be identified in the plan which will assist in meeting the housing requirement.

Name: Mrs Sarah Headlam

Representing: **ID:** 661

Main Modification: MM4

Representation: Support and approve all proposed changes as affect Sherborne i.e. retain existing DDB, and provision of only 279 housing units on Barton Farm.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.2.4-3.2.6 - (SUMMARISED) Information from 3.2.4 and 3.2.6 - Paragraphs 3.2.4, 2.5.23 and the recent change to the Planning Practice Guidance, Section: Housing and economic development needs assessments Paragraph number: 021. This information should be drawn together to understand how age profile and household mix relate to each other, and how this may change in the future. When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of working age people." My emphasis. Given there is a significant ageing population in the plan area the plan acknowledges that it will need to attract in –migrants. These people will need homes unless they are to commute from neighbouring areas which is not consistent with the strategy of sustainable development or the NPPF. As mentioned in our previous reps the proposed housing target of 775 per annum does not represent a 'significant boost' in housing delivery compared to historical levels of planned supply. The Council state that further site allocations to meet the requirements from 2028 - 2031 are not included as the Council considered that the consultation necessary to agree significant further allocations would require a longer period of time and is best done as part of a further review of the plan.

However, the Council now propose to extend the plan period back to that in the submitted Draft Plan i.e. 2031, but have not included any allocations, the only changes made to Table 3.7 Housing Allocations Sites is that there has been an increase in the number of dwellings proposed for Weymouth town centre (increase of 200 dwellings) , which can be offset by the reduction in the site at Markham and Little Francis from 500 to 320 dwellings and the reduction

in the Chickerell urban extension from 850 to 820 dwellings. It is therefore not clear how the position has changed apart from the fact that it appears that the Council are relying on the Call for Sites for almost 25% of its supply (see representations to Chapter 3 para 3.3.10 – 3.3.18) as many appeals nationally, sites arising from Call for Sites exercises have been routinely dismissed from the deliverable supply.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: Strategic Approach Box - We support the plan period being extended to 2031 and resulting 2,325 increase in housing requirement. However, we object to the Councils' proposing to meet the additional housing requirement through increased delivery from windfall and SHLAA sources of supply instead of allocating additional sites. For the plan to be found sound it is critical that the Councils demonstrate sufficient supply to deliver the 15,500 dwellings requirement to 2031 and which is also flexible enough to respond to rapid change. Our review of the updated supply summarised in this letter highlights that the revised assumptions are too optimistic, not backed up by NPPF / NPPG compliant evidence and not robust enough to be relied upon to make the plan sound.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.3.19 - 3.22 including Table 3.6 - Persimmon Homes object to the housing land supply as set out in Table 3.6. For the reasons set out in response to paragraphs 3.3.10 – 3.3.18. It is considered that the housing land supply is 4.3 years rather than 5.9 years. Paragraph 3.3.22 should be amended: Over the five year period 2014 – 2019 there is land for a total of 4,881 homes to meet the needs of 5,654. (The five year requirement (including a 20% buffer) is 5,487 according to the Council, but when correctly calculated it should be 5,654.) The identified five year supply does not meet the five year requirement by approximately 773 dwellings. (It should be noted that this is based on a conservative assessment of the supply as no site specific analysis been undertaken). (SEE REP FOR FURTHER DETAIL)

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.3.10 - Refers to the review of the SHLAA being published in February 2015 and includes revised assumptions about each element of supply. At present, the SHLAA is not justified, robust or consistent with either the PPG or the NPPF in many regards. This needs to be

addressed as a matter of urgency and as it is expected as demonstrated within this representation that a PPG and NPPF compliant assessment would demonstrate a significant deficit in both the deliverable and developable supply. (See rep for each of the identified issues addressed)

Name: Mr Andrew Elliott

Representing: Grainger plc, part of the North Dorchester Consortium **ID:** 648

Main Modification: MM4

Representation: Grainger plc, part of the North Dorchester Consortium, continues to object to the strategic approach for Dorchester as set out in past representations and statements and orally at the Local Plan Examination hearings. It is not appropriate to delay decisions about the future growth of Dorchester to a review of the plan. Insufficient sites are identified to meet housing requirements of West Dorset in the plan period, and given the lead in time for the appropriate planning and delivery of larger sites decisions-making needs to start now. The proposal to identify growth at Crossways instead of further development of the county town is not a logical or sustainable choice. New Figure 3.1 requires amendment as it implies that Crossways is a town rather than a village. Pegasus Group is submitting representations to object to the Main Modifications on behalf of the North Dorchester Consortium in relation to the proposed housing numbers, which are not justified (Policy SUS1).

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.2.1 - The changes state that this plan covers the period from 2014 to 2031 and provides seventeen years from adoption, if the plan is adopted in 2015 this will provide for 16 years from adoption. It is not clear why the reference to the plan covering the period 2014 – 2031 is included in this paragraph as the plan period in Policy SUS 1 is 2011 – 2031. This sentence should simply state that the plan period is 2011-2031 and if adopted in 2015 will provide for sixteen years post adoption. The paragraph states that "It is likely that the plan will need to be reviewed within five years from adoption or no later than 2021 in order to maintain a robust five year land supply". It is considered that the Plan will need to be reviewed within five years. "Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption" (my emphasis) ID 12-007-20140306. As proposed there is no flexibility in the Plan, it has not been prepared with the ability to respond to changing circumstances (para 153 of the NPPF). Unless our concerns about the robustness of the housing land supply and the inadequate housing land requirement are addressed it is considered that there is no doubt that an early review will need to be undertaken i.e. with 5 years from adoption. In this context there should be a commitment in Policy SUS 1 in the plan to an early review.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.3.27 - Pegasus on behalf of Persimmon Homes have considered the BNP Paribas assessment of housing delivery, (dated February 2015) there are some inaccuracies in the report in terms of anticipated delivery which have then been included in the SHLAA. It is not clear how the anticipated delivery rates have been derived as the figures for example for Policy CHIC 2 have not been submitted by the developer. It is also noted that land at Rashley Road which is the existing school site in Chickerell is included for redevelopment purposes (the primary school is being retained and refurbishment is taking place this month.) See previous comments in respect of paragraphs 3.3.10 – 3.3.18)

Name: Mr Christopher Burton

Representing: SW HARP Planning Consortium **ID:** 884

Main Modification: MM4

Representation: 3.2.1 - We support the measures for a Plan review by 2021, or before that date should monitoring indicators trigger the need for an earlier review. We would encourage the addition of additional monitoring indicators for example: 1) Monitoring the number of sites which fail to deliver the Local Plan affordable percentage targets; 2) second home and vacant property levels; 3) Market indicators, for example lower quartile entry levels for market purchase and private rent; 4) significant changes in employment delivery; and 5) non-economic migration figures.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.3.9 - It is assumed that the figure of 2028 in paragraph 3.3.9 is a typo and should refer to 2031.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.2.7 - The plan sets out a level of housing provision across the entire Plan area. In our representations to the further Proposed Changes in September 2014 we objected to having a single housing target. There is no evidence to justify that the requirements cannot be

met in West Dorset and that they need to rely on the surplus in Weymouth and Portland to meet needs.

The Council stated in the Committee report of 9th June 2014 at para 5.26 “Using a whole plan area target, and the existing housing land supply, we would be able to demonstrate sufficient supply to 2028 for the whole plan area. With separate targets there would be a significant shortfall in the supply for West Dorset. Adopting the plan with less than ten years’ post-adoption supply would not be a sound option.” Whilst the proposed housing requirement can be grounded in the HMA, there needs to be a breakdown to ensure that each LPA maintains a 5 year housing land supply. The crucial point is that paragraph 179 deals with situations where development requirements cannot wholly be met, within an LPA’s own area – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. There is no evidence to justify that the requirements cannot be met in West Dorset and that they need to rely on the surplus in Weymouth and Portland to meet needs.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: Table 3.7 - Persimmon Homes object to the reduction for the Chickerell urban extension (Policy CHIC 2) from 850 to 820 dwellings. (See comments on MM 57)

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.2.8 and Policy SUS 1 - Object to Policy SUS1. In our representations in September 2014 in response to the Further Proposed Changes we objected to the figure of 775 dwellings per annum. Although the plan period is extended to 2031 in line with the submitted plan the housing requirement has not been increased, the same figure of 775 dwellings per annum is proposed. The sentence and the second paragraph of the Policy which states that: “Additional allocations of land will be made in the next review of the plan, to meet the needs after 2031” is superfluous, it is obvious that additional allocations will be needed in the next review of the plan. Paragraph (ii) “Further land to meet needs beyond 2031 will be provided in the next review of the plan.” This is unsound and should be deleted. A commitment to an early review should be included in the policy. It is not clear whether paragraph 3.2.8 implies that if there are any housing land supply issues identified through regular plan monitoring; that these will only be addressed by additional allocations in the next review of the plan. For reasons outlined in our previous representations (September 2014) the plan does not provide sufficient flexibility to respond to rapid change in accordance with the NPPF (para 153). The proposed housing provision will not significantly boost housing supply, meet the economic objectives of the plan or reflect market signals. Please see the review of the PBA SHMA which has been

prepared and was attached at Appendix A Part 1 of our representations in response to the Further Proposed Changes in September 2014.

Name: Mr Christopher Burton

Representing: SW HARP Planning Consortium **ID:** 884

Main Modification: MM4

Representation: SUS1 - No justification has been given by the Councils for the newly proposed housing target. We are concerned that the Councils' approach to projected employment growth will have implications for the housing target. In the matters statements we raised concerns to the validity of the SHMA, especially with regards to the OAN model which has applied a reduced out-commuting rate to the labour force projections. This increases the local labour workforce without increasing the population due to labour requirements from increased economic growth. We are also concerned that market signals have not been fully considered. Please see headings 3.3, 3.4 and 3.5 of our representation to Matter 3 for a more detailed analysis.

Name: Mr Christopher Burton

Representing: SW HARP Planning Consortium **ID:** 884

Main Modification: MM4

Representation: Para 3.2.3 - Though we are glad to see that the figure of 2,300 (projected increase in resident labour force) has been replaced in paragraph 3.2.3, we do not support the figure of 13,000, especially as this is still a reduction on the previously expressed jobs target of the submitted Local Plan, which was 16,100. As with the new housing target of 15,500 (P50, SUS1) no justification has been given for the inclusion of this new target. Please see our correspondence from Matter 3, heading 3.5.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM4

Representation: 3.3.26 - Persimmon Homes have continuously objected to the housing requirement of 15,500 dwellings for the plan period 2011 – 2031 i.e. 775 dwellings per annum for the reasons outlined previously. It is considered that insufficient provision has been made in the plan even to meet the Council's requirement, and consequently the plan does not provide the flexibility and choice neither does it provide a boost to housing supply in line with government policy set out in the NPPF and PPG. (The previous housing requirement for the HMA total i.e. West Dorset Weymouth and Portland was 834 dwellings per annum as set out in the Structure Plan. These figures were supply led as opposed to representing the level of objectively assessed market demand or need which represented a significant reduction in

building rates compared with those of the past (see our previous submission Appendix A : Housing Evidence Base Review Paper dated September 2014 which accompanied our representations on the Further Proposed Changes). The proposed modifications are not positively prepared, justified, effective and consistent with national policy and the Plan is therefore unsound.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Page 61, Table 3.7 - Housing Allocation Sites (including large sites with current planning permission in grey shading, which are counted in supply from extant permissions). This table indicates Local Plan Allocations for the periods covered by the Five Year Housing Land Supply. Thus as presented the Five Year Housing Land Supply 2014-2019 does not explicitly include the Housing Allocations shown in Figure 3.2 and Table 3.7 and quantified in the BNP Paribas report Table 2.3 Housing Trajectory shown on page 5. I recommend that the Five Year Housing Supply explicitly identify housing derived from the Local Plan Allocations as a separate line item from the housing derived from Large Identified Sites.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: Table 3.4 (Large Sites) - This source is now projected to deliver 3,834 dwellings instead of the 3,520 discussed at the examination hearings. Having checked, the sites and expected delivery period (2014 to 2028) is exactly the same between the 2014 and 2015 SHLAAs so it appears that the Councils are now simply taking a more optimistic view on expected delivery rates. NPPF footnotes 11 and 12 requires evidence to confirm that sites in years 1-5 are deliverable and there are reasonable prospects of delivery for sites to be included as developable in years 6-15. However, no updated evidence or explanation is provided to confirm what has changed since the hearings, and why the Councils now consider that this source of supply will provide an additional 484 dwellings. This is particularly surprising given the concerns raised at the hearings over the deliverability of many of the Appendix C sites due to alternative existing uses, physical / environmental constraints and site availability being unknown in some cases. In short, the hearings highlighted that (contrary to the Councils' updated position) caution should be applied over what can realistically come forward from large SHLAA sites over the plan period. In the absence of sufficient evidence, we contend that a discount on delivery from large SHLAA sites should be applied throughout the plan period and not just limited to the first five years. We suggest at a least a 25% discount should be applied to years 6-15, which would reduce overall supply by 605 dwellings.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Para 3.2.5 - The second sentence is factually incorrect. The PBA study did not indicate that West Dorset District Council needs to provide around 775 new homes each year. The ONS migration data also does not indicate that younger people will live and work in the area. West Dorset house prices also do not support a big increase in in-migration of younger people. The actual figure the Council need to provide is about 200 new homes less. The 775 figure is merely a very subjective number which incorporates (and acknowledged by the report author) the erroneous assumptions that statistical correlation equals causation and that past economic performance is a good predictor of future economic performance. My review of the PBA report provides the detail. Delete the second sentence. I recommend that the following sentence is inserted after the second sentence. The Council has decided to provide 775 new homes each year which incorporates an optimistic a baseline projection of future housing need plus an additional approximately 200 homes per year to allow for the level of in-migration to significantly exceed current projections and the economy to perform to a higher level than it has in the past.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Para 3.2.6 - I recommend that the paragraph 'The Office of National Statistics.. ', the following paragraph and the table 'Delivering Growth' be reinserted into Chapter 3. These provide a good description of the baseline upon which the Council has arrived at its projection for the number of dwellings required. Deleting these sections means that subsequent to the Local Plan's publication it will be difficult to understand the Council's plans for the future. If the Council considers that a number(s) is now not correct then the right number(s) should be inserted, but the paragraphs and table should be kept in the Local Plan.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Para 3.2.8 & Figure 3.1 - Delete or potential difficulties in achieving a balanced overall development strategy for the plan area. Figure 3.1 on page 54 clearly shows that the strategy is not balanced over the whole area. The major settlement of Sherborne which has no planning restrictions has almost the smallest housing and employment allocations for the area, despite the fact that it is an eminently suitable location for housing and employment allocations. According to the DCC November 2013 document West Dorset Economy & Labour Market Profile, page 27, table of Average Claimant Unemployment Rate 2012 – West Dorset Wards, Sherborne has the highest rate in West Dorset at 2%. The table

