



Sustainability Appraisal POST ADOPTION STATEMENT




Weymouth & Portland
Borough Council

Sustainability Appraisal Post Adoption Statement

West Dorset, Weymouth & Portland Local Plan

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1. Introduction

- 1.1 This document provides the Post-Adoption Statement for the West Dorset, Weymouth & Portland Local Plan ('Local Plan'), which was adopted on 15th October 2015 by Weymouth & Portland Borough Council on 22nd October 2015 by West Dorset District Council.
- 1.2 The Local Plan is the main basis for making decisions on planning applications within the administrative area of West Dorset, Weymouth and Portland. The Local Plan provides a general policy framework and suggests sites for development to meet the housing and employment needs of the district and borough.
- 1.3 A sustainability appraisal was undertaken whilst developing the Local Plan. The purpose of the sustainability appraisal was to ensure that the environmental, social and economic issues are considered throughout the development of the Local Plan with the aim of achieving sustainable development through the planning system.
- 1.4 The purpose of the Post-Adoption Statement is to satisfy the legislative requirements of Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations (2004), which are explained in the Legislative Background section below.

LEGISLATIVE BACKGROUND

- 1.5 European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment ('the SEA Directive') states that a Strategic Environmental Assessment is mandatory for plans prepared for town and country planning and land use purposes.
- 1.6 The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the Sustainability Appraisal of local development plan documents.
- 1.7 The Town and Country Planning (Local Planning) Regulations (2012) states that a sustainability appraisal report must be completed for Local Plan documents in accordance with section 19(5) of the Planning and Compulsory Purchase Act (2004).
- 1.8 In accordance with these regulations, a Sustainability Appraisal was completed for the Local Plan.
- 1.9 Article 9 of the SEA Directive requires that when a plan or programme is adopted, the Council makes available a statement summarising:
"how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with."
- 1.10 This requirement in European law has been transposed into UK law through Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations (2004), which

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requires the responsible authority to produce a statement containing the following information as soon as reasonably practical after the adoption of a plan or programme:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed in response to:
 - i. the invitation referred to in regulation 13(2)(d);
 - ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
- how the results of any consultations entered into under regulation 14(4) have been taken into account;
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (regulation 16).

2. How environmental considerations have been integrated into the Local Plan

- 2.1 The sustainability appraisal process involves assessing the performance of a plan or a programme against a series of sustainability objectives to test whether it is likely to result in significant environmental effects. These sustainability objectives are often collectively known as the sustainability framework.
- 2.2 The sustainability framework for the Local Plan was developed during the scoping stage for the sustainability appraisal by considering the following:
- The environmental objectives of other plans, programmes and objectives on a local, national and international scale;
 - the characteristics of West Dorset, Weymouth and Portland; and
 - the key environmental problems within West Dorset, Weymouth and Portland (see Figure 2.1).
- 2.3 This ensured that both the wider environmental considerations and the specific environmental problems in West Dorset, Weymouth and Portland (presented in Figure 2.1) were integrated into the sustainability framework and therefore the Local Plan, since each policy and allocation was tested using the sustainability framework.

Figure 2.1: The key sustainability issues and problems and how they are reflected in the sustainability framework.

Key sustainability issues and problems identified in the scope of sustainability appraisal	How this is reflected in the sustainability framework
The sensitivity of internationally designated wildlife sites at the Dorset Heathlands and Poole Harbour to certain types of development.	Sustainability objective 6 considers the impact of the Local Plan upon European wildlife sites.
Protecting the rich historic and built heritage and archaeological remains within the plan area from the impacts of development.	Sustainability objective 1 considers the impact of the Local Plan upon archaeological sites, scheduled ancient monuments, conservation areas and listed buildings, in addition to other culturally important features.
Protecting the unique and special landscape/seascape character of the largely undeveloped coastline within the plan area, which has a number of designations including the Heritage Coast, Portland Coast, and Dorset and East Devon Coast World Heritage Site.	Sustainability objective 2 considers the impact of the Local Plan upon the distinctive qualities and features of the seascape.

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Key sustainability issues and problems identified in the scope of sustainability appraisal	How this is reflected in the sustainability framework
The loss of green space within the plan area causing habitats to be isolated from one another through the loss of wildlife corridors (habitat fragmentation).	Sustainability objective 6 considers the impact of the Local Plan upon the connection of habitats and the creation of wildlife corridors, to allow species to migrate between wildlife designations in response to climate change.
The risk of fluvial and tidal flooding within the plan area.	This issue is addressed by sustainability objective 4 which looks to reduce vulnerability to flooding through the sustainability framework.
The loss of productive farmland particularly within the district of West Dorset, which provides local food security by providing a means for local people to grow their own food thus reducing resilience to climate change on a local scale.	Sustainability objective 4 looks to prevent the loss of productive agricultural land and sustainability objective 5 protects and enhances soil quality, particularly with respect to the loss of productive agricultural land.
Many people are unable to afford to live in a decent home by buying or renting on the open market.	Sustainability objective 9 considers the impact of the Local Plan upon the availability to decent affordable housing.
Above average levels of unemployment in Weymouth and Portland.	Sustainability objective 8 looks to increase economic activity and provide employment opportunities, as well as providing the necessary infrastructure to support the growth of a sustainable economy.
There is a definite need to provide affordable homes both for those in the greatest need and also for those that need help getting onto the housing ladder.	Sustainability objective 9 considers access to decent, affordable housing, and looks to encourage the development of the appropriate type and amount of housing to meet the needs of the local community.
Reliance on the car to access jobs and services, particularly by those located in the more rural areas of West Dorset.	Sustainability objective 3 looks to reduce our contribution to climate change by promoting energy conservation particularly with respect to transport.

2.4 The sustainability framework for the Local Plan considers each of the environmental topics set out in Annex 1 of the SEA Directive and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004), as shown in Figure 2.2. The full range of environmental considerations were therefore integrated into the Local Plan.

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2.5 The Environment Agency, Natural England and Historic England (formerly known as English Heritage) were consulted during the development of the sustainability framework, as statutory consultees. This ensured that the sustainability framework addressed the key environmental considerations of other organisations.

Figure 2.2: The sustainability objectives used to ensure that environmental considerations have been integrated into the Local Plan

Sustainability objective	Decision-making criteria	Environmental Topics
1. To maintain or enhance features of historic and cultural importance	<ul style="list-style-type: none"> Will it protect or enhance archaeological sites, scheduled ancient monuments, conservation areas and listed buildings, in addition to other culturally important features? 	Cultural heritage
2. To maintain, protect and enhance the landscape, townscape and seascape	<ul style="list-style-type: none"> Will it protect or enhance the special character of the Dorset AONB? Will it protect or enhance the distinctive qualities and features of the landscape, townscape and seascape? 	Landscape, material assets
3. To reduce our contribution to climate change	<ul style="list-style-type: none"> Will it reduce the emission of air pollutants, including greenhouse gases, and maintain or improve air quality? Will it encourage an increase in the proportion of energy generated from renewable energy sources? Will it promote energy and water conservation and efficiency, particularly with respect to transport and buildings? 	Air, climatic factors, material assets
4. To reduce vulnerability to climate change	<ul style="list-style-type: none"> Will it reduce vulnerability to flooding, sea level rise and coastal erosion? Will it promote self-sufficiency, and increase local resilience to the predicted impacts of climate change? Will it prevent the loss of productive agricultural land, which provides local food security? 	Climatic factors, human health
5. To maintain or enhance soil and water quality	<ul style="list-style-type: none"> Will it protect or enhance soil quality, particularly with respect to productive agricultural land? Will it maintain or enhance water quality? 	Water, soil, human health

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Sustainability objective	Decision-making criteria	Environmental Topics
6. To protect or enhance biodiversity, geodiversity and the quality of natural habitats	<ul style="list-style-type: none"> • Will it conserve, enhance or restore habitats, species and sites of wildlife interest, and designated areas on the basis of ecological importance (such as SAC, SPA, SSSI and SNCI)? • Will it encourage the provision of new or improved wildlife habitats? • Will it conserve or enhance sites of geological interest? • Will it allow adaptation to climate change through the connection of habitats and creation of wildlife corridors? 	Biodiversity, fauna, flora
7. To encourage the development of sustainable, safe and vibrant communities to improve quality of life	<ul style="list-style-type: none"> • Will it improve access to essential services (such as health facilities), leisure facilities, community facilities, and cultural activities by sustainable modes of transport? • Will it improve access to recreational facilities, such as green open spaces, by sustainable modes of transport, promoting healthy lifestyles? • Will human health be protected? • Will it reduce crime, the fear of crime, and anti-social activity to create a safer community? 	Population, human health, material assets, climatic factors, air
8. To encourage sustainable economic growth	<ul style="list-style-type: none"> • Will it increase economic activity or provide employment opportunities? • Will it provide the necessary infrastructure to support the growth of a sustainable economy? • Will it improve accessibility to training and education facilities? 	Population, material assets
9. To provide decent, affordable housing that meets the need of the local community	<ul style="list-style-type: none"> • Will it increase availability to decent, affordable housing? • Will it provide an appropriate type and amount of housing to meet the needs of the local community? • Will it reduce the number of people that are homeless or in temporary accommodation? 	Population, human health, material assets

3. How the environmental report has been taken into account

- 3.1 The sustainability appraisal recommends a series of measures to reduce or avoid the potential adverse effects and maximise the potential beneficial effects of the Local Plan.
- 3.2 The Environmental Report (which presents the findings of the sustainability appraisal) presented recommendations at the following stages:
- June 2012: Sustainability Appraisal of the Draft Local Plan
 - June 2013: Sustainability Appraisal of the Recommended Modifications to the Draft Local Plan; and
 - February 2015: Sustainability Appraisal of the Main Modifications to the Submission Local Plan Following the Examination
- 3.3 These recommendations, which involve changes to the wording of Local Plan policy and other text, are summarised in Appendix A alongside an explanation of how these recommendations have been taken into account.

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4. How the opinions raised during consultation have been taken into account

- 4.1 The SEA Directive requires the opinions expressed by consultees to be taken into account during the preparation of the plan before its adoption.
- 4.2 There were six stages of consultation for the sustainability appraisal of the Local Plan:
- Dec 2011-Jan 2012: Scope of the sustainability appraisal;
 - June-July 2012: Environmental Report for the draft Local Plan;
 - Feb-March 2013: Sustainability appraisal of alternative land allocations in West Dorset;
 - Aug-Sept 2013: Submission draft of the Local Plan;
 - July-Sept 2014: Sustainability appraisal following the exploratory meeting; and
 - Feb-March 2015: Sustainability appraisal of post-examination modifications
- 4.3 Appendix A summarises the main points raised with respect to the sustainability appraisal, and shows how the Council responded and considered these points during the development of the Local Plan and accompanying sustainability appraisal.

5. Reasons for choosing the plan or programme as adopted, in light of other alternatives dealt with

- 5.1 The sustainability appraisal considered the reasonable alternatives to the policies and land allocations in the Local Plan, as required by the SEA Directive and SEA regulations. This occurred as an iterative process, feeding into the development of the Local Plan.
- 5.2 The sustainability appraisal considered alternatives at the following stages in the development of the Local Plan:
- September 2011: Sustainability Appraisal of Options (Chapter 6 of M Mod 5);
 - February 2013: Sustainability Appraisal of Alternative Land Allocations in West Dorset (Chapter 8 of M Mod 5); and
 - July 2014: Sustainability Appraisal of Suggested Further Changes to the Local Plan Following the Exploratory Meeting (Chapter 10 of M Mod 5).
- 5.3 At each of these stages, the sustainability appraisal provided an explanation of how the reasonable options were identified, followed by an assessment of the sustainability impacts of each option and an explanation of the reasons for selecting the preferred option.
- 5.4 The Council commissioned an independent review of the sustainability appraisal of the Local Plan which concluded that it was fundamentally sound, meeting the legislative requirements which relate to sustainability appraisal. The Inspector commissioned to undertake the examination of the Local Plan and sustainability appraisal on behalf of the Planning Inspectorate concurred with this view. The Inspector also supported the Council's approach towards the identification, evaluation and explanation of alternatives stating that "there has not been a failure to adequately consider reasonable alternatives or key aspects of the plan."
- 5.5 The Inspector's report concluded that the West Dorset, Weymouth & Portland Local Plan was sound and provided an appropriate basis for the planning of the District and Borough Council areas, providing that a number of modifications were made. These modifications were made accordingly and the decision was made to adopt the Local Plan on 15th October 2015 by Weymouth & Portland Borough Council and 22nd October 2015 by West Dorset District Council, rather than withdraw the plan. Adoption of the Local Plan means that the Councils have an up to date development plan. Withdrawal of the plan would have meant that the Councils would have to restart the process of plan-making, and would be without an up to date plan for a considerable length of time. This would mean that planning applications would be considered primarily on the basis of the National Planning Policy Framework and the 'presumption in favour of sustainable development', rather than having local planning policies.

