



The Planning Inspectorate

Report to West Dorset, Weymouth and Portland Councils

by Paul Crysell BSc MSC MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE WEST DORSET, WEYMOUTH AND PORTLAND JOINT LOCAL PLAN

Document submitted for examination on 24 June 2013

Examination hearings held between 25 November and 9 December 2014

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Abbreviations Used in this Report

AA	Appropriate Assessment
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LP	Local Plan
MM	Main Modification
MS	Bournemouth, Dorset and Poole Minerals Strategy
OAN	Objectively assessed need
PPG	Planning Practice Guidance
prs	Private Rented Sector
RS	Regional Strategy
SA	Sustainability Appraisal
SANG	Suitable Alternative Natural Greenspace
SOCG	Statement of Common Ground
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SEP	Strategic Economic Plan
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SNPP	Sub-National Population Projections
SPD	Supplementary Planning Document

Non-Technical Summary

This report concludes that the West Dorset, Weymouth and Portland Joint Local Plan provides an appropriate basis for the planning of the District and Borough Councils providing a number of modifications are made to the Plan. The Councils have specifically requested me to recommend any modifications necessary to enable the plan to be adopted. The majority of the modifications were proposed by the Councils but I have amended detailed wording and/or added consequential modifications in the interests of soundness. I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Acknowledgement of the need for an early review of the Local Plan by 2021 to ensure provision of sufficient housing land for the remainder of the plan period;
- Changes to the level of housing provision and revision of the five year housing land supply position;
- As part of the review process identify a long-term strategy for development in the Dorchester area and reappraise housing provision in Sherborne;
- Remove reference to a Trunk Road Service Area as part of park and ride proposals at Dorchester.

Introduction

1. This report contains my assessment of the West Dorset, Weymouth and Portland Joint Local Plan (hereafter referred to as the Plan or LP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authorities have submitted what they consider to be a sound plan. The basis for my examination is the submitted draft plan (June 2013) [CD/SP2].
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**)¹. In accordance with section 20(7C) of the 2004 Act the Councils requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendices to this report.
4. The main modifications that are necessary for soundness relate to matters that were raised in written representations or discussed at the examination hearings. Following these discussions, the Councils prepared a schedule of proposed main modifications and carried out sustainability appraisal. This schedule has been subject to public consultation and I have taken account of the responses in coming to my conclusions in this report. As a result I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Background

5. Following an exploratory meeting held on 22 January 2014 the Councils requested² that I suspended the examination to allow further work to be undertaken on an objective assessment of housing need to inform the level of housing provision required during the plan period.
6. The results of this work led to changes being recommended to the Plan and a six week period of public consultation on further alterations took

¹ N.B. There are no main modifications under MM12, MM13, MM14 or MM45

² Letter of 13 March 2014 [CD/INSP11]

place between 31 July and 11 September 2014. Hearing sessions for the public examination were held between 25 November and 9 December 2014. A number of main modifications the Councils recommended were published, together with an updated Sustainability Appraisal. These were subject to consultation between 19 February and 8 April 2015. An additional period of consultation took place between 17 April and 29 May 2015 to allow for responses to a further modification which was not included in the original schedule.

Assessment of Duty to Cooperate

7. Section s20(5)(c) of the 2004 Act requires that I consider whether the Councils complied with any duty imposed on them by section 33A of the 2004 Act in relation to the preparation of their joint plan. The Councils contend that West Dorset (WD) and Weymouth and Portland (WP) share the same Housing Market Area (HMA) and there has been no suggestion to the contrary by other parties.
8. Nevertheless, a number of respondents felt that the Councils have not embraced the legislative provisions of the Duty to Cooperate because they failed to have regard to development needs at peripheral locations. Three areas where administrative boundaries influenced development options were highlighted; on the edge of Yeovil (South Somerset); at Lyme Regis which borders East Devon District; and at Crossways close to the Council's eastern boundary with Purbeck District. The Councils' position on this matter is set out in a statement [CD/CON12] and in a response to initial concerns I identified [CD/INSP15].
9. A joint approach to plan-making has been agreed by Weymouth and Portland and West Dorset Councils because of the geographical and functional relationship between the two authorities. The association has led to land in West Dorset being allocated which will meet some of the housing needs of Weymouth and Portland.
10. It is not unreasonable to suggest that peripheral areas of WD could offer opportunities for more effective plan-making if administrative boundaries were ignored because there is potential overlap with HMAs in adjacent authorities. However, discussions with neighbouring authorities and prescribed agencies have not led to formal cross-boundary proposals.
11. Development options within WD adjacent to Yeovil were investigated during the formative stages of the South Somerset Local Plan but not pursued. Similarly, the Inspector conducting the examination into Purbeck District's Core Strategy/Local Plan [CD/OCP9] made no explicit reference to meeting development needs on the common boundary with WD but recognised that opportunities for sustainable growth could emerge as WD were contemplating strategic growth in this area. Consequently, he saw potential benefits in identifying the infrastructure which would be required in Purbeck District if this location was a focus for future growth.
12. In recognition of this and the need for cross border cooperation at Crossways, the Councils accepted that further clarification would be

helpful [WDWP/Ex22]. A modification is therefore recommended acknowledging the partial review of the Purbeck Local Plan which is being undertaken and the need for a joint approach to implementing planning outcomes (**MM63**). In addition, a new policy (CRS 2) is proposed committing WD to explore future options for this cross-border area in conjunction with relevant organisations (**MM65**).

13. These changes have been criticised for placing undue emphasis on Crossways in preference to other development options. I consider these concerns are premature given the conclusions I reach later in this report. The modifications clarify the need for the two Councils to coordinate infrastructure needs as part of current LP proposals, to work together on the outcome of the Purbeck Partial Review for this area while also recognising that a joint approach is needed should growth in this location be seen as a longer-term option.
14. Discussions have taken place between the authorities on the western edge of WD where Lyme Regis merges with Uplyme, the neighbouring settlement in East Devon. The proximity of these settlements means development options might exist which could provide alternative planning outcomes for the area. The two Councils have jointly assessed development options while recognising that these are limited because of the location of both settlements in Areas of Outstanding Natural Beauty (AONB)³ and land stability and access issues.
15. The opportunity to explore matters further has not been pursued, in part because published advice from the Planning Advisory Service (June 2014) says HMA boundaries should not cut across local authority areas because of the difficulties this presents [CD/CON20]. Even so, I do not consider the close relationship between two parts of what can be viewed as the same settlement should be dismissed. It does not appear there was any reluctance on the part of WD to participate in cross-boundary working and the Councils have since agreed that a common approach should be adopted in pursuing future options for growth [WDWP/Ex21].
16. West Dorset Council has allocated land on the periphery of Lyme Regis for housing purposes which will contribute to the market and affordable housing needs of the local area. It is unclear whether additional sites in Uplyme could be made available and it is difficult to conclude that cross-boundary issues are so significant to warrant delaying adoption of the LP.
17. The duty to cooperate is not one which forces parties to agree but discussions during the Examination led to a position statement supporting future joint working between the Councils [WDWP/Ex21]. This is endorsed through modifications to the text and policy content of the LP (**MM76, MM77 and MM78**). I appreciate that this does not mean a common solution to meeting development needs will be reached but it provides formal recognition that administrative boundaries should not be an obstacle to more positive planning outcomes.

³ Uplyme lies within the East Devon AONB; Lyme Regis within the Dorset AONB

18. The needs of the Gypsy and Traveller community have been assessed as part of a County-wide study. This is intended to provide the basis for individual districts to make appropriate provision through collaboration on a Dorset-wide Gypsy, Traveller and Travelling Showpeople Site Allocations Plan. The latter has been the subject of consultation at various stages beginning with an initial Issues and Options Document in November 2011 [CD/HOUS5] and, more recently, an additional sites exercise in March 2015. The final Plan is intended to be in place by the end of 2016.
19. It is regrettable that the Site Allocations Plan has not been published by now but there is a reasonable prospect that the Councils will comply with national policy, set out in Planning Policy for Traveller Sites, regarding the identification of sites to meet locally set targets. It is imperative that they do so. In the short term, applications for Gypsy and Traveller sites in both WD and WP will be considered using existing national and local policy provisions as set out in **MM18**.
20. In the context of the joint LP it is evident that both WD and WP have been party to discussions and regular meetings with relevant organisations during Plan production. While some of these bodies have made representations there is no suggestion that these arise through a failure to cooperate. None of the neighbouring authorities have indicated that Plan proposals would adversely affect their development strategies and I do not agree with those who argue that the absence of tangible outcomes shows there has been a failure to engage appropriately. I am satisfied the Councils have complied with the Duty to Cooperate.

Assessment of Soundness

Preamble

21. The Local Development Scheme [CD/CON1] sets out the Councils' intention for a joint Local Plan and Dorset-wide Gypsy, Traveller and Travelling Showpeople Site Allocations Plan. Additional policy covering green infrastructure and coastal change will be prepared, together with Supplementary Planning Documents (SPD) including the Weymouth town centre masterplan and guidance on planning obligations. Both Councils have also produced Charging Schedules as part of their Community Infrastructure Levy (CIL) for examination alongside the LP.
22. The Councils were criticised by a number of residents for failing to consult sufficiently during the preparation of the LP but there is evidence⁴ to show there was engagement with local communities throughout the process. Changes have been made to the Plan in response to representations although more than one respondent found modified versions incorporating strikethrough text, underlining and colour coding difficult to understand. I am, however, satisfied that the Councils have tried to make the changes as clear as possible.

⁴ See for example – CD/CON4; CD/CON5; CD/CON8; CD/CON10; CD/CON14

23. The Councils have undertaken Sustainability Appraisals (SA) including Strategic Environment Assessments (SEA) at the various stages of plan preparation⁵. These documents set out the purpose, methodology and baseline information used in assessing the Councils' vision and objectives and the different development options which have been considered.
24. The various iterations of the SA leading to the Submission Plan culminated in a report of June 2013 [CD/SA4]. The Councils also commissioned an independent review of the process [CD/SA10]. This found the work to be fundamentally sound but made a number of recommendations, particularly in light of recent case law. Among these it was suggested that links were provided to all stages of the reporting process; that the significant effects of each version of the LP in terms of SA findings were identified together with reasons for rejecting alternative policy options and sites; and that a record of how responses to the SA consultation processes were addressed.
25. A further update to the SA [M Mod 5 including Appendices] accompanied the main modifications. This outlined the preparatory stages of the LP process and the corresponding work undertaken for the purposes of SA. A summary of the SA is provided for each iteration of the Plan while the full assessment is included in the appendices. These show the Councils have assessed the effect of changes to policies and allocations in terms of their SA impact including the reduction in scale of development at different locations.
26. The SA has been criticised for a number of reasons including a failure to examine alternative options. I do not agree. A strategic approach was followed when assessing potential allocations and relevant parts of the SA were reviewed once changes were made to the Plan. The process of refinement examined alternative sites as well as the consequences for SA purposes of a reduction in land allocations when alterations were proposed in February 2013 [M Mod 5, Appendix E]. Similarly, the implications of revisions to housing supply in July 2014 [M Mod 5, Appendix G] were taken into account.
27. It is also claimed that some of the specific alterations, including those affected by the proposed modifications have not been properly assessed for the purposes of SA. A number of changes have been made to policies and text as the Councils have sought to respond to representations and clarify and ensure compatibility with the NPPF and PPG. These adjustments may have implications for the effectiveness of the Plan but do not mean the SA is deficient.
28. I find that SA work has been undertaken consistently during the plan preparation process and examination stages and there has not been a failure to adequately consider reasonable alternative options or key aspects of the Plan.