Claimant Unemployment September 2013 on page 30 states that the Claimant Unemployment rate for West Dorset was 0.9%. The table 3.1 on page 55, clearly indicates that there is an affordable housing need in Sherborne. Figure 3.1 shows that despite the population being spread over the whole area, housing and employment allocations are overwhelmingly centred on the south-east corner of the plan area.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Page 59, Table 3.6 Five year Housing Land Supply 2014-2019 - This includes Extant planning permissions and Submitted/large identified sites within settlements where reasonable developer indication of delivery before 2019. It does not include Local Plan Allocations. The implication of the words reasonable developer indication of delivery before 2019 implies that these Submitted/large identified sites are in fact the Draft Local Plan allocations. Is this true? If the Submitted/large identified sites are the Local Plan allocations - why are they not called allocations? If they are not allocations, what are the Large identified sites shown in Figure 3.2 on page 62 and why are there no allocations in the Table? The pages 58 to 62 are the most important and will have the most impact across West Dorset of the whole Draft Local Plan. But they present a simple subject in an extremely confusing manner. It seems amazing that after over 3 years of the production and consultation of the Draft Local Plan that it is still not possible to state, on an approximately yearly basis, the names of the large identified sites, Local Plan allocations and extant permissions which the Plan projects will produce the overwhelming majority of the housing supply over the plan period to 2031. Recommendation - The only way to overcome confusion and provide a real housing plan is to provide a table which shows the individual years of the plan to 2031 vertically, and horizontally against each year the names of each of the Large identified sites, Local Plan allocations and Live (extant) permissions, as represented in Figure 3.2 on page 62, together with an estimated yearly housing build total.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: Table 3.4 (Pre-application or pending) - Another new source of supply where the Councils have not provided adequate evidence to justify its inclusion at the levels stated. 360 dwellings of the Appendix K supply are from schemes currently in for pre-application discussions. However, no evidence is presented to demonstrate these schemes have any prospect of being granted planning permission or even if an application will be submitted. Without any evidence to show that the pre-app sites are deliverable, the 360 units should be excluded from supply.

Of the four pending applications listed two have since been refused (14/001191 and 14/002286 - combined total of 52 dwellings) with the other two still outstanding. Taking off the 360 dwellings from pre-app and 52 dwellings refused, supply from this source should be reduced by 412 dwellings.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Table 3.3 Employment Supply - The table has the column title Key Site. There is no definition of what constitutes a Key Site. I recommend a definition of the term Key Site is included under the Table 3.3 title.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Table 3.3 - The table has a column title Key Site. There is no rationale given for nominating 3.5ha of land at Crossways as a Key Site. An existing employment site which has been nominated in successive West Dorset Local Plans has remained empty for over 20 years. If an existing industrial site has been unused for 20 years, what makes an additional 3.5ha of employment land a key site? CRS1 does not explain why the 3.5ha of employment land is a key site. I recommend that the plan clearly explain why despite an existing site remaining empty for over 20 years that the new employment allocation in CRS1 is a key site.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM4

Representation: Strategic Approach Box & para 3.2.2 to 3.3.27 - The proposed changes made within Main Modification 4 do not address the fundamental soundness failings of the Local Plan that were previously raised within our representations and the examination sessions. Furthermore Main Modification 4 introduces new soundness failings and result in the Local Plan being internally inconsistent. The key failings include: 1) a housing requirement that does not meet identified market and affordable housing need in full; b) continued reliance on PRS as affordable housing; 3) continued lack of evidence over how 775 dwellings per annum supports the creation of 2,300, 16,100 and 13,000 jobs; 4) a revised housing supply that fundamentally alters the spatial strategy and renders the Local Plan internally inconsistent; 5) a revised housing supply strategy which lacks credibility and reduces delivery of much needed affordable housing. As previously concluded, the Councils must withdraw the Local Plan from examination. (SEE ADDITIONAL DOCUMENT)

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: 3.2.7 - states that the BNP Paribas report “confirms that the Councils’ assessment of housing delivery is realistic and deliverable”. This is factually incorrect and misleading as the BNP Paribas report only looks at delivery from the proposed allocated sites and large committed sites. The report has not assessed the delivery from the remaining components of supply, which comprises a significant proportion of both the five year and plan period supply position. As we identify in this letter the Councils have not provided further evidence to confirm the deliverability of the SHLAA and windfall sources meaning that fundamental issues with soundness in respect of meeting the housing requirement have not been addressed in the proposed modifications.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Para 3.3.2 Table - I recommend that the table is reinserted in the Plan. A large part of the permissions section will be implemented during the plan period and therefore is of significance to the plan. If it is deleted the information will still be required but will be buried within many other documents and be difficult to recreate in the form shown on the table.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Para 3.3.27 - Refers to an independent analysis of the delivery of housing sites over the Local Plan period and states that this can be found on the councils' website www.dorsetforyou.com This analysis is the most important of the whole Draft Local Plan and yet its location and name are not given. If the housing sites cannot be delivered the Plan will fail the government inspection. Surely a more precise reference can be given that the global dorsetforyou? For example the website page number could be provided. Alternatively the precise name of the independent analysis report and the organisation which produced it could be given so that it could be accessed via Google. Recommendation - I recommend that the precise website address of the independent analysis report be given in the Local Plan together with the name of the organisation which produced the report.

Name: Mr Christopher Lindley

Representing: Catesby Property Group **ID:** 3842

Main Modification: MM4

Representation: Assumptions with regard to housing supply across the HMA should be treated with caution. CPG submit that housing land requirement and supply is better considered on a “disaggregated” basis. It is disputed whether a 5 year supply exists, particularly in relation to West Dorset where the shortfall is particularly severe. Our clients’ landholding when considered on its own merits represents an entirely appropriate option for the delivery of housing over the next 5 years in a sustainable location and is able to support the Councils in rectifying the deficit in housing land supply. (SEE FURTHER REP)

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: Table 3.4 (New Land Allocations) - The robustness of the Councils' updated supply position listed in Table 3.4 goes to heart of whether the plan can be found sound. We query whether the BNP Paribas report provides sufficient new evidence to objectively validate the Councils’ expected delivery from new allocations. Many of the conclusions made are based simply on what the developers / agents have reported back. Whilst this shows some intent to develop it does not provide certainty that the sites will come forward in the timeframes stated by the Councils. Overall we consider that some of the assumptions used when sites will come forward are optimistic and have not been informed by an assessment of actual lead-in times within the plan area (i.e. time taken from submission of outline permission to first completion). For example, the report confirms that the Vearse Farm and Littlemoor major sites will be sold off to house builders once permission is granted. Given that applications have not yet been submitted for these sites, disposal will inevitably create delay in the process that has not been incorporated to delivery assumptions for the first five years. With applications not yet submitted for most of the new allocations we maintain that caution should be applied to delivery assumptions, which warrants a discount being applied to at least the five years. Such an approach was recently endorsed by the Eastleigh Local Plan inspector (report enclosed) where discounts to supply ranging between 10 - 50% were applied. In this case we suggest applying a discount of at least 10% to delivery within the first five years, which would reduce supply by 150 dwellings.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: 3.2.1, 3.2.8 and SUS1 - We object to the Councils proposing to only make available further land to meet needs beyond 2031 in the next review of the plan. Our previous submissions and further comments in this letter make clear that not enough land has been made available for housing in the current draft plan to deliver a genuine boost to supply and ensure that the requirements to 2031 will be met. The proposal to only consider making further

allocations in the next (unconfirmed) review is not a sufficient response to make what is clearly an unsound draft plan, sound.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd **ID:** 526

Main Modification: MM4

Representation: Table 3.7 – Housing Allocation Sites page 61: Object to the reduction of the capacity for Chickerell Urban Extension (Policy CHIC 2). See objection to MM57.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd **ID:** 526

Main Modification: MM4

Representation: Table 3.5 – Five-year housing land requirement 2014-19 page 58: The buffer should be applied to the annual requirement and the shortfall, giving a requirement of 5654 dwellings.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd **ID:** 526

Main Modification: MM4

Representation: Table 3.3 – Employment Supply page 56: Support flexibility introduced for Policy CHIC 1 by the use of “Potential”.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd **ID:** 526

Main Modification: MM4

Representation: Paragraph 3.2.1 page 47: Assuming adoption in 2015, this will provide a sixteen year plan period (not a seventeen-year period).

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM4

Representation: Page 62 Figure 3.2 Housing Trajectory to 2031

This figure includes Large identified sites and Local Plan allocations as two separate elements of the housing trajectory.

Name: Ms Susan Green

Representing: Home Builders Federation (HBF) **ID:** 3840

Main Modification: MM4

Representation: 3.3.9 - As discussed above there is more confusion about dates in Paragraph 3.3.9 which refers to a land supply to 2028 whilst Table 3.4 is titled Housing Requirement and Land Supply 2011 - 2031. Again the Council should provide further clarification. It is also confusing why Paragraph 3.2.1 refers to the allocation of sites beyond the plan period?

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: Table 3.4 (Large site Windfall) - We object to the inclusion of this new source of supply, which is projected to deliver 544 dwellings over the plan period. The 544 dwellings have been calculated on an assumption of 34 units per annum derived from historic rates of delivery from large sites outside settlement boundaries in the period 2004 to 2010. Given the draft plan's policy presumption against development outside of settlement boundaries it is unclear why the Councils' now envisage that a further 544 dwellings will emerge without any analysis provided as to whether there are any suitable sites available. This approach does not accord with Para 48 of the NPPF and the NPPG, which requires both compelling evidence to include windfall as well identification of broad locations where any allowance is to be included for years 6-15. No evidence is provided in either respect and large site windfall (which has not been tested at examination) should be removed from supply altogether.

Name: Ms Susan Green

Representing: Home Builders Federation (HBF) **ID:** 3840

Main Modification: MM4

Representation: Policy SUS1 (i) - refers to in the region of 15,500 dwellings (775 dwelling per annum) between 2011-2031. However the housing requirement proposed in Policy SUS1 should be expressed as a minimum. As set out in previous HBF representations there is a concern that this proposed housing requirement is based upon an under-estimation of objectively assessed housing needs (OAHN). The National Planning Practice Guidance (NPPG) confirms that the 2012-based household projections published on 27th February 2015 represent the most up to date

estimate of future household growth (ID 2a-016-20150227) but this is only the starting point for OAHN. It is acknowledged that the 2012-based household projections show lower figures for the West Dorset Weymouth & Portland Housing Market Area (HMA) than previously stated. However it should also be emphasised that household projections are only projections of past trends and not forecasts as such these projections reflect past influences on household formation. Housing shortages over the last two decades and poor housing affordability have restricted the ability of many young people to form independent households. Therefore such projections under-estimate future requirements by building into future housing provision the adverse impacts on household formation of past undersupply and very weak economic and market conditions between 2008 and 2012. Of greater concern is the misalignment of economic and housing growth in the Councils OAHN. The assumptions on economic participation rates of older people and commuting rates used in the economic forecasts suppress the workforce needed meaning an insufficient workforce to support the economic growth sought. So although the plan acknowledges that in-migrants are necessary to achieve economic growth (Paragraph 3.2.4) ultimately there will be too few homes for the workforce.

Name: Ms Susan Green

Representing: Home Builders Federation (HBF) **ID:** 3840

Main Modification: MM4

Representation: 3.2.1 - The Councils should re-consider the timelines as set out in Paragraph 3.2.1. If the Plan is adopted in 2015 only sixteen rather than seventeen years remain before the expiry date in 2031. Moreover if the Plan is to be reviewed within five years of adoption this review should be completed by 2020. It is noted that the NPPG envisages that Local Plans are regularly reviewed every five years (ID 12-007-20140306). There is also some confusion about dates in the proposed modifications which the Councils should clarify. Paragraph 3.2.1 refers to a plan period of 2014 – 2031 but the Strategic Approach and Policy SUS1 refer to 2011 -2031.

