

West Dorset, Weymouth and Portland Local Plan Examination

Hearing Statement

for

Matter 6: Environment and Climate Change



Prepared by West Dorset District Council and
Weymouth & Portland Borough Council

November 2014

Matter 6: Environment and Climate Change

Agenda Item 6.1: Large parts of West Dorset are covered by environmental designations. Does the Plan balance the need between growth and protection in the most effective way?

- 1.1 The Submission Plan's visions and objectives make clear the intention to balance the need for growth with the protection of the environment, and its specific policies for the protection of the natural and built environment are commensurate with the provisions of the National Planning Policy Framework (NPPF).
- 1.2 The Submission Plan's strategy for distribution of growth across the plan area is influenced by:
 - the needs, size and roles of the area's settlements, taking into account any current imbalances of housing or jobs;
 - the benefits of concentrating most development in locations where homes, jobs and facilities will be easily accessible to each other and there is a choice of transport modes;
 - the availability of land, and whether it has been previously developed (brownfield); and
 - the environmental constraints of the plan area.
- 1.3 The Visions for each local authority area have been a starting point for decisions about the location of development. The vision for Weymouth & Portland has a greater emphasis on growth, in order to help address some of the particular challenges of the borough, while growth in West Dorset is intended more to reflect local needs and aspirations and to maintain thriving communities.
- 1.4 The Submission Plan's allocations of land for development were selected based on a sound evidence base of the environmental designation within and near by each of the sites, and the likely impacts upon them.
- 1.5 A key environmental designation within the Submission Plan area is the Dorset Area of Outstanding Natural Beauty (AONB), which covers over 70% of West Dorset District. In the site selection process, it was clear that following the above criteria for distribution of development, major development within the AONB was inevitable, as the designation washes over three of the larger settlements (Bridport, Beaminster and Lyme Regis). These are the main settlements in the western part of West Dorset, and Bridport in particular is the main town serving a wide rural hinterland. Avoiding development in the AONB would result in no new development in the western area of West Dorset at all, and an even greater concentration of development in the eastern part of the Submission Plan area.

- 1.6 Bridport had no new development allocations in the previous local plan, and the previous local plan inspector recognised that while it was constrained by its landscape setting, there should be further development planned for the town in future.
- 1.7 Further information can be found in the councils' Site Selection Background Paper (CD/SSBP).
- 1.8 The councils consider that the need for growth from a national and local perspective, and the need to plan positively in a sustainable manner across the plan area, does provide the exceptional circumstances to justify planning major development in a nationally designated landscape.
- 1.9 The site-specific allocation policies set out criteria to secure mitigation for any harm to environmental designations where considered necessary. Because of the challenges surrounding potential development within the AONB, the options for development have been discussed with environmental stakeholders including Natural England and the Dorset AONB team, throughout the Submission Plan's preparation. It is considered that both the Vearse Farm (Bridport) and Littlemoor sites have the potential to be developed appropriately in a way that provides some positive benefits to the qualities of the AONB, for example the opportunity to enhance the settlement edge at Littlemoor.
- 1.10 The councils' consider that affording more weight to protection would result in an unsustainable pattern of development across the plan area. Affording more weight to growth over the need to protect the environment would result in unacceptable harm to the natural and built environment of the plan area. The councils' consider therefore that the strategy for growth effectively balances the need for growth and the protection of environmental designation in the most appropriate way.

Agenda Item 6.2: Is Green Infrastructure policy comprehensive and practicable?

- 2.1 The councils' propose to review the different elements of the Green Infrastructure network in a separate Development Plan Document. Submission Plan Policy ENV 3 is therefore an interim policy until this work is completed. The policy provides guidance which is both comprehensive – in that it defines the elements of Green Infrastructure to which the policy applies – as well as being a practical approach , given the councils' intention to prepare a Development Plan Document.
- 2.2 The councils' propose to incorporate the green infrastructure network defined on the Proposals Maps within the Adopted West Dorset Local Plan (CD/POL2) and the

Adopted Weymouth and Portland Local Plan (CD/POL1) on to the Policies Map for the Submission Plan when it is adopted. Existing policies relating to the Green Infrastructure networks in these plans will be replaced by Policy ENV3.