⁵ See for example – CD/SA1 through to CD/SA5, CD/SA9, CD/SA10, M Mod 5 & M Mod 6 for the documents covering sustainability appraisals carried out for plan preparation and submission.

29. Screening reports required for the purposes of a Habitats Regulations Assessment (HRA) were carried out in June 2012 [CD/SA6] which recommended that amendments were made to the LP to avoid harm to protected sites. These were undertaken. An update to the HRA in June 2013 [CD/SA7] concluded that it was unlikely that significant adverse effects would result from the adoption of the LP and that an Appropriate Assessment of potential effects was not necessary.
30. I am therefore satisfied that for the purposes of the HRA and SA the work carried out for the LP has been adequate.

Main Issues

31. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified four main issues upon which the soundness of the Plan depends.

Issue 1 – Whether the spatial strategy is the most appropriate one to deliver the sustainable development objectives promoted in the National Planning Policy Framework.

32. The objective of the LP is to direct most development to the principal towns of Dorchester and Weymouth and the larger communities in West Dorset. Where possible, use will be made of previously developed land although greenfield sites will also be needed.
33. Many parts of the Plan area are subject to constraints and this has had a bearing on the choices made in formulating the spatial strategy. For example, extensions to some settlements could have an adverse effect on the natural environment by increasing the risk of flooding or by detracting from the landscape. The latter is of particular concern because a large proportion of the Plan area lies within the Dorset AONB.
34. Despite physical and environmental restrictions the Councils have concluded that allocations in parts of the AONB are unavoidable even though the NPPF says that 'great weight should be given to conserving landscape and scenic beauty' in these areas (paragraph 115). Although paragraph 14 refers to the presumption in favour of sustainable development and the need for local plans to meet objectively assessed needs, it advises that some designations, such as AONB, may influence what development is allowed.
35. There has been widespread opposition to a number of proposals in the LP, particularly where allocations have been put forward within the AONB. It is difficult to see how some incursions can be avoided if the Councils are to adhere to sustainable development principles and meet the needs of rural communities. Apart from areas to the east and north of Dorchester and those around Sherborne most of the remaining parts of the Plan area are subject to AONB designation and it would be unsustainable and perverse to reject suitable options.
36. Concentrating development in the larger settlements means there is access to existing services and facilities while new development can be the

catalyst for improved provision. With the exception of Crossways and Sherborne, criticism of the Councils' approach focused more on site selection, scale and the effects of change rather than opposition to the distribution of growth in the spatial strategy.

37. Having regard to the purposes of the LP, sustainability objectives, environmental constraints and my conclusions about housing land supply, I am satisfied that the spatial strategy can, in principle, be supported. Nevertheless, I am concerned that the LP fails to give sufficient emphasis to the sustainable role of particular settlements and the contribution they could make to meeting development needs. I examine the merits of proposals for each of the key settlements later in this report. However, as part of my overall findings I consider a modification is required to ensure the Councils identify further development options at specific settlements as part of an early review of the LP which, it was made clear, they intend to undertake. I therefore recommend the wording of modification **MM60** is revised in order to make the LP sound.

Issue 2 – Whether adequate provision is made to meet future housing needs consistent with the objectives of national policy

Background

38. The Submission Plan identified sufficient land to enable the construction of between 12,340 and 13,220 dwellings by 2031 (617 – 661 dwellings per annum (dpa)). This was seen by some respondents as insufficient to meet future needs particularly as both the Panel reporting on the Regional Spatial Strategy for the South West (RS) and the Dorset County Structure Plan (SP)⁶ had identified higher targets (905 and 788 dpa respectively). In my view this earlier work is no longer a reliable guide to current housing needs because of the time that has elapsed since the reports were produced, their broader strategic objectives and the changes which have taken place in the economy. Consequently, I give little weight to these documents.
39. Local planning authorities are required to undertake an objective assessment of need (OAN) when preparing plans to establish the amount of housing required during a plan cycle. The starting point for this calculation is the most recent population and household projections but these are influenced by past trends including national and local policy initiatives. For this reason they do not necessarily provide a representative and unrestrained figure of housing need and, as the PPG explains⁷, account should be taken of local circumstances and factors such as demographic characteristics, migration and 'market signals'.

Assessment of Housing Need

40. It was generally accepted that WD and WP is a self-contained housing market area which provides an appropriate basis for undertaking a

⁶ The Bournemouth, Dorset and Poole Structure Plan 2011 (Formally the Dorset County Structure Plan)

⁷ PPG 2a-015 20140306

Strategic Housing Market Assessment (SHMA) [CD/HOUS2]. The purpose of the SHMA is to examine population trends in the Plan area to determine the level of OAN taking into account natural change and the effects of migration. Work undertaken to inform the Submission Plan was based on interim ONS household projections⁸ from 2011 which provided an estimate of likely housing requirements to 2021.

41. These projections gave no indication of the changes likely to occur after 2021 leading the Councils to adopt a range for the number of homes anticipated after this date to provide flexibility and cater for increased demand should it materialise in a more buoyant economy. Separate provision was made for WD and WP with growth in the former largely consistent with numbers provided over the previous 20 years. However, targets were set at a lower level than those previously delivered in WP.
42. The figures were criticised because they were regarded as too low implying that further land in both authorities should be allocated to meet future needs. Several housebuilders also pointed out that neither Council had been able to meet its annual targets. Without further sites to improve choice, the deficit in housing completions was likely to get worse.
43. I had similar concerns but I find some of the criticism is flawed. For instance, before 2006/07 97% of the Structure Plan target (for the period 1994 – 2011) was met but this had reduced to 91% by 2011 [CD/SUS12]. Past building rates were largely consistent with planned targets until the effects of the economic downturn took hold contributing to a reduction in house completions. As building rates have yet to recover a deficit has developed since the start of the current plan period.
44. Nevertheless, I found the original evidence [CD/HOUS2] in support of the housing targets unconvincing and neither sufficiently robust nor fully in accordance with the NPPF⁹. Further work was commissioned to review the SHMA [CD/SUS10, July 2014] following the suspension of the examination. This used the most recent population and household forecasts as a starting point for assessing housing needs across the combined authority areas following a methodology¹⁰ for calculating OAN consistent with national guidance¹¹.
45. Population projections are particularly sensitive to the effects of migration and the variations which can occur from previously observed trends. Forecasting is also made more difficult when there are significant changes in economic conditions. In order to minimise reliance on recessionary factors trends prevalent at different times were modelled to test the robustness of population and household estimates. Thus account was taken of pre-recessionary migration patterns, changes over the ten year census cycle (2001 - 2011) and issues affecting the 2011 Interim projections. Initial results from the ONS 2012 Sub-National Population

⁸ Office for National Statistics, Household Interim Projections, 2011 to 2021, England

⁹ CD/INSP15, 10 December 2013

¹⁰ Objectively Assessed Need and Housing Targets, June 2014 (Technical Advice Note prepared for the Planning Advisory Service by Peter Brett Associates)

¹¹ PPG 2a-017-20140306 – 2a-020-20140306

Projections (SNPP) were incorporated into the model prior to the release of new household projections by the Department for Communities and Local Government (DCLG).

46. Consideration was given to the likely effects of technical discrepancies in data such as 'Unattributed Population Changes'¹² to ensure reliable population statistics were used. A precautionary approach was also taken on the numbers of older people expected to work following Government initiatives to increase retirement ages. I am therefore satisfied the assumptions provide a reasonable basis on which to estimate demographic change. Local factors were then examined to see how house prices and rents influenced market demand and whether these or other matters warranted an upward revision of housing need.

Market Signals

47. Planning Practice Guidance says that household projections should be adjusted to reflect market signals having regard to factors such as land and house prices, rents, affordability and rates of development. The Councils' Review shows house prices have increased faster than its comparators since 1996 but that the difference is small. Houses in WD are more expensive than those in either the South West or England but are comparable to those for Dorset generally. The small increase in house prices witnessed in Weymouth and Portland is no worse than those in other parts of the region or England and is generally applicable to the wider Plan area.
48. As noted previously, the annual number of house completions has normally kept pace with targets. Rates have fallen since the start of the recession as consumer confidence has waned forcing the building industry to respond to new market conditions. This is indicative of economic forces in operation rather than an inherent problem of land availability constraining the supply.

Employment Growth

49. Future levels of employment are to be taken into account in housing needs assessments to ensure housing is available to avoid unsustainable commuting patterns making it difficult for businesses to recruit staff¹³. However, the relationship between homes and jobs is difficult to predict and depends on assumptions made about key variables such as population change, economic growth and labour supply. Small changes in assumptions can have a significant effect on outcomes and is a reason why estimates should be seen as an indication of job growth rather than a precise target.
50. Population change in the Plan area is heavily influenced by migration because of the demographic profile (where deaths exceed births). The Submission Plan identified an additional 16,100 jobs (full-time equivalent)

¹² Differences between Census returns and mid-year estimates

¹³ PPG para. 018 2a-018-20140306

would be needed by 2031. Given the demographic profile it is not surprising that some respondents argued that the Councils had underestimated housing needs and placed too much reliance on older people continuing to work up to and past state retirement ages.

51. I do not discount the possibility that this may happen which would reduce pressure to replenish the economically active population. However, there is a risk that any shortfall in the workforce would draw in economic migrants leading to increased commuting if there was insufficient housing to accommodate them. I was not convinced that the evidence [CD/SUS1] was sufficiently robust to support the Councils' position.
52. The anticipated growth in jobs was therefore re-assessed as part of the housing needs review. Experian, a specialist forecaster, estimated that between 13,070 and 13,640 jobs were likely to be created in the HMA during the plan period [WDWP Ex13]. Alternative forecasts supplied by Oxford Economics (8,300) and Cambridge Econometrics (12,800) produced results which, some suggested, supported the case for additional housing. The similarity (and differences) in these estimates derives from modelling techniques, choice of population data and assumptions made about the extent to which high labour demand influences migration and how economic activity rates change over time.
53. The latter has important implications where the population is comparatively elderly but evidence is emerging which points to a propensity for older people to continue in employment. Work carried out by the Office of Budget Responsibility (OBR)¹⁴ shows employment rates in older age groups are expected to increase during the plan period. This is most noticeable in women reaching retirement age i.e. those between 60 – 69, but is also apparent in other elderly groups [WDWP/Ex13].
54. Further testing of the Experian models was undertaken using 2010 and 2012 SNPP data as well as population and migration changes aligned with proposed Plan targets. This showed the local economy was unlikely to be constrained by a lack of labour making it less dependent on economic migrants.
55. I am conscious of the limitations in modelling workforce changes because of the assumptions made and the number of variables involved. However, having considered the further testing of core assumptions the Councils have undertaken I am satisfied that the likely growth in jobs can be supported by the planned level of housing which is unlikely to be a constraint on economic growth.

Affordable housing needs

56. Affordable housing need was reassessed as part of the SHMA review following the approach set out in PPG¹⁵. The outcome of this process is presented in CD/SUS10 (SHMA, Part 2). This shows there is an annual

¹⁴ OBR – Independent economic advisors to the Government

¹⁵ PPG 02a-022-20140306 - 02a-029-20140306

net need for 362 affordable houses in WD and 423 in WP. From this position the model was refined taking into account factors which influence the way in which the local housing market operates.