Name: Ms Susan Green

Representing: Home Builders Federation (HBF) **ID:** 3840

Main Modification: MM4

Representation: 3.3.12 & 3.3.20 - With regards to the 5 years housing land supply (YHLS) it is noted in Paragraph 3.3.12 that C2 residential institutions are included in the land supply. Such sources of land should be excluded from the 5 YHLS because the need for such accommodation is not assessed as part of the OAHN. The HBF disagrees with the Councils calculation of the 5 YHLS set out in Paragraph 3.3.20 because the 20% buffer has not been added to the shortfall. The buffer should be added to the annualised housing requirement and the shortfall (SEE REP). Therefore the corrected 5 YHLS is 5,654 dwellings rather than 5,487 dwellings as stated. When the 5 YHLS is re-calculated and C2 planning permissions are excluded from the land supply the 5 YHLS will be less than 5.9 years as stated by the Councils. As the HBF do not comment on the merits or otherwise of individual development sites a detailed analysis of the Councils 5 YHLS has not been undertaken but if there is not reasonable certainty that the Councils have a 5 YHLS

the Joint Local Plan cannot be sound as it would be neither effective nor consistent with national policy. Moreover if the Plan is not to be out of date on adoption it is critical that the land supply requirement is achieved as under Paragraph 49 of the NPPF “relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites”.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: (SEE FURTHER REP) Table 3.4 (Supply from rural and office conversions) - Rural buildings are now expected to provide 315 dwellings (255 from barns and 60 from offices), an increase of 188 dwellings. However, the Councils’ evidence has been based on simply projecting forward an assumed delivery from rural building conversions based on applications submitted during 2014. As this is a windfall source of supply, para 48 of the NPPF requires compelling evidence to be provided to show that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Given the sample size (from 2014 applications only) and no evidence being presented to confirm that rural conversions will provide a reliable source of supply over the plan period, there is not compelling evidence to include delivery from this source at the level given. Our point is confirmed by three of the sites listed (Townsend Farm, Frome Farm and Spring Cottage with a combined yield of 5 dwellings) being refused permission since the SHLAA was published. If these 5 dwellings are removed from the calculation used to project forward supply, this source would provide only 180 dwellings instead of 255 dwellings. Rural office conversions are now projected to provide 60 dwellings over the plan period based on the 3 schemes submitted during 2014. However, the Council’s own document confirms that all 3 applications were refused, which in our view questions whether it is appropriate to include office conversions within supply until further evidence is presented to show that there are reasonable prospects of delivery. The Government also announced on 25th March 2015 that permitted development rights that allow change of use of office to residential will not be extended beyond May 2016, which further raises doubts over including this as supply to meet strategic housing requirements. The inaccuracies in the data used to project forward supply from rural buildings emphasises our view that caution needs to be applied. We contend that as a minimum a 50% discount would be more appropriate, which would reduce supply from this source by 156 dwellings.

Name: Mr Peter Dutton

Representing: Gladman Developments **ID:** 3846

Main Modification: MM4

Representation: SUS1, para 3.3.9 - 3.3.27 - Whilst Gladman welcome the decision to now revert back to 2031 as the end date of the Plan period, we remain concerned that the Councils are continuing to progress a housing requirement that will be insufficient to meet the authorities full objectively assessed needs and is founded on a deficient evidence base.

Although the modifications indicate that the authorities can identify a sufficient supply of deliverable and developable housing land to cover the next five years and remaining lifetime of the Local Plan, this is highly dependent on sites and sources that have yet to receive planning consent and assumptions that they will deliver the level of homes envisaged. (SEE ADDITIONAL DOCUMENT)

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: MM4

Representation: Table 3.4 (Minor Identified Sites) - We object to the removal of the 50% discount previously applied to minor sites. The discount was applied as the Councils could not demonstrate reasonable prospects of delivery (in accordance with NPPF footnote 12) from this source over the plan period. No new evidence on delivery prospects is provided to justify removal of the discount and therefore it should remain in place. Maintaining the 50% discount would reduce supply by 891 dwellings.

Name: Mr Samuel Wilberforce

Representing: **ID:** 4015

Main Modification: MM4 (on form referenced as MM3 but clearly relates to chapter 3, so MM4)

Representation: 3.2.4 - points to problems of aging population along with demand for older age groups moving into the area, and points to the need for provision of housing for economically active people. But the plan does not specify a proportion of affordable housing, nor any provision to prevent second homes, or homes being sold within a year as speculative investment. I would also like to see all houses to high eco-specification Code for Sustainable Homes (CSH) Level 4 or above, with district heating and generation being considered. This paragraph should be modified to include these changes.

Name: Mrs Rosie Mathisen

Representing: **ID:** 4009

Main Modification: MM4 (on form referenced as MM3 but clearly states chapter 3, so MM4)

Representation: One thing is absolutely clear - Bridport needs more housing - affordable housing for the people who already live here who cannot afford the house prices or high rents. However, paragraph 3.2.4 argues the case for Vearse Farm from a very different position. It states that migration into the area 'tops up' the population, demand for such housing is strong, particularly older age groups - and this is the basis of the argument for Vearse Farm. There are four main problems with this argument: 1) This migration unbalances the demographic of the population. 2) Older incomers squeeze up house prices. 3) Bridport's infrastructure and unique

identity is threatened by this large-scale development? Economic benefit is questionable. There is no evidence for the jobs which working people will move into apart from existing public sector employment. If the incomers are pensioners, then any jobs created are more likely to be lower paid service jobs - catering, caring, retail. There is a huge question mark about affordability provision. Hallam Homes presented little or no information or interest in this at the Community event in the town Hall – and local and national evidence of developer commitment to actually meeting the commitment to affordable homes is patchy. So the effect of the 700+ homes proposed at Vearse Farm will be to the detriment of Bridport overall without actually addressing the real problem of affordable rents and prices matched with the dearth of good quality, well paid jobs for local people. WDDC needs to think again but this time with the benefit of real research into what the area, which it is meant to work on behalf of, really needs.

Name: Mr Tristan Allsop

Representing: **ID:** 4000

Main Modification: MM4 (on form referenced as MM3 but clearly states chapter 3, so MM4)

Representation: West Dorset (and specifically Bridport) does not need to encourage in-migration of older people. It needs younger, economically active people, and the urgent provision affordable rented and owned accommodation. It is the only way to maintain the area as an economically prosperous and successful region. In-migration of the retired boosts house prices even further out of reach of locals, and whilst they may bring spending money they do not build businesses. The strategy is flawed. The priorities are wrong.

Name: Mrs Tina Golden

Representing: **ID:** 4013

Main Modification: MM4 (on form referenced as MM3 but clearly states chapter 3, so MM4)

Representation: Bridport has a very high number of young people leaving the town because of lack of affordable housing. We have a below average number of working age people from the mid 20's to mid 40's, statistics available on DCC web site. This is partly due to the fact that there are very few jobs in the town and surrounding area other than the lowest paid, part time and in the summer during the tourist season. Bridport has some of the poorest communities in England (Skilling, Court Orchard) and many families that at the moment cannot afford to buy their own home in the area near their own families. We have one of the highest elderly populations in England meaning that our welfare and care services are very heavily used. The kinds of houses that seem to be being built on Vearse Farm are for the reasonably well off, the second home owners and prospective landlords and not for local people. Any housing that is built here should be for those already in need in West Dorset and those that are coming here to bring employment or work themselves. This is unsustainable development that isn't adding to the benefits of those already living here but imposing a decision made by WDDC and DCC to increase the population of the town without consideration to the needs of the people and the town. Everything that I have seen on the plans for Vearse Farm makes me concerned that the designs, the flood plane, the "maybe" of the landscaping, the lack of services, moving St. Mary's

– which will be a disaster for those in poverty on Skilling, has not been thought through, nor has it in anyway considered any of the points from those in the community of have objected.

Name: Mr Robert Golden

Representing: **ID:** 4010

Main Modification: MM4 (on form referenced as MM3 but clearly states chapter 3, so MM4)

Representation: The plan is unacceptable because the town needs affordable housing for the young of the town, to encourage them to stay, work and build a life near their families and friends. The town does not need inwards migration from other places for what seem to be a majority of expensive houses. Further, the town thrives in part from its beautiful position and surrounding landscape. To nibble away at that constitutes an implausible and irrational set of political and economic impositions that have little to do with the reality on the ground. People agree we need housing but for the young and the poor and not for more retirees and investors. Further, who is going to pay for the additional health care, parking spaces, road widening and other amenities which I guess will be externalised from the builders to the town's tax payers. Finally the real estate agents prospectus is filled with 'shoulds', 'coulds' and 'mays' rather than commitments to greening the area and providing amenities which in plain English will mean the carrots will never be planted.

Name: Mrs Rosie Allsop

Representing: **ID:** 4001

Main Modification: MM4 (on form referenced as MM3 but clearly states chapter 3, so MM4)

Representation: Are these houses for the community or merely to satisfy Government requirements, needing then to be justified? 4 types of potential buyers. Not younger working migrants without available jobs, not locals searching affordables which local wages make impossible, perhaps second home owners who contribute nothing to the community other than Council tax. We have already adequate numbers of the elderly without more arriving overloading medical and social services. Even WDDC has said its younger people we need. It's impossible to get the balance right without addressing employment issues. This plan hasn't been thought through and would be a massive mistake.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no comment on the proposed modifications to chapters 3 - 7.

Summary of Main Issues Chapter 4, Economy – MM5-11

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM5

Representation: Whilst the Town Council recognises that this list is taken from the LEP, it feels that the priorities should not be limited to these targets and important areas such as tourism, creative industries, food and drink etc. must still feature as priority areas for economic development. They are important for this part of Dorset.

Name: Ms Sally Cooke

Representing: **ID:** 75

Main Modification: MM5

Representation: I support the inclusion of reference to the energy sector as one area of economic development to be supported. I suggest the inclusion of the word 'renewable' or 'zero-carbon' before 'energy' (for the avoidance of doubt), as I do not believe there is wide local support for fracking or nuclear development in Dorset, which could otherwise be thought to receive support from this policy.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM5

Representation: With a fundamentally aging population it remains to be demonstrated and evidenced that the existing workforce skills and age profile is suitable for the key employment sectors referred to within MM5. Main Modification 5 is therefore unsound as it is not justified or effective.

Name:

Representing: Sherborne Town Council **ID:** 877

Main Modification: MM6

Representation: Sherborne Town Council fully supports the West Dorset, Weymouth and Portland Local Plan Main Modifications and in particular the amendments in section MM6 and encourages the early approval and the implementation of the Local Plan as soon as is possible.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM9

Representation: Such development also needs to be consistent with policies outside of the Local Plan re the coastal situation. For example I have seen a document that suggests that the whole communities of Seatown and Charmouth will need to be relocated on account of coastal erosion and rising sea levels. It doesn't make sense to allow expansion of tourist sites and accommodation right on coast in such circumstances.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no comment on the proposed modifications to chapters 3 - 7.

Summary of Main Issues Chapter 5, Housing – MM12-23

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM12

Representation: Whilst it is understood that the national planning guidance has changed in respect of affordable housing provision in smaller developments, it is considered this paragraph should still refer to all developments that meet the national criteria for contributions. The national guidance could change at some point, to allow for contributions from smaller developments.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM12

Representation: As set out within our representations to Main Modification 16 at best only 70% of the Main Modifications land supply comprises sites eligible to deliver affordable housing. It is therefore incorrect for MM12 to state that 'most' new open market housing sites make a contribution.

Name: Mr Andrew Leppard

Representing: **ID:** 3533

Main Modification: MM12

Representation: The change from ALL to 'MOST' is not acceptable. Controls on a proportion of affordable homes must be tightly upheld in West Dorset due to the unusually high disparity between the low local average wage and high house prices and rents. This is also crucial in preventing the loss of the younger working population. I would request that 'ALL' is re-instated as any alternative would be highly damaging and would fail to achieve providing the existing needs for housing in the area.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM12

Representation: Given that this paragraph recognises the projected need for affordable housing is not expected to be met within the plan period it doesn't make sense to change 'all' to 'most'. 'all' should be retained. WDDC has, in my opinion, a poor record of failure to deliver on a lot of affordable housing and I see the downgrading of the wording as fairly typical softening in commitment. Please do not allow this change of wording.

Name: Mr Barry Bates

Representing: **ID:** 3504

Main Modification: MM12

Representation: MM12 changes the affordable housing requirement from all - to most developments. I strongly object to this for 2 reasons. 1) West Dorset desperately needs affordable housing and this makes it less likely the Plan already accepts it will not meet the need. 2) What little support exists in Bridport for Vearse farm exists because of a naive belief that it will deliver significant amounts of affordable housing. Hallam Land at their recent presentation in Bridport were at pains to point out that additional costs may mean they cannot deliver much affordable housing. This modification gives credence to the get out clause.

Name: Mr Richard Freer

Representing: **ID:** 3508

Main Modification: MM12

Representation: I find the proposed change from all to most, extremely divisive. Surely this is giving developer(s) the option not to comply with and possibly renege on building affordable houses on any new development. This suggested protocol is not satisfying the national need for affordable homes in West Dorset. I find it abhorrent that West Dorset County Council can envisage and suggest this change, as it is clearly a loophole that a developer could benefit from!

