



**WEST DORSET, WEYMOUTH AND
PORTLAND LOCAL PLAN
EXAMINATION**

**FURTHER STATEMENT ON BEHALF
OF LITTLEMOOR DEVELOPMENT
CONSORTIUM
REPRESENTOR ID: 724
MATTER 9 (9.1)
MR RICHARD BOOTHER**

Date: 5 November 2014

Our Ref: JWG0379

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1 EXAMINATION STATEMENT

Introduction

- 1.1 RPS has been instructed by Littlemoor Development Consortium (LDC), who are the landowners promoting land at Littlemoor for mixed use development, to prepare a further statement in relation to Policy LITT1 of the West Dorset, Weymouth and Portland Local Plan (WDWPLP) to address the issues raised by the Inspector to be addressed at the hearing session scheduled for Wednesday 3rd December 2014. LDC has played an active role at all stages of the preparation of the WDWPLP.

Does LITT1 offer the best opportunity for accommodating future development needs?

- 1.2 In general terms in relation to the distribution of development, the options considered by the West Dorset District Council (WDDC) and Weymouth and Portland Borough Council (WPBC) ('the joint LPA's') are set out in para. 5.8-5.12 of the Chapter 3 Background Paper (CD/SUSBP). LDC has consistently supported the allocation of development in areas which take account of the needs, size and roles of the area settlements (Option A) as the most sustainable approach to meeting the areas development needs over the Plan period.
- 1.3 LDC consider that LITT1 does offer the best opportunity for accommodating future needs at Weymouth, as one of the Plan area's principal settlements. It is submitted that the site has gone through several phases of assessment and scrutiny and has consistently been shown to be the most appropriate strategy, when considered against the reasonable alternatives. This is summarised in the Weymouth, Portland, Littlemoor and Chickerell Background Paper in June 2013 (CD/WPCLBP).
- 1.4 The need for a 700-dwelling urban extension of Weymouth was first identified in proposed changes to the Regional Spatial Strategy for the South West in July 2008, noting that Weymouth is highly constrained and cannot accommodate the identified demand, therefore additional provision should be made within an urban extension in West Dorset. Following this, Halcrow Group Ltd. was commissioned by WDDC to study the deliverability of such an urban extension (alongside urban extension to Dorchester)(CD/SUS6). Land within the area administered by WPBC was therefore excluded from the study and land at Littlemoor and Chickerell were identified as Areas of Search (AoS). The framework for assessing these areas was based on the following themes: agriculture and land use; biodiversity; built and cultural heritage; flood risk and drainage; landscape; road networks; water resources; utility supply; access to employment and services; availability of community facilities and social cohesion.
- 1.5 The report published in September 2008, concludes:
- "In comparison to the Dorchester and Chickerell areas, the Littlemoor Area of Search has presented limited development constraints, with no critical or significant issues identified."**

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- 1.6 Two sites in the Chickerell AoS, and the Littlemoor site were taken forward by WDDC in the 'Options for Growth' Consultation in June 2009 (CD/CON14) (alongside option H03 in WPBC's 'Our Community, Your Future: Options' Consultation (CD/CON5)).
- 1.7 The feedback report on 'Options for Growth' was published in September 2009 (CD/CON15). The report states that comments were to be taken forward into the preferred options for the Core Strategy.. Whilst the report did not draw any firm conclusions in relation to a particular option, it did explain that the greatest level of opposition was to the Southill option and that that consultees had not ruled out the Littlemoor option on environmental grounds, pointing out that there is potential for environmental enhancement depending on how the development is carried. As a result of this exercise, no further options were identified for further consideration. Shortly afterwards, WDDC and WPBC announced they were preparing a joint Local Plan, and in actual fact the comments were taken forward into the Draft Local Plan where the Southill option was not included as an allocation, and land at Chickerell and Littlemoor were identified as urban extensions.
- 1.8 In Autumn 2011 the joint LPAs embarked on a series of consultation events. This was an opportunity for other alternatives to emerge and be tested, and the chapter background paper (CD/WPCLBP) records that 7 sites were put forward for development. These are considered in more detail below (see **Appendix 1**).
- 1.9 As noted above, the site was included in the Pre-submission Draft Local Plan (July 2012) (CD/SP1) published in July 2012. An alternative site public consultation was undertaken during November and December 2013. Again, at both stages of consultation, a number of alternative sites were presented, all of these were rejected as they were of insufficient scale to deliver the amount of homes required or mixed use opportunities.