- 2.3 The Local Development Scheme sets out the steps and programme for producing the Green Infrastructure Development Plan Document and this work has commenced. This will include a review of the existing local landscape designations in both authority areas. The strategy is being developed in partnership with a range of organisations and local communities. Once adopted, the Development Plan Document will replace Policy ENV3 in the West Dorset, Weymouth and Portland Local Plan.

Agenda Item 6.3: Does the Plan provide a reasonable balance between protection and the positive use of heritage assets?

- 3.1 The councils' strategy (Submission Plan Policy ENV4) for heritage assets is to ensure that historic buildings and other heritage assets that make a positive contribution to local character are put to an appropriate and viable use that is consistent with their conservation. In conformity with national policy, the Submission Plan sets out an approach to conserve and enhance heritage assets, giving greater weight to the more important assets.
- 3.2 Changes to the strategy and policy are being developed through a Statement of Common Ground with English Heritage which will be finalised prior to the Examination. These changes are intended to further improve and clarify the councils' position, and address the comments previously received.

Agenda Item 6.4: Is the stance on flood risk and protection sufficiently comprehensive?

- 4.1 The councils' approach to dealing with flood risk and protection is set out in Submission Plan Policy ENV5. This policy is in conformity with the NPPF¹ as its principle aim is to steer development towards areas of lowest flood risk and avoid inappropriate development in higher flood risk areas. The policy has been prepared in consultation with the Environment Agency and Dorset County Council who are the lead Local Flood Authority for the Submission Plan area.

¹ NPPF Paragraph 100

- 4.2 The Environment Agency were satisfied with the amendments made to Submission Plan Policy ENV5. The Environment Agency stated in correspondence received in October 2013 that:
- “[The Environment Agency] support the amendment of the policy since June 2012 and confirm that it will be in accordance with the flood risk principles within the NPPF”*
- 4.3 The councils’ made modifications to Policy ENV5 and its supporting text in response to comments made by Dorset County Council at pre-submission stage. These modifications included reference to the use of Sustainable Drainage Systems (SuDs) within development proposals and improving the definition of flood zones to accord with national policy. No further comments were raised by Dorset County Council in relation to flood matters during consultation on the Submission Plan.
- 4.4 As evidence to support the policy, the councils’ have prepared level 1 and level 2 Strategic Flood Risk Assessments (SFRA) for West Dorset (CD/ENV9, ENV10 and ENV10a) and Weymouth & Portland (CD/ENV11, ENV12 and CD/ENV13). These assessments have identified areas at most risk of flooding and have been used to inform the selection of strategic development sites. Weymouth Town Centre, Chiswell on the Isle of Portland, and Bridport are considered to be the most vulnerable areas to flooding. Weymouth & Portland Borough Council have worked jointly with the Environment Agency to investigate the flood risk management measures that are required now and in the future.
- 4.5 The SFRA findings are relevant not only to planning, but also site specific flood risk assessments, and mapping for emergency planning, alleviation of flood risk within existing urban development and surface water management plans.
- 4.6 Flood risk has been addressed on strategic allocations by directing development away from areas of greatest flood risk. With the exceptions of Weymouth Town Centre and St Michael’s Trading Estate, Bridport no built development proposed within these allocations is within the highest risk flood zones 2 or 3. Flooding issues in Weymouth Town Centre are addressed by the flood risk management strategy (CD/ENV14) developed in partnership with the Environment Agency and at St Michael’s Trading Estate, Bridport the SFRA level 2 (CD/ENV10 and ENV10a) concluded that as the site is defended it is not currently at risk except in a breach scenario. If this were to occur there would be less than 10% of the site that would be affected, the flood hazard would be low and scheme layout could accommodate breach areas.
- 4.7 Criterion (i) of Policy ENV5 recognises the risks of flooding from multiple sources including surface water, fluvial and coastal sources. Many parts of the Submission

Plan area are affected by surface water, groundwater and sewer flooding. It is expected that these types of flood risk will generally increase due to the expected wetter winters, causing more frequent and prolonged groundwater flooding, and the incidence of short-duration high intensity rainfall events associated with summer storms causing more frequent surface water and sewer flooding. The councils propose to deal with this specifically through Submission Plan Policy ENV6 which takes a proactive approach to delivering flood alleviation schemes in consultation with DEFRA, The Environment Agency (EA), Dorset County Council and communities. Surface water flood maps are provided by the EA.