57. An allowance was made for a higher proportion of household income (30%) to be spent on accommodation. This was said to be more representative of housing costs than the discontinued 25% threshold used in previous guidance¹⁶ and would see a reduction of 103 affordable units required across the Plan area.
58. Further refinements removed younger single persons from needs calculations because they were more likely to share as local housing allowances are reduced. The role of the private rented sector (prs) in meeting housing needs was also acknowledged as a source of housing for households unable to afford market accommodation. Estimates suggest that this accounts for 161 households annually in WD and 214 households in WP. These adjustments would reduce the need for affordable accommodation to 104 dpa (WD) and 130 dpa (WP).
59. It is difficult to exclude supported tenancies from a needs assessment because they are not an explicit part of the affordable housing model, a point made by a number of respondents. On this matter, I was referred to the conclusions of the inspector examining the Eastleigh Borough Local Plan¹⁷. He was critical of the Council's reliance on the prs to meet some affordable housing needs because of concerns regarding tenure security, the suitability of accommodation and reliance upon it as a longer-term option.
60. These may be recognised problems for those renting in the private sector but it is a component of the housing market and the only available source of accommodation for some households. Providing for all households reliant on the prs would require 609 affordable units annually across the Plan area, a figure approaching the total amount of housing proposed in the LP. The transfer of existing private tenants to affordable housing would also have significant implications for the wider housing market.
61. The PPG says consideration should be given to increasing the amount of housing where it could help to deliver the required number of affordable homes¹⁸. In this case more than double the amount of land allocated for housing purposes would be required. The difficulties would be compounded if efforts were made to meet the greater needs of WP where the Council is anticipating that no more than 35% of affordable units will be provided on mixed market sites in Weymouth and 25% on Portland.
62. I do not accept it is feasible or appropriate to support further land releases as a means of increasing affordable housing delivery. It would entail a substantial uplift in housing allocations and put pressure on the housebuilding industry to sustain excessively high building rates which the

¹⁶ DCLG, SHMA Guidance, 2007

¹⁷ Eastleigh Borough Local Plan, Inspector's Report, February 2015

¹⁸ PPG 02a-029-20140306

market may be unable to deliver. A large increase in the amount of market housing would also be likely to reduce the viability of larger schemes and undermine the numbers of affordable units being delivered.

63. A Ministerial Statement in 2014¹⁹ highlighted government concerns over the burdens faced by small-scale housing developers and proposed the introduction of thresholds below which affordable contributions should not be sought. Changes were also planned where vacant buildings were brought back into use. In response, the Councils recommended alterations to relevant parts of policy HOUS 1 and the supporting text in four modifications (**MM12**, **MM13**, **MM14** and **MM16**).
64. The modifications were criticised, particularly by local residents and organisations, because it was felt they would make it more difficult for the Councils to deliver affordable housing although it would be possible for communities to identify potential sites for affordable housing purposes in neighbourhood plans. A legal challenge to the Ministerial Statement has, however, resulted in the High Court finding against the Secretary of State and the revisions which had been made to the PPG on planning obligations for affordable housing and social infrastructure contributions²⁰.
65. The judgement confirms the policies in the Written Statement should not be treated as a material consideration in development plan procedures and decisions. As a result, I consider it is no longer appropriate to endorse the changes proposed in **MM12**, **MM13** and **MM14** and that alterations should also be made to **MM16**.
66. Having regard to previous representations on this matter I consider the Councils should revert to their original policy provisions i.e. that all new market housing should make a contribution towards affordable housing needs. This would support efforts to provide this type of accommodation and would largely affect sites of five or fewer dwellings which would have been exempt from contributions in those areas designated as AONB (approximately 70% of the Plan area) and sites of ten or fewer dwellings elsewhere.
67. Setting limits to the percentage of affordable housing to be provided across Portland, Weymouth and West Dorset have been recommended to policy HOUS 1 (as set out in **MM16** but now altered to remove reference to small-site thresholds) and corresponding monitoring indicators (**MM17**). Evidence for the Community Infrastructure Levy shows this would reduce the risk of inhibiting the delivery of some sites²¹. Reference is also to be included to the housing register which along with the SHMA provides the basis for identifying affordable housing demand in the Plan area (**MM15**).
68. The need for affordable housing remains a significant issue but I can see no advantage in recommending the Plan should be withdrawn to allow a

¹⁹ Ministerial Statement - Small-scale developers, 28 November 2015

²⁰ West Berkshire District Council and Reading Borough Council v SSCLG, 31 July 2015

²¹ CD/CIL 8 and CD/CIL9

fundamental review of the housing strategy. Delay would jeopardise the affordable provision the Councils' assessment concludes is required. Thus 234 of the annual housing target of 775 dwellings should be in affordable categories, a figure capable of being delivered across the Plan area.

Revised housing provision

69. The outcome of the review showed that 529 to 775 new households required accommodation annually according to which of the underlying trends formed the basis for calculating the OAN. In setting annual targets for new housing at 775 dpa the Councils accepted that pre-recessionary trends (2008) and high migration levels witnessed in the early years of the new millennium provided a better basis for estimating future needs than the more pessimistic projection of household formation in the 2011 modelling. Allowing for pre-recessionary migration movements also means that growth in the local labour force is unlikely to be inhibited by a constrained housing supply were migration flows to recover to those seen in more buoyant times (2001 – 2007).
70. Despite this some parties maintained the view that housing levels should be commensurate with those advocated in the RS or even higher. I do not consider the evidence to support higher building rates outweighs the Councils' assessment and the most recent household projections. The latter were released for England by DCLG in February 2015. These cover the period from 2012 to 2037²² and follow the methodology used for the 2011 interim results and the 2008 household projections. Prior to their release the Councils had used the 2012 population projections to estimate that 507 dpa would be sufficient to satisfy local housing needs increasing to 554 once an allowance was made for second homes and vacant dwellings.
71. The latest projections suggest a slightly slower rate of growth can be expected of 494 dpa rising to 539 dpa to allow for vacant stock and second homes [CD/SUS15]. A number of parties urged caution in interpreting these figures because they are influenced by recent economic events and depressed market conditions. I agree it would be unwise to place undue reliance upon them because trends are inevitably hostage to cyclical changes in the economy.
72. However, the most recent evidence supports the premise that recessionary effects are likely to have a long term impact so that growth in the Plan area will be lower than predicted prior to the recession. Even so, the difference between the Councils' estimates and the most recent projections is small and I consider it is advisable for the Councils to discount any downward revision of housing targets given concerns about affordability and government emphasis to 'significantly boost' the supply of new homes.
73. The annual requirement of 775 dwellings (15,500 over the plan period) represents an increase of between 17 to 26% over proposals in the

²² 2012-based Household Projections: England, 2012 – 2037, 27 February 2015

Submission Plan. Having regard to the available evidence I consider this is a reasonable estimate of the amount of housing required during the plan period.

Overall provision to meet housing needs

74. The consequence of this higher target meant that sites identified in the SHLAA [CD/SUS9] would not be sufficient to meet needs to 2031. Initially the Councils said they intended to alter the end date of the plan period from 2031 to 2028 meaning an early review would be necessary to ensure the maintenance of an adequate housing land supply.
75. I do not dispute the need for councils to undertake timely reviews of their development plans but the purpose of adopting a preferred 15 year timeframe²³ is to provide certainty, encourage investment and ensure continuity of the housing land supply. I therefore agree with those respondents who felt the original plan period should remain as the basis for long-term decisions, especially as it provides a common timeframe for initiatives elsewhere in the LP.
76. Following discussions at the examination, the Councils took the opportunity to update their SHLAA. The latest iteration of this document [CD/SUS13] provides the basis for the Councils' contention that sufficient land is now available to meet the revised target for the original plan period i.e. to 2031. This identifies sites from a variety of sources with strenuous efforts made to avoid double counting and the inclusion of sites having no development potential.
77. In support of this work a study was commissioned by the Councils using BNP Paribas Real Estate (BNP Paribas) to provide an independent assessment of the main sites they have identified and which constitute the bulk of the housing supply (CD/SUS14). A majority of landowners and/or developers provided information on the timing of planning applications and construction programmes on allocated and committed sites as well as known or anticipated obstacles to delivery. This suggests that most sites are likely to deliver dwellings either in line with or even in advance of the Councils' trajectory. In a few cases building programmes may be overly ambitious but delays are expected to be offset by earlier delivery on other sites. Nonetheless, some respondents believe this work does not overcome their previous reservations and they continue to argue there is a need for additional sites.
78. Circumstances change and it is possible that unforeseen delays will affect some sites but I have no reason to believe this should seriously threaten delivery of the larger sites especially as the BNP Paribas study found evidence of renewed confidence amongst developers and buyers both nationally and locally. This increases the likelihood of convergence between the ability of the housebuilding industry to increase supply and the demand for accommodation. Allocations are also distributed across

²³ NPPF paragraph 157

the Plan area reducing concentration where multiple outlets could influence rates of delivery.

79. I therefore consider it is likely that most of the main sources of housing supply will be delivered over the course of the plan period. I am, however, less confident over the contribution from other areas because the evidence is less convincing. Figures for numbers derived from the change of use of rural buildings are based on applications submitted in 2014, a majority of which were refused or remain pending. This does not constitute an adequate basis for long term planning.
80. Similarly, I do not consider there is sufficient experience of neighbourhood planning to rely on it as a consistent source of supply although I accept it has the potential to make an important contribution, especially in villages and smaller settlements. I also consider it is unwise to rely on contributions from large windfall sites or pre-application or pending applications.
81. I have therefore excluded these as realistic components of the supply and only included rural exceptions sites where funding has been agreed. I accept that dwellings will come forward which fall within these categories but the current evidence is not sufficiently robust to justify their inclusion. As a result I consider the overall supply (including completions between 2011 to 2014) amounts to 14,855 dwellings meaning there is insufficient land to meet housing needs to the end of the plan period.
82. The NPPF accepts it may not be possible for authorities to identify locations for growth in the years 11 – 15 of a plan period (paragraph 47), the Councils having previously endorsed the need for an early review to address this. Their most recent position is that a review remains a prudent option in order to ensure a 'robust' five year housing land supply is maintained and to examine post 2031 development needs. In light of the conclusions I have reached regarding the overall housing supply situation, I find I am not fully in accord with their conclusions. Instead I consider it is imperative that an early review is undertaken to identify additional land capable of meeting housing needs to the end of the current plan period as well as the broad location for development in the five year period thereafter, in the expectation that current Government guidance will not change.
83. A review will also provide an opportunity to consider growth options at Dorchester. The need to do so is expressed in **MM60**. It is a crucial, albeit difficult, matter for the Councils' to resolve but one which it is vital to address when examining options for further growth. The failure to do so is an unsatisfactory feature of the current LP but I do not consider it is a reason for finding the Plan unsound.
84. There is inconsistency between the timescales for a review as set out in **MM4** and **MM60** which needs to be resolved. I therefore recommend a review should be in place no later than 2021, if not earlier, to avoid development having to be allowed in locations which are not favoured or are in less sustainable locations. I have adjusted **MM60** accordingly.