Additional Sites Put Forward for Development

i Land at Bob Lucas Stadium, formally known as Wessex Stadium Weymouth/Chickerell

- 1.10 Wessex Delivery LLP (Person ID 414) are promoting land at the Bob Lucas Stadium, as an alternative the LITT1 Allocation. The land within the objectors control amounts to 4 ha, and even at 40 dwellings per hectare (dph) this would only yield approximately 160 dwellings, and that is without any additional employment land or other infrastructure. Additional land to the east is proposed as part of the suggested alternative, but this is not defined and presumably not under the control of the objector. There are no firm plans in place for the relocation of Weymouth F.C who play their home games at the stadium. In such circumstances the site is clearly inconsistent with the NPPF as it fails the test of developability (footnote 12 , para. 47).

ii Wyke Oliver, Farm

- 1.11 Mrs. List and Miss Scutt (Person ID 736) are promoting land at Wyke Oliver Farm which would only deliver 150 units in piecemeal fashion across two sites. Again, it does not make provision for balanced sustainable growth through the delivery of employment or other infrastructure. The development on steeply-sloping land would erode an important local gap between Littlemoor and Preston, and would project into open farmland to the detriment of the landscape character of the area.

iii Land at The Willows, Icen Farm

At 5.6 ha, the site would yield not more than 225 dwellings at 40 dph, and so is not a credible alternative to LITT1 (and is not being promoted as such). The Plan makes adequate provision for the areas development needs over the Plan period, and the additional dwellings are not required. In the context of the work undertaken to date on a masterplan for the LITT1 site (AD/WPCL13) , the land at Icen Lane would unnecessarily extend the built form of the development further to the north and into the Area of Outstanding Natural Beauty (AONB) and would undermine the opportunities presented by the development to create a softer edge to built-up area: the tree belt proposed not being of a sufficient scale and sufficiently robust to provide the significant enhancements required as part of a landscape-led approach advocated by the Dorset AONB Partnership and the joint LPAs.

iv Land to the north of Upwey, between Dorchester Road and Icen Lane, Weymouth

- 1.12 The full extent of this site is also not in the objector's full control (Person ID 835), and so also fails the test of developability. The objector appears to be suggesting that the land should be included in lieu of some or all of the land allocated under LITT1. Notwithstanding difficulties with accessing the site and noise from the Relief Road and the railway line, in the absence of any clear proposals supported by evidence as to how the site could deliver balanced growth as an alternative to all or part of the Littlemoor urban extension, the Plan would fail the 'Justified' test were this site to be included in the Local Plan. Like the site at Icen Lane, it would unnecessarily extend the built form of the development further to the north and into the AONB.
- 1.13 In the absence of any credible alternatives, the LITT1 site has rightly been included in the version of the Local Plan submitted to the Secretary of State.
- 1.14 The strategy for Weymouth set out in chapter 9 represents the most appropriate strategy when considered against the reasonable alternatives. Objectors to the site have suggested a range of alternatives that have rightly been discounted at various stages of the Plan's preparation. A strategy based on any one or combination of these alternatives would represent a disjointed and piecemeal strategy for the town, which would have a detrimental effect land its landscape setting and would not make the best use of the transport network in the vicinity. None of the alternative options presented and considered can offer the same balance of sustainable growth that LITT1 can offer. The allocation of the site provides the opportunity to enhance the AONB and provide a positive gateway to Weymouth, as well as consolidating and improving Littlemoor's role as a local service centre.