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6. Measures that are to be taken to monitor the significant environmental effects of the implementation of the Local Plan

- 6.1 The significant effects of the implementation of the Local Plan will be monitored to identify any unforeseen adverse effects and enable appropriate remedial action to be taken if necessary.
- 6.2 The monitoring of the sustainability appraisal (Figure 6.1) will focus on the significant effects identified during the sustainability appraisal process. When new information is available, this will be considered and reported on alongside the monitoring of the Local Plan.

Figure 6.1: Table showing the monitoring of the Local Plan

Significant Effects	Potential Indicators	Source of Information
Longer term loss of biodiversity	Information on the condition and change of area of local, national, and international designated wildlife sites.	Natural England provides survey data on the status of designated wildlife sites. Further data is provided by Dorset County Council with the assistance of the Dorset Environmental Records Centre.
Impacts of development upon internationally designated wildlife sites	Information on the condition of internationally designated wildlife sites.	Natural England and Dorset County Council with the assistance of the Dorset Environmental Records Centre.
River quality	Water quality, including the rivers within Central Bridport.	Environment Agency.
Air quality	Air quality within Air Quality Management Areas.	West Dorset District Council and Weymouth and Portland Borough Council.
Access to affordable housing	Number of units granted each year through social housing schemes and planning obligations, and the number of people on the housing register.	West Dorset District Council and Weymouth and Portland Borough Council.

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Appendix A: Recommendations from the Environmental Report and the Response

Recommendations from the Environmental Report	Response
June 2012: Sustainability Appraisal of the Draft Local Plan	
<p>ENV 2: Wildlife and Habitats</p> <p>Longer term adverse impacts upon wildlife and habitat may be mitigated by adding the following wording (added text in <i>italics</i>, deleted text in strikethrough) to section (v) of policy:</p> <p>“Development of major sites will be expected to <i>must demonstrate no net loss in biodiversity</i>”</p> <p>and changing the wording at the end of section (iv) of policy, which protects local wildlife designations, trees and hedgerows, and key wildlife corridors, from “will be resisted” to “will not be permitted.</p>	<p>Policy ENV 2 was amended through consultation with Natural England and (as amended) ensures that proposals for development that conserve or enhance biodiversity should be supported, and proposals that result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and veteran trees) will be refused.</p>
<p>ENV 5: Flood Risk</p> <p>It is recommended that all development, including those classified as less vulnerable development, must show that adequate measures have been taken to mitigate the flood risk and ensure that potential occupants will be safe.</p>	<p>Policy ENV 5 was amended to ensure that new development will be planned to avoid the risk of flooding to including the ‘less vulnerable development’ shown in Table 2.3 of the Local Plan.</p>
<p>ENV 10: Contaminated Land</p> <p>The policy should also protect the built environment against the impacts of contaminated land by including the following wording (in <i>italics</i>) in the policy:</p> <p>“Planning permission for development on or adjoining land that is suspected to be contaminated will not be granted unless it can be demonstrated that there is no unacceptable risk to future occupiers of the development, neighbouring uses and the <i>built and natural</i> environment from the contamination”.</p>	<p>The policy addressing contaminated land (policy ENV 9 in the submission Local Plan) has not been amended to provide protection to the built environment from contamination, since it was considered that the building regulations provide sufficient protection against aggressive ground conditions (part C1 of Schedule 1 of the Building Regulations 2010).</p>
<p>SUS 2: Distribution of Development</p> <p>The following wording (in <i>italics</i>) could be added to part (v) of this policy, to ensure that</p>	<p>Policy SUS 2 has been amended to include the following wording (in <i>italics</i>): “Outside defined development boundaries, development will be strictly controlled, having particular regard to</p>

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<p>development outside the defined development boundaries does not adversely impact upon landscape, biodiversity and the loss of agricultural land:</p> <p>“Outside defined development boundaries, development will be strictly controlled, having particular regard to the need for the protection of the countryside, <i>particularly landscape interests, wildlife sites and productive agricultural land</i>, and be restricted to...”</p>	<p>the need for the protection of the countryside <i>and environmental constraints</i>”, thus providing mitigation against potential environmental impacts.</p>
<p>SUS 4: Re-use and Replacement of Buildings Outside Defined Development Boundaries</p> <p>In order to mitigate impacts upon habitats and biodiversity, the policy should include a requirement for the developer to demonstrate that there will be no significant increase upon key wildlife habitats and species resulting from the adaptation, replacement or reuse of rural buildings. The following wording may be added to part (i) of this policy:</p> <p>“<i>there is no resulting unacceptable impact upon wildlife and habitats.</i>”</p>	<p>The amended policy allows the replacement of a building outside defined development boundaries, but only providing its continuing use would be consistent with other policies in this plan, including policy ENV 2 which prevents unacceptable impacts upon wildlife and habitats.</p>
<p>ECON 1: Provision of Employment</p> <p>The policy should require the developer to consider impacts upon habitats and biodiversity, climate change (through accessibility/ sustainable transport) and soil quality (retention of productive agricultural land) by including the following text to the final bullet point in part (i) of the policy:</p> <p>“...providing the development does not result in a significant loss of productive agricultural land or significant adverse impacts upon habitats and biodiversity, and does not limit opportunities for public transport and pedestrian/cycle routes to be used in future.”</p>	<p>The amended policy ECON 1 does not include the suggested text to mitigate against environmental effects. However, any applications relating to employment will be considered in accordance with all policies within the whole plan, including those which provide protection to habitats and biodiversity, climate change, and soil quality, which will provide sufficient mitigation.</p>
<p>ECON 2: Protection of Key Employment Sites</p> <p>In order to encourage the use of sustainable transport modes, and introduce positive impacts in terms of air quality, climate change mitigation and climate change vulnerability, it is suggested that the policy is amended to mention “<i>sustainable transport options</i>”, rather than “transport options”, in part (iii) of the</p>	<p>The amended policy ECON 2 requires planning applications for retail uses to have good access to a range of transport options but, whilst this range of transport options is likely to include some which are considered more sustainable (for public transport, cycling, walking), there is no specific requirement for these transport uses to be sustainable.</p>

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<p>policy.</p>	
<p>ECON 4: Retail and Town Centre Development</p> <p>The policy permits small scale rural offices or other small scale rural development outside defined development boundaries. It is recommended that the following text (in <i>italics</i>) is added to the policy to mitigate the impacts upon habitats and biodiversity, and landscape interests:</p> <p>“Small scale rural offices or other small scale rural development may be permitted outside defined development boundaries, <i>providing the development does not result in significant adverse impacts upon wildlife and habitats, and the landscape amenity</i>”.</p>	<p>Since policy ECON 4 was drafted, legislation has changed to allow small scale rural offices and rural development outside defined development boundaries through permitted development rights. Therefore, policy ECON 4 no longer refers to this and does not require the suggested mitigation.</p>
<p>ECON 6: Built Holiday Accommodation</p> <p>The potential adverse impacts associated with unsustainable transport may be addressed through mentioning COM 7 in the preamble to this policy. The potentially adverse impacts upon wildlife and habitats from increased pressure in areas outside the defined development boundaries may be mitigated through adding the following text (in <i>italics</i>):</p> <p>“Outside the defined development boundaries, extensions to existing serviced accommodation will be supported where they are proportionate to the size of the original building and their location. New holiday accommodation from the alteration or replacement of existing rural buildings will also be permitted, <i>providing the development does not result in significant adverse impacts upon wildlife and habitats.</i>”</p>	<p>Since policy ECON 6 was drafted, legislation has changed to allow the development of new holiday accommodation from the alteration or replacement of existing rural buildings outside defined development boundaries through permitted development rights. Therefore, policy ECON 6 no longer refers to this, and so does not require the suggested mitigation.</p>
<p>ECON 7: Caravan and Camping Sites</p> <p>The policy should require biodiversity interests to be considered during the redevelopment of caravan and camping sites by adding the following text (in <i>italics</i>) to part (ii) of the policy:</p> <p>“All schemes should not, individually or cumulatively, harm the landscape character, <i>sites of wildlife interest, or rural amenity of the countryside.</i>”</p>	<p>Policy ECON 7 does not specifically mention mitigation against the potential impacts upon sites of wildlife interest or the rural amenity of the countryside. However, planning applications relating to caravan and camping sites will be considered in accordance with all policies within the whole plan, including those which provide protection to wildlife and habitats, and the rural amenity of the countryside.</p>
<p>ECON 8: Farm Diversification</p>	<p>Policy ECON 8 doesn't include scope to prevent</p>

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<p>It is recommended that this policy should include scope to prevent the loss of significant amounts of productive agricultural land from the development or reuse of farmland to mitigate potentially adverse impacts upon resilience to climate change and soil quality.</p> <p>The policy may also consider the unacceptable impacts upon wildlife and species from the development of rural areas. It is suggested that the following wording (in <i>italics</i>) is added to this policy:</p> <p>“Farm diversification projects for the use of land or buildings for non-agricultural employment purposes will be supported, provided they are in keeping with the rural character, <i>prevent the permanent loss of large amounts of productive agricultural land, and avoid significant adverse impacts upon wildlife and habitats, and comprise...</i>”</p>	<p>the loss of productive agricultural land from the development of farmland or avoid significant adverse impacts upon wildlife and habitats. The existing policies in the Local Plan were considered to provide sufficient protection against impacts upon the loss of productive agricultural land and wildlife and habitats, should a farm diversification scheme be under consideration.</p>
<p>ECON 9: New Agricultural Buildings</p> <p>Policy may include scope to minimise the impacts of the new development for agricultural purposes upon biodiversity, and demonstrate that the loss of productive agricultural land has been minimised by including the following wording (in <i>italics</i>):</p> <p>“The scale, siting design and external appearance of the buildings should be designed to minimise adverse impact on the landscape character, <i>wildlife and habitats</i>, and residential amenity as far as practicable. <i>The permanent loss of productive agricultural land should also be minimised wherever possible.</i>”</p>	<p>Policy ECON 9 has not been amended to highlight the specific impacts upon wildlife and species, as any applications for new agricultural buildings will be considered in accordance with all policies within the whole plan, including policy ENV 2 which provides protection to wildlife and habitats. The policy has not been amended to address the permanent loss of productive agricultural land.</p>
<p>ECON 10: Equestrian Development</p> <p>The preamble to this policy should refer to policy COM 7 to ensure that sustainable travel is a key consideration. The impacts upon wildlife and habitats and the loss of productive agricultural land may be considered by adding the following condition to this policy, after point (ii):</p> <p><i>(iii) The permanent loss of productive agricultural land should also be minimised wherever possible.</i></p> <p><i>(iv) New development and the associated</i></p>	<p>The preamble has not been amended to mention policy COM 7, and the policy doesn't include protection against the loss of productive agricultural land or significant adverse impacts on wildlife and habitats. However, any application for equestrian development should consider all policies within the Local Plan as a whole, including policy COM 7 and policy ENV 2 which prevents significant adverse impacts upon wildlife and habitats. However, the loss of productive agricultural land is not addressed through this policy.</p>