Name: Mr Alan Rowley

Representing: Dorchester Civic Society **ID:** 611

Main Modification: MM12 & MM14

Representation: The reason for proposed change given as changes to NPPG Nov 2014. NPPG is only guidance, whilst material matter in determining policy it is not mandatory. Exceptions to guidance upheld by courts where supported by reasoned argument. Guidance says, 'should', which in itself admits possibility of exceptions. Revised SHLAA identifies housing sites in Dorchester for 555 houses on already developed sites. Policy HOUS1 seeks a minimum of 35% affordable housing in Dorchester. This implies a loss of some 200 affordable homes in Dorchester. Inspector in letter of 10 December 2013 had already expressed his concern that Council, 'concluded that it is impossible to deliver sufficient affordable housing to meet needs even though a significant issue'. Change to policy worsens that shortfall. Civic Society believes provision of affordable housing is essential element of the housing mix to ensure needs of all Dorchester residents are met. None of sites identified are known for long dereliction or major environmental problems where a concession on affordable housing might be justified.

Name: Mr Steve Tapscott

Representing: Purbeck District Council **ID:** 3852

Main Modification: MM13

Representation: Small inconsistency with MM16. The text in MM13 states 1,000m² for floor space. However, the PPG and MM16 say 1,000sqm. The difference between sqm and m² can be huge. For consistency, the councils may wish to consider altering other references to m², for example at 4.4.11, which asks for an impact assessment for developments of 1,000m² (i.e. developments measuring 1,000 x 1,000m). Paragraph 8.6.1 also uses m².

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM13

Representation: Rather than saying that a contribution can be sought, this should read will be sought.

Name: Ms Sally Cooke

Representing: **ID:** 75

Main Modification: MM13

Representation: I support the approach of seeking financial contributions to affordable housing from sites of between 6 and 10 dwellings, where it is not practicable to provide the affordable housing units on the development site.

Name: Ms Susan Green

Representing: Home Builders Federation (HBF) **ID:** 3840

Main Modification: MM13 & MM14

Representation: MM13 to Paragraph 5.2.1 and MM14 to Paragraph 5.2.2 should refer to the Written Ministerial Statement 'Support for small scale developers, custom and self-builders' dated 28th November 2014 which is national policy as well as the NPPG. Where financial payments towards off site affordable housing provision are sought on sites of 6-10 dwellings under MM16 (Policy HOUS1) reference should be made to the fact that such payments are deferred until completion of the development in accordance with the Written Ministerial Statement.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM16

Representation: The implications of MM16 coupled with MM4 (housing land supply) will result in significantly less affordable housing delivery in the period between 2014-2031. This is a significant consequential failing given the Local Plan is already falling considerably short of meeting identified affordable housing need. Nexus Planning calculates that based on the number of housing supply sites that are exempt from affordable housing delivery, between 2014 and 2031 only 2,666 potential new affordable homes can be delivered compared to 3,824 affordable homes that the Councils' Main Modifications Local Plan purports to deliver (a 30% reduction). The Councils must withdraw the Local Plan from examination to fundamentally review the proposed planning strategy. (SEE ADDITIONAL DOCUMENT)

Name: Mr Richard Freer

Representing: **ID:** 3508

Main Modification: MM16

Representation: I find the proposed change of cancelling the wording a minimum of, extremely divisive. Surely this is giving developer(s) the option not to comply with, (and possibly renege on) and reduce the number of affordable houses from 35% on any new development in West Dorset. This suggested protocol is not satisfying the national need for affordable homes in West Dorset. I find it abhorrent that West Dorset County Council can envisage and suggest this change, as it is clearly a loophole that a developer could benefit from!

Name: Mr John Budden

Representing: **ID:** 4004

Main Modification: MM16

Representation: Consider Weymouth and West Dorset is a low wage / income area - HOUS 1. i) MM 16 The level of affordable housing required reflects the viability of development land in the local area, and will be: - a minimum of 35% or preferably more in Weymouth and West Dorset as a whole

Name: Mr Christopher Burton

Representing: SW HARP Planning Consortium **ID:** 884

Main Modification: MM16

Representation: Though we support the wording of the modifications to MM16, it is with disappointment that we note that the Councils have not taken the opportunity to adopt a Rural Exception Sites Policy. Paragraph 54 of the NPPF clearly supports this, while the PPG sets out guidance for promoting rural communities and assessing their housing need (ID: 50-001-

CONSULTATION SUMMARY West Dorset, Weymouth and Portland Draft Local Plan, April 2015

20140306). Such an approach would be of significant benefit to delivering affordable housing where it is most needed. Please see our correspondence to Matter 4 for a detailed assessment of the benefits of such a policy approach and a potential amendment to Policy HOUS2.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM17

Representation: Given WDDC's statement above in MM12, para 5.1.2. The words 'minimum' should be retained.

Name: Mr John Budden

Representing: **ID:** 4004

Main Modification: MM17

Representation: Consider Weymouth and West Dorset is a low wage / income area - HOUS 1. Monitoring Indicators MM 17 ...Target: a minimum of 35% or preferably more secured in Weymouth and West Dorset as a whole

Name: Mr Richard Freer

Representing: **ID:** 3508

Main Modification: MM17

Representation: I find the proposed change of cancelling the wording a minimum of, extremely divisive. Surely this is giving developer(s) the option not to comply with, (and possibly renege on) and reduce the number of affordable houses from 35% on any new development in West Dorset. This suggested protocol is not satisfying the national need for affordable homes in West Dorset. I find it abhorrent that West Dorset County Council can envisage and suggest this change, as it is clearly a loophole that a developer could benefit from.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM19

Representation: I support these changes.

Name: Mr Richard Brown

Representing: Dorset AONB Partnership **ID:** 510

Main Modification: MM19 & MM20

Representation: These two entries are related and my comment particularly addresses changes to the latter statement. Overall there is concern that the modification substantially alters the balance between demonstrating the need for such housing and considering the environmental effects, which could be foreseeably overriding in sensitive locations within Dorset AONB. I feel that the comments that have been deleted regarding the scale and siting of development and its appearance are likely to be key in the context of NPPF 115, which states that great weight should be attached to conserving and enhancing the landscape and scenic beauty of the AONB.

Name: Christine Bright

Representing: Beaminster Town Council **ID:** 639

Main Modification: MM20

Representation: States "...cumulative extensions to existing dwellings should generally be no greater than 40% of the original dwelling" - we question how officers will define the size of the original dwelling as extensions can be built, houses renamed and officers become less knowledgeable about areas.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM20

Representation: I object to this. The Local Plan aims to increase the number of houses and it is acknowledged in previous modifications that there is a need for some housing in rural areas. It makes perfect sense to me to allow people to divide existing dwellings and add extensions to enable them to do so. I do agree that given that it refers to the AONB the aesthetic appropriateness of the planning applications will need to be taken into account.

Name: Mrs Michele Harding

Representing: Burton Bradstock Parish Council **ID:** 955

Main Modification: MM20

Representation: Clarify MM20 in respect of permitted development rights: is the 40% increase applied to the original dwelling before any extension including permitted development?

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM23

Representation: The deletions here appear to contradict the additions in MM19 and to therefore be inconsistent.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM23

Representation: The deletion of the large number of proposed criteria and the simplifying of the criteria is welcomed.

Name: Mr Rob Duff

Representing: Mr A Dommett **ID:** 1614

Main Modification: MM23

Representation: (SUMMARISED) (SEE FURTHER REP) - WDDC/WPBC chose to meet the specific need for Low Impact and self-build homes by allowing for provision in suitable locations outside development boundaries. This policy position has remained unchanged in the Local Plan throughout its preparation until this point and thus has at no time been subject to Examination in public. This is a fundamental change in policy position, from a position which was sound in that by proposing their own initiative to deliver self-build and low carbon homes WDDC complied with NPPF and PPG, to a position that takes no account of the need to meet need for self-build and low impact homes and therefore is no longer sound. The proposed modification is not justified by the statement that: 'Reference to 'low impact dwellings or self build dwellings' in criterion v) is not necessary as other policies in the plan apply'. There is no other reference to low impact dwellings or self-build dwellings within the local plan and no other policies will deliver them or in any way address the critical barriers to their delivery or accord with NPPF or PPG. The only housing policies that apply are those restricting homes outside development boundaries to agricultural or forestry workers dwellings, etc, or exceptions affordable homes, neither of which will deliver self-build or low impact homes due to the restrictive cost of construction. This policy was part of a raft of policies aimed at significantly increasing the supply of homes in accordance with NPPF. To remove it departs from that objective and is not sound. The Local Plan accepts at paragraph 5.7.4 that there is need for low-impact and self-build homes, but then by proposing MM23 removes the manner in which this need was to be met. The Local Plan therefore no longer accords with the NPPF requirement to meet Objectively Assessed Need. I hereby request that MM23 be withdrawn and Policy HOUS6 v) be retained as proposed in the submission changes. If this Main Modification is not withdrawn the only conclusion is that the Local Plan is not sound and should not be adopted.

Name: Mr James Walker

Representing: The Ernest Cook Trust **ID:** 584

Main Modification: MM23

Representation: The Ernest Cook Trust supports the proposed modification to subsection iv of Policy HOUS 6 to remove the various requirements which relates to the cancelled PPS7 Appendix A for rural workers' dwellings. This amendment is justified in that Paragraph 55 of the NPPF refers only to demonstrating the essential need for rural workers' dwellings and does not require consideration beyond this, as confirmed by the High Court judgement R (Embleton PC) v Northumberland CC [2013] EWHC 3631. The Trust therefore considers section iv of policy HOUS 6 to now properly reflect the provisions of the NPPF in this regard.

Name: Mr & Mrs F.J. Loosemore

Representing: **ID:** 1036

Main Modification: MM23

Representation: (SUMMARISED) Following our letter of 5 April 2014 and your reply of 9 April 2014 (SEE FULL REP) we understand the 'Self Build and Custom House Building Bill' received royal assent last week. We believe this will give local authorities such as yours new responsibilities to plan for self build homes. From your attached reply, last year, we got the impression the local authority had done little towards this and had no apparent plans to do so. We suggest the best way forward for this is a specific policy within the draft local plan as we had alluded to in our last correspondence. Has any provision been made in the amendments to the draft plan as i do not recall seeing anything mentioned or added? If there is nothing as yet included within the revised draft local plan can you please make sure this letter is included as an objection to the draft local plan for 'lack' of any policy that will cover self-build over the next plan period.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no comment on the proposed modifications to chapters 3 - 7.

Summary of Main Issues Chapter 6, Community Needs and Infrastructure – MM24-30

Name: Mr Ross Anthony

Representing: The Theatres Trust **ID:** 4007

Main Modification: MM25

Representation: Policy COM3 Retention of Local Community Buildings and Structures - The Trust supports the modifications to Policy COM3 (MM25). The Policy now reflects item 70 of the NPPF.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM28

Representation: I think that the statistics referred to should continue to be made available. The original wording should be maintained. The provision of increasingly localised services is important or people can't get to them who don't have access to cars. Taxi journeys are very expensive in rural areas and beyond the means of many. The area is known to have lower than national average wages.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM29

Representation: or' should be retained. 'and' weakens statement.

Name: Mr Richard Brown

Representing: Dorset AONB Partnership **ID:** 510

Main Modification: MM30

Representation: Whilst supportive of the spirit of the statement and modification, I should highlight that my response to such proposals will be primarily influenced by the appropriateness of the scale and location of what is put forward. The Dorset AONB Management Plan 2014-19 states that we will "support renewable energy development where this is of appropriate scale and location". I appreciate that your statement does not rule out considering scale and location, but I feel that the term "allowed wherever possible" could perhaps be revised to "allowed where appropriate".

Name: Ms Sally Cooke

Representing: **ID:** 75

Main Modification: MM30

Representation: This modification does not achieve its aim. To be more positive the wording should be 'proposals..... will be permitted unless they cause significant harm which cannot be satisfactorily mitigated. Special attention will be paid to ... ' and then list the factors mentioned in the bullet list in the policy COM 11.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no comment on the proposed modifications to chapters 3 - 7.

Summary of Main Issues Chapter 7, Weymouth – MM31-48

Name: Mrs Brenda Pickett

Representing: Weymouth Civic Society **ID:** 914

Main Modification: MM31

Representation: We object to the increase from 400 to 600 new homes in Weymouth Town Centre. This is in our view patently unreasonable, considering Weymouth's shortage of available space when compared with land available in West Dorset. We do not think the Borough has sufficient available land in the Town Centre to avoid 'urban cramming', whereas adjacent West Dorset does. The housing load should be more equitably spread between the two authorities.

Name: Mr Cliff Lane

Representing: C G Fry & Son Ltd - David Lohfink **ID:** 526

Main Modification: MM42

Representation: The modification refers to the land having the potential to deliver in the region of 320 new homes over the plan period. CG Fry would point out that 320 came from a crude land budget assessment early on in the process and has stuck ever since. Now a more rigorous appraisal has been undertaken for the preparation of a masterplan, which forms part of a live outline planning application currently with the council, we believe 340 is a more realistic and justifiable figure.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no comment on the proposed modifications to chapters 3 - 7.