Has the need to develop in the AONB been fully considered?

- 1.15 The guidance in paragraph 115 of the NPPF which states that states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty, and in Paragraph 116 which states that planning permission should be refused for major development in these areas except in exceptional circumstances, is noted.
- 1.16 The edge of the built up-area has changed considerably since the Dorset AONB was designated in 1959, and the recent completion of the Weymouth Relief Road has had a

significant effect on the character and appearance of this part of the AONB, whilst delivering positive enhancements to the town's infrastructure.

- 1.17 As noted in paragraph 1.26 of the Local Plan, just over two thirds of the Plan area is within the AONB, which not only abuts the principal settlements of Weymouth and Dorchester, but also washes over other large settlements at Bridport, Beaminster and Lyme Regis. If no development were proposed in the AONB, development would be focused within the urban areas of Weymouth and Dorchester, and to the north and east of Dorchester, and focused on existing settlements at Sherborne and Crossway, all heavily constrained in their own right, as set out on page 56 of the Draft Local Plan. Because of these additional constraints, paragraph 3.3.6 of the Draft Local Plan explains that local housing and economic needs could not be met without major development in the AONB, and that the need for growth is considered to justify the exceptional circumstances for allowing major development to take place in the national designated area. LDC has therefore supported the joint LPA's approach that where development has been allocated in such areas, it is on the basis that any landscape impact can be mitigated, and, as is the case with the site at LITT1, that opportunities exist to actively enhance the setting of the AONB through softening the visual impact of the existing urban edge on the wider landscape. This landscape-led approach has been given very early consideration by LDC, as evidenced in the Landscape Character and Features Strategy (AD/WPCL14), and the foundations for meeting these requirements are clearly shown on the Illustrative Masterplan (AD/WPCL13) both submitted with LDC's early representations. The Dorset AONB Partnership (Person ID 510) and the County and District landscape teams have been involved in the further evolution of the masterplan.
- 1.18 LDC consider that the need to develop in the AONB has been fully considered at all stages of the Plan's preparation.
- 1.19 Weymouth has not become any less constrained since the publication of the Proposed Modifications to the Draft RS in 2008. The Halcrow Report concluded that:
- “Although the Littlemoor AoS is located within the Dorset AONB, the landscape assessment judged that the development could be provided without major impact on the existing landscape character.”**
- 1.20 The issue was considered in some detail in the Options For Growth feedback report. It was noted that the Dorset AONB Partnership could support the development here if it could be proven to be an enhancement. It was noted that this would involve the integration of a comprehensive mitigation strategy to include soft landscape measures such as the provision of open space to accommodate groups of large scale trees, plus innovative high quality design, materials and standards of workmanship.
- 1.21 In responding to the consultation on the Draft Local Plan, the Dorset AONB Partnership commented on the extent to which the draft allocation complied with the NPPF. Critically, the Dorset AONB Partnership does not provide any evidence to support the assertion that undesignated areas may have capacity to accommodate the development. Otherwise, the Dorset AONB Partnership clearly recognise the opportunities presented by the proposed development at Littlemoor and support the approach proposed in the Local Plan with regard to developing in the AONB:

“In the event that the national policy for major development in AONBs is satisfied a comprehensive mitigation and enhancement strategy would be required to minimise the impact of the development upon the AONB. A high quality development should be landscape-led, advanced planting along the boundaries of the site is supported, however there is concern that the specified tree and copse planting should be large scale, and robust enough to provide a significant enhancement within the urban and interface. The integration of increased access, nature conservation and greenspace provision is supported.”