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<p><i>activities should avoid significant adverse impacts upon wildlife and habitats.</i></p>	
<p>HOUS 2: Exception Sites</p> <p>The policy may include the following condition (in <i>italics</i>) to ensure that exception sites do not have a significant adverse impact upon biodiversity and habitats.</p> <p>Small scale sites for affordable housing adjoining settlements may, as an exception to normal policy, be permitted provided that: ...</p> <p><i>- adverse impacts upon wildlife and habitats are avoided wherever possible;</i></p>	<p>The amended policy HOUS 2 does not include protection against significant adverse impacts upon wildlife and habitats. However, since any applications for exception sites will be considered alongside all policies in the Local Plan, including policy ENV 2, any adverse impacts upon wildlife and habitats are likely to be addressed through the Local Plan.</p>
<p>HOUS 5: Sites for Gypsies, Travellers and Travelling Showpeople</p> <p>The site allocations presented in the Gypsy and Traveller Development Plan Document will undergo a sustainability appraisal that will address sustainability issues on a site by site basis. However, on a strategic level, this policy should also give consideration to environmental impacts through the following wording:</p> <p><i>“Sites should not have a significant adverse environmental impact, particularly with regard to the landscape, the loss of productive agricultural land, and the degradation of habitats and species.”</i></p>	<p>The policy has not been amended to prevent adverse environmental impacts. However, since all of the policies in the Local Plan will be considered when developing sites for gypsies, travellers and travelling showpeople, the environmental impacts should be given full consideration despite not being specifically mentioned.</p>
<p>HOUS 6: Other Residential Development Outside Defined Development Boundaries</p> <p>The preamble to this policy may refer to policy COM 7, which relates to efficient transport. The potential loss of productive agricultural land, and loss of biodiversity and habitats, are potentially significant adverse impacts and it is recommended that they are addressed through adding the following text (in <i>italics</i>) to this policy:</p> <p><i>“(i) The extension of an existing lawful dwelling-house located outside the defined development boundaries will be permitted provided that the extension is subordinate in scale and proportions to the original dwelling, and does not harm the character of the locality or its landscape setting, or adversely impact upon</i></p>	<p>The preamble has not been amended to mention policy COM 7, and the policy doesn’t include protection against the loss of productive agricultural land or significant adverse impacts on wildlife and habitats. However, any application for residential development outside defined development boundaries should consider all policies within the Local Plan as a whole, including policy COM 7 and policy ENV 2 which prevents significant adverse impacts upon wildlife and habitats. However, the loss of productive agricultural land is not addressed through this policy.</p>

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<p><i>wildlife and habitats.</i></p> <p>(iv):</p> <ul style="list-style-type: none"> - <i>The development avoids the loss of productive agricultural land, wherever possible.</i> - <i>The scheme avoids significant adverse impacts upon wildlife and habitats.”</i> 	
<p>COM 4 New or Improved Local Recreational Facilities</p> <p>The development of recreational facilities in the coast or countryside may encompass sensitive areas in terms of wildlife conservation and result in the loss of productive agricultural land, in addition to the impacts upon landscape interests or local amenity mentioned in the policy. Therefore, the policy needs to extend its considerations to mitigate these impacts by including the following wording (in <i>italics</i>):</p> <p>“ii) Proposals for recreational facilities in the coast or countryside will only be permitted if they require a rural location and their scale is in keeping with the surrounding environment. Such proposals must not:</p> <ul style="list-style-type: none"> - be intrusive in the landscape; - <i>result in the unacceptable loss of productive agricultural land;</i> - <i>cause significant adverse impacts upon wildlife and habitats; or</i> - cause unacceptable impacts to local amenity through increased vehicle movements.” 	<p>The amended policy doesn’t include protection against the loss of productive agricultural land or significant adverse impacts on wildlife and habitats. However, any application for New or Improved Local Recreational Facilities should consider all policies within the Local Plan as a whole, including policy ENV 2 which prevents significant adverse impacts upon wildlife and habitats. The loss of productive agricultural land, however, is not addressed through this policy.</p>
<p>WEY 3: Station Area and Swannery Car Park</p> <p>The potentially adverse impacts upon the adjacent national wildlife designation (‘The Swannery’ Site of Special Scientific Interest) should be mentioning in the preamble to this policy. Whilst some protection is given by policy ENV 2, further consideration should be given by mentioning this in the policy text given the importance of the Site of Special Scientific Interest status.</p>	<p>No mention is given to the Radipole Lake SSSI specifically. However, policy ENV 2 provides protection against significant adverse impacts upon designated national wildlife sites.</p>
<p>WEY 8: Lodmoor Gateway</p> <p>The policy could mention the impacts upon adjoining designated wildlife areas and address</p>	<p>The preamble to this policy (paragraph 7.3.26) mentions the land contamination issues and the SSSI status of some of the areas adjoining the</p>

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<p>the human health and environmental issues resulting from the contaminated land at the site by including the following wording (in <i>italics</i>) to the policy:</p> <p>“The development will be expected to be of a high quality design to minimise vulnerability to flooding and relate positively to the adjoining highway and car parking areas. <i>The development should also address contaminated land issues and avoid significant adverse impacts upon the wildlife designations located in close proximity to the site.</i> A comprehensive approach may be required to ensure that development complies with the aims of the Weymouth Town Centre Strategy.”</p>	<p>site. Policies ENV 2 and ENV 9 will provide protection against the impacts upon wildlife and habitats and the potential impacts from contaminated land at the site.</p>
<p>WEY 15: Bowleaze Cove</p> <p>Whilst the preamble to the policy mentions the areas of nature conservation and geological importance, the actual policy itself may include wording that highlights the key issues to ensure that the impacts of development upon international wildlife designations and areas of geological interest are acceptable. It is suggested that the policy is amended in the following way (additional text in <i>italics</i>):</p> <p>“Development at Bowleaze Cove will be restricted to tourist and leisure related development. <i>The development will must avoid unacceptable impacts upon the international wildlife designations and sites of geological interest.</i>”</p>	<p>The amended policy requires the nature conservation interests of the site to be protected and enhanced.</p>
<p>PORT 1 Portland Port</p> <p>This policy should address the potential landscape and biodiversity impacts of development at Portland Port, by including the following text (in <i>italics</i>) to the policy:</p> <p>“Land within Port jurisdiction will be safeguarded for potential port operational and ancillary uses. <i>Proposals for these areas must be sensitive to the areas of historic importance, the local landscape interest and the heritage coastline status of this coastline. Any development or activities must avoid significant adverse impact upon international wildlife designations</i>”.</p>	<p>There is no longer a policy dedicated to Portland Port in the Local Plan.</p>

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<p>Also, the development boundaries for Portland Port presented in the Local Plan should be amended to preclude European and Ramsar sites from development.</p>	
<p>CRS 1: Crossways</p> <p>It is recommended that the masterplan that will be produced for this site includes provision for cycle links in addition to road links, in order to encourage sustainable travel.</p>	<p>The amended policy requires the masterplan at Crossways to ensure that the development provides good links to the cycle network through the village and to Moreton train station.</p>
<p>BRID 1: Land at Vearse Farm</p> <p>This policy could require the developer to consider options to minimise the irreversible loss of soil quality and productive agricultural land as a result of the development by providing a community farm at the site. The following wording (in <i>italics</i>) could be added to the policy:</p> <p>(vi) The development will be guided by a masterplan (...) It should ensure that:</p> <p>- <i>“The development provides a community farm to minimise the irreversible loss of soil quality and productive agricultural land wherever possible.”</i></p>	<p>The preamble to the policy highlights the opportunity to explore the concept of including a community farm on the site.</p>
<p>BRID 4 Future Town Centre Expansion</p> <p>The preamble to this policy should highlight the flood issues and potential impacts upon protected wildlife species.</p>	<p>Whilst no mention is given to the issue of flooding in the preamble to this policy, any application will be considered in accordance with policy ENV 5, which prevents significant adverse impacts as a result of flooding.</p>
<p>BRID 5: St Michael’s Trading Estate</p> <p>To ensure that the development does not adversely impact upon the quality of habitat of the adjacent river or substantially increase recreational pressure upon this habitat or species which include the Otter (a European protected species) and the Water Vole (a UK protected species), the following wording (in <i>italics</i>) should be included to the policy:</p> <p>St. Michael’s Trading Estate is designated for a comprehensive mixed-use development, subject to</p> <p>- <i>“avoiding unacceptable impacts upon protected wildlife species and their habitats”</i></p>	<p>The amended policy includes provision for a wildlife corridor, preventing adverse impacts upon protected wildlife species and habitats. The flood risk issue at the site is not mentioned in the policy, but any application for development would be considered alongside policy ENV 5, thus preventing adverse impacts from flooding.</p>

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<p><i>- adequately managing the flood risk from the adjacent watercourse"</i></p>	
<p>BRID 6 Broomhills Waste Management Site</p> <p>The preamble to this policy should mention that the impact of development upon sensitive wildlife areas, including those that have been designated for ecological importance, should be minimised.</p>	<p>There is no longer a policy for the Broomhills Waste Management Station.</p>
<p>LYME 1: Land at Woodberry Down</p> <p>It is recommended that should the playing fields at the site be lost to development, options to replace these facilities should be considered (if it is decided that they are a valuable asset to the community) by including the following text (in italics) as section (iii) of the policy:</p> <p><i>"(iii) Should the development result in the loss of playing fields, a replacement of equal or better quality should be provided in a suitable location, unless it can be demonstrated that the open space is surplus to requirements."</i></p> <p>In order to mitigate the potential loss of downland habitat, this issue should be mentioned in the preamble or the following text added as section (iv) of the policy:</p> <p><i>"(iv) The value of the downland habitat should be assessed prior to development and measures taken, if necessary, to ensure no significant loss in rare habitat or species of importance."</i></p>	<p>The preamble to the policy states that any development will need to address the loss of private playing fields.</p> <p>Whilst the policy does not mention the potential for impacts upon rare habitat or species, any application for development will be considered in accordance with policy ENV2 which provides protection against significant ecological impacts.</p>
<p>SHER 1: Land at Barton Farm</p> <p>It is recommended that the issue of surface water flooding should be resolved through the Masterplan document, in order to reduce vulnerability to the impacts of climate change. The following wording should therefore be added to the policy:</p> <p><i>"(iv) – How potential issues with surface water runoff may be resolved."</i></p>	<p>Whilst the amended policy does not mention the surface water issues, the application for development will be considered in accordance with policy ENV 5 which prevents significant adverse impacts as a result of flooding.</p>
<p>June 2013: Sustainability Appraisal of the Recommended Modifications to the Draft Local Plan</p>	
<p>ENV 2 Wildlife and Habitats</p> <p>In terms of the mitigation against the longer term impacts upon sites other than</p>	<p>Policy ENV 2 was amended through consultation with Natural England to ensure that proposals for development that conserve or enhance biodiversity are supported, and</p>