Summary of Main Issues Chapter 8, Portland – MM49-52

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM50

Representation: The maintained description of Portland Port as “a port of national and international importance” is not supported by any evidence. Presumably for such a description to be justified Portland Port would need to be of similar scale to other nationally and internationally important ports, or have a particular national / internationally important speciality.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM51

Representation: The modification linking the SEP to the local plan should include a caveat that any provisions within the SEP will remain subject to Local Plan Policy Env. 2.

Summary of Main Issues Chapter 9, Littlemoor – MM53-54

Name: Mrs Gill Smith

Representing: Dorset County Council **ID:** 544

Main Modification: MM53

Representation: Dorset County Council supports the proposed change of wording identified in MM53.

Name: Mr Richard Boother

Representing: Littlemoor Development Consortium **ID:** 724

Main Modification: MM53 & MM54

Representation: The Consortium has no objections to the proposed modifications to LITT1, other than to suggest that it should be made clearer that the requirement for the provision of good pedestrian links between the new development and Bincombe Valley and St. Andrew's Schools is related to the alternative of an education contribution, as opposed to physical off-site provision. The Consortium wish to make it clear that it will not accept a Grampian-style condition relating to the delivery of these pedestrian links from the development to the schools.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no comment on the proposed modifications to chapters 9 - 11.

Summary of Main Issues Chapter 10, Chickerell – MM55-MM59

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd **ID:** 526

Main Modification: MM55

Representation: Support the additional flexibility.

Name: Mr Gavin Fryer

Representing: **ID:** 4002

Main Modification: MM55

Representation: 1) Putton Lane, Chickerell has the potential to deliver new homes...Outline planning permission for 220 homes appears to have been withdrawn. 2) Juggling with planning consents has the potential for obfuscation. 3) This example could be set against MM66. Chapter 13 about Bridport and Vearse Farm in particular. 4) It is unclear why for 5 years there has been an insistence on the provision of houses at Vearse Farm, where the site has a number of significant and difficult infrastructure problems. 5) If Putton lane site has potential to deliver new homes, why could not that be taken from the presumed allocation to Vearse Farm? Reducing the magnitude of VF development would help to alleviate concerns there, although not eliminate them.

Name: Mrs Hilary Trevorah

Representing: Chickerell Town Council **ID:** 583

Main Modification: MM56

Representation: Chickerell Town Council wishes community facilities and open spaces to still be included. Chickerell Town Council is still very keen that space is retained in the centre of the village for a health centre.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd **ID:** 526

Main Modification: MM56

Representation: Support the additional flexibility.

Name: Mr Alan George

Representing: ID: 4005

Main Modification: MM57

Representation: The development East of Chickerell was previously rejected and the facts of this determination have not changed, thus remain and the visual impact on the local landscape is significant: the proposed area covers the highest contour in Chickerell. The 2011 census shows 2470 properties housing growth has been less than 25 properties per annum since 2001, with a stable population of circa 5000 since 1991. The Fry's development has exceeded this by a factor of 10. The proposal is a 30% increase in the total number of dwellings. The impact to landscape and wildlife habitat is already self-evident, whilst the impact to infrastructure, traffic and other social factors is not yet quantified and only an estimate from previous planning applications. On the scale proposed DCC cannot as per MM57 "ensure" there is sufficient infrastructure to support this development based on estimate alone, when the full impact of the recent unprecedented increase is unquantified. As examples of evidence: the current road surface at the bottom of School Hill, is in a state of dis-repair at current traffic volumes. There is no analysis that proves this road/Chickerell – Nottingham minor road are suitable for the levels of proposed vehicular traffic. Indeed, neither road has public footpaths along their lengths presenting a risk to public/pedestrian safety. Furthermore, the Chickerell Primary School is already judged by OFSTED to require improvement, thus I would argue it is already under pressure to support current demand. In sum DCC has presented no analysis across a spectrum of potential impacts: environmental, transport, public infrastructure, economic benefit and finally social factors such as crime. On the basis that the proposal is so significant in terms of proportional size the Government Independent Examiner, should at the very least reject the MM until a full and proper analysis can be made based on rigorous evidence that takes account of the current CG Fry development. The council must comply with its own MM2, which requires proper monitoring of planning proposals.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd ID: 526

Main Modification: MM57

Representation: There is no justification for reducing the number of dwellings envisaged to be delivered on the Policy CHIC 2 site as a whole from 850 to 820. It was not discussed at the Examination nor was any evidence presented to the Inspector. There is no justification for identifying capacity figures for different parts of the Policy CHIC 2 site allocation. It was not discussed at the Examination nor was any evidence presented to the Inspector. Reference to a capacity figure for the north part of the Policy CHIC 2 site (350 dwellings) is unjustified, limits flexibility and could arbitrarily reduce the potential contribution of this site to meeting housing needs. Although the EIA screening opinion for the north part of the Policy CHIC 2 site referred to 350 dwellings, this figure was a very broad estimate and was not based on a masterplanned scheme. Furthermore, it would not prevent the developer from re-screening and/or submitting a planning application for a larger scheme that is acceptable in all other respects. Accordingly, the Local Plan should not refer to the capacity figures for each parts of the site even if the reference is approximate.

Name: Mr Robert Loder

Representing: ID: 4012

Main Modification: MM57

Representation: The adding of 820 new homes to the Chickerell conurbation represents an over intensive use of the land. This will result in the loss of important green space and offers little in the addition of public services or local employment for the new residents. The transport infrastructure serving this area is already stretched, the plan offers no means to prevent the use of 'rat runs' on narrow lanes through important hamlets such as Radipole and Nottingham.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes ID: 797

Main Modification: MM57

Representation: These changes stem from wording proposed in WDWP/EX16 published first on 18th December 2014 and then revised on 7th January 2015. Whilst our representations to the Pre-Submission version of the Plan in 2012 requested that there should be two policies for the allocation CHIC2 i.e. CHIC2a and CHIC2b, we did not propose the figures included in either versions of WDWP Ex 16. We have objected to the most recent version of the note which not only proposes separate housing figures for the northern and eastern part of the allocation without any justification, but also reduced the total figure for the proposed allocation from 850 dwellings to 820 dwellings without any explanation, this detail was not discussed at the Examination Hearing Session on 3rd December 2014. Both parties are preparing planning applications i.e. for the east and north of Chickerell. A considerable amount of technical work is underway in terms of the detailed studies required to support a planning application, which will determine the overall quantum of development (in terms of design layout and access to the site). Screening opinions for both parts of the allocated site have been made on the basis of 350 dwellings to the north and 470 dwellings to the east, but that is not to say that there is no flexibility in these figures. It is noted in paragraph 3.3.25 of Appendix 2 Chapter 3 Achieving a Sustainable Pattern of Development, " The total numbers of homes on the sites will depend on the mix of house types and sizes, and also the proportions of housing and employment, and may be higher or lower than those indicated." However, this still does not provide the justification to reduce the site by 30 dwellings. It is considered that the 850 dwellings should remain in the plan; this enables some flexibility in approach to the development of the site. Furthermore in terms of the capacity of the site the site maps should be changed to reflect the extent of the allocation. The Local Plan allocation for CHIC 2 should be amended to include the additional areas as submitted on the plan attached to the representations in July 2012 (ie the area to the north of School Hill). The extent of the settlement boundary for Chickerell should be amended to include the area to the south of the proposed allocation of CHIC 2 i.e. the Ponderosa site. This site is developed and constitutes an employment use; the opportunity should now be taken to establish the revised settlement boundary at the same time as the settlement is being extended by virtue of the allocation of CHIC 2.

Name: Mr Timothy Wells

Representing: ID: 413

Main Modification: MM58

Representation: The current development by Frys at Putton Lane, Chickerell is causing considerable disruption to that area of the town. The developers have failed to adhere to agreements with the Town Council concerning protection of the environment, specifically retention of hedgerows and other wildlife requirements. Residents therefore have serious concerns and severe reservations about further potential failures to stick to agreements. Once the local environment is destroyed, it cannot be reinstated. If Persimmon Homes are allowed to develop the green field sites to the east of Chickerell, residents have no confidence that any agreements will be adhered to, and permanent disruption to the existing environment will result. Any development should be restricted to more appropriate and less visually obvious low-lying areas, specifically those adjacent or close to the new Chickerell link road.

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd ID: 526

Main Modification: MM58

Representation: Support

Name: Mr Simon Coles

Representing: C G Fry & Son Ltd ID: 526

Main Modification: MM59

Representation: Agree to the principle; object to the wording. As worded, this could prevent development from taking place on some parts of the site at the same time as strategic planting is undertaken on other parts of the site. Suggested amended wording: Strategic Planting is carried out in accordance with an agreed strategic landscape phasing plan. This would enable the Authority to ensure that development could commence (enabling the site to deliver housing and start meeting need) in tandem with strategic planting. The alternative would be that housing delivery on some parts of the site has to wait until strategic planting has been put in on other parts of the site.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes ID: 797

Main Modification: MM59

Representation: The visual and environmental impact was raised by respondents to the Plan prior to the examination. In the submitted Plan Policy CHIC 2 requires that strategic planting is carried out to reduce the impact of the development to longer views and that semi-natural green space is secured. A Landscape and Visual Appraisal for Chickerell East (AD/WPCL8 March 2010) has been prepared by Pegasus Group which concludes that by locating development below the ridge top and away from the north-eastern site area, “the characteristic openness of the ridge and its setting within the wider landscape would be maintained”. There is therefore no significant adverse impact of the development on the landscape and whilst we are not averse to some strategic planting, it is considered unnecessary to actually formally include the wording into the policy of the plan that an agreed landscape phasing plan is required.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no comment on the proposed modifications to chapters 9 - 11.

Summary of Main Issues Chapter 11, Dorchester – MM60

Name: Mr Andrew Elliott

Representing: Grainger plc, part of the North Dorchester Consortium **ID:** 648

Main Modification: MM60

Representation: Grainger plc, part of the North Dorchester Consortium, continues to object to the strategic approach for Dorchester as set out in past representations and statements and orally at the Local Plan Examination hearings. It is not appropriate to delay decisions about the future growth of Dorchester to a review of the plan. Insufficient sites are identified to meet housing requirements later in the plan period, and given the lead in time for the appropriate planning and delivery of larger sites decision-making needs to start now. The proposal to identify growth at Crossways instead of further development of the county town is not a logical or sustainable choice.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM60

Representation: MM60 refers to a review process to consider further development opportunity issues around Dorchester and Crossways post 2021. It is however unclear what technical issues and other planning matters the Councils' are expecting to consider in the period post 2021. The Councils' already have an extensive evidence base relating to the land surrounding Crossways and Dorchester. Given the Councils' plan-making track record, it is not considered plausible that they will be able to undertake and put in place an updated Local Plan in a timely manner. The Main Modifications should therefore either: 1) Allocate additional land to address identified supply shortfalls towards the end of the plan period. This should include the Woodsford Farms sites at Crossways; or 2) Commit to completing an early review by 2017 at the latest (to align with the emerging Purbeck Local Plan Partial Review process). (SEE ADDITIONAL DOCUMENT)

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM60

Representation: It is not clear from the evidence base why the position has changed from where there was a need to consider sites for housing and employment towards the end of the plan period (i.e. to 2031) and it was originally acknowledged in this paragraph in the submitted Plan, that further investigations were proposed in relation to the plan area for the period post 2026. It is clear from the proposed allocations for Dorchester that there has been no change in the assumptions about the delivery of the sites, having compared the figures in Table 3.7 Housing sites in the Proposed Modifications with previous versions of this table. The proposed

change to the paragraph, last sentence states that “the plan review process will consider these issues further post 2021.” This proposed change relates to the proposed changes to paragraph 3.2.1 in Chapter 3 under the sub- heading A sustainable Level of Economic and Housing growth where it states that: “It is likely that the plan will need to be reviewed within five years from adoption or no later than 2021 in order to maintain a robust five year land supply.” It is considered that these issues will need to be considered before 2021 in order that the plan maintains a five year housing land supply and to accord with the guidance in the PPG ref ID 12 – 008 “Most Local Plans are likely to require updating in whole or in part at least every five years.”

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM60

Representation: I recommend the modification The plan review...2021. be deleted. Because there are no easily deliverable sites for major growth, work should start now assessing how land north of the water meadow can be developed in phases and not as a complete site as in the Halcrow Report. Relying on rural, green fields, in the remote (>6 miles), unsustainable, dormitory village of Crossways, where services in this area are barely adequate to support the new residents (SA page 190), over 93% of journeys are by car, 3% by bus, 5.7% by train, there is extremely little employment, where industrial developers have shunned the available industrial site for over 20 years, is not a good way to plan Dorchester’s future housing need.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no further comment on the proposed modifications to chapter 11. We would however note our outstanding concerns relating to Policy DOR10.

Summary of Main Issues Chapter 12, Crossways – MM61-MM65

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM61

Representation: Natural England is supportive of the proposed modification to paragraphs 12.2.2 and 12.2.5.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM62

Representation: Please refer to our representations to Main Modification MM64.

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: MM63

Representation: Persimmon Homes whilst acknowledging that both West Dorset and Purbeck Councils are working together to fulfil the duty to co-operate are nevertheless concerned that this will result in further development being located at Crossways which is for the reasons outlined in our previous representations an unsustainable location compared to opportunities at Dorchester – which is the county town compared with Crossways which is a village. It should be noted that one of the options included in the Purbeck Issues and Options consultation (January 2015) is for between 200 – 900 dwellings to be located around Moreton station - however the consultation document acknowledges that existing facilities and services are limited and would be reliant on new development at Crossways.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM63

Representation: Natural England is supportive of the proposed modification to paragraphs 12.2.2 and 12.2.5.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM63

Representation: Please refer to our representations to Main Modification MM65.