Five-year housing land supply

85. Having regard to my conclusions in relation to the housing target for the plan period I consider the five year housing requirement is derived from an annualised requirement of 775 dwellings to which a buffer of 20% (775) is added because of past under-delivery and a further 1004 (837 units x 20%) to compensate for the shortfall in delivery since the start of the plan period in 2011.
86. The calculation of a five year housing land requirement in accordance with the NPPF (paragraph 47) is relatively straightforward. The Councils accept a 20% 'buffer' is necessary, because completions have not matched targets in recent years although they did not apply it to the shortfall. An appeal decision²⁴ by the Secretary of State has endorsed the need to do so meaning that sufficient land to accommodate at least 5,645 dwellings in the first five year period should be provided rather than the 5,487 suggested by the Councils.
87. Several developers have questioned the validity of the Councils' five year housing land supply including their intention to use a combined figure for the HMA rather than separate figures for each authority which had been done previously. It was suggested that a combined assessment was inappropriate, partly because it masks deficiencies in the supply position in West Dorset. However, PPG says a five year supply can apply across a joint plan area²⁵. I consider it is reasonable because it provides additional flexibility with allocations in WD able to contribute towards the housing needs of WP.
88. It is commendable that the Councils are looking to eliminate the shortfall in dwelling numbers as soon as possible²⁶ but this would require building rates to exceed past levels of construction. Consequently, phasing proposals and the corresponding housing trajectory were regarded by some parties as being impractical. This is a weakness in the Plan although it illustrates the limited influence councils have because housebuilding is affected by market conditions, including access to finance, as well as the availability of sites. Even with Government initiatives to stimulate the market there is no guarantee that the 'uplift' in building rates necessary to deliver the five-year housing target is feasible because it is dependent on circumstances outside the Councils' control.
89. Nevertheless, the Councils have calculated that sufficient land to accommodate 6,519 dwellings is available for the period 2014 – 2019. The sources of supply have been challenged, however, and alternative levels of provision have been calculated (based on the Councils' information) amounting to between 4,200 and 5,200 dwellings²⁷. In common with some respondents I also find it difficult to give unqualified support for some categories of supply.

²⁴ APP/H1840/A/13/2199085

²⁵ PPG 2a-010-20140306

²⁶ The so called 'Sedgefield' methodology

²⁷ N.B. These figures are approximate because of the degree of detail involved in the assessment.

90. The Housing Delivery Review [CD/SUS14] examined likely rates of delivery on existing and committed sites and allocations in the LP and was broadly supportive of the Councils' trajectory. Even so, the number of dwellings likely to come forward from these categories has been contested by some developers.
91. A 5% lapse rate has been applied to existing permissions though rates between 2008 and 2011 averaged 2% per annum. During this period lapse rates increased, presumably as recessionary effects took hold, but remained below the 5% threshold. Sites where there are known timetabling issues have been excluded or numbers have been discounted in recognition that some sites will not be fully implemented in the five year period. Approximately 32% of sites with planning permission have been omitted from this element of the supply to prevent double counting and avoid duplication with sites in other categories.
92. Sites allocated in the LP without the benefit of full planning permission form a separate element of supply. Assumptions regarding the timescales for delivery have been examined by BNP Paribas resulting in the identification of 1,497 units in the five year period. Doubts were expressed over possible constraints on some sites and I consider a more precautionary approach should be adopted. Consequently, a lapse rate of 10% should be included in the calculation of units derived from this source rather than assuming, as the Councils have done, that the anticipated numbers on all sites will be completed.
93. Large sites identified through consultation exercises, sites known to be surplus to requirements, underutilised or vacant or identified in Urban Capacity Studies make up a further significant source of supply. These are sites of 0.15 ha. or more meaning that many would deliver relatively small numbers of dwellings. Those deemed unsuitable because of physical or policy constraints were rejected during the assessment process. A 10% lapse rate was then applied to the 5 year supply anticipated from this source.
94. It has been suggested that these sites should be allocated in the LP if they are to be included in the overall supply. I regard this as impractical given the number and limited size of many of the sites. The Government has exhorted local authorities to identify land with housing potential but I consider the Councils' 10% lapse rate is too optimistic and a more cautious approach should be taken of their potential in the next five years. Consequently, I consider a 20% lapse rate is the minimum which should be applied to sites in this category.
95. On minor sites below 0.15 ha. monitoring evidence shows an average of 156 dwellings were completed each year between 1998 and 2013. The Councils estimate that 111 dpa will be available from small site development based on identified sites rather than adopting a (larger) generic windfall level. As for the previous category, those affected by planning constraints were excluded including sites with known ownership issues. Checks have also been undertaken to ensure the supply is not dependent on the use of residential gardens (NPPF, paragraph 48).

96. Excluding development in year one (in effect a 20% discount) minor sites are considered capable of delivering 444 dwellings over a five year period. This represents a significant improvement from earlier calculations when a 50% discount was applied. However, there is ample evidence to show these sites have been and remain an important component of housing supply to justify their inclusion, especially as the Councils have taken a cautious view on the numbers likely to be delivered from this source.
97. An allowance of 63 dwellings from rural exception sites relies on sites where an affordable housing provider has shown interest or where funding from the Homes and Communities Agency (HCA) has been approved. An average of 10 dwellings has come from this source since 2009/10. In order to bring exception sites forward a supporting housing needs survey is required as well as planning permission. I consider a more conservative estimate of 35 dwellings should be used by taking account only of the sites benefitting from HCA funding.
98. Prior approval applications involving the change of use of rural buildings or office conversions to residential uses outside development boundaries are seen as a further source of supply. Estimates are based solely on applications since April 2014 some of which have been refused or are pending. In my view this does not provide a credible basis for their inclusion and this element should be discounted.
99. Five units are anticipated from sites in neighbourhood plans but there is no evidence to show these are likely to be delivered. It may be possible that sites in plans will come forward later in the plan period but it would be unwise to rely on the unpredictability of this source in contributing to housing supply in the short term.
100. An allowance for 'large windfall sites' is based on schemes of five or more dwellings built between 2004 and 2010 in locations outside development boundaries. It has been argued that the likelihood of similar sites continuing to come forward will be reduced because of the LP focus on sustainable development. I am less certain because businesses evolve and change and alternative uses are often sought. A modest contribution has been made to housing numbers from such sites (mostly providing between five and fifteen dwellings). Nevertheless, I consider it would be unwise to rely on a source which is likely to fluctuate considerably from year to year. For this reason it should be discounted from five year supply estimates.
101. Units anticipated from pre-application or pending applications should not be included in the five year supply. The SHLAA acknowledges that these sites can have long 'lead-in' times making them an uncertain source in the short term. It has also been argued that residential institutions (Use Class C2) should be excluded because no assessment has been made for this type of accommodation in the OAN. In principle, the PPG permits local planning authorities to include housing for older people against their

housing requirement but says the approach should be set out in the LP²⁸. This has not been done by WD and WP and is a matter which should be addressed when reviewing the Plan. However, I do not consider it is unreasonable for the Councils to take existing schemes with planning permission into account because they will provide housing to meet a particular form of need while freeing some existing dwellings for use by other households.

102. The NPPF expects local planning authorities to boost significantly the supply of housing yet in the first three years of the plan period less than 10% of the required dwellings have been completed. If sites were to come forward as the Councils say is possible (subject to the revisions I have referred to above) approximately 38% of properties would be provided in the course of the next five years, 36% in the following five years and 15% in the remainder of the plan period. Having regard to the different timescales I consider the potential to increase delivery in the next ten years would represent a 'significant boost' in supply.
103. I find the Councils' identification of a five year housing supply is overly optimistic in the types of sites and number of dwellings expected to come forward. Once these are removed and a more precautionary view is taken on delivery, a figure close to that required remains (5.1 years). While this means it is possible to conclude the Councils can meet their five year housing supply needs, based on the available information at 1st April 2014, there is very little margin should circumstances change. For this reason, I consider it is imperative that the Councils do not ignore new opportunities which come forward in sustainable locations and are consistent with other policy provisions.
104. On balance, based on the updated SHLAA [CD/SUS13] and taking all of the above into account, I consider sufficient sites have been allocated in the LP to potentially meet the Councils' five year housing land target while providing the necessary 'buffer' to ensure flexibility of choice and competition required by the NPPF.

Conclusions on housing provision

105. For the reasons set out above I am satisfied that the figure of 775 dwellings per annum derived from the revised SHMA is soundly based for the purposes of paragraph 47 of the NPPF and that the affordable housing element for growth represents a realistic projection of needs having had regard to local circumstances. Whilst a degree of uncertainty remains as an inevitable consequence of the limitations in modelling techniques, I am not persuaded that a convincing case has been made to support an alternative level of housing provision.
106. The overall number of dwellings derived from the various sources of supply is unlikely, however, to be sufficient to meet housing targets to the end of the plan period making it necessary for the Councils to identify further land. The evidence to support a five year housing land supply,

²⁸ PPG 3-037-20150320

while more persuasive, is close to the minimum required to provide choice and competition. It is therefore important that the Councils closely monitor the delivery of new dwellings and take advantage of every reasonable opportunity to improve their short term supply position as well as the overall amount of housing for the plan period.

107. In order to reflect the revised figures on housing land provision, I have recommended changes to parts of the text and tables in Chapter 3 of the LP (Achieving a Sustainable Pattern of Development). These are referenced under **MM4** and shown in full in **Appendix C**. The Councils will also need to revise the housing trajectory shown in Figure 3.2 to take account of the revisions which I recommend are made to the calculation of housing supply.
108. Despite my concerns on housing provision my overall view is that the Councils' strategy is fundamentally sound. I therefore consider the most appropriate option is to endorse the LP as a basis for guiding future development in the Plan area while recognising that an early review is necessary to resolve land supply issues in the latter part of the plan period and to address other issues to emerge from the examination process. The alternative conclusion of a finding of unsoundness could compromise the delivery of key sites and increase the likelihood that development takes place in less favourable or sustainable locations.

Issue 3 – Whether the distribution of development and other proposals for the various settlements is justified?

109. I have previously acknowledged the spatial strategy means that land has been allocated in the LP which, in some cases, lies within the Dorset AONB but is regarded as necessary to meet future development needs. The Countryside and Rights of Way Act 2000 says regard should be had to conserving and enhancing the natural beauty of an AONB, a matter which is repeated in the NPPF²⁹ and PPG, the latter also pointing out the duty is relevant where development outside an AONB could have an impact on its setting³⁰. Paragraph 116 of the NPPF makes clear that exceptional circumstances are required for major development in these areas. I have therefore had regard to this duty when considering proposals which may affect land whether in or adjacent to the AONB.

Weymouth

110. Weymouth is the largest settlement in the Plan area. Its attractive setting in a wide sweeping bay makes it an important holiday destination while it retains a role as a commercial and employment centre. Like a number of other coastal towns it is reliant on low paid service jobs and has pockets of deprivation. The town is at risk of flooding from the land and sea, a problem which is likely to be exacerbated by climate change.