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<p>international or national designations, mitigation may be provided through the change of wording in section (vi) of the policy from “Development of major sites will be expected to demonstrate no net loss in biodiversity” to “Development of major sites must demonstrate no net loss in biodiversity”, and a change of wording at the end of section (v) of the policy, which considers areas other than international or national sites, from “will be resisted” to “will not be permitted”.</p> <p>Mitigation against the cumulative and synergistic impact associated with the loss of wildlife corridors resulting in habitat fragmentation in the short term, until the Green Infrastructure Strategy is adopted, is provided by including the following condition in policy ENV 2:</p> <p>“key wildlife corridors shall be safeguarded from development until the Green Infrastructure Strategy has been adopted”</p>	<p>ensure that development takes advantage of opportunities to help connect and improve the wider ecological network.</p>
<p>SUS 3 Re-use and Replacement of Buildings Outside Defined Development Boundaries</p> <p>In order to mitigate impacts upon habitats and biodiversity, the policy should include a requirement for the developer to demonstrate that there will be no significant impact upon key wildlife habitats and species resulting from recreational pressure due to the adaptation or reuse of rural buildings. The following condition may be added to part (i) of this policy:</p> <p>- “there is no significant loss of habitat or biodiversity.”</p>	<p>The amended policy allows for the reuse or replacement of a building outside defined development boundaries, but only providing its continuing use would be consistent with other policies in this plan, including policy ENV 2 which prevents unacceptable impacts upon wildlife and habitats.</p>
<p>February 2015: Sustainability Appraisal of the Main Modifications to the Submission Local Plan Following the Examination</p>	
<p>BRID 3 Land to the East of Brady Vet Centre, Off Jessops Avenue</p> <p>The northern area of the allocation is within an area which is subject to surface water flooding. Since the frequency and magnitude of flooding is likely to increase in future, flood mitigation should be provided with this development.</p> <p>The following wording (in <i>italics</i>) should be included to the policy:</p>	<p>Whilst policy BRID 3 does not mention the potential for surface water flooding at the site, the application will be considered in combination with policy ENV 5 of the Local Plan, to prevent significant adverse impacts due to flooding.</p>

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<p><i>“Development will adequately manage the flood risk from surface water flooding.”</i></p>	
<p>BRID 5 St Michael’s Trading Estate</p> <p>The development area is within a medium to low flood risk area. With flood events likely to increase in frequency and magnitude in future, defences against flooding should be provided with this development. The following wording (in <i>italics</i>) should be included to the policy:</p> <p>St. Michael’s Trading Estate is designated for a comprehensive mixed-use development, subject to:</p> <p><i>“adequately managing the flood risk from the adjacent watercourse.”</i></p>	<p>Policy BRID 5 does not mention the potential risk of flooding at the site. However, any application on this site will be considered in combination with policy ENV 5, which prevents significant adverse impacts due to flooding.</p>

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Appendix B: Consultation Responses and how these comments were addressed in the Environmental Report

Dec 2011-Jan 2012: Scope of the sustainability appraisal

The Environment Agency, Natural England and Historic England (known as English Heritage at the time), as the statutory consultation bodies, were consulted on the scope of the sustainability appraisal for the Local Plan in accordance with legislative requirements.

The Environment Agency provided guidance on undertaking sustainability appraisal, along with a list of policies and plans for review, baseline information, and guidance on possible sustainability indicators which were fully taken into account whilst developing the scope of the sustainability appraisal.

Historic England also provided guidance on the scope of the sustainability appraisal, which was taken into account whilst developing the scope of the sustainability appraisal.

Natural England responded to the consultation by confirming that they were satisfied with the scope of the sustainability appraisal.

June-July 2012: Environmental Report for the Draft Local Plan

Summary of consultation response	How these comments were addressed in the Environmental Report
<p>"Paragraph 165 of the National Planning Policy Framework (NPPF) states :</p> <p><i>"Planning policies and decisions should be based on up-to date information about the natural environment and other characteristics of the area, this should include an assessment of existing and potential components of ecological networks"</i></p> <p><i>"A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors."</i></p>	<p>The Sustainability Appraisal meets the requirements of the SEA Directive, as shown in Figure 1.2 of the Environmental Report.</p> <p>The sustainability appraisal of the Local Plan was an integral process as specified in the NPPF, in that the stages of the sustainability appraisal occurred alongside the development of the Local Plan, feeding into its development throughout the plan making process to ensure that sustainability issues are considered at each stage.</p> <p>The sustainability appraisal of the Local Plan considers the mandatory environmental topics required by Article 5(1) and presented in Annex 1 of the SEA Directive, in addition to the wider social and economic effects required through the sustainability appraisal process.</p>
<p>"Whilst the Local Plan specifically identifies the issues associated with Poole Harbour there is no link to the further requirements to meet the objectives of EU Directives such as the Water Framework Directive, Shellfish and Bathing Waters Directives. However, we note that it is highlighted in the Sustainability Appraisal that</p>	<p>The Environmental Report included a review of the policy context of the Local Plan in Chapter 2 and Appendix A. Considering the targets and objectives of other relevant plans and programmes whilst developing the scope of the sustainability appraisal prevents conflict between the Local Plan and other documents,</p>

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<p>there is likely to be negative impact on (sic).”</p>	<p>and ensures that any common objectives between the Local Plan and other documents are exploited.</p> <p>The review of the policy context in the sustainability appraisal included the Water framework Directive and Bathing Quality Directive, ensuring that the requirements of these policy documents were taken into account during the development of the Local Plan.</p> <p>The Environment Agency were given the opportunity to comment on the scope of the sustainability appraisal prior to the review of the policy context. In their response, they provided a list of documents for review, which were subsequently reviewed in the sustainability appraisal. The Shellfish Directive was not included on this list.</p>
<p>“Page 25 of the sustainability appraisal only assesses the broad locations around Dorchester i.e. land to the SE Dorchester, land to the West of Dorchester, land to the north of the Watermeadows. It is considered that the SA should include a full assessment of the proposed development for land north of Dorchester.”</p>	<p>Page 25 of the Environmental Report, to which this comment refers, provides a summary of the sustainability appraisal of options for the eastern area at an early stage in the plan making process, when decisions were being made regarding which land to allocated for development in the draft Local Plan. At this stage, the exact boundaries of the land allocation options were not provided in all cases.</p> <p>Since this time, a sustainability appraisal which assesses the impacts of development at the sites surrounding Dorchester (including land North of Dorchester referred in this comment) has been completed, during the consideration of alternative land allocations for development in West Dorset.</p>
<p>“The draft Sustainability Appraisal accompanying the Local Plan is of poor quality, there are numerous errors and inconsistencies in the assessment for the eastern area growth options and policies, and consequently, it is unreliable for decision making purposes. Whilst it is recognised that any Sustainability Appraisal involves subjective assessments, it is considered that the assessment for the Eastern Area fails to compare sites and policy options on a like for like basis, which gives rise to</p>	<p>The sustainability appraisal is consistent in its approach to assessing the potential effects of land allocation options, using the following methodology to predict the nature of effects which is presented in the Environmental Report:</p> <p>“The sustainability framework consists of a series of sustainability objectives, each with decision-making criteria to assist in the process of making a judgement about the possible sustainability effects of an alternative approach. In addition, baseline information and any other</p>

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<p>concerns about consistency and validity of the process.”</p>	<p>evidence was used to predict the effect of the approaches where available, along with the professional opinion of specialists such as the relevant Council Officers. In some cases, reasonable assumptions were made to predict the impact, as specified in the appraisals presented in Appendix C.”</p> <p>In light of this, the appraisal of effects relies upon a degree of subjective assessment. However, we believe that a consistent approach has been practiced throughout, which uses expert opinion and the interpretation of baseline information and evidence to appraise the impacts associated with development. Justification for the magnitude and nature of impacts is presented throughout the sustainability appraisal documents.</p>
<p>“It is not clear that the Sustainability Appraisal has been a genuinely integrated part of the plan making process, and it is questionable whether it does any more than meet the very minimum requirements of the European Directive on Strategic Environmental Assessment.”</p>	<p>The sustainability appraisal of the Local Plan was an integral part of the plan making process, feeding into its development during the decision making exercises to ensure that sustainability issues are fully considered throughout. Sustainability appraisal documents have been published and consulted upon during the development of the Local Plan, highlighting the iterative nature of this assessment.</p> <p>In addition to meeting the requirements of the SEA Directive, which are shown in Figure 1.2 of the Environmental Report, the wider social and economic issues have also been considered in this sustainability appraisal.</p>
<p>“There is a lack of transparency in the assessment, making it difficult to understand why particular development alternatives have been scored in the way that they have.”</p>	<p>Chapter 7 of the Environmental Report gives details of the methodology used to assess the potential effects of options and alternatives.</p> <p>An explanation of the reasons for the scoring of each particular land allocation option is presented in Appendix C.</p> <p>Justification for the magnitude and nature of impacts is presented throughout the sustainability appraisal documents.</p>
<p>“It is not clear how the designation of sites as AONB has informed the assessment on page 25. (There is no reference to the AONB in Section 3 Environmental Baseline). Option L, land W of</p>	<p>Chapter 7 of the Environmental Report gives details of the methodology used to assess the potential effects of options and alternatives.</p> <p>The sustainability framework includes the sustainability objective “to maintain, protect,</p>

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<p>Dorchester, which falls within AONB, has been scored '0' (i.e. neutral or negligible effect) for landscape. By contrast Option J, which is not located within AONB has been scored '-1' (i.e. a strong negative effect)."</p>	<p>and enhance the landscape, townscape and seascape". This sustainability objective includes two questions which are used as decision-making criteria in judging the nature of the impact:</p> <ul style="list-style-type: none"> • Will it protect or enhance the special character of the AONB? • Will it protect or enhance the distinctive qualities and features of the landscape, townscape and seascape? <p>The judgement of the landscape impacts associated with a development is therefore not reliant on the location within the AONB alone.</p> <p>As explained on page 154, development at option J (Land N of Dorchester) is likely to result in impacts upon landscape character as the site is "open and elevated, and physically separate from Dorchester" and is therefore "likely to be visible from a wide distance".</p> <p>Whilst option L (Land W of Dorchester) is within the AONB, the principle of development in this location was considered unlikely to compromise the special character of the AONB.</p>
<p>The text on page 154 incorrectly summarises Option M as falling within AONB.</p>	<p>This error was noted, and has been amended in the latest version of the sustainability appraisal.</p>
<p>"Option J is the only area to be scored '-1' (i.e. strong negative effect) for climate change mitigation. The only clue to this scoring is text on page 154 which states that "the provision of housing at this site is likely to require a new bypass". We would suggest that the need for a bypass has not been confirmed, and is dependent on the scale and design of development proposed. Furthermore, the comments about the river acting as a barrier to access to services and facilities are not founded by any robust evidence. Utilising existing footways, option J is readily accessible to Dorchester town centre services and facilities and closer than other options considered and there is scope to further improve linkages through bridge provision for cyclists etc and enhancing green infrastructure."</p>	<p>The reasons for a strongly negative impact relating to climate change mitigation being associated with option J are alluded to on page 154 of the Environmental Report. It is stated that a new bypass will be required should development occur at this location, and the appreciable distance and high flood risk between the essential services and facilities of Dorchester and the land north of the water meadows is also mentioned. These factors are likely to result in the increased use of less sustainable modes of transport, particularly during flood events which are likely to increase in severity and frequency as the impacts of climate change are realised. Access to the town by sustainable transport modes is not considered realistic during flood events.</p>
<p>"Option J has been scored '0' for housing on page 25, which does not make sense as all</p>	<p>Housing at option J was considered unlikely to meet the needs of the local people, as required</p>

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<p>other options that have the potential to deliver a strategic level of housing have been scored '++' (i.e. strong positive impact). It is not clear why option M has been scored '0' for economy, when it has the potential to offer employment land."</p>	<p>by this sustainability objective, since the site is prone to flooding and does not provide access to essential services and facilities throughout the year. Therefore, this allocation is unlikely to have a positive impact upon providing housing to meet the needs of the local community.</p> <p>The assessment of alternatives was completed whilst considering which alternatives to include in the Local Plan. At this early stage, it was believed that employment land may not be provided with the development, partly since the site had been identified through the SHLAA process, and therefore this option was scored as neutral under the economy sustainability objective at this time. The site has since been assessed, with some of the allocation dedicated for employment use.</p>
<p>"Overall the assessment is inconsistent and the Council have acknowledged that the SA has not assessed the environmental impacts of the urban extension around Dorchester (page 39 of the SA) as the location of the potential urban extensions were unknown. It is questionable what further information was available for other options."</p>	<p>The sustainability appraisal of alternative land allocations presented in Chapter 7 of the Environmental Report includes an assessment of the likely impacts of development on the sites surrounding Dorchester that were considered for inclusion in the draft Local Plan.</p> <p>Policy DOR11 of the Local Plan state that "the District Council will work with landowners/developers and local communities to explore options to support long-term growth in Dorchester". No specific location surrounding Dorchester is mentioned here. Since the impacts of development on land surrounding Dorchester depends very much on its location, with very different issues and impacts in different locations, it was not possible to accurately predict the impacts of this development.</p> <p>However, the Environmental Report states that "the environmental impacts of the proposed development will be fully assessed if and when land is identified for development". This was provided in the sustainability appraisal of land allocations for West Dorset which was provided at a later date, when the possible sites surrounding Dorchester were under further consideration.</p>
<p>"It is not clear what additional work in terms of the information for the assessment for</p>	<p>Page 25 of the Environmental Report provides a summary of the results of the sustainability</p>