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: MM63

Representation: I recommend the modification starting Looking to the future... be deleted. The Purbeck Local Plan Partial Review is focussed on the conurbation and East Dorset SHMA, is aligned with Poole's local planning development and contains no plans for services or infrastructure at Moreton Station. There is almost no land available at the station itself for development. Purbeck Council Local Plan Review is focussed on the east (as stated by the Head of Purbeck Planning at a Purbeck District Council meeting), West Dorset Council on the west. In effect there is nothing to Master Plan. This was exemplified at the EiP: Purbeck District Council was not invited to the EiP Crossways session (I asked the Pubeck Plan Review team). Moreton PC were not consulted or invited (I asked). East Devon District Council, however, was invited to the cross-border issues at Lyme Regis.

Name: Mr Andrew Elliott

Representing: Grainger plc, part of the North Dorchester Consortium **ID:** 648

Main Modification: MM63 & MM65

Representation: Grainger plc, part of the North Dorchester Consortium, objects to the proposed policy approach for Crossways as set out at length in pervious representations, statements and orally at the Local Plan Examination Hearings. The proposal to identify growth at Crossways instead of further development of the county town is not a logical or sustainable choice. The proposed policy CRS2 suggests that cross-boundary work to consider the acceptability of growth at Crossways will be undertaken in future, notwithstanding that policy CRS1 is already proposing the allocation of growth to the village. As drafted, the current policy approach 'puts the cart before the horse', allocating a site before the planning, design and environmental justification is in place to support it. The wording of policy CRS2 is only credible in isolation if the policy CRS1 site allocation is deleted. Full co-ordination through joint master planning work should take place before any site or sites are considered for development purposes in this location.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM64

Representation: MM62 and MM64 confirm that the inclusion of Site B at Crossways within Policy CRS1 contradicts national and local planning policy. The Councils' have continually failed to give special consideration to the Site B development impact on a Scheduled Ancient Monument. Main Modifications 62 and 64 seek to introduce significant heritage changes in an attempt to mitigate earlier plan-making shortcomings. Fundamental questions over the deliverability of 500 dwellings on the Site B site at Crossways remain. As previously set out within our representations the Woodford Farms should be allocated within the Local Plan as these sites are deliverable and developable. There are no heritage issues associated with any of the Woodford Farms sites. (SEE ADDITIONAL DOCUMENT)

Name: Mrs Kate Allsopp

Representing: Crossways Parish Council **ID:** 566

Main Modification: MM65

Representation: Crossways Parish Council is shown as 'Crossways Town Council', please amend this to Crossways Parish Council.

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: MM65

Representation: MM65 as currently drafted lacks clarity for local residents, developers and landowners on what the Councils' are committing to in terms of timescale and process. To provide certainty to local residents, landowners and developers and infrastructure providers any review process should be completed by 2017. However, in light of the Purbeck Local Plan partial Review, which includes significant potential growth at Moreton station, Policy CRS1 and MM65 should be deleted in favour of a new Crossways and wider area policy which commits to putting in place a Crossways and Moreton joint development plan document along the Purbeck Local Plan Partial Review timetable. This joint document would enable a comprehensive masterplan led approach. (SEE ADDITIONAL DOCUMENT)

Name: Mr Steve Tapscott

Representing: Purbeck District Council **ID:** 3852

Main Modification: MM65

Representation: Further to email correspondence between WDWP and PDC officers on 27/03/15, PDC understands that DCC have suggested a further modification to MM65. DDC's concerns appear to be around committing third parties to evidence gathering. PDC agree with DCC's proposed wording because it will still allow for solutions to be fully understood and explored. For the avoidance of doubt, the agreed wording is: i) The district council will work with

Purbeck District Council, Crossways Town Council adjoining Parish Councils, Dorset County Council and Network Rail to ensure that over the long term, the most appropriate solutions to meeting needs are fully understood and explored and thereafter expressed in future planning policy documents, including master planning work. PDC only have one minor additional comment on the above, which is that it understands Crossways is a parish, rather than a town. WDWP councils may wish to consider consistency with MM78, which commits third parties to evidence gathering.

Name: Mrs Gill Smith

Representing: Dorset County Council **ID:** 544

Main Modification: MM65

Representation: Dorset County Council is concerned that, as currently worded the commitment in the policy to “undertake joint evidence gathering” may commit the County Council to the provision of new evidence (such as traffic counts) which could have resource implications. DCC is willing to work with the other parties and supply evidence which it already holds but would expect any additional evidence gathering needed to support any development proposals to be funded by the developer/ landowner. We also question whether the solution should meet needs in general rather than those of both authorities. Revised wording is proposed to clarify these points. Proposed revised wording of New Policy CRS2: The district council will work with Purbeck District Council, Crossways Town Council adjoining Parish Councils, Dorset County Council and Network Rail to undertake joint evidence gathering, including on constraints to ensure that over the long term, the most appropriate solutions to meeting the needs of both authorities are fully understood and explored and thereafter expressed in future planning policy documents, including master planning work.

Summary of Main Issues Chapter 13, Bridport – MM66-MM75

Name: Mr Gavin Fryer

Representing: **ID:** 4002

Main Modification: MM66

Representation: (SUMMARISED) 1) Suggests an overall plan to construct over 760 houses on the Vearse Farm Site of which a significant proportion are destined for affordable housing is too large for Bridport to support; this suggests 1800-2000 extra people added to a town population of c.11,000, approaching 20% extra. 2) The Vearse Farm site was the subject of a visual presentation at Bridport Town Hall on Monday 9th March 2015. None of the several consultants with whom I spoke had ever walked the streets to be involved in entry and exit of people envisaged to live on the development. None were aware of the problems with traffic along B3162 through West Allington. No consideration appears to have been given to the implications of routing business, residential and service traffic from the development in and out of the Vearse Farm site into West Allington. 3) Consultants seemed unaware of flooding on the Vearse Farm site in three of recent years or the depth of water involved. 4) The costs of preparing the Vearse Farm Site to provide fully effective flood prevention measures, over and beyond attenuation ponds and swales, do not appear to have taken these factors properly into account. 5) The public have not seen any publicly available arguments for and against this site, given the risks involved. Too many discussions appear to have been conducted behind close doors, and then with invited parties, not by way of proper public consultation. 6) The traffic risks in West Allington (List in rep). 7) In view of the traffic risks, traffic certainly should not be directed into Brisport town centre along West Allington.

Name: Mr Tim Hoskinson

Representing: Hallam Land Management **ID:** 7

Main Modification: MM66

Representation: The proposed rate of delivery at Vearse Farm of in the region of 100 homes a year is supported. This is considered a reasonable and realistic estimate which reflects the developer's intentions for the site and is in line with the Housing Delivery Review prepared by BPB Paribas. Hallam Land Management has recently undertaken a public consultation event setting out proposals for the site (the event was held on 9 March in Bridport Town Hall). Feedback from the consultation will inform the planning application which is currently being prepared in line with the timetable set out at the Examination hearing session.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM66

Representation: The increase in numbers is not supported. It is understood that the Council's numbers in the SHLAA were 60 units in the first year and the figures in the BNP Housing Delivery Review also do not equate to 100 in the first year. The Town Council has previously stated that there is a need to assess local demand for housing through the Neighbourhood Plan and allow the Neighbourhood Plan to determine the best location for housing and numbers on each site. Previous concerns have also been expressed on the need for infrastructure improvements to be in place, before any housing is considered for this site and the increase in numbers will further increase pressure on the local infrastructure.

Name: Mr Charles Wild

Representing: Bridport Environment Group **ID:** 534

Main Modification: MM66

Representation: The increase in housing numbers is not supported. The Bridport Environment Group has previously stated its view that the proposal for Vearse Farm is contrary to NPPF policy 116, which states that major development in AONBs should be refused except in exceptional circumstances. These circumstances are not satisfied, in that the proposed housing numbers are not based on objectively assessed local need, but on the district council's need to meet centrally imposed targets for the district as a whole, and Bridport having to "take its share" (which is a questionable planning consideration). We believe the proposal fails the conditions for major development in the AONB, and if approved is liable to render statutory protection worthless. Others have raised valid points about the infrastructure concerns raised by the proposal, from roads to health services, which are shared by the Bridport Environment Group.

Name: Mr Barry Bates

Representing: **ID:** 3504

Main Modification: MM66

Representation: The number of houses proposed each year has increased to 100. Over a 10 year period this now equates to 1000 houses. No justification has been given as to why this has been increased other than the fact the developer thinks they can deliver. ADVEARSE has consistently argued that Bridport does not need development on this scale and that WDDC has given no justification for this. At the Inspectors Enquiry we gave many reasons why the site is inappropriate. Taylor Wimpey in their submission highlighted queries about the feasibility of the scheme. I find it astonishing that all arguments about reducing the scale of development have been ignored and the MM actually increases the rate of development. This development remains all about speculative building and nothing to do with local needs.

Name: Ms Sarah Horniman

Representing: ID: 2519

Main Modification: MM66

Representation: I object to the increase in the number of houses per year from 50-80 to 100 at Vearse Farm. It will: Compound the problem of too many new houses in Bridport AONB and effects on infrastructure; Don't specify where they will go - Tim Hoskins of Savils told me no plan to put them on Vearse Farm site - so not proper consultation; Wessex water still assessing foul drainage implications; Heating network should have been planned at this stage of outlining plan - no thought has been given to this and I understand from a Savil's consultant is'nt in developers brief from WDDC (?!) so 240 more houses increasing carbon output contrary NPPF.

Name: Mr Tim Hoskinson

Representing: Hallam Land Management ID: 7

Main Modification: MM67

Representation: As currently drafted, proposed modification MM67 suggests that the proposed new school site at Vearse Farm is a replacement for existing school provision in the area. This is not the case, no decisions have been made in relation to existing school provision in the area, which is under review. The new school at Vearse Farm could be provided in addition to existing school provision in the area. Paragraph 13.2.2 and MM67 should therefore be further amended to accurately reflect the advice from Dorset County Council's education team as set out in their note on Matter Education Provision in Bridport (document ref WDWP/Ex08) submitted after the Examination hearing session on Matter 11, which states: 'In order to respond these birthrates and to the new housing, Dorset County Council has identified the need for a minimum of 1 additional form of entry in the town with the capacity to further extend to another 1FE if required in the future. To this end DCC identified the need for a new school site on the Vearse Farm development – which could either be a new school or an enlarged replacement for an existing school.' This could be achieved by the following change to paragraph 13.2.2: '13.2.2. As such, a new replacement primary school site with capacity for up to two forms of entry will need to be included in the urban extension....'

Name: Ms Sarah Horniman

Representing: ID: 2519

Main Modification: MM67

Representation: Reduction of school size at Vearse Farm to two form entry rather than three is an improvement and more in keeping with the area's culture. However this is still likely to limit choice by threatening viability of St Mary's and Symondsburry schools. The playing field area at St Mary's is large, comparing favourably to that of larger schools. The school is also next to Leisure Centre playing fields. No study to see if drainage can be improved at St Mary's. Expand St Mary's school instead.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM68

Representation: The inclusion of comments from English Heritage is welcomed and comments should also be sought and included from the Dorset Area of Outstanding Natural Beauty.

Name: Mr Tim Hoskinson

Representing: Hallam Land Management **ID:** 7

Main Modification: MM69

Representation: The proposed modifications to Policy BRID1 are supported. For clarity, the reference in criterion i) to a two-form entry primary school should be supported by additional text at paragraph 13.2.2 as set out in our comments on MM67. The proposed rate of delivery at Vearse Farm of in the region of 100 homes a year set out in criterion ii) is supported. This is considered a reasonable and realistic estimate which reflects the developer's intentions for the site and is in line with the Housing Delivery Review prepared by BPB Paribas. The amendment to criterion viii) to confirm the role of the developer in preparing the masterplan for the site is welcomed. Hallam Land Management has recently undertaken a public consultation event setting out initial proposals for the Vearse Farm site (the event was held on 9 March in Bridport Town Hall). Feedback from the consultation will inform the planning application which is currently being prepared in line with the timetable set out at the Examination hearing session.

Name: Mr Gavin Fryer

Representing: **ID:** 4002

Main Modification: MM69

Representation: (SUMMARISED) 1) So large a development as 760 houses on the Vearse Farm site would tend to unbalance the working and residential activities of Bridport. 2) There is no argued case for adding significant employment opportunities on this scale for Bridport where employment is pretty full. 3) In preference to Vearse Farm, the St Michael's Trading estate, for example, could provide scope for sympathetic development of work units in and around existing buildings and provide the needed extra employment in Bridport. 4) It appears to have been presumed that residents on the Vearse Farm site who need work would travel by road to employment elsewhere than in Bridport (See MM 66 REP). 5) See MM 55 REP. 6) 7) 8) 9) SEE REP. 10) The magnitude of the proposed addition of 760 houses at Vearse Farm and more houses at other sites around the town risk damage to tourism, light industry and local amenities. Refer to comment on MM66. 11) In summer the B3162 already feeds significant traffic into the town of Bridport. Tourist visitors add to already heavily used car parks so that moving vehicles are even now filling the streets to capacity and beyond. Adding 760 houses in a

single development would be expected to lead to traffic jams. In such circumstances, the delicate balance that nurtures tourism in the town could be damaged. 12) Local traders have told us that on Friday afternoons they do not dare to send a representative to customers any distance from their workplace in case the high level of traffic on Friday makes such visits totally wasted, and return to base, as it were, virtually counter-productive.