²⁹ See NPPF paragraphs 14 and 115

³⁰ PPG 8-003-20140306

111. Both Weymouth and Portland are physically restricted by their proximity to the sea. Peripheral sites on the edge of Weymouth have a functional relationship and obvious link to the town despite being in West Dorset. Consequently, urban extensions proposed at Chickerell and Littlemoor will contribute towards the housing needs of the Weymouth and Portland area.
112. The Councils believe there are opportunities for improving the town centre and delivering new housing. Doubts were expressed by some respondents about these ambitions given the likely loss of parking and the risk of 'town cramming'. I agree that any development would need careful treatment to ensure the distinctive character of the centre with its mix of historic buildings is not damaged. Nevertheless, there are areas where improvements would be beneficial and where new or more intensive uses could be introduced. The most recent work on housing capacity, for instance, has suggested that town centre regeneration could contribute at least 600 dwellings during the plan period (**MM31**).
113. The Councils are keen to ensure the vibrancy of the central area is maintained during the early evening by encouraging suitable activities. To reflect the findings of a study into the evening and night time economy of Weymouth [AD/WPCL1] changes to the duration of activities have been recommended (**MM32, MM33, MM34, MM35** and **MM36**). In addition a further location (Lodmoor) has been included as one of the key sites in the central area for which more detailed guidance will be provided to aid the development process (**MM33**). The boundaries of the relevant sites as illustrated in the LP will be updated (**MM38**) and shown on the Proposals Map (**MM37**).
114. A number of other relatively modest but necessary modifications have been recommended to reflect variations in land use proposals (**MM39**), revisions to housing numbers, phasing arrangements or other alterations (**MM41, MM42, MM44, MM46, MM47** and **MM48**). Changes are also proposed for sites at Markham and Little Francis (WEY 10) (**MM40**) and for land at Wey Valley (WEY 12) (**MM43**) to emphasise the primacy of the developer/landowner in producing masterplans for these locations, albeit in conjunction with other relevant parties. Revisions to the site capacity of the latter have been questioned by the developer although there is no implication in the drafting of the revised text of an attempt to impose a precise limit rather than reflect the Councils' reappraisal of likely numbers.

Portland

115. The geological and geographical attributes of Portland give the island a unique identity which has been further influenced by stone quarrying and its long maritime history. It remains a significant employment area with the former naval estate being a focus for regeneration initiatives while tourism continues to have an important role in the local economy.
116. The Council's proposals for Portland are modest reflecting in part the opportunities which exist for employment and housing but which have not been fully exploited. In seeking to maintain progress for the mixed-use redevelopment of Osprey Quay the Councils are adhering to a masterplan

approved in 2001 while planning permission for the redevelopment of navy accommodation at the former Hardy Complex is still to be completed. The Councils says that economic conditions have slowed progress and local developers confirm that difficult site conditions mean viability is an issue.

117. The LP identifies Portland Port as an important element of the regional and local economy and there was considerable debate during the examination about its role and future prospects. This centred on whether the Councils should re-instate the Port-related policy from the pre-submission draft and acknowledge the value of the maritime services sector by reference to it in the Economy chapter of the Plan.
118. I am not persuaded of the need to do so. A balance has to be struck between encouraging and promoting business activities and safeguarding other interests. I therefore share the Councils' reluctance to single out maritime activities in the generic policy sections of the LP and also note the potential for conflict between employment initiatives at the Port and their environmental impact. The latter was of clear concern to Natural England and an issue behind the removal of the earlier Port policy in light of a Habitat Screening report [CD/SA6].
119. Natural England has broader doubts regarding the balance between environmental protection and promotion of Port-related activities and advocates reference is made to guidance in the NPPF. I do not consider this is necessary because schemes will be required to adhere to all relevant policy provisions including guidance and advice in the NPPF and PPG which are material to planning decisions.
120. Nevertheless, the Councils have suggested a number of changes should be made to highlight their support for the Port and its maritime services. These endorse the protection of 'key employment sites' (**MM49**) and specifically acknowledge the value of the maritime sector and supporting industries (**MM50**). The Local Enterprise Partnership (LEP) has identified the Port as an 'opportunity' area in its Strategic Economic Plan and one which is capable of attracting new investment. This merits inclusion in the LP which is recommended through **MM51**.
121. Reference to a 'safeguarded' route for the A354 Weymouth to Portland Relief Road was included in the adopted LP (2005) to support economic growth and to mitigate the impact of vehicular traffic accessing the island. A new route could be of considerable benefit to businesses and local residents but it appears the County Council have doubts as to how it could be funded. Uncertainty over timescales runs the risk of unreasonably 'blighting' land and properties. Until further work to assess alternative routes, economic and environmental factors, timescales and funding sources have been fully considered I am not persuaded there is sufficient justification for safeguarding a route at present.
122. In recognition that consent has been granted at Southwell Business Park for a new educational academy, a modification is proposed to improve links with local business and community activities (**MM52**). Elsewhere the

creation of a Quarries Nature Park has been the Councils' long term goal to ensure disused quarries are opened to the public and their importance for nature conservation, geology and cultural heritage is recognised. Concern was raised that working quarries should be excluded from policy initiatives (PORT 3) although, as drafted, land would only be included if agreement can be reached with owners. I am satisfied that this reflects the Councils' longer term aspirations but safeguards the interests of existing operators.

Littlemoor

123. The allocation of land at Littlemoor (LITT 1) involves the northwards extension of Weymouth beyond the administrative boundary into WD and part of the Dorset AONB. The Councils identify this as a strategic site representing major development thereby giving rise to concerns regarding its impact both on the AONB and wider landscape.
124. Rising land to both the north and east helps to contain the proposed site and I agree with the Councils that strategic planting would help mask the scale of the development and mitigate the obvious boundary between the countryside and the existing urban edge. Internal planting could further help to contain building forms and ameliorate its impact on the surrounding countryside.
125. Development in this location would benefit from its proximity to the Weymouth Relief Road, the station at Upwey and existing services at Littlemoor. While other sites have been put forward such as Wyke Oliver Farm and land to the north of Upwey, I do not regard these as genuine alternatives but rather locations capable of augmenting the strategic provision of LITT 1 and are sites which should be considered when reviewing the LP.
126. As a number of respondents have pointed out development at any of these locations would have consequences for this part of north Weymouth whether through increased traffic movements, the need to address flooding issues or the loss of agricultural land. I have seen no evidence to suggest the first two matters are insurmountable or that the amount of agricultural land to be lost is crucial given that greenfield sites will be needed if the Councils are to meet their housing target.
127. Fears were also expressed that the scale of development would lead to local facilities being 'swamped' although there is no evidence to show that this would be the case. In my opinion the market is likely to respond to increased demand for goods and services including the provision of new or revised public transport links.
128. To support the level of proposed development it is envisaged there would be a need for additional education facilities involving the provision of a new primary school or the expansion of an existing one, depending on the County Council's needs as the education authority. To retain flexibility the supporting text should be revised to allow for either option (**MM53**). The Councils now accept that the developer/landowner will be the primary

source of masterplanning for the area subject to this work being undertaken in collaboration with relevant parties. A modification is proposed to adjust the Plan accordingly (**MM54**).

129. Taking the various factors into account I consider there are sound reasons to support the Councils' preferred choice of site at LITT 1 despite its location in the AONB. Having regard to the overall level of housing need and the availability, size and merit of other sites on the periphery of the Weymouth urban area, I am satisfied it would be less visually harmful when compared to the release of a number of smaller sites. In coming to this conclusion I also recognise the development would provide an opportunity to improve the transition between the countryside and urban area. Furthermore, positively promoting the use of nearby land at Icen and Weyside Farms for employment uses (LITT 2) would, in turn, help to resolve historical planning issues and improve the containment of an adjacent and prominent site in the AONB.

Chickerell

130. The Councils' objectives for Chickerell are to create a better balance between homes and jobs while improving services and facilities. Permission has been given for a mixed-use scheme (CHIC 1) at Putton Lane and for more substantial expansion to the north and east in order to deliver some 800 – 850 new dwellings (CHIC 2). These proposals would augment housing provision in the wider Weymouth and Portland area and from this perspective they are a pragmatic contribution to meeting the housing needs of both authorities.
131. The development of CHIC 2 would reduce the gap between Chickerell and existing development in Weymouth but would not extinguish it. This is important because it would maintain the identity of the settlement. A nearby area of land off Radipole Lane, Southill has been promoted as a more suitable option to development at both Littlemoor (LITT 1) and to the use of the northern part of the Chickerell allocation (CHIC2) because of the impact these schemes would have on the AONB.
132. The land off Radipole Lane has been viewed favourably by the Councils in the past because it is well related to the existing residential area at Southill, has good road connections and is close to facilities and services. Ultimately it was rejected because of its impact on the landscape and public opposition to the proposal. In my view it does not represent a reasonable alternative to the plans for Littlemoor because it is smaller and some distance from it. Development of the northern part of the site could, potentially, provide an alternative to the northwards expansion of Chickerell (part of the CHIC 2 allocation) but use of the western part, currently occupied by a 9 hole golf course and driving range, would involve coalescence with the eastern portion of the same scheme. On balance, I am not persuaded the site offers the same advantages and opportunities as the Councils' preferred sites.
133. Adjustments to the scheme at Putton Lane (**MM55** and **MM56**) would encourage a more flexible approach to the use of the site without

compromising previous objectives. Changes are also recommended to the major urban extension to the north and east (CHIC 2) to identify the likely capacity of its two distinct if physically linked parts (**MM57**). I regard this as a helpful addition to the supporting text but I share the developers' concerns that it should not inhibit alterations to layouts and densities, or obstruct a flexible approach to development possibilities through the masterplanning process. The landowner/developer is now identified as the main contributor to the latter, subject to the inclusion of relevant groups including the Town, District and County Councils (**MM58**).

134. In proposing modifications under **MM57** the Councils reduced the nominal capacity of CHIC 2 resulting in representations from the developers. I understand their reservations but the supporting text uses the terms 'about' and 'approximately' in the phrasing of the modification to indicate the final figure may change. Modification **MM59** requires that a strategic landscape phasing plan is produced although a Landscape and Visual Appraisal [AD/WPCL8] suggests the development can be contained effectively. Nevertheless, an agreed phasing plan would ensure that the potential effects of development on the adjacent AONB to the west of the site are fully addressed.
135. The possibility of using the existing primary school off Rashley Road for housing purposes is signalled in policy CHIC 3, subject to the provision of replacement facilities. The policy sets out a flexible approach in dealing with future education provision in the area although some parties questioned whether it was appropriate. I do not consider it to be a matter which affects the soundness of the Plan.

Dorchester

136. Opportunities for development at Dorchester are constrained by natural features and the town's setting in the landscape. The Councils therefore intend to make maximum use of available land within existing boundaries, defined by the A35 bypass and the floodplain of the River Frome, but acknowledge there is insufficient capacity for Dorchester to meet its own needs during the plan period. The Councils' original intention was to resolve this by identifying significant housing and employment allocations at Crossways, a modest settlement some six miles east of Dorchester. Although the village has potential as a sustainable location it is regarded by many respondents as a less effective option for development.
137. A scheme to meet housing needs on land to the north of Dorchester has been rejected by the Councils. The idea drew considerable opposition from local residents mainly because of landscape and flooding issues and from the Councils' perspective expansion of the town in this direction is not favoured. Despite this it is not obvious that other or better alternatives exist or indeed whether the Councils are committed to finding a solution to the longer-term expansion of the county town.
138. Implementing options for development within existing town boundaries provides, at best, a short term solution to meeting future housing and employment needs. The Councils appreciate this is a significant issue and

intend to review the Plan in order to address it. Although welcome, I do not consider sufficient attention is being given to this matter especially if, as seems likely, deficiencies exist in the overall housing land supply.

139. These are matters which require resolution as a matter of urgency rather than waiting until after 2021 to commence the review, which is the Councils' preference. I therefore consider alterations to the supporting text are necessary to make the LP sound (**MM60**). The change requires that a strategy is in place to meet long term development needs at or in the vicinity of Dorchester by 2021 and that a site or sites necessary for its implementation are identified as part of review proposals. The Government's initiatives on localism mean that the involvement of local residents could be encouraged through neighbourhood planning.