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<p>Crossways has been available to inform the SA as Crossways is assessed in the same way as land to the north of the Watermeadows, Dorchester on page 25 of the SA (i.e. an assessment of the land allocation options)."</p>	<p>appraisal of land allocation options at an early stage in the development of the Local Plan. All options were assessed equally, using the same methodology, which is presented in Chapter 7 of the Environmental Report. As explained in this Chapter, the appraisal of the magnitude and nature of impacts uses baseline information in addition to other evidence and expert opinion.</p>
<p>"It is not clear what further information was required to assess land north of the Watermeadows, at Dorchester. Representations have been made to the SHLAA to identify potential urban extensions around Dorchester and submissions have been made promoting North Dorchester as an urban extension - this information could have been used in order to assess potential locations. In which case it is considered that the SA fails to comply with Article 5 of the SEA Directive, the public must be presented with an accurate picture of what reasonable alternatives there were to the proposed policies and why they were not considered to be the best option."</p>	<p>As explained in Chapter 7 of the Environmental Report, the land allocation options were mainly identified through guidance, research and evidence, and consultation with the public, statutory consultees and other stakeholders. The Land north of Dorchester was identified through this process as a reasonable alternative, and was appraised as a land allocation option in the sustainability appraisal accordingly.</p> <p>In terms of the alternatives, Article 5 of the SEA Directive states that an Environmental Report shall be prepared in which the likely significant effects on the environment of "reasonable alternatives taking into account the objectives and geographical scope of the plan" are "identified, described and evaluated". The Environmental Report meets these requirements.</p> <p>Article 6 of the SEA Directive relates to consultation, both with the public and other consultees. The sustainability appraisal also fully meets these requirements of the SEA Directive.</p>
<p>"This flawed work suggests to us that the strategic allocation of Crossways fails to be justified by sustainability evidence, and that Option J North Dorchester has been unfairly overlooked in the search for the most sustainable alternative development option of the alternatives."</p>	<p>All options were assessed equally, using the same methodology, which is presented in Chapter 7 of the Environmental Report.</p> <p>Please note that the role of the sustainability appraisal is to inform the decision making process during the development of the Local Plan, by providing information on the sustainability effects of the plan. Whilst there is a statutory requirement to consider the results of the sustainability appraisal, there is no legal duty to select the most sustainable option as it is acknowledged that there are also other factors to consider.</p>
<p>"It is not made clear in the eastern area assessment on pages 153 and 154 what scale of</p>	<p>As explained in the account of the 'Difficulties in undertaking the assessment' in Chapter 7 of the</p>

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<p>development or timescale for delivery is being assessed in each option. It seems that sites are being unfairly compared, for example the content of consented proposals for the Poundbury mixed use site appear to be weighted favourably in the assessment of this site (e.g. 'sensitive building design in the AONB' is referenced) but as building designs do not yet exist for other alternative sites this appears to be an unfair scoring."</p>	<p>Environmental Report, which is a requirement of Annex 1 of SEA Directive, the land allocation options at this early stage were "largely strategic and lacked detail". Therefore, the scale and timescale of development was not known in all cases, and the appraisal considered the principle of development in these instances.</p> <p>The appraisal for Poundbury noted a negative impact upon the Dorset AONB, whilst acknowledging that buildings at this site are likely to be sensitively designed in light of the published Poundbury Development Brief.</p>
<p>"The assessment findings for Option M land at Crossways on page 25 do not tally with the Policy CRS1 assessment for a strategic development allocation at Crossways on page 250. This is a clear signal of an internally inconsistent and unreliable assessment."</p>	<p>In accordance with the requirements of the SEA Directive, the land allocation options were appraised at an early stage, and the draft policy was appraised for those options taken forward for inclusion in the Local Plan at a later stage. The assessments on pages 25 and 250 are different as they were completed at different stages in the development of the Local Plan, one assessing the Crossways option at an early stage, and one assessing the Crossways allocation in the draft Local Plan.</p> <p>Page 25 of the Environmental Report summarises the findings of the sustainability appraisal of land allocation options during the writing of the draft Local Plan.</p> <p>Page 250 of the Environmental Report presents the sustainability appraisal of policy CRS1 for the Land at Crossways which is included in the draft Local Plan.</p>
<p>"We consider that the findings of this work would serve to identify sustainability concerns with the selected development strategy for Crossways, which we feel does not perform as well in sustainability terms as an alternative strategic development option of similar scale in the North Dorchester area (Option J, to the north of the Watermeadows)."</p>	<p>The role of the sustainability appraisal is to inform the decision making process during the development of the Local Plan, by providing information on the sustainability effects of the plan. Whilst there is a requirement to consider the results of the sustainability appraisal, there is no statutory duty to select the most sustainable option as it is acknowledged that there are also other factors to consider.</p>
<p>Feb-March 2013: Sustainability Appraisal of Alternative Land Allocations in West Dorset</p>	
<p>Summary of consultation responses</p>	<p>How these comments were addressed in the Environmental Report</p>
<p>"We note that the SEA rates the impacts on</p>	<p>The appraisal of impacts uses the following</p>

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<p>Landscape, Townscape and Seascape. It is far from clear what assessment this is based upon.</p> <p>It (sustainability appraisal for the allocation at the Land Southeast of Dorchester) also states; 'Whilst the Dorset AONB lies in the elevated area immediately to the south of the site, this development would be located in an enclosed area, reducing the impact on the wider landscape. Existing hedgerows will be maintained where possible and development will not be permitted if it has an adverse impact upon the surrounding landscape or setting of the town.</p> <p>The phrase '<i>reducing the impact</i>' does not inform the reader what the impact has been reduced from and to.</p> <p>The statement '<i>development will not be permitted if it has an adverse impact upon the surrounding landscape or setting of the town</i>' is not reflected in the policy; and to permit this level of uncertainty in relation to the deliverability of this proposal would seem to render it unsound.</p> <p>If this statement is correct, it should be included within the policy alongside confirmation that the allocation be sound if included."</p>	<p>methodology, as specified in the Environmental Report:</p> <p>"The sustainability framework consists of a series of sustainability objectives, each with decision-making criteria to assist in the process of making a judgement about the possible sustainability effects of an alternative approach. In addition, baseline information and any other evidence was used to predict the effect of the approaches where available, along with the professional opinion of specialists such as the relevant Council Officers. In some cases, reasonable assumptions were made to predict the impact, as specified in the appraisals presented in Appendix C."</p> <p>To clarify, the passage from the Sustainability Appraisal of Alternative Land Allocations in West Dorset referred to by Natural England states that owing to the enclosed nature of the site, the landscape impacts are less than they otherwise would be. The current landscape characteristics of the plan area are discussed in the baseline data of the sustainability appraisal, which refers to the Landscape Character Assessments for West Dorset and Weymouth & Portland and the Dorset Coast Land and Seascape Character Assessment. Other evidence, such as the landscape information provided in the background papers, is used to determine the impacts, in addition to the expert opinion of the Council's Landscape Officers.</p> <p>Contrary to Natural England's comments, the suggested policy for the Land Southeast of Dorchester does include measures to minimise landscape impacts. The suggested policy for the allocation states that a masterplan will be prepared for the development, which will ensure that "the design and layout relates positively to the surrounding area and does not have an adverse impact on the surrounding landscape and the setting of the town".</p>
<p>"The analysis provided by the Sustainability Appraisal is rather ambiguous, failing to offer clear indication of the degree of impact upon the various heritage assets affected."</p>	<p>The sustainability appraisal clearly indicates whether an impact is either strongly positive (++) , positive (+), neutral (0), negative (-) or strongly negative (--) using the methodology explained in Chapter 3 of the sustainability appraisal of land allocation options for West</p>

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	<p>Dorset. Under the ‘historic and cultural features’ sustainability objective, the sustainability appraisal clearly shows the degree of impact, highlighting some of the heritage assets which may be affected by the development.</p> <p>It is worth noting that the role of the sustainability appraisal is to consider impacts at a strategic level. The sustainability appraisal therefore omits the consideration of some detailed issues which are dealt with at a project level through the planning application process. An environmental impact assessment may be deemed necessary at this stage.</p> <p>The Council have commissioned a Historic Environment Study for Dorchester in order to more fully investigate the impacts of allocations upon heritage assets.</p>
<p>“The original June 2012 Sustainability Appraisals Non-Technical Summary indicated (see page 8) that the impact on historical and cultural features of development at the Land at Barton Farm would be either neutral or of negligible effect. However, this is not consistent with the Draft Sustainability Appraisal page 263 where the short, medium and long term effects are all indicated as being positive. The comment states;</p> <p><i>‘The Masterplan will outline how local character will be enhanced, protecting the character of the nearby conservation area.’</i>”</p>	<p>In accordance with the requirements of the SEA Directive, the land allocation options were appraised at an early stage, and the draft policy was appraised for those options taken forward for inclusion in the Local Plan at a later stage. The assessments on page 8 of the non-technical summary and page 263 of the Environmental Report are different as they were completed at different stages in the development of the Local Plan.</p> <p>Page 8 of the non-technical summary shows that the impact of development at Land at Barton Farm upon historic and cultural features would be neutral during the consideration of land allocation options.</p> <p>Page 263 presents the results of the sustainability appraisal of draft policy, and shows that the impact of development at Land at Barton Farm upon historic and cultural features is now considered as positive in light of the policy explaining that:</p> <p><i>‘The Masterplan will outline how local character will be enhanced, protecting the character of the nearby conservation area.’</i></p>
<p>“The Sustainability of Alternative Land Allocations Report (Feb 2013) states that the loss of 14 ha of agricultural land resulting from the development of the reduced area of the</p>	<p>The quote provided in this comment refers to the ‘Soil and Water Quality’ sustainability objective, part of which considers the loss of productive agricultural soils. Both the extended</p>

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<p>allocation at Barton Farm is <i>'not considered significant in terms of local food production in light of the wealth of agricultural land in this local area.'</i></p> <p>We believe the same arguments are equally relevant to the extended Barton Farm allocation."</p>	<p>allocation at Barton Farm and the reduced allocation perform the same in terms of this sustainability objective, with a negative impact in the long term (defined as the site in 50 years time in Chapter 3 of the report) owing to the potential longer term drainage issues in the site, which may become a more significant issue in time as the effects of climate change are realised.</p> <p>The sustainability appraisal therefore supports the statement provided in this instance, as it reflects the fact that the loss of agricultural land is not considered a significant issue at either the extended Barton Farm allocation or the original Barton Farm allocation due to the wealth of agricultural land in the areas surrounding the site.</p>
<p>"For the Land south east of Dorchester assessment, a short and medium term negative impact is identified against the historic and cultural features; landscape and townscape criteria. We believe that the Council's assessment understates the seriousness of the harm. Given the site's prominence and relationship with the historic town and its setting, the impact falls into the 'strong negative effect' category.</p> <p>We concur with the assessment which acknowledges strong negative and negative impacts under the climate change, soil and water quality criteria but disagree with neutral assessments of the biodiversity, geo-diversity and habitats criteria.</p>	<p>The sustainability appraisal uses the following methodology, presented in the Environmental Report, to predict the nature of effects in a consistent manner:</p> <p>"The sustainability framework consists of a series of sustainability objectives, each with decision-making criteria to assist in the process of making a judgement about the possible sustainability effects of an alternative approach. In addition, baseline information and any other evidence was used to predict the effect of the approaches where available, along with the professional opinion of specialists such as the relevant Council Officers. In some cases, reasonable assumptions were made to predict the impact, as specified in the appraisals presented in Appendix C."</p> <p>In light of this, the appraisal of effects relies upon a degree of subjective assessment, using expert opinion in addition to the interpretation of baseline information and evidence.</p> <p>Reasons for determining the nature and magnitude of a predicted impact are presented in the Sustainability Appraisal of Alternative Land Allocations in West Dorset.</p>
<p>"...Similarly we strongly and fundamentally disagree with the neutral and positive assessment attributed to the Quality of Life and Economy Criteria for the Land SE of Dorchester.</p>	<p>The appraisal of effects relies upon a degree of subjective assessment, using expert opinion in addition to the interpretation of baseline information and evidence (see response in the</p>