Name: Mr Richard Freer

Representing: **ID:** 3508

Main Modification: MM69

Representation: BRID1 ii) - The number of houses proposed each year has increased to 100. Over a 10 year period this now equates to 1000 houses. I understand from meeting with the potential developer, Hallam Land Group that they intend building only 760 dwellings. This was discussed with their representative Tim Hoskinson (Savills) at a consultation in Bridport on the 9th March 2015. What is the justification of this increase please? BRID1 viii) - This infers to me that only West Dorset District Council agreed to this plan, and the remaining bodies not part of the decision process!? Is that democratic?

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM69

Representation: BRID1 ii) - I object to the increase in the number of houses per year from 50-80 to 100 at Vearse Farm. It will: Compound the problem of too many new houses in Bridport AONB and effects on infrastructure; Don't specify where they will go - Tim Hoskins of Savills told me no plan to put them on Vearse Farm site - so not proper consultation; Wessex water still assessing foul drainage implications; Heating network should have been planned at this stage of outlining plan - no thought has been given to this and I understand from a Savil's consultant is'nt in developers brief from WDDC (!) so 240 more houses increasing carbon output contrary NPPF.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM69

Representation: BRID1 i) - Reduction of school size at Vearse Farm to two form entry rather than three is an improvement and more in keeping with the area's culture. However this is still likely to limit choice by threatening viability of St Mary's and Symondsburry schools. The playing field area at St Mary's is large, comparing favourably to that of larger schools. The school is also

next to Leisure Centre playing fields. No study to see if drainage can be improved at St Mary's. Expand St Mary's school instead.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM70

Representation: St Mary's School should not be closed as it is considered important to retain for its catchment area. Options to expand the school, if Vearse Farm goes ahead, should be looked at. The site of the school is within an important leisure and green corridor with St Mary's, Football Club etc. and there is a need for additional pitches and playing space. This site must be protected for leisure and recreational purposes.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM71

Representation: As stated in its response on MM70, the Town Council would oppose any development on this site. It was also understood that the Children's Centre was to be retained by the County Council as important Social Services provision in the area. The future of this building needed to be clarified.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM72

Representation: The comments from English Heritage are welcomed.

Name: Ms Sarah Horniman

Representing: **ID:** 2519

Main Modification: MM72

Representation: Whilst I see the wording of this modification as an improvement, I would like to see the words 'exploit existing opportunities' deleted to strengthen the statement so it reads: exploit opportunities to enlarge the existing buffer and provide high quality green infrastructure along the river corridor. I welcome the wording re protecting the heritage asset and ancient right of way.

Name: Mr Gavin Fryer

Representing: ID: 4002

Main Modification: MM72

Representation: 1) The need for corridor for wildlife is seen to be necessary in the Asker river watercourse. 2) Wildlife should not be compromised in the Brit and Symene watercourses either. 3) As regards the Symene, that watercourse runs along the site proposed to be developed at Vearse Farm. So this consideration should be highlighted in respect of MM66 and associated paragraphs. 4) Should any development occur at Vearse Farm, and having regard to the projected 760 houses, maybe more, some 1800-2000 additional people could be 'thrown at' the Symene watercourse by such development. This huge number of new residents would necessitate retention of existing vegetation, some older, plus added trees and bushes and appropriate planting along the river bank to allow wildlife to live in safety within a corridor of more than adequate width for their safety. 5) Without maintenance and promotion of wildlife activity the quality of life for residents would be poorer. 6) Any development must be advised of this necessity in early stages of planning.

Name: Mr John Stobart

Representing: Natural England ID: 782

Main Modification: MM72

Representation: Natural England is supportive of the proposed modification to paragraph 13.3.1.

Name: Mr John Stobart

Representing: Natural England ID: 782

Main Modification: MM73

Representation: Natural England is supportive of the proposed modification to BRID 3 ii).

Name: Ms Sarah Horniman

Representing: ID: 2519

Main Modification: MM74

Representation: I welcome the amendment to this section.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM74

Representation: Natural England is supportive of the proposed modifications to Para 13.5.2 and BRID 5. i) Fifth Bullet Point.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: MM75

Representation: Natural England is supportive of the proposed modifications to Para 13.5.2 and BRID 5. i) Fifth Bullet Point.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Main Modification: MM75

Representation: Support the provision of the wildlife corridor.

Summary of Main Issues Chapter 15, Lyme Regis – MM76-MM78

Name: Mr Tim Hoskinson

Representing: Pinhay Estate **ID:** 3542

Main Modification: MM76

Representation: The last sentence of the proposed text for paragraph 15.3.1 does not present an accurate picture of the housing needs and issues facing Lyme Regis. There is a clear need for housing at Lyme Regis that will not be met though the emerging Local Plan. This raises cross boundary issues between West Dorset District Council and East Devon District Council that have not been adequately dealt with in the plan-making process to date. It is imperative that the modifications to the plan recognise these issues and set out a firm way forward that commits both Councils to a well defined action plan. Housing needs in the Lyme Regis area are particularly acute, and straddle the administrative boundaries. This includes a current and urgent need for affordable housing. In Lyme Regis between 2006/07 and 2011/12 affordable housing delivery averaged just 3 dwellings per annum against an objectively assessed need for 15 per annum, resulting in an accumulated backlog of some 70 affordable dwellings against a target provision of 90 over the same period. In West Dorset there are around 2,645 applicants on the Housing Register, of which 190 have expressed a preference for Lyme Regis, whilst in East Devon there are around 2,841 applicants in housing need on the Housing Register. In addition, the October 2014 Parish Housing Needs Survey identified a further need for an additional seven affordable dwellings in Uplyme Parish. The modifications to paragraph 15.3.1 state that there has not been a formal local housing and employment needs assessment, but acknowledge that there is a local expression of need. This is a failure in the evidence base which needs to be addressed in current and future plan making. At the very least, the emerging Local Plan should include a clear commitment and timescale for undertaking this work. The last part of the last sentence of paragraph 15.3.1 refers to the emerging East Devon Local Plan, however the Inspector dealing with this plan has identified serious issues with its soundness for various reasons including a failure to consider cross boundary issues at Uplyme and Lyme Regis. It is unsound to base the approach of the West Dorset Local Plan on the provisions of the emerging East Devon Local Plan which is in itself unsound in its current form. The last part of the proposed modifications to paragraph 15.3.1 should be deleted as follows: '... though at Uplyme, as set out in the emerging East Devon Local Plan, local aspirations for development are modest.'

Name: Mr Peter Coe

Representing: Lyme Society **ID:** 4008

Main Modification: MM76 & MM77

Representation: The Lyme Society is concerned with apparent inconsistencies in the revised West Dorset District Plan. Lyme Regis is a major tourist attraction on the Jurassic Coast within the World Heritage Site. There are significant proposals for developments which are well known to West Dorset District Council. The revised plan fails to take into account these developments and in particular the implications of a substantial increase in the local population. The proposals for housing do not allow for the already urgent requirements for low cost / social housing for

both young people as well as those earning the minimum wage. The plan does not moreover set out how infrastructure of the town will be able to support the present population without denigrating the attractions of the conservation area or surrounding green belt. The proposals in East Devon are possibly critical to this and are not mentioned. (See Seperate Document)

Name: Mr Tim Hoskinson

Representing: Pinhay Estate **ID:** 3542

Main Modification: MM77

Representation: The last part of paragraph 15.3.2 states that Lyme Regis and Uplyme are considered to be suitable only for limited local growth, rather than strategic or significant growth. It is unclear what is meant by this or how it can be justified. In particular, the references to 'limited local growth' and 'strategic or significant growth' are not defined, difficult to interpret, and potentially conflicting. The reference to local needs is potentially misleading as people have been forced to move away from the area due to affordability issues. In short, provision needs to be made for the needs arising from the town and contiguous parishes. The preceding sentence of paragraph 15.3.2 explains that further work is needed to fully understand the local needs of Lyme Regis and Uplyme and identify the most appropriate solutions to meeting these needs. This further work should be used to guide the nature of future development patterns at Lyme Regis, with a clear commitment and timescale for undertaking this work. The joint work on options for growth around Lyme Regis referred to in the Duty to Cooperate Statement on Cross Boundary Issues at Uplyme / Lyme Regis (CD/CON20) has only considered SHLAA sites in Lyme Regis and Uplyme insofar as they relate to landscape, and has not factored in wider sustainability considerations. Furthermore, the land to the north of Sidmouth Road (E324) has not taken account of the potential for a scheme based on the eastern field adjoining Lyme Regis to deliver a modest development. The opportunity exists for development in only the field contiguous with the western boundary of the town rather (than all three fields) to provide a more modest level of development coupled with local improvements / planting to the park and ride site. The accompanying site location plan submitted alongside these representations shows a reduced site area which with well-designed locally distinct new homes, attractive streets and greenspace located within an appropriate and sensitive landscape framework, would be appropriate within the landscape context. In the absence of an adequate programme of joint working between East Devon and West Dorset that is needed to clearly identify and address the future growth needs at Lyme Regis, the last sentence of paragraph 15.3.2 should be deleted as follows: In terms of future development patterns, Lyme Regis and Uplyme are considered to be suitable only for limited local growth, rather than strategic or significant growth.

Name: Mr Tim Hoskinson

Representing: Pinhay Estate **ID:** 3542

Main Modification: MM78

Representation: There is an acute need for housing at Lyme Regis that will not be met through the emerging Local Plan. This was acknowledged in the pre-submission Draft Local Plan published in June 2012, and is clear in the evidence base. Over the last 36 months the issue has continued to worsen, but the opportunity to address this problem has not been taken. When it has come to tackling this issue the authorities have failed to demonstrate adequate resolve to complete the task; without firm commitment from both authorities, it has proved too difficult to address positively, leaving the same problem as identified at the start of the plan making process and with no clear path to its resolution. It is imperative that the modifications to the plan recognise the issue and set out a clear way forward that commits West Dorset and East Devon councils to work together to an agreed timetable to expedite the identification and delivery of a solution to address the growth needs and aspirations of Lyme Regis. The following working to Policy LYME2 is suggested: The district council will work with East Devon District Council, Lyme Regis Town Council and Uplyme Parish Council to identify and bring forward proposals of an appropriate scale to support the growth needs of Lyme Regis and Uplyme. In light of the acute and urgent need, this work should be undertaken in the next 18 months.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no further comment on the proposed modifications to chapters 15 – 18. We would however note our outstanding concerns relating to Policy DOR10.

Summary of Main Issues Chapter 17, Glossary – MM79-MM80

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no further comment on the proposed modifications to chapters 15 – 18. We would however note our outstanding concerns relating to Policy DOR10.

Summary of Main Issues Chapter 18, Maps – MM81-83

Name: Mr Raymond Bulpit

Representing: Casterbridge Property Developments Limited **ID:** 45

Main Modification: MM81

Representation: As lead consultants for the proposed Trunk Road Service Area and Park & Ride development we welcome and are pleased to support the suggested extension of the development boundary as illustrated on the relevant plan. The footnote on that plan is also noted.

Name: Mr John Stobart

Representing: Natural England **ID:** 782

Main Modification: N/A

Representation: Natural England has no further comment on the proposed modifications to chapters 15 – 18. We would however note our outstanding concerns relating to Policy DOR10.

Summary of Main Issues – General

Name: Mr Adrian Stuart

Representing: Dorchester Town Council **ID:** 2516

Main Modification: N/A

Representation: The Town Council has noted the main modifications to the West Dorset, Weymouth & Portland Local Plan and has no specific comments to add.

Name: Mr Rohan Torkildsen

Representing: English Heritage (Historic England) **ID:** 591

Main Modification: N/A

Representation: Historic England welcomes those changes made which reflect the EH/WD,W&P Statement of Common Ground (SOCG 3 November 2014). However we note that the agreed modification to paragraph 14.2.2 (Land to the North of Broadwindsor Road) is absent.

Name: Mr Gary Parsons

Representing: Sport England **ID:** 836

Main Modification: N/A

Representation: No comment(s) to make at this time.

Name: Mr Gaynor Gallacher

Representing: Highways Agency **ID:** 659

Main Modification: N/A

Representation: We have reviewed the changes in relation to their potential impact on the strategic road network, particularly those changes affecting proposals at Dorchester, Bridport and Weymouth, and have no additional comments to make.

Name: Ms Angela Gemmill

Representing: Marine Management Organisation **ID:** 3501

Main Modification: N/A

Representation: I can confirm that the MMO has no comments to submit in relation to this consultation.

Name: Mrs J.A. Tubridy

Representing: Netherbury Parish Council **ID:** 4016

Main Modification: N/A

Representation: The modifications were discussed at the recent meeting. It was decided that anything which improves the housing and work prospects for young people should be supported.