- 4.8 Policy ENV5 applies a sequential risk based approach. In assessing proposals for development in areas with medium or higher risk of flooding, criterion (ii) requires adequate measures to mitigate risk and ensure that occupants are safe, including measures to ensure the development is appropriately flood resilient and resistant.
- 4.9 The councils' evidence base and policies relating to flood risk and surface water flooding demonstrate a sufficiently comprehensive stance on flood risk and protection.

6.5 Has adequate consideration been given to the consequences of climate change?

- 5.1 The Submission Plan considers the consequences of climate change in a number of ways. It directs development away from areas vulnerable to consequences of climate change such as flood risk and coastal erosion zones. The one exception to this is in Weymouth Town Centre where a flood risk management strategy is in place. Work is also progressing on the Weymouth Bay Coastal Processes Study by Jackson Hyder Consulting, funded by the EA. It involves coastal process modelling and will provide more detail to develop options for dealing with flood risk, including costings and possible grant funding routes. This study is due to be completed by May 2015.
- 5.2 Where existing development is within areas vulnerable to coastal change, the relocation of properties is permitted outside development boundaries (Submission Plan Policy SUS 1) and in addition Submission Plan Policy ENV7 states that the council will identify Coastal Change Management Areas based on the Shoreline Management Plan where no further development will be permitted.
- 5.3 Nature conservation can have a large role in both mitigating and adapting to climate change such as; restoring flood plains and wetlands to provide further water supplies, carbon storage and flood protection, increasing the number of trees and woodlands to boost the amount of carbon stored in vegetation and soils,

provide shade and shelter, a source of renewable energy, reduce soil erosion, flood damage and water pollution. A number of Submission Plan policies will seek to protect and enhance nature conservation and provide the associated benefits of mitigation and adaptation to climate change. Policy ENV2 seeks to support this by conserving and enhancing biodiversity. Policy ENV3 supports the development of a green infrastructure strategy which will identify a network of multifunctional green spaces, protect them and develop appropriate management mechanisms. Policy ENV1 protects important landscapes and seascapes and Policy ENV10 provides for the future retention and protection of trees.

- 5.4 The Submission Plan is supportive of renewable energy generation, flood defence, land stability and coastal protections schemes as Policy SUS1 permits these outside development boundaries. Local flood alleviation schemes are also supported under Policy ENV6 and Policy COM11 deals specifically with renewable energy development.
- 5.5 Policy ENV8 encourages community food and local energy production and steers development towards poorer quality agricultural land. Policy ENV15 seeks the efficient and appropriate use of land. Both of these policies protect land resources to provide greater food security and resilience to climate change.
- 5.6 Sustainable transport methods are promoted through Policy COM7 and together with the design Policies ENV 10 – 13 require development to be of high quality design, which is a key component of sustainable development.
- 5.7 Policy ENV13 specifically deals with achieving high levels of environmental performance. Modifications to this policy and supporting text are however required in light of the government’s review of housing standards. These modifications are set out in the Schedule of Suggested Changes (CD/SSC) and propose deleting the requirements for homes to comply with Code for Sustainable Homes and Lifetime Homes standards and non domestic buildings to comply with levels of the Building Research Establishment Environmental Assessment Method (BREEAM). In place of these standards homes will be required to comply with national minimum space standards when in place and the council will develop an approach to adaptable and accessible homes in accordance with the latest government guidance.
- 5.8 Strategic development sites WEY10, WEY12, LITT1, CHIC2, CRS1 and BRID1 are required to be developed in accordance with a masterplan that has been subject to a sustainability assessment such as BREEAM for Communities, to demonstrate that major development proposals are sustainable. The BREEAM for Communities assessment includes a category (SE 10) on adapting to climate change which aims to ensure development is resilient to the known and predicted impacts of climate

change. It considers issues of; increased temperatures (including heat island effect), flood risk, increased weather volatility, impacts on water resources, and changes in ground conditions.

- 5.9 A key consideration of the Sustainability Appraisal (CD/SA4) was to ensure that the Submission Plan reduced vulnerability to the future impacts of climate change. The Sustainability Appraisal contained the sustainability objective to “*reduce vulnerability to climate change*”, which focussed particularly upon reducing vulnerability to flooding, sea level rise and coastal erosion, and providing local food security by protecting productive agricultural land. Therefore, throughout the development of the Submission Plan, each policy was subject to an appraisal to ensure that vulnerability to climate change was reduced where possible, embedding resilience to climate change into the Submission Plan.