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<p>As detailed above, NPPF guidance and the Local Plan and objectives highlight the importance of promoting integrated and inclusive communities and concentrating development in location where homes, jobs and facilities will be easily accessible to each other and there is a choice of transport modes. The A35 bypass represents a near impenetrable barrier frustrating accessibility to facilities. A second footway/cycle bridge over the A35 will not be sufficient to promote pedestrian and cycle movements to the existing facilities north of the A35. A bus route through the site would inevitably follow a tortuous route with relatively long journey times to destinations making it an unattractive mode of transport compared with the private car. A segregated development of only 1,000 houses would deliver a limited range of local community facilities. Notwithstanding the proposed 3 hectare employment area we believe that the development would exacerbate out commuting.”</p>	<p>box immediately above).</p> <p>In this instance, it is believed that the footway/cycleway bridge over the A35 supplied with the development will provide a route to the essential services and facilities located within Dorchester Town Centre via sustainability modes of transport, as required by sustainability objective 7: To encourage the development of sustainable, safe and vibrant communities to improve quality of life.</p>
<p>“On assessment of the Council’s Sustainability Appraisals, we cannot agree with the positive findings of the document as a reduction in the level of housing growth in Sherborne will have significant implications for the housing/jobs imbalance and housing affordability in this part of the District. There is a clear identified need for housing in Sherborne. The failure to provide housing in this location will have a significant impact on the provision of local services, infrastructure and ultimately the future sustainability of the town. It is important that the housing needs of Sherborne are met; the evidence is quite clear that this is a location that should accommodate greenfield residential development.”</p>	<p>The sustainability appraisal indicates that the reduction in the number of homes resulting from reducing the Land at Barton Farm allocation would cause the effect on sustainability objectives relating to housing, economy and quality of life (which directly relate to housing, services and infrastructure) to be positive rather than strongly positive. Reducing the allocation would still provide a benefit in terms of housing, services and infrastructure, just less of a benefit than there otherwise would be should the extent of the allocation presented in the Local Plan not be reduced.</p>
<p>“In light of the importance of the local area for the cultural identity of Dorchester and Dorset, it is concerning to note the assessment of impacts on historic and cultural features in the latest Sustainability Appraisal. The assessment does not mention Max Gate or Old Came Rectory, and indicates a negative short to medium term impact (until strategic planting is implemented) and a neutral or negligible long</p>	<p>Whilst the sustainability objective does not specifically mention every heritage asset in the area, it notes the negative impact upon historic and cultural assets from a strategic standpoint.</p> <p>The appraisal of effects relies upon a degree of subjective assessment, using expert opinion in addition to the interpretation of baseline information and evidence. In this instance, it</p>

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<p>term impact. However, “strategic planting” would not address the Trust’s concerns regarding the historic sense of place of this locality. It is suggested that negative or strong negative effects in the short, medium and long term would be the more likely scenario.”</p>	<p>was considered that the strategic planting would provide some mitigation to the setting of the historic and cultural features, but not enough mitigation to prevent a negative effect in the short to medium term.</p> <p>It is worth noting that the role of the sustainability appraisal is to consider impacts at a strategic level. The sustainability appraisal therefore omits consideration of some detailed issues which are dealt with at a project level through the planning application process which may require an environmental impact assessment.</p> <p>The Council have commissioned a Historic Environment Study for Dorchester in order to more fully investigate the impacts of allocations upon heritage assets.</p>
<p>“In landscape terms, the Sustainability Appraisal concludes that there would be a neutral or negligible impact in the longer term, again once “strategic planting” has mitigated the impacts of development. With the land being designated as of Local Landscape Importance in the current Local Plan, and with the Dorset AONB lying in an elevated position immediately to the south, it is questioned whether the proposed planting could reduce the long term harm to the landscape to a negligible level.”</p>	<p>Once again, the appraisal of effects relies upon a degree of subjective assessment, using expert opinion in addition to the interpretation of baseline information and evidence. In this instance, it was considered that the in light of the enclosed nature of the Land Southeast of Dorchester and the strategic planting, the impacts upon the landscape would be neutral in the longer term (defined as in 50 years time).</p>
<p>“The Sustainability Appraisal fails to consider the impact of development at the Land Southeast of Dorchester upon the setting of two Grade I Listed Buildings (Max Gate and Came House) and a Grade II Listed Building (Old Came Rectory). The Sustainability Appraisal has failed to give adequate consideration to the significance of these heritage assets, and the potential for enhanced significance arising both from their setting and inter-connection, both of which would be substantially harmed if development was to proceed on the proposed allocation site.”</p>	<p>The sustainability appraisal considers the impacts upon historic and cultural features of development at the land Southeast of Dorchester, adjudging there to be a negative effect in the short and medium term, with a neutral effect in the longer term (defined at the time as being in 50 years) as strategic planting mitigates the impacts upon the setting of the historic and cultural features.</p> <p>To more fully consider the impacts upon cultural and historic features, the Council have commissioned a Historic Environment Study for Dorchester in order to more fully investigate the impacts of allocations upon heritage assets.</p>
<p>“The NPPF states that planning authorities should consider the degree of harm that</p>	<p>The sustainability objective “to maintain or enhance features of historic and cultural</p>

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<p>development would cause to non-nationally designated heritage assets such as the gardens of Max Gate, Old Came Rectory and Came House (para 135); in this context it should be noted that The Garden History Society considers, on the basis of its extensive national experience, that the grounds of Max Gate and Came House are appropriate for national designation, and those of Old Came Rectory for local designation. Such an assessment is not contained within your Authority’s supporting documentation including the Sustainability Appraisal, indicating that the proposed Policy DOR11 has been formulated on the basis of deficient and defective information and fails adequately to justify any possible attempt at a defence based upon the potential public benefit of any development on the proposed allocation site, contrary to NPPF para 134.”</p>	<p>importance” includes the decision making criteria “Will it protect or enhance archaeological sites, scheduled ancient monuments, conservation areas and listed buildings, in addition to other culturally important features?” The garden at Came House is a designated Historic Park and Garden as mentioned in the sustainability appraisal, and is considered a ‘culturally important feature’ according to the sustainability objective above. A negative impact upon cultural and historic buildings was noted in the short to medium term due to adverse impacts upon the setting of this feature. A neutral impact was identified in the long term, when the strategic planting is likely to mitigate the adverse impacts upon the setting of this historic feature.</p> <p>Once again, the Council have commissioned a Historic Environment Study for Dorchester in order to more fully investigate the impacts of allocations upon heritage assets.</p>
<p>“The SA concludes that development on land south of the A35 (land southeast of Dorchester) would have a negative effect in the short to medium term. We must conclude that it would have a strong negative effect on the short to medium term and a negative effect in the longer term. This significant development would bring Dorchester south of the A35 into a currently unspoilt rural location. This attractive rural designation is also already designated by WDDC for its Landscape of Local Importance in the adopted 2006 Local Plan, and the site would adjoin the AONB and be in close proximity to a Site of Local Importance for Nature Conservation.”</p>	<p>The appraisal of effects relies upon a degree of subjective assessment, using expert opinion in addition to the interpretation of baseline information and evidence (see response in the box immediately above).</p> <p>The sustainability appraisal concluded that the landscape impacts were negative in the short to medium term, with a neutral impact in the longer term. This is due to the site being located in an enclosed area, with strategic planting mitigating the visual impacts in the longer term.</p> <p>The Site of Local Nature Conservation Interest, located approximately 240m to the south of the site, is considered unlikely to be significantly affected by development at the land southeast of Dorchester.</p>
<p>“Climate Change Mitigation at the Land Southeast of Dorchester: The SA concludes that the site is in a sustainable location in relation to Dorchester and postulates a neutral short term impact and a positive long term impact. However, in our view, the site is some distance from Dorchester Town Centre and as far as we are aware not on the route of regular bus services. In terms of longer journeys by non-car</p>	<p>The following justification is given for allocating the land to the southeast of Dorchester for development is given in the Sustainability Appraisal of Alternative Land Allocations in West Dorset, in terms of climate change mitigation:</p> <p>“Dorchester town centre will be accessible by sustainable modes of transport, reducing fuel</p>

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<p>modes of transport, as advocated by the NPPF, Dorchester Station is on the Western side of Dorchester and clearly some considerable distance from the site, so we would conclude a “negative short to medium impact” although in the longer term more regular bus services to serve the housing estate might be introduced.”</p>	<p>usage and promoting energy conservation.” Development at this site will result in the provision of a footway/cycleway bridge over the A35 which will provide a route to the essential services and facilities located within Dorchester Town Centre via sustainability modes of transport, such as by bicycle or by walking.</p>
<p>“Climate Change Vulnerability and Soil Water Quality at the Land Southeast of Dorchester: The SA recognises that the site is located on a relatively low lying area of land in a groundwater source protection zone, and that acknowledges that in the short to medium term the scheme would have a negative impact and a strong negative impact in the longer term. We would agree with this, but would suggest a strong negative impact in the short and medium terms in light of the flooding particularly in the south west region in 2012.”</p>	<p>In consideration of the baseline data, including the current surface water flooding maps, and expert opinion, it was considered unlikely that the magnitude of the impact will be strongly negative in the short, medium and longer term for the Climate Change Vulnerability, and Soil and Water Quality sustainability objectives.</p>
<p>“Crossways use of railway: The sustainability appraisal section on Crossways in option A in the two rows on climate change states the improved links to Moreton Station will enable travel by sustainable modes of transport. The proposed but not indicated links would only serve the minority of Crossways population. Access for the current population and for most of the residents will be along the B3390. Presumably the statements in the sustainability appraisal about Crossways residents using the train will have taken into account numerical data on the number of Crossways residents who already catch the train. Would it be possible to see the numerical data upon which the Council has based its sustainability statements on train usage by future Crossways residents?”</p>	<p>The sustainability appraisal concludes that the development at Crossways would provide the opportunity to use more sustainable modes of transport, such as the train, by providing pedestrian/cycle links to Moreton Station. Future predictions of the use of the train were not part of the assessment as it is considered likely that some residents will take advantage of the improved transport links, resulting in positive medium to long term impacts upon climate change mitigation and vulnerability as fuel usage and reliance upon the motor car is reduced.</p>
<p>“The Eastern Background paper contains the Strategic Environmental Appraisal for Crossways in the table at the top of page 13. The initial SEA appraisal column states that...essential services in this area are barely adequate to support new residents. The sustainability appraisal does not provide any guidance or evidence as to why reducing the already small allocations at Sherborne and</p>	<p>The assessment of the land allocation option at Crossways stated that “Whilst essential services in this area are barely adequate to support the new residents, the new development will provide a town centre, new facilities and a generally improved infrastructure”. Once the Crossways option was selected for inclusion in the Local Plan, the ensuing policy required the provision of the necessary infrastructure,</p>