Park and Ride/Trunk Road Service Area

140. As the County town and one of its main employment centres Dorchester attracts residents, commuters and those living in its rural hinterland that work or use the services and facilities in the town. The road system, however, struggles to cope with the amount of traffic resulting in congestion at peak periods and levels of pollution which have led to the designation of an Air Quality Management Area.
141. To improve the environment and reduce traffic problems alterations to key junctions and re-routing traffic have been contemplated³¹ although the Councils' vision for the town centre allows for the expansion of facilities should the need arise. This is likely to increase the pressure on parking because spaces will be lost through redevelopment which, in turn, could have an adverse effect on the vitality and viability of the centre.
142. In order to avoid this it is intended that priority is given to short-stay visitors while 'capturing' a proportion of those commuting from the Weymouth area by providing 'Park and Ride' (P&R) facilities. A site for this purpose has been identified adjacent to the A354 (DOR 10), immediately south of the A35 bypass (land to the south of the Stadium Roundabout). As part of the proposal the policy also allows for the provision of a trunk road service area (TRSA).
143. It is anticipated that the TRSA would incorporate restaurants, shops and a petrol filling station and both facilities would have extensive areas for parking. The TRSA would ensure facilities for drivers accorded with guidance in Circular 1/2008³² and combining the uses would have economic, accessibility and logistical advantages.
144. The land allocated for the P&R/TRSA would involve development extending well beyond the A35 which currently acts as the boundary between Dorchester and the countryside beyond. More importantly, the uses would intrude into the AONB. An absence of suitable alternative sites was

³¹ See for example, the Dorchester Transport and Environment Plan

³² Circular 01/2008 Policy on Service Areas and other Roadside Facilities on Motorways and all-purpose trunk roads in England

cited as part of the justification for the P&R location although the supporting text suggests the case for the TRSA is less convincing requiring adequate justification were such a use to be pursued.

145. I understand the Councils' reasoning but, together with the AONB, both the P&R and TRSA would have implications for the setting of the nearby historic sites at Maiden Castle, a round barrow further to the south east and Herringston round barrows. These are important features in the landscape, Maiden Castle being the largest iron-age settlement in the UK.
146. Studies have suggested the impact of the P&R/TRSA would be limited [AD/EAST7] and that comprehensive planting would help to screen the facilities from the historic sites and the wider landscape. A Landscape and Visual Impact Assessment (LVIA) [AD/EAST7 F] concluded that the effect on the AONB would be marginally beneficial while that on Maiden Castle moderately adverse once landscaping of the site had had the chance to mature.
147. Natural England and Historic England contest these conclusions given the sensitivity of these sites and the prominence of Maiden Castle in the landscape. Together with the Dorset AONB Team, they also question why these facilities cannot be provided elsewhere. I share their concern because the linear form of the site together with the plethora of buildings, lighting and signage would have a noticeable urbanising effect and extend a 'finger' of development into the countryside. This would be difficult to mask effectively, especially from higher areas in the surrounding landscape and particularly during winter months. Development would also have a noticeable impact during construction and problems of noise and light pollution would be on-going issues.
148. In particular, I do not find the case for a TRSA to be so compelling so as to outweigh the substantial harm that siting the scheme adjacent to the Stadium Roundabout would have on the landscape and historic features of national importance. I appreciate there are no dedicated TRSA facilities near Dorchester but studies have shown an alternative, nearby site (Site M) would be less intrusive as a service location although it has value as a community space [AD/EAST 7A].
149. Other locations in and around Dorchester are capable of accommodating a TRSA although I accept they may not be ideal. Nevertheless, I do not consider the operational advantages of a combined P&R/TRSA are sufficient to justify its siting in a sensitive area of designated landscape and historic importance which would be contrary to paragraphs 115 and 116 of the NPPF and principles for conserving the historic environment.
150. Conversely, I find the case for a P&R to be more convincing. There is a considerable body of evidence on commuting patterns and vehicular movements [AD/EAST7] to support the provision of parking facilities outside the town. A number of locations have been investigated. The preferred site, immediately south of the A35, is regarded as the most favourable location because it is well placed to intercept the largest

number of commuters and reduce vehicular movements at the busy A35/A354 junction.

151. An alternative suggestion promoting the use of the P&R service at Weymouth would not be financially sound [AD/EAST7 D] requiring continued public subsidy while other sites would not confer the same operational benefits. Reducing the size of site required to accommodate P&R facilities would have significantly less impact on the landscape and historic features and would be less harmful than the combined use because it would be smaller and require fewer structures.
152. On balance, I therefore consider that reference to the TRSA should be deleted from policy DOR 10 and the supporting text and that a smaller, revised area capable of accommodating the P&R only should be identified. I endorse alterations to the boundary of the original site as proposed through modification **MM81** insofar as it could help to limit how far the site need intrude beyond the A35 while adjusting the wording of the policy and text accordingly.

Crossways

153. Crossways lies close to the District's eastern boundary with Purbeck District and functions as a dormitory settlement for Dorchester, other parts of West Dorset and settlements to the east. Although it is relatively large (2,267)³³ the village has no obvious centre but it is close to Moreton Railway Station which has connections to Poole, Bournemouth and Dorchester. Its proximity to the latter (six miles) means the Councils regard Crossways as a location which is capable of offsetting some of the county town's development needs.
154. The presence of the railway station means the village is theoretically a sustainable location even though parts of the settlement are beyond a reasonable walking distance. While it is possible for residents to use public transport I was presented with evidence to suggest the limited service means most people are likely to use their cars. For this reason there are concerns that further development would put more traffic on what some have suggested is a barely adequate road system.
155. In their preparatory work the Councils identified four peripheral sites with the capacity to accommodate some 1500 dwellings and up to 15ha. of employment land. This scale of development was opposed by many including the parish council and the Councils subsequently reduced the amount of development. Current proposals involve the allocation of land to the south of the B3390 for housing purposes and a smaller area on the south-western flank of the settlement for employment uses. These would deliver approximately 500 dwellings and a minimum of 3.5 ha. of employment land (policy CRS 1).
156. Some respondents claim this remains an excessive level of growth for the size of settlement, especially when compared to proposals for more

³³ Population at 2011 Census

established communities which have better facilities and service provision. I understand the reasoning behind this argument but it is not always feasible or appropriate for plans to adopt a proportionate approach to growth once constraints to development are taken into account.

157. In my view there are limited differences between the sites originally identified for housing purposes. Each is in a broadly sustainable location but the Councils' preference for development south of Warmwell Road would mean that a southerly expansion of the settlement would encourage additional services and facilities to focus on the main route through the village.
158. Expanding Crossways in this direction would, however, potentially compromise the sand and gravel reserves which underlie much of the area and also place housing closer to internationally protected heathlands and wildlife sites. This would increase the possibility of disturbance and a loss of habitat. According to the Councils neither factor would hinder development.
159. Sand and gravel deposits are within a Mineral Safeguarding Area as identified in the Bournemouth, Dorset and Poole Minerals Strategy 2014 (MS) [CD/OCP8] which accords with advice in the NPPF on conserving mineral resources and avoiding the sterilising of reserves (paragraphs 142 and 143). I was told that prior extraction of sand and gravel was feasible as part of a phased programme of building works and this would be consistent with policy provision in the MS.
160. A study undertaken on behalf of the landowner [AD/EAST4] sets out reasons why extraction might be uneconomic as a result of adverse impacts (MS - policy DM1) or the need to provide 'buffers' between residents and mineral workings (MS - policy DM2). These factors would have a bearing on whether extraction was viable but would be unlikely to prevent residential development from taking place.
161. Protecting important habitats by providing suitable alternative natural greenspace (SANG) is essential as new development would otherwise result in people and their pets intruding into sensitive areas. This is acknowledged in the development proposals for Crossways (policy CRS 1). A plan illustrating how areas of SANG could be incorporated into the future layout of this area was provided [WDWP/Ex05] and the Councils have responded to the views of the County Council and Natural England [see SOCG2] by recommending changes via **MM61**.
162. Modifications proposed in **MM62** and **MM64** would address concerns raised by Heritage England about adverse effects on a Scheduled Monument. Acknowledging the importance of these factors would ensure proposals accorded with the NPPF.
163. Previous sites identified to the north-west (Site D) and north of Crossways (Site A) are not affected by similar constraints. Despite this Site D would extend the village into more open landscape but Site A would be contained by the railway line. It was suggested that a significant

proportion of this area would remain open to serve as a recreational area and that it would be possible for cycling and pedestrian links to be created to Moreton Station. My inspection of this area leads me to conclude that it is of sufficient merit to warrant consideration as a location for longer-term development.

164. Nevertheless, I consider the Councils' preferred site (Site B) is the best direction for development at Crossways being better placed than alternatives to provide a focal point for the community along the B3390. In endorsing this site the Councils have focused on the developer/landowner as critical in the production of a masterplan while recognising that local residents, Parish, District and County Councils and Network Rail should be party to this process (**MM64**).
165. Crossways is close to Dorchester but without substantial enhancements to transport links I do not consider it is a particularly sustainable option for meeting the longer term needs of the county town. I am mindful, however, of the Partial Review of the Purbeck Local Plan which may have implications for this area and these could, if appropriate, be taken forward in the early review of the LP I have recommended.

The Western Settlements - Lyme Regis, Bridport and Beaminster

166. Allocations are proposed in the larger communities in the western parts of WD at Beaminster, Bridport and Lyme Regis although these settlements are located in the Dorset AONB. This, together with other factors have been considered by the Councils when balancing the likely impact of development on the natural environment and the future needs of each community.

Beaminster

167. Three sites were identified in the Pre-Submission Plan as suitable locations for housing provision in Beaminster but were later reduced to one following public consultation on the draft proposals. Residents were worried that access to two sites in Hollymoor Lane would mean vehicles had to negotiate a narrow section of East Street where there are safety concerns because of the potential conflict between pedestrians and road users.
168. I accept there are risks involved but a significant amount of housing has been built already beyond the 'pinch point' of traditional properties in East Street. The Highway Authority has been unable to resolve complaints by residents about this problem and it seems unlikely that an alternative route can be provided. A prospective developer has suggested a 'shared surface' could provide a workable solution similar to one adopted on the main road through South Perrot, some five miles to the north of Beaminster. There highway problems are compounded by the bends and volume of traffic although the village is much smaller than Beaminster. East Street, in comparison is straighter with better sight lines and is not a through route. I therefore consider a shared surface could help offset

safety issues although further work should be undertaken to determine what level of additional development could be accommodated.

169. In reaching this conclusion I am mindful that land off Broadwindsor Road has been proposed for a mixed-use development (BEAM 1) with the emphasis mainly on housing (120 dwellings). Viability issues have meant employment uses proposed under the previous LP have not materialised although the Councils believe some limited employment (0.5 ha) and live-work units could still come forward. The site is flat but would extend the western edge of the town into the countryside and intrude into the designated AONB while it can be seen from higher land beyond the settlement.
170. I find it difficult to conclude that BEAM 1 represents major development in the AONB given the scale of strategic sites promoted elsewhere in the Plan area although I do not dispute it would be a significant scheme for Beaminster. I have therefore had regard to its potential impact on the landscape while recognising that some development is required to maintain the vitality of the settlement. I consider there are exceptional circumstances to support the allocation because of the need for new homes and jobs and the scope for minimising the visual impact of the development and protecting wildlife interests through strategic planting.
171. An additional paragraph should be inserted into the LP in response to concerns raised by Heritage England. This would highlight the presence of nearby heritage assets (**MM84**) and accord with the revised wording agreed between the parties [SOCG 3]. The alteration is supported by Natural England who sees the setting of historic assets as contributing to the special qualities of the AONB.