Summary of Main Issues – Sustainability Appraisal

Name: Mrs Sarah Hamilton-Foyn

Representing: Pegasus on behalf of Persimmon Homes **ID:** 797

Main Modification: Sustainability Appraisal

Representation: The SA does not take consider the changes made in respect of MM 60 as the Council consider that this change does not represent a considerable change in the direction or approach towards the policy area. However, it is considered that this does represent a considerable change as the plan is now saying that there are sufficient development sites in Dorchester to 2031 (with the assistance of development proposed at Crossways) whereas previously in the plan it had acknowledged that only the needs of the early part of the plan period could be met and fell short of meeting the needs towards the end of the plan period, in which case further investigations were proposed in the plan area post 2026.

Name: Mrs Susan Cheesman

Representing: **ID:** 4011

Main Modification: Sustainability Appraisal

Representation: There is nothing in place to sustain these homes (CHIC 2) and the families that they will generate. The existing town will only suffer as a consequence.

Name: Mr John Preston

Representing: **ID:** 4006

Main Modification: Sustainability Appraisal

Representation: Verse Farm - Flood proposal defence measures not explained fully with regard to ongoing maintenance.

Name: Mr Andrew Elliott

Representing: Grainger plc, part of the North Dorchester Consortium **ID:** 648

Main Modification: Sustainability Appraisal

Representation: The sustainability appraisal still fails to consider the sustainability merits of growth at Dorchester versus growth at Crossways. The North Dorchester option has not been considered fully as part of a positive planning approach.

Name: Mrs Tina Golden

Representing: **ID:** 4013

Main Modification: Sustainability Appraisal

Representation: We need affordable housing, we need social housing, we need more services, if Vearse Farm is to be built in some form, we need a community/cultural centre, we will need more roads, sewage and a larger medical centre, we will need the youth centre to be supported and properly funded and we need to ensure that the reason why people want to come and live here which is the beauty of the surrounding area, the rich culture and arts centres and theatres, the market and the local shops are guarded. May I just add to this that our local doctor's surgeries and the community hospital are already heavily subscribed with local elderly people as well as the rest of us. As social services are being cut to bring in hundreds more pensioners is going to create an unsustainable burden on what already exists in this area. We have just heard the rumour that the Tory led DCC are now considering closing Dorchester hospital to save money. This all just adds up to a complete lack of thorough thinking and planning and just looks like an add on without concern and without serving the people.

Name: Mrs Rosie Allsop

Representing: **ID:** 4001

Main Modification: Sustainability Appraisal

Representation: The development does not tick all the boxes including affordable housing provision. A new dedicated web sit has just been launched dealing with all these issues and would be well worth a read.

Name: Mr Andrew Elliott

Representing: Grainger plc, part of the North Dorchester Consortium **ID:** 648

Main Modification: Sustainability Appraisal

Representation: The sustainability appraisal still fails to consider the sustainability merits of growth at Dorchester versus growth at Crossways. The North Dorchester option has not been considered fully as part of a positive planning approach.

Name: Mr Andrew Elliott

Representing: Grainger plc, part of the North Dorchester Consortium **ID:** 648

Main Modification: Sustainability Appraisal

Representation: The sustainability appraisal still fails to consider the sustainability merits of growth at Dorchester versus growth at Crossways. The North Dorchester option has not been considered fully as part of a positive planning approach.

Name: Mrs Kate Allsopp

Representing: Crossways Parish Council **ID:** 566

Main Modification: Sustainability Appraisal

Representation: On page 289 it still states "Approximately 7.2ha of land reserved for employment uses..." and "the provision of 1,200 to 1,500 new homes". These need to be corrected to the reduced area of land for employment use (3.5ha) and the provision of 500 new homes.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estates **ID:** 261

Main Modification: Sustainability Appraisal

Representation: The updated SA has not tested the reasonable alternative of allocating more land against the Council's proposed strategy of meeting the additional 2,325 dwellings through greater reliance on SHLAA sites and windfall sources. Given the context, there are clear merits of allocating more land on sustainable sites (such as the extended Barton Farm land) that can provide certainty of delivery and a significant contribution to meeting affordable housing needs (particularly acute in Sherborne). Without this reasonable alternative being tested in the SA, we contend that the Council's strategy does not meet the NPPF's positively prepared or justified tests of soundness.

Name: Mr James Bennett

Representing: **ID:** 4014

Main Modification: Sustainability Appraisal

Representation: It should be noted that the appraisal states a "strongly negative effect upon biodiversity and habitats", "landscape impacts" and "the loss of agricultural land and habitats" which furthers the need for policy safeguarding greenfield sites outside of the Defined Development Boundary. (Chickerell)

Name: Mr Malcolm Hill

Representing: **ID:** 677

Main Modification: Sustainability Appraisal

Representation: SUMMARISED - The Sustainability Appraisal contains some good planning principles. The problem is that they are either frequently ignored or the evidence is bent to suit

CONSULTATION SUMMARY West Dorset, Weymouth and Portland Draft Local Plan, April 2015

a desired objective. I could illustrate numerous other examples throughout the entire Sustainability Report, including the update, where the report's sustainability principles are either ignored or perversely interpreted. Whilst it is a government requirement to produce a Sustainability Appraisal it would appear that its principles are often applied illogically. (PLEASE SEE FURTHER REP)

Name: Mr Dominick Veasey

Representing: Nexus Planning Limited **ID:** 933

Main Modification: Sustainability Appraisal

Representation: As repeatedly set out within our representations and examination statements and also stated on numerous occasions throughout the examinations sessions the Sustainability Appraisal for Policy CRS1 is in clear breach of the SEA Directive and SEA Regulations. As such, it is unlawful and these breaches are fatal to the legality of the Local Plan. It is therefore regrettable that the Councils' Main Modifications Sustainability Appraisal has failed to address these breaches. The Councils should withdraw the Local Plan and Sustainability Appraisal to rectify the legal and soundness failings. Please also refer to paragraph 4 of our representation to MM64.

Name: Mr Raymond Bulpit

Representing: Casterbridge Property Developments Limited **ID:** 45

Main Modification: Sustainability Appraisal

Representation: M Mod 5 - WDWP Local Plan Sustainability Appraisal Update: Pages 89, 92, 189, 287 and 345 and M Mod 6 - WDWP Local Plan Sustainability Appraisal Non-technical Summary: Page 34. For the sake of consistency all references to Park and Ride should also include reference to 'Trunk Road Service Area'.

Appendix A: List of respondents by name/organisation (ID)

T. Allsop	4000	Greene	650
R. Allsop	4001	Hallam Land Management	7
Bates	3504	Headlam	661
Beaminster Town Council	639	Highways Agency	659
Bennett	4014	Hill	677
Bridport Environment Group	534	Home Builders Federation (HBF)	3840
Bridport Town Council	641	Horniman	2519
Budden	4004	Leppard	3533
Burton Bradstock Parish Council	955	Littlemoor Development Consortium	724
C G Fry & Son Ltd - David Lohfink	526	Loder	4012
Casterbridge Property Developments Limited	45	Loosemore	1036
Catesby Property Group	3842	Lyme Society	4008
Cheesman	4011	Marine Management Organisation	3501
Chickerell Town Council	583	Mathisen	4009
Cooke	75	Natural England	782
Crossways Parish Council	566	Netherbury Parish Council	4016
Dommett	1614	Nexus Planning Limited	933
Dorchester Civic Society	611	Pegasus on behalf of Persimmon Homes	797
Dorchester Town Council	2516	Pinhay Estate	3542
Dorset AONB Partnership	510	Preston	4006
Dorset County Council	544	Purbeck District Council	3852
Ellis	4003	Sherborne Castle Estates	261
English Heritage (Historic England)	591	Sherborne Town Council	877
Freer	3508	Sport England	836
Fryer	4002	SW HARP Planning Consortium	884
George	4005	The Ernest Cook Trust	584
Gladman Developments	3846	The Theatres Trust	4007
R. Golden	4010	Wells	413
T. Golden	4013	Weymouth Civic Society	914
Grainger plc, part of the North Dorchester Consortium	648	Wilberforce	4015
		Woodland Trust	240

Appendix B: Responses to Household Projections Consultation

Name: Mrs Sarah Hamilton-Foyn

Representing: Persimmon Homes South Coast **ID:** 797

Household Projection

Representation: The 2012 Based Household Projections were published by the Department for Communities and Local Government on 27th February 2015. These project the number of households for each Local Authority from mid-2012 to mid-2037.

When comparing the 2012 Based Household Projections to the earlier 2011 Based Household Projections, a slower rate of growth has been projected, in the main. The projections however, should be treated with caution as they are informed by recent trends covering a period of severe recession, which resulted in limited economic growth, low levels of house building and suppressed rates of household formation.

The National Planning Policy Framework (NPPF) requires Local Planning Authorities to have an understanding of their needs, which meets household and population change. Planning Practice Guidance sets out that household projections 'provide the starting point estimate of overall housing need' and that these may require adjustment to reflect factors affecting local demography and household formation rates (ID 2a-015-20140306). Other factors such as economic forecasts, worsening trends in market signals and affordable housing needs should also be considered which may necessitate an upward adjustment above demographic projections (ID 2a-018-20140306, 2a-019-20140306 and 2a-020-20140306).

The PPG states at paragraph 2a-016-20150227 that further analysis of the household formation rates as revealed by the 2011 Census will continue during 2015.

"Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued."

Whilst the 2012 based household projections are indicating a lower level of household growth, with an average additional 506 households per annum from 2011 to 2031 in West Dorset, Weymouth and Portland these are again recessionary based. Applying the same ratio of households to dwellings, this equates to an additional 11,175 dwellings over this period. The new projections therefore indicate less additional households will form if recent trends continue, and therefore approximately 1,450 fewer dwellings will be required. This is however largely based on the 2012 based projections indicating much smaller population growth.

However, the limitations of the 2012 based household projections are well documented in particular they include:

- The extent to which they are influenced by the historical period from which they project forward future need. The 2012 projections are influenced by a once in a generation recession and sustained economic and housing market downturn. This will have a moderating effect on the new projections.

- The projections are a demographic starting point. They do not reflect the full requirements of the PPG and are therefore not a substitute for a full and objectively assessed housing need.

The PPG requires an evidence based assessment of market and economic signals to confirm the need to uplift projections of need from the demographic starting point provided by the 2012 SNHP.

The 2012 based projections are recessionary based, replicating trends from 2007 to 2012. Indeed, given that the recession struck in 2008, the new projections can be seen to reflect recessionary trends to a greater degree than the 2011 based interim projections which replicated trends from 2006 to 2011. As such, similar adjustments are required to the 2012 based projections in order that they reflect a more balanced economy in the future. Housing shortages over the last two decades and poor housing affordability have restricted the ability of many young people to form independent households. Therefore such projections under-estimate future requirements by building into future housing provision the adverse impacts on household formation of past undersupply and very weak economic and market conditions between 2008 and 2012.

Births - Despite the marked difference in the number of births between the two projections, this will not significantly affect the number of dwellings required as these persons will not be in household forming ages by 2031.

Migration - The 2008 based projections, which are more representative of a balanced economy, indicate that over the period 2011 to 2031 there would be 27,200 net additional migrants to West Dorset, Weymouth and Portland, if trends continued. However, the corresponding figures from the 2011 interim and 2012 based projections are 21,400 and 22,600 respectively. In order to reflect positive planning and reflect a more balanced economy, an upward adjustment to allow for migration is still required.

Headship Rates - The headship rates within the 2012 projections are even more aligned to recessionary rates than those in the 2011 based interim projections (although there may be some variation for specific cohorts). Given that the 2012 based projections are recessionary based; it would suggest that in order to model a balanced economy, a blended approach should be used as previously suggested.

Once these factors are considered and appropriately addressed it will have minimal, if any, effect to the demographic need.

The previous representations from Pegasus Group identify and address issues with the way in which the economic need has been calculated. These objections remain and relate to the methodology that was applied rather than the inputs. The 2012 projections therefore do not affect the strength of these objections, and their effect on the resulting objectively assessed need.

Name: Mr Christopher Burton

Representing: South West HARP Planning Consortium **ID:** 884

Household Projection

Representation: We support the measures for a Plan review by 2021, or before that date should monitoring indicators trigger the need for an earlier review. We would encourage the addition of additional monitoring indicators for example:

- monitoring the number of sites which fail to deliver the Local Plan affordable percentage targets;
- second home and vacant property levels;
- market indicators, for example lower quartile entry levels for market purchase and private rent;
- significant changes in employment delivery; and
- non-economic migration figures.

Name: Mr Dominick Veasey

Representing: Woodsford Farms **ID:** 933

Household Projection

Representation: The Councils' have not published any updated Local Plan housing requirement evidence that takes account of the 2012-based household projections. However, should such work become available we would welcome the opportunity to submit representations and/or attend any examination sessions.

Name: Mr Peter Dutton

Representing: Gladman Developments **ID:** 3846

Household Projection

Representation: Gladman welcome the opportunity to comment on the implications of the 2012 household projections for establishing West Dorset, Weymouth and Portland's housing needs, revealing a requirement to provide 506 dwellings per annum across the two authority areas. However, whilst these should form the starting point of an objective assessment of housing needs, it is clear that they should be used with some caution, as they may capture past changes in demography that may be overly influenced by local and national policy decisions and economic conditions. As the Planning Practice Guidance on Housing and Economic Development Needs Assessments makes clear, local planning authorities should consider whether there is a need to adjust these projections to take account of local circumstances, alongside wider factors that include meeting economic needs and addressing market signals of housing demand and supply.