- 1.22 The Sustainability Appraisal accompanying the Pre-Submission Local Plan (CD/SA4) states that the development will positive medium and long-term impacts on the objective to maintain, protect and enhance the landscape, townscape and seascape.
- 1.23 The issue of the need to develop in the AONB was also raised in the Inspector’s letter to the joint LPAs on 24 July 2013. LDC agree with the joint LPA’s response that there is sufficient evidence to explain why there are ‘exceptional circumstances’ which would allow development to take place in the AONB in the relevant chapters and Sustainability Appraisal. LDC supports the additional wording in the Local Plan and reiterates the point that the scope for mitigation was a factor in deciding on where development might be acceptable, and that in the case of the land to the north of Littlemoor Road, there is potential for enhancement.

Other Matters

- 1.24 In addition to the matters raised by the Inspector, LDC would comment as follows on the following matters raised by other participants scheduled to appear that the Examination on 3rd December 2014.
- 1.25 The RSPB (Person ID 832) has not objected to the allocation of land, and appears to support the landscape-led masterplanning approach of the policy. It should be noted that a Phase 1 Habitat Survey of the site was undertaken in 2014. In addition, a range of species specific surveys have also been undertaken during 2014, and where required, appropriate mitigation measures will be incorporated into the detailed design of the development.
- 1.26 In addition to the use of land within the AONB, Mr Charles Norman (Person ID 259) has objected to LITT1 on two grounds; flooding and the loss of the Dairy Farm. It is considered that there is sufficient evidence before the Inspector that the site is not prone to flooding. The Halcrow Report notes that the site is located entirely within Flood Zone 1 (low risk) and that it is in a position and has a topography that would enable sustainable drainage by infiltration to ground, attenuation and discharge to ordinary water course, or a combination of both. Any application for development on the site will be accompanied by a Flood Risk Assessment and drainage strategy.
- 1.27 In terms of the Dairy Farm, the land at LITT1 is farmed as part of one agricultural unit extending to over 2,500 acres (of which over 1,000 is in the same ownership). This will continue to remain a substantial commercial business, the viability of which will not in any way be affected by the loss of land at for the development of LITT1. The dairying facilities at Marsh Farm are now obsolete and are to be replaced in any event regardless of the proposed development at LITT1 (being relocated elsewhere on the unit – which already incorporates a number of other groups of farm buildings).