Bridport

172. As the largest settlement in this part of WD, Bridport is the most suitable location to meet future development needs in both the immediate and wider area. The proposed development of Vearse Farm on the western fringes of Bridport is therefore consistent with sustainability principles but led to a large number of representations, including a petition, opposed to the allocation. Local residents and organisations object to the choice and scale of the site and contend that development would see a significant expansion in the population of the town adding to existing problems of traffic congestion and pressure on local services and facilities.
173. The size and extent of the allocation challenges the presumption in the NPPF that major development should be avoided in AONB unless there are exceptional circumstances. It is clear to me that the Councils are well aware of the importance of protecting designated landscape but face the difficult problem of balancing such concerns with the need to provide homes and jobs to meet future needs. In order to achieve this and adhere to sustainable development principles it is inevitable that some areas in the AONB will be affected.

174. From my visits to the area I concur with those who say that buildings on Vearse Farm would be visible from various points in the immediate and wider landscape. However, the topography would make it difficult to appreciate the size of the development from any one location and this could be reinforced by appropriate landscaping. If attention is paid to the design throughout the phasing programme it would be possible to introduce variety in the form and layout to help offset some of the concerns about the scale and massing of the development.
175. I was told of various issues such as flooding problems affecting the site, as well as land downstream, which could increase the likelihood that development would intensify run-off and have adverse consequences for areas between Bridport and West Bay. I cannot discount this but there has been no formal objection by the Environment Agency to suggest this is so serious an issue to curtail either some or all of the housing and employment uses proposed for the site.
176. Similarly, there are fears that traffic generated by the scheme would add to congestion and pressure on the highway network, particularly West Allington Road (B3162). This is the main route into Bridport from the west and one which, I was told, is very sensitive to further development. I am aware that congestion is a significant issue, particularly at peak times and during the summer months. Nevertheless, the Highway Authority is satisfied that measures can be taken to accommodate the level of development involved.
177. It was suggested the forthcoming neighbourhood plan for Bridport could be used to examine development options before a final decision was made. I regard this as unrealistic given that the plan is at an early stage of preparation. The delivery of Vearse Farm is a crucial element in the Councils' housing land supply calculations. Deferring a decision until such time as a neighbourhood plan can be put in place would undermine the soundness of the LP and increase the risk of schemes being promoted in locations where the individual and cumulative impact of development may be greater. On balance and having regard to the site's location and other issues I have referred to, I consider there are exceptional circumstances to justify the identification of Vearse Farm in the LP.
178. Vearse Farm is seen as a suitable location to provide a new school or for an enlarged replacement should the decision be taken to close an existing school. A review of education capacity is being undertaken by the County Council although it has yet to decide how it intends to meet future needs in Bridport. A minimum of one additional form of entry (FE) is required to cater for the projected increase in birthrates and new housing but a further FE may prove necessary in future [WDWP/Ex08].
179. The County Council says the primary school site at Skilling Hill Road (St Mary's) is too small to accommodate a further FE although this was disputed by a number of respondents. It was also argued that the relocation of education facilities from St Mary's to Vearse Farm would exacerbate traffic movements and increase the distance for those travelling from West Bay and areas to the south of the town. I accept a

change of location might prove inconvenient for some families but existing and potential school sites are relatively close to each other.

180. In relation to education it seems to me that WD is taking a pragmatic approach by preparing for changes to provision in the absence of a final decision. Thus policy BRID 2 explains the existing school off Skilling Hill Road could be used for housing purposes if facilities were moved to Vearse Farm (**MM71**). However, a small adjustment to the modified text to BRID 1 (**MM67**) is required to clarify that provision of a new school site at Vearse Farm should have capacity for a two-form entry in the event that this is required.
181. My overall view is that the allocation of Vearse Farm should be supported. It is a relatively well-contained site bounded to the west and south by the A35 bypass, by the B3162 to the north and the current western limits to the town on the east. The scale of the proposed development affords opportunities to address some of the wider traffic issues including improvements to the Miles Cross junction while introducing new facilities of benefit to the town.
182. As part of its housing review, discussions with the developer have encouraged the Councils to increase the rate of building activity from between 50 and 80 dpa to 100dpa. This is reflected in **MM66**. Changes to the supporting text and policy (BRID 1) are also necessary in light of information provided by Dorset County Council regarding school provision on the site (**MM67, MM69 and MM70**), changes to sustainable construction standards and to address concerns raised by Heritage England regarding the treatment of heritage assets (**MM68**).
183. The Councils have identified waste land off Jessopp Avenue on the north-eastern side of the town as suitable for housing purposes. The site benefits from good access to the road system but also has amenity and recreation value. Being close to the River Asker water voles and otters are known to be present. In responding to the concerns of local residents and Natural England the Councils have endorsed the need for a substantial and effective wildlife corridor between development and the river. The changes are reflected in both policy BRID 3 (**MM73**) and the supporting text (**MM72**). The latter also includes revised text noting the historic assets which are close to and visible from the site and to which regard should be had when development proposals come forward.
184. In view of the likely need for further retail space the Councils, in common with their approach to other centres, have designated two car parks as the preferred locations for this purpose (BRID 4). The proposal has been criticised because of the existing pressure for parking in the town centre although a feature of the policy is to ensure sufficient parking is retained as part of any scheme. In order to deliver the Councils' ambitions for this land much will depend on the careful design of any development.
185. In written representations and views expressed during the hearings it was clear that St Michael's Trading Estate is an area which makes an important contribution to the vitality of Bridport town centre. An eclectic mix of

businesses occupies traditional but small-scale industrial buildings which add considerably to the town's retail appeal. Some of these buildings are of historic interest but the Councils, supported by the owner, maintain that regeneration of the Trading Estate is necessary to secure its future. This would involve retaining employment opportunities and restoring buildings of historic interest by allowing residential development as part of a viable scheme.

186. It is apparent the buildings are in need of repair and improvement but opponents fear proposals could devalue the unique form and appeal of the site and undermine its character. Such risks cannot be discounted but ignoring the condition of the buildings is more likely to jeopardise the future of the site in its current form. Incorporating some residential use appears to be a realistic and modest option which is capable of funding improvements while retaining the inherent character of the Estate. I see no reason to reject the proposal subject to the changes to the policy (BRID 5) and the supporting text to reinforce measures necessary to safeguard the riverside corridor and maintain its wildlife value (**MM74** and **MM75**).

Lyme Regis

187. Reservations were expressed over the feasibility of developing land at Woodberry Down (LYME 1) because of geological problems and soil conditions. The site was allocated in the previous LP and has been enlarged to accommodate some 90 dwellings as well as employment uses. Visually it is very well contained by the surrounding landform so its impact on the AONB is limited and is not, in my view, a reason for opposing development. As I saw work is underway, the developer having piled the site to overcome stability issues. Despite the awkward nature of the site the housebuilder is confident of meeting the Councils' objectives although it illustrates the difficulties associated with finding suitable development land.
188. I have commented previously on matters arising from the proximity of the administrative boundary with East Devon and the importance for the neighbouring authorities to collectively examine future development options as part of a cross-border assessment (see paragraphs 14 to 17).

Sherborne

189. Sherborne is an attractive and historic town in the northern part of WD which many respondents believe would be irretrievably damaged by further expansion. I accept that inappropriate schemes could undermine its attractiveness but the Councils are required to plan for the future needs of the community. Sherborne is a sustainable market town with a wide range of services and facilities and as one of the largest settlements in the Plan area it is an appropriate and suitable location for accommodating some development, a view shared by the Councils [CD/NORTH/BP].

190. The draft Submission Plan acknowledged that high house prices had led to more commuting. Residents were travelling to better paid jobs elsewhere while those with lower-paid jobs could not afford to live there and had to commute from surrounding places such as Yeovil. Consequently there was support for increasing the supply of affordable housing following work undertaken for the Sherborne Area Community Plan³⁴.
191. Nonetheless there has been little housebuilding in recent years and the majority of new housing is reliant on implementing a previous LP allocation [Policy NA1]. Work on this site has only begun recently and little additional housing is anticipated during the remainder of the plan period. Proposals in the Pre-Submission Plan [CD/SP1] favoured an extension to the LP allocation at Barton Farm on the northern fringes of the town but strong opposition meant it has not been pursued.
192. The Councils have investigated other development options on the periphery of the town but contends that these would be damaging. Various factors have been cited to support this claim such as the impact on historic assets, poor access, reduced gaps to nearby settlements and landscape constraints.
193. At the examination hearings the Councils explained how further expansion of Barton Farm would be detrimental because its position on rising land would be seen from the opposite side of the valley. I agree it would be visible but its overall effect would be limited because the topography restricts views from other locations including those closer to the town. The impact of development in the wider landscape could be ameliorated by structural planting although a sensitive approach would be required because extensive planting would be inappropriate in view of the open character of the escarpment.
194. I do not discount the potential impact on the town from more people and traffic but the further extension of Barton Farm would assist in meeting future housing needs and provide an opportunity to secure a new link road from the A30 and improve access to the north. This could help in removing some of the traffic from the town while the site itself is sufficiently distant to avoid any direct effect on the town centre.
195. The allocation of the former gasworks (SHER 4) for employment and housing uses was regarded by some respondents as impractical because access and flooding issues could impede delivery. There are alternative routes to the site should it be necessary to avoid the nearby railway crossing while a flood warning area has been identified immediately across the River Yeo from the site. However, the Councils confirmed that neither the Environment Agency nor the Highway Authority considered these were issues which could not be overcome. I was also informed that new owners had acquired the site and following its remediation intended to pursue an application for housing in 2015. Given the proximity of the site

³⁴ As referred to in CD/NORTH/BP

to the railway station and facilities in the town centre, I consider it is a suitable location for this purpose.

196. I am aware that a housing scheme involving a modest site on the western edge of the town was recently rejected by the Councils. In view of my conclusions that the LP has made insufficient provision for housing for the entirety of the plan period, suitable sites in sustainable settlements should not be too readily rejected. The identification of further land at Sherborne is, in my opinion, a necessary and logical requirement for the successful and sustainable planning of this part of WD before the end of the plan period.
197. As part of the Plan review I therefore consider development needs in Sherborne should be reappraised. In reaching this conclusion I am conscious of the considerable local opposition to the Councils' efforts in site finding during the plan preparation process. Consequently, it may prove opportune for the community to examine and engage in the planning regime for Sherborne by examining options for further growth through a neighbourhood plan. I have therefore amended the Councils' modification (**MM60**) requiring that additional housing site(s) are brought forward either through the LP review process or by means of neighbourhood planning.
198. I have had regard to representations to LP provision for land at Sherborne Hotel (SHER 3) and for any future expansion of the town centre retail area (SHER 4) but I can find no reason for recommending changes to these policies.

Issue 4 – Whether generic policies for the Plan area are appropriate and consistent with the requirements of the NPPF and PPG?