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<p>Beaminster should then be quoted as the very reasons why a rural village served by a very poor road network, and those essential services which are barely adequate to support new residents should be allocated a 69% dwelling allocation.”</p>	<p>including community facilities. Therefore, it is clear that the development at Crossways will not result in issues regarding access to essential services and facilities.</p>
<p>“The sustainability appraisal states on page 20 in option A in the row titled landscape, townscape and seascape that the proposed development at sites A and B will enhance local character and will not adversely impact upon the setting of Crossways village. It is very difficult to see how covering these fields will enhance the local character and not adversely impact upon the setting of Crossways.”</p>	<p>The policy for Crossways requires the development of a masterplan, which will ensure that “the design and layout relates positively to the surrounding area, enhances local character and does not have an adverse impact upon the landscape setting of the village”. In light of this, the sustainability appraisal considers it unlikely that the development adversely impact upon the local landscape.</p>
<p>“Objective 3 of the sustainability framework is to reduce our contribution to climate change, and includes the sub-objective which is to reduce the emission of air pollutants, including greenhouse gases, and maintain or improve air quality. The development at Crossways will result in the failure of this objective due to increased mileage through travelling to Dorchester by car.”</p>	<p>The pedestrian/cycle links to Moreton Station will provide the opportunity to use more sustainable modes of transport, such as the train. The sustainability appraisal noted positive medium to long term impacts upon climate change mitigation and vulnerability as fuel usage and reliance upon the motor car is reduced as a result.</p>
<p>“The sustainability appraisal does not include a like for like comparison. There is a sustainability assessment for Came View but the assessment for Sherborne is only for the site already included in the 2006 Local Plan. It does not include land north of Sheeplands Lane which is part of the ongoing local plan consultations. To obtain this information you have to refer back to the sustainability appraisal of the Local Plan.”</p>	<p>The Environmental Report for the Local Plan, published in June 2012, appraised the effects associated with the extended Barton Farm allocation which includes the land north of Sheeplands Lane. When consideration was given to reducing the allocation to the size presented in the Local Plan adopted in 2006, the sustainability impacts were also appraised in the Sustainability Appraisal of Alternative Land Allocations in West Dorset. The sustainability appraisal of both the extended and original allocation is also presented in Chapter 5 of the Sustainability Appraisal of Alternative Land Allocations in West Dorset for ease of comparison.</p>
<p>“Land SE of Dorchester: The sustainability Appraisal states that the “areas prone to surface water flooding will be kept free from development, however, the frequency and severity of surface water flooding is likely to increase in future as the effects of climate change are realised. Surface water flooding at</p>	<p>There is a statutory requirement to consider the findings of the Sustainability Appraisal of Alternative Land Allocations in West Dorset during the decision making process with regards to which allocations to include in the Local Plan. The sustainability appraisal findings have been incorporated into the decision making process</p>

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<p>the site in the longer term may compromise safety". This has been ignored."</p>	<p>during the development of the Local Plan.</p>
<p>"The Sustainability appraisal was published in February 2013, giving people insufficient time to be properly informed and consulted."</p>	<p>The Sustainability Appraisal of Alternative Land Allocations in West Dorset was consulted upon alongside the consultation for the proposed changes to the previously suggested sites at Sherborne, Beaminster and Crossways, in accordance with Articles 6.1 and 6.2 of the SEA Directive.</p>
<p>"The Council have not responded reasonably and realistically to the nine sustainability objectives. The reasons for discounting alternative sites apply more to the proposed site SE of Dorchester. There are no intelligent arguments for choosing this site, compared to other previously proposed locations."</p>	<p>The role of the sustainability appraisal is to inform the decision making process during the development of the Local Plan, by providing information on the sustainability effects of the plan. Whilst there is a statutory requirement to consider the results of the sustainability appraisal, alongside other evidence and information, there is no legal duty to select the most sustainable option, as it is acknowledged that there are also other factors to consider.</p>
<p>"Section 4 giving justification to the findings of the sustainability appraisal should say increased vulnerability rather than reduced vulnerability."</p>	<p>This is a typographic error, and was meant to say "increased" rather than "reduced" vulnerability as noted in this comment. This error is not reflected elsewhere, as the appraisal notes a negative long term impact on climate change vulnerability in this instance.</p>
<p>Aug -Sept 2013: Submission draft of the Local Plan</p>	
<p>Summary of consultation responses</p>	<p>How these comments were addressed in the Environmental Report</p>
<p><i>"Climate change: Vearse Farm will increase the risk of flooding in Bridport which you have identified yourselves as a major flood risk; - Landscape: this is within the AONB which should only be built on in exceptional circumstances; - Habitat: this is an area with some special habitats, hedgerows and some specific creatures e.g. in the Simene River; - Loss of productive farm land. I cannot see how you could possibly have arrived at a RAG rating if you had actually visited the site. You have failed to carry out any meaningful sustainability analysis on the site. What you have done is to attempt to produce evidence to support your policy rather than looking at the evidence on</i></p>	<p>The assessment of impacts resulting from the Vearse Farm policy indicated that:</p> <ul style="list-style-type: none"> • Flooding: the floodplain of the river will be kept free from development, improving flood resilience. • Landscape: impact reduced by strategic planting in advance of construction. • Habitats: The hedgerow will be retained and land to the south will remain undeveloped and managed for the benefit of local wildlife. <p>The methodology section (Chapter 7, under the heading 'Methodology') explains the system of assessing the impacts of the policy (including the 'RAG' rating). Sustainability appraisal uses</p>

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<p>site.”</p>	<p>the available information to provide a balanced view of the impacts of the policy, highlighting both the positive and negative aspects and suggesting mitigation to address the significant impacts.</p>
<p>“The SA is not legally compliant with the SEA Directive as it does not consider alternatives to CRS1. The alternatives assessed in the SA which informed the June 2012 draft Local Plan considered Crossways sites A, B, C and D. The SA of the reduced area of Crossways considered option A which comprised areas A, B and C and option B which considered areas A, C and D. Throughout the SA process, no assessment of the four individual sites at Crossways has been made and therefore no SA has been undertaken to assess the implications of 500 dwellings and 3.5ha of employment land at Crossways. This could be remedied by reinstating policy CRS1 from the June 2012 Local Plan.”</p>	<p>The SA fully considered all reasonable alternatives whilst developing the CRS 1 policy. The sites A to D at Crossways were not considered separately because they were not considered reasonable alternatives on their own at this stage in the development of the Local Plan. Two reasonable strategic options for reducing the development at Crossways were considered in March 2013; option A to develop areas to the south of Crossways (areas A, B and C) and option B to develop areas to the north of Crossways (areas A, C and D). These two options, which between them include all four of the areas A to D at Crossways, were developed through discussions with Crossways Parish Council, as explained on page 66 of the final SA, published in February 2015.</p> <p>The final CRS 1 allocation presented in the submission draft of the Local Plan is not considered to be materially different to the areas previously considered, since it comprises a minor modification to area B at Crossways which was assessed as part of a larger area whilst considering the options in the sustainability appraisal of alternative land allocations in West Dorset in March 2013.</p> <p>By considering the reasonable options for development at Crossways in the Sustainability Appraisal, the decision to reduce the area of the CRS1 allocation was made in full knowledge of the potential impacts associated with development at Crossways. Therefore, it is considered that all reasonable options have been considered and the assessment of alternatives at Crossways has been adequate.</p>
<p>“The sustainability appraisal for St Michaels Trading Estate (SW Quadrant of Bridport) must include the option to expand the site for commercial and community uses. It should be recognised as a KEY EMPLOYMENT SITE, being the largest Trading Estate providing employment for over 212 (FTE) jobs at present,</p>	<p>The SA considered the land at the SW Quadrant of the St Michael’s Trading Estate as an option which includes both residential and employment uses, as the residential element is likely to help bring forward a viable scheme. St Michaels Trading Estate as an option for commercial and community uses only was not</p>

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<p>and an ideally situated site for small businesses.”</p>	<p>considered a reasonable alternative, as it was seen as unfeasible (i.e. unachievable) and was therefore discounted at the options stage using the methodology explained in the section in Chapter 6 of the SA titled ‘Identification of Options’. The SW Quadrant was not considered a ‘key employment site’, as defined in policy ECON 2 of the Local Plan, in light of the potential for impacts upon the historic buildings at the site.</p>
<p>“The Barton Farm development performs better than the Crossways development in the SA, supporting our conclusions that the Barton Farm site is a marginally more sustainable alternative than the Crossways site. The negative impacts identified in the SA with respect to the extended Barton Farm site (page 292 of SA) with respect to climate change vulnerability (through loss of agricultural land) and soil and water quality (due to surface water runoff and loss of agricultural land) should be amended to positive scores as the SA states that the loss of farmland is unlikely to be significant and a sustainable urban drainage system (SUDS) will be deployed.”</p>	<p>The SA identifies a long term negative impact with respect to climate change vulnerability at Land at Barton Farm (though not a strong negative impact). There is no requirement in the policy for Land at Barton Farm to install a SuDS, although it is appreciated that SuDS may come forward through other legislation. The impacts due to surface water flooding were considered to have significance in the longer term (defined by the SA as in 50 years time) as the effects of climate change are realised. For this reason, the SA recommends that the policy includes wording to ensure that potential issues with surface water flooding are resolved. The loss of farmland is an issue which must be considered through the SA in accordance with the sustainability framework and methodology for assessing the impacts.</p>
<p>“Appendix F of the SA (published in June 2013) does not provide an assessment of the modification to SHER 1, and this should be addressed.”</p>	<p>The modification to SHER 1 is presented in Appendix E of the Local Plan.</p>
<p>“We dispute the findings of the SA (on page 320 of SA published in June 2013) regarding the reduced Crossways allocation and the Barton Farm allocation, as the Crossways site scores strongly positive under the quality of life criteria due to the SANG provision and community infrastructure. The Barton Farm site is scored positively under quality of life but it is the only site which would deliver a link road providing associated community infrastructure benefits and on this basis alone should be scored as strongly positive.”</p>	<p>Access to community facilities by sustainable transport modes is considered through the Quality of Life sustainability objective of the SA. The local community facilities would be accessible by sustainable transport modes from both the Crossways and Barton Farm developments. However, the SANG provided by the Crossways development will also provide improved access to a significant recreational facility, resulting in a stronger positive impact for the Crossways development. The link road which would be provided with an extended Barton Farm development, whilst necessary, will not significantly improve access to the existing community facilities in Sherborne by sustainable</p>

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	transport modes (such as walking and cycling) from the Barton Farm development.
“There appears to be no evidence for the SA at page 254 to have come to the conclusion that development at WEY13 will have a positive effect on the historic environment. The robustness of the SA is therefore in question.”	The draft policy for Wey 13 (Land at the Old Rectory, Lorton Lane) stated that “...any development must enhance the setting of the Old Rectory and preserve or enhance the character of the Broadway Conservation Area.” The SA, in reflection of the protection provided to the historic environment, considered this policy as having a positive impact.
July – Sept 2014: Sustainability Appraisal following the exploratory meeting	
Summary of consultation responses	How these comments were addressed in the Environmental Report
“The level of housing development in Dorset and the quality of development (poor and not designed to meet the demands of the Dorset house buyer) are unsustainable when compared to the infrastructure and employment of the county.”	The SA attempted to address the issue of the level and quality of new housing development in the plan area through sustainability objective 9 of the SA, which is “to provide decent, affordable housing that meets the needs of the local community”.
“It is evident that the Councils SA is flawed and has not tested all reasonable alternatives.”	The Council commissioned an independent review of the SA which concluded that the SA was fundamentally sound. The Inspector’s Report on the Local Plan and accompanying SA concurred with this view, stating that “there has not been a failure to adequately consider reasonable alternatives or key aspects of the plan.
“The addendum's logic fails in the area of employment and growth as it does not take into account of areas' different potentials and social issues. Sherborne will have reduced growth should housing numbers be too low whilst Weymouth will have increased unemployment if housing levels are too high. In the Central area where retirees are very significant, the number of new homes would unlikely to impact either growth or employment, just property prices.”	In terms of the relationship between growth and employment, the SA considered that some of the housing options would encourage or prevent economic growth due to providing sufficient or insufficient housing for the workforce. Other factors are likely to have an effect on this complex relationship, such as immigration and workforce age. These relationships are explained in the section titled ‘findings of the sustainability appraisal’ in Chapter 10 of the SA (M Mod 5).
“Para 3.3.6 – The Bridport Environment Group is conscious of the pressures on local planning authorities to set what appear in effect to be centrally imposed housing targets (contrary to the principles of Localism and evidenced local	The Local Plan set a level of housing provision based on population projections which makes an allowance for younger people to live and work in the area, support the economy, and provide decent affordable housing. The SA aims