Summary and Conclusions

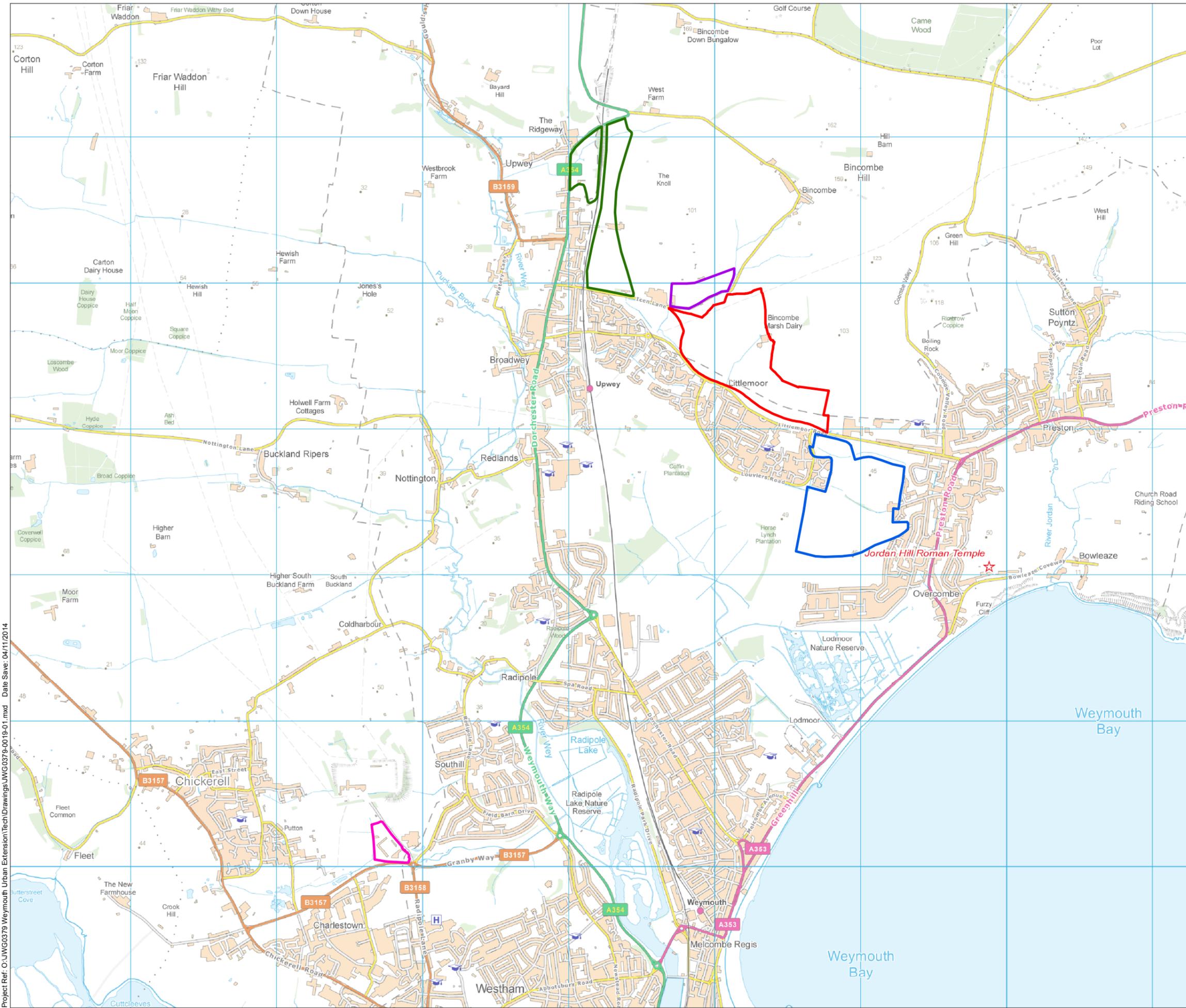
- 1.28 Since the need for an urban extension to Weymouth was identified in the emerging Regional Spatial Strategy for the South West, the land to the north of Littlemoor Road has consistently been shown through various stages of the preparation of the Local Plan to be the best opportunity for accommodating future development needs. It is in the best location to offer the balanced delivery of homes and jobs in accordance with the core planning principles set out in paragraph 17 of the NPPF, particularly in terms of managing patterns of growth to make the fullest possible use of public transport, walking and cycling.
- 1.29 The Plan area is heavily constrained, particularly in terms of being washed over by an AONB. Delivering the areas development needs outside the ANOB is considered to be unsustainable and would bring development into conflict with other aims and objectives of the NPPF. The joints LPAs approach to development in the AONB is supported, and as is landscape –led approach in relation to the LITT1 allocation. This will ensure that the visual impact on the AONB is properly mitigated and will lead to a softer transition between the built-up and the countryside to the benefit of the wider community.

APPENDIX 1

ALTERNATIVE SITES LITTLEMOOR

Figures

REFERENCES



Legend

- Site Boundary
- Land at Wyke Oliver Farm
- Land to the North of Upwey
- Land at Bob Lucas Stadium
- Land at The Willows' Icen Lane

Rev:	Date:	Amendment:	Name:	Checked:

■ Data Source:
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■ Client: -
 Project: Weymouth Urban Extension

Title: Alternative Sites, Littlemoor

Scale: 1:25,000 @A3

Date: Nov 2014 Datum: OSGB36 Projection: BNG
 Drawn: AVG Checked: RB Job Ref: JWG0379

■ Figure No: **Appendix 1** Revision: .

Project Ref: O:\JWG0379 Weymouth Urban Extension\TechDrawings\JWG0379-0019-01.mxd Date Save: 04/11/2014