Housing

199. Policy HOUS 6 seeks to restrict residential development in rural areas where settlement boundaries have not been defined. Several respondents felt there were settlements which were capable of accommodating modest housing projects particularly where schemes were designed to meet local needs. Limited development would also assist in supporting and retaining community facilities without compromising the form or function of rural communities.
200. Adopting a more dispersed spatial strategy could make a modest contribution to housing needs in WD but it would not be a sustainable option. Many villages have limited facilities, poor public transport links and are in sensitive locations in the Dorset AONB. Nevertheless, the Councils say they welcome initiatives to promote schemes which have local support through neighbourhood planning and I was told of several communities who are engaged in this work. There is no guarantee that plans will come to fruition but the Councils' stance accords with the Government's localism agenda and could assist in delivering more affordable housing.

201. In responding to other issues associated with policy HOUS 6 [WDWME09] the Councils produced a supplementary paper clarifying how applications for rural worker accommodation will be assessed. The intention is that relevant factors should be included as part of the supporting text rather than in policy (**MM19**). In my opinion, the changes strike a reasonable balance between the Councils' roles in maintaining the open character of the countryside yet supporting rural enterprise consistent with paragraphs 28 and 55 of the NPPF.
202. The Councils were reluctant to set a threshold for extending or replacing properties outside defined settlement boundaries in the absence of evidence. I agree it is difficult to do so but it is clear that local residents and organisations are worried that inappropriate development could damage sensitive locations, especially those in the AONB. Reliance on phrases such as 'significantly larger' provides little help to potential applicants. More precision is therefore proposed with the introduction of a 'guide' percentage while retaining flexibility to allow for exceptions where they can be justified (**MM20**).
203. Further definition is provided for 'low impact dwellings' (**MM21**) and reference is removed to the creation of new residential curtilages where there is no dwelling (**MM22**). The changes to the text are reflected in revisions to policy HOUS 6 as shown in **MM23**. The removal of reference to low-impact or self-build dwellings from policy HOUS 6 was said by one respondent to make the Plan unsound because it would no longer accord with the NPPF in meeting objectively assessed need. I disagree because the revision made in **MM21** acknowledges that there is demand for both low impact dwellings and self-build projects. Neither types of development would be prevented from coming forward, subject to compliance with relevant policies for new housing.
204. It has also been argued that modification **MM23** fails to acknowledge requirements in the Self-Build and Custom Housebuilding Act 2015³⁵. This obliges local authorities to keep a register of individuals and community groups who have expressed an interest in acquiring land for self-build and custom-build projects. I see no reason why the Councils cannot implement a register of interest outside the local plan process.

Community Needs and Infrastructure

205. The LP identifies the need for a variety of community facilities and services to support new and existing development. The Councils have endeavoured to respond positively to comments by making some modest but important modifications. These in turn have attracted criticism but I do not consider they raise issues which would affect the soundness of the Plan or weaken the policy base; instead, they update, clarify or provide further explanation of the Councils' position and are reasonable changes to make (**MM24, MM25, MM26, MM27, MM28, MM29** and **MM30**).

³⁵ Granted Royal Assent on 26 March 2015

206. The Councils approach to renewable energy is set out in policy COM 11 and would allow schemes generating power from renewable sources subject to compliance with three criteria. As drafted this means it would not be consistent with a recent ministerial statement or revisions made to the PPG³⁶. A change to both the supporting text and policy is required so that it is clear that proposals will not apply to wind energy developments, the latter needing to comply with national policy and guidance until the LP is reviewed. The revisions are set out in **MM85** and have the approval of the Council.

Economy

207. There is little opposition to the Councils' employment strategy which proposes land allocations of around 60 ha. in sustainable locations within or close to main population centres, although, as previously discussed, projected levels of employment growth are seen by some as needing the support of a larger workforce and further housing. The Councils' intention to align their objectives with those of the LEP (**MM5**) is regarded as further proof of a potential imbalance because LEP priority areas are unlikely to reflect the skills and age profile of the existing workforce.
208. I do not accept that alterations to the introductory text on the economy presage a significant change to the employment structure or the workforce which would be needed to support it. The LEP's Strategic Economic Plan (SEP) [CD/ECON 5] identifies county-wide business priorities which will be more relevant to some areas than others. The need to reduce unemployment and improve the skills of the workforce are acknowledged with the SEP emphasising the improvements required in the economy of Weymouth, the employment potential of Portland Port and the tourism opportunities associated with the Jurassic Coast.

Retail Development

209. Limited but necessary changes are required to explain the Councils' position when assessing retail proposals. The modifications (**MM6** and **MM7**) would ensure the LP reflects the most recent Government guidance.
210. Policies allowing for the expansion of retail facilities using car parks in town centre locations led to a number of objections. Respondents were generally of the view that the loss of parking would be detrimental because of the effect on the vitality and viability of shopping centres. I have commented on this previously and I am satisfied the Councils are endeavouring to strike a reasonable balance by supporting new initiatives while requiring schemes ensure sufficient parking is retained to minimise the threat to town centres activities.

Tourism

211. A number of caravan and camping site operators contend that policy changes in the LP would be detrimental to their businesses. I consider

³⁶ Ministerial Statement on Wind Turbine Development, 18 June 2015

that differences between these and the previous LP are subtle and I am not convinced they are as restrictive as has been claimed. Tourism is acknowledged as a very important part of the areas' economy and one which is closely linked to its environmental quality. The intention of policy is to achieve a sensible balance encouraging and supporting tourism yet protecting the landscape and environment that attracts visitors to this part of Dorset.

212. Proposals for caravan and camping sites would be subject to policy ECON 7. This is largely supportive of new and expanded facilities subject to their impact on the natural and built environment. The policy does, however, imply that schemes on the Heritage Coast are not likely to be favoured which, given the importance of this stretch of coastline, is an appropriate stance for the Councils to adopt.
213. In response to criticisms of their position, the Councils have said the introductory text should be altered to identify other policies which are relevant to proposals involving the change of use of existing buildings (**MM8**) or the replacement and expansion of existing tourist accommodation (**MM9**). Further details of accommodation permitted on caravan and camping sites is provided in **MM10** and a small but significant alteration to policy ECON 8 broadens the definition of diversification projects in rural areas (**MM11**).

Environment and Climate Change

214. Revisions to policy on the environment and climate change are shown in a revised chapter under **MM3** and **Appendix B**. Some of these alterations are minor, such as correcting the title of the County Minerals Plan, and could be taken forward as Additional Modifications. Responses to the proposed modifications also identify adjustments which would improve the Plan but are not relevant to my consideration of soundness.
215. Modifications to the sub-section on wildlife and habitats expand on how the Councils will assess proposals. The changes have been criticised for undermining biodiversity interests but, in my opinion, they provide a reasonable approach by supporting development yet recognising the Councils' responsibility to protect species and habitats. The changes are supported by Natural England, except where references to a net loss in biodiversity have been removed, and are broadly consistent with the objectives of paragraph 118 of the NPPF. A missing 'or' should, however, be inserted into the final part of the second sentence of ENV 2 (iv) to clarify that development will not be permitted if appropriate measures are not put forward to adequately mitigate development affecting wildlife interests.
216. In adjusting the policy relating to heritage assets the Councils have reflected content in the NPPF. Revisions to the supporting text identify key initiatives where heritage has relevance for wider Plan objectives. The position on flood alleviation schemes has also been updated to provide a generic stance on protecting schemes from inappropriate development.

217. During the examination it was acknowledged that government changes to housing and energy standards would necessitate adjustments to LP policies. The Councils have attempted to address this by setting out broad objectives for building works while accepting the need to comply with new initiatives.
218. The changes being introduced have been outlined in a recent ministerial statement³⁷ and initiated through the Deregulation Act 2015. I therefore consider that modifications proposed to policy ENV 12 and the supporting text are no longer appropriate given the Government's intention to introduce additional optional Building Regulations on water and access and a new national space standard to complement the existing Regulations.
219. The revisions mean that local planning authorities should not set any additional technical standards in local plans or supplementary planning documents relating to the construction, internal layout or performance of new dwellings. The optional new national technical standards can be required through LP policies where there is evidence to support the case for doing so and providing their impact on viability has been considered. The Councils have not yet had an opportunity to consider this.
220. I therefore recommend changes are made to the supporting text (paragraphs 2.5.22 and 2.5.23 and policy ENV 12 (i) as proposed. In addition, paragraph 2.5.26 should include reference to proposals to exempt small sites in meeting zero carbon standards.
221. Small but important changes are also proposed to the supporting text and policy ENV 16 on amenity which are intended to provide further explanation on matters the Councils will have regard to when assessing development proposals. The alterations complement rather than change the original aims and objectives of the policy and should be supported.
222. The modifications referred to above are referenced under **MM3** and shown in full in **Appendix B**.

Other matters

223. Since the economic downturn development viability has become a more prominent issue. The Government has advised councils to avoid making unrealistic or excessive demands on developers whether through financial contributions or the physical provision of infrastructure if this is likely to put schemes at risk.
224. It is important to adopt a flexible approach to viability issues. For this reason the inclusion of a new paragraph (paragraph 1.4.4) would help to clarify the Councils' position (**MM1**). On a similar theme, revised wording confirms that infrastructure requirements will be reviewed in order to maintain an up-to-date Infrastructure Delivery Plan (**MM2**).

³⁷ Ministerial Statement (Planning Update) by the Secretary of State for Communities and Local Government, 25 March 2015

225. Additional wording would improve explanation of two terms relating to heritage to address concerns raised by Historic England (**MM79** and **MM80**). The Councils have also identified changes are necessary to development boundaries for Cerne Abbas (**MM82**) and Godmanstone (**MM83**) following the adoption of a Neighbourhood Plan covering both settlements.
226. A number of alterations are also necessary to correct minor errors. These include factual updates and wording and mapping changes which have no bearing on the substance of the Plan and can be taken forward as Additional Modifications.

Conclusion

227. My overall conclusion is that the Plan provides a logical basis for promoting and regulating growth in West Dorset and Weymouth and Portland by adhering to sustainable development principles. However, I am not convinced it provides sufficient reserves of land to meet housing needs for the entirety of the plan period or addresses issues which are crucial for the longer-term planning of the area.
228. The Councils have acknowledged the need for an early review, a measure I endorse. It is imperative that the deficiencies I have identified are addressed as quickly as possible. The key is for the Councils to monitor the effectiveness of their housing strategy and respond positively should changes prove necessary. As part of the review they should consider the future role of the county town in accommodating growth as well as other sustainable locations, including Sherborne.
229. I do not agree with those who advocate the LP is so deficient that it should be found unsound. Doing so would increase the risk that alternative schemes come forward in less suitable or sustainable locations or otherwise jeopardise progress on improving housing delivery which is crucial if needs are to be met. Subject to the Councils implementing the recommended modifications my overall conclusion is that the Plan is sound.

Assessment of Legal Compliance

230. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The West Dorset, Weymouth and Portland Local Plan is identified within the approved LDS April 2014 which sets out an expected adoption date of May 2015. A short delay in adoption does not affect the Local Plan's content which is broadly compliant with the LDS.

Statement of Community Involvement (SCI) and relevant regulations	The latest SCI was adopted in November 2014 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Reports (June /2012 and June 2013) sets out why AA is not necessary.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
Public Sector Equality Duty (PSED)	The Local Plan complies with the Duty and is adequate.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

231. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
232. The Councils requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendices the West Dorset Weymouth and Portland Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

P R Crysell

Inspector

This report is accompanied by appendices containing the Main Modifications