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<p>need), and is appreciative of the conscientious efforts of the councils to deliver an effective Local Plan in testing circumstances. However we cannot accept that the “need for growth from both a national and local perspective” constitutes the “exceptional circumstances” required to justify major development in the AONB, which we questioned in our initial response in 2012. The “need for growth” is too vague a concept and if this is accepted as a precedent will render designations such as the AONB meaningless, contrary to para. 116 of the NPPF.”</p>	<p>to reduce the impact upon the Dorset AONB through sustainability objective 2, which is “to maintain, protect and enhance the landscape, townscape and seascape”, including the Dorset AONB.</p>
<p>"The sustainability appraisal is flawed. There is too much reliance on subjective opinion."</p>	<p>There are instances where a judgement on the impacts of a policy must be made subjectively in the absence of data, for example using the opinion of specialists in a subject where there is no data or quantitative information is available.</p>
<p>"In order to honour the statement in the Sustainability Appraisal that “The local plan will ensure that new local services and facilities are provided with new development so that the additional demands that new development places on local services and facilities are fully met”, the District Council should put in hand an analysis of the capacity of Beaminster’s infrastructure - notably the schools, the disposal system for foul and storm water, and the town’s internal road system – before the next phase of major housing development takes place.”</p>	<p>The Local Plan will ensure that the appropriate amount of housing and facilities will be provided alongside new development at Beaminster, and across the plan area in accordance with policy COM 1.</p>
<p>"There is a very significant omission in that the implications of a change of planned new jobs from 16,100 to 2,300 (FPC3) have not been assessed."</p>	<p>The change in the estimation of the new jobs that will arise as a result of local plan policy is a revised estimation rather than a change in policy approach. Amendments to policy are the main consideration of the SA.</p>
<p>"Even though housing option D offers the highest increase in the housing supply of the options tested, there is uncertainty that the selection of the preferred housing option D will provide adequate workforce to develop a sustainable local economy and stimulate recovery. This suggests that higher growth options require testing (for example the outcome of the Chelmer model work by the North Dorchester Consortium, Grainger and</p>	<p>Housing option D, as explained in Chapter 10 of the SA (M Mod 5) is estimated using statistics from the 5 year period from 2001-7, during the pre-recession period of higher economic growth. The SA considers that this level of housing growth will increase the population of people of a working age, encourage the development of a sustainable economy, and stimulate recovery from economic recession.</p>

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<p>Persimmon).”</p>	
<p>“It is noted also that the implications of a reduced plan period are not tested by the SA.”</p>	<p>The SA identified reasonable alternatives for the level of housing growth and the plan period in the section titled ‘Identification of reasonable alternatives’ in Chapter 10 of the Local Plan (M Mod 5).</p>
<p>“The final paragraph of page 7 of the July 2014 sustainability appraisal states that “a joint target provides greater flexibility in terms of providing the housing supply. Should the target be split between these two areas, some of the existing allocations in Weymouth & Portland would need to be removed and some of the previously rejected allocations in West Dorset would need to be added to the Local Plan”. This does suggest that the strategy that is being consulted upon is relying on Weymouth & Portland to meet West Dorset’s needs. However the implications of this strategy for each district have not been assessed in the SA.”</p>	<p>The Local Plan is a joint local plan, covering land under the jurisdiction of West Dorset District Council and Weymouth and Portland Borough Council, representing a single housing market area. There is no requirement, or indeed any benefit, for the SA to split the impacts of development according to individual Council administrative areas rather than considering the entire geographical area of the Plan strategically, as a whole.</p>
<p>“The SA does not examine the alternatives of separate housing requirements for West Dorset and Weymouth and Portland – instead a single target is used. A joint target is not consistent with the need to monitor the housing land supply in each LPA in accordance with the NPPF. It can be concluded that the plan is not satisfying the requirements of national policy. It is clear from the evidence that the proposed provision fails to significantly boost housing land supply, the plan does not provide for 15 years post adoption and does not take into account the longer term requirements. The SA is therefore flawed and fails to accord with national policy.”</p>	<p>The SA explains in the section titled ‘Area of Housing Target’, under the ‘Identification of reasonable alternatives’ in Chapter 10 of the Local Plan (M Mod 5) the reasons why a single housing target covering the geographical area of the Local Plan was selected for consideration.</p> <p>However, a joint target does not prevent the housing land supply from being monitored separately, and therefore does not compromise the ability of the local plan to comply with the NPPF.</p> <p>Furthermore, the local plan is considered to boost housing supply in the long term.</p>
<p>“Within the Further Proposed Changes Sustainability Appraisal the Councils have failed to assess (either properly or at all) all reasonable alternatives. It has not identified the full objectively assessed housing needs within the housing market area and the extent to which unmet housing need within the market area could be met within neighbouring housing market areas.”</p>	<p>In accordance with the relevant legislation, the Council identified reasonable alternatives for housing growth (please see the section titled ‘Identification of reasonable alternatives’ in Chapter 10 of the Local Plan (M Mod 5)). With respect to working with neighbouring housing market areas, the Inspector’s report concluded that the Council have complied with Duty to Cooperate.</p>
<p>“The Sustainability Appraisal also does not</p>	<p>The SA of the Local Plan fully complies with the</p>

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rectify legal flaws previously brought to the Councils' attention, namely the failure to assess the four individual alternative strategic sites at Crossways. The Further Proposed Changes Sustainability Appraisal is therefore wholly unsound as it has not been positively prepared, nor is it justified. Moreover, by not assessing all reasonable alternatives the Sustainability Appraisal is in clear breach of the SEA Directive and the SEA Regulations. As such, it is unlawful and these breaches are fatal to the legality of the Further Proposed Changes and the Submitted Local Plan. To appropriately address each of these fundamental issues the Councils must withdraw the Further Proposed Changes and the Submitted Local Plan and Sustainability Appraisal from examination."

SEA directive and SEA regulations. The Council commissioned an independent review of the SA which concluded that the SA was fundamentally sound. The Inspector's Report on the Local Plan and accompanying SA concurred with this view, stating that "there has not been a failure to adequately consider reasonable alternatives or key aspects of the plan.

With respect to the consideration of alternatives at Crossways, the individual sites (A to D) at Crossways were not considered separately because they were not considered reasonable alternatives on their own at this stage in the development of the Local Plan. Two reasonable strategic options for reducing the development at Crossways were considered in March 2013; option A to develop areas to the south of Crossways (areas A, B and C) and option B to develop areas to the north of Crossways (areas A, C and D).

The final CRS 1 allocation presented in the submission draft of the Local Plan is not considered to be materially different to the areas previously considered, since it comprises a minor modification to area B at Crossways which was assessed as part of a larger area whilst considering the options in the sustainability appraisal of alternative land allocations in West Dorset in March 2013.

By considering the reasonable options for development at Crossways in the Sustainability Appraisal, the decision to reduce the area of the CRS1 allocation was made in full knowledge of the potential impacts associated with development at Crossways. Therefore, it is considered that all reasonable options have been considered and the assessment of alternatives at Crossways has been adequate, as supported by the findings of the independent review of the SA and the Inspector's report.

"In fact the motives are clear, money. The Sustainability Assessment is clear that all the effects to the landscape and environment are negative, you proudly display this and then proceed to ignore and disregard the evidence provided. Continuing thus shows no respect for the environment nor any desire to protect this

The objective of the Local Plan is to deliver sustainable development, providing economic and housing growth but with the minimum impact upon the environment. Inevitably, there are conflicts between growth and environmental conservation. A purpose of the SA is to highlight where there are impacts upon

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<p>Area of Outstanding Natural Beauty and all it contains. I look out on this glorious landscape and see ancient hedgerows, deer, an abundance of birds and wildlife, yet you find it acceptable to destroy existing farm land, build on a flood plain, and increase consumption and pollution in a way that changes the character of a beautiful town irrevocably. I am deeply disturbed that your own Sustainability Appraisal shows a negative impact across the board to the community, environment, wildlife, agricultural land. You know the parameters, and your own study is comprehensive. It also shows VERY negative impact from the specific plan you are selecting. This must be totally against all the ideals of West Dorset regarding conservation, protection of land and community. Building here is reckless and shameful.”</p>	<p>the environment and recommend mitigation to address these impacts.</p>
<p>“3.2.4 cites lack of suitable housing as a reason young people move away; actually, it is lack of employment opportunities. Home building is a worthy aim but developing the local economy by better supporting business aspirations is just as deserving. This is not reflected in the Sustainability Appraisal which reads as if it has been written by a house building company.”</p>	<p>The SA makes the point that a higher level of housing will enable the Local Plan to play its part in the development of a sustainable economy and drive recovery from economic recession, thus providing employment opportunities for young people, by providing sufficient housing to support an increase in the population of people of a working age.</p>
<p>“Renewable energy as an integral part of the plan could make for increased sustainability, allotment space for food and cycle paths for local commuting.”</p>	<p>The SA considers the use of renewable energy through sustainability objective 3, which is “to reduce our contribution to climate change”. This sustainability objective asks “will it encourage an increase in the proportion of energy generated from renewable energy sources”? It is appreciated that renewable energy has many other associated benefits.</p>
<p>“I warmly welcome the sustainability addendum. It has exactly the right ideas. To combat climate change we need local resilience, local energy production 3, food growing on allotments 4 and community growing schemes. Good cycle links 7, I cannot see how the proposed local plan takes any of these into account. There is a total disconnect between the local plan and the sustainability appraisal. The appraisal should direct the plan, not be a tick box add on. I always feel these appraisals sound compelling but all too often</p>	<p>Whilst it is appreciated that all of the recommendations of the SA have not been incorporated into the Local Plan, the main findings of the SA have been taken into account in the development of the Local Plan.</p>

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<p>are forgotten when commercial pressures are exerted on the planning authority. One must believe it when one sees it happening.”</p>	
<p>“Support for Option D: Options A, B and C would under-provide housing which would have an adverse impact on the economy and housing sustainability objectives in the short term but would also have a continuing adverse impact in the medium and long term. Consequently, the Plan would be contrary to the objectives for growth set out in the NPPF. Conversely, Option D is identified as having a strongly positive impact by the end of the plan period and long term and complies with the NPPF objectives of meeting objectively assessed housing needs and encouraging growth. There is an assumption that the greater rates of development proposed in Option D will produce greater impacts on the natural environment, historic and cultural features. However this does not necessarily follow i) where there are opportunities for (re-) development within the defined settlement boundaries these should either be identified and sites allocated or their potential recognised. This will minimise greenfield land take; ii) Development proposals can bring with them mitigation and compensatory proposals which will neutralise adverse impacts as well as enhancements to yield a betterment in habitat; iii) Mitigation through good design can in any event neutralise such potential impacts. No allowance has been made for this within the SA. Accordingly the long term impacts of SA Objectives 1-6 should be re-classified as (-) amber.”</p>	<p>The SA considers that providing 775 houses per year over the plan period will result in impacts upon the natural environment, despite some of this development occurring within development boundaries and the potential for mitigation and compensation.</p>
<p>“FPC1- The Councils’ explanations for the proposed housing land supply figures and calculations are not adequately explained in the text of the SHLAA update July 2014 and the Sustainability Appraisal July 2014. The latter seeks to justify the preferred Option D figure of 775 dpa, whereas a much larger figure is required by the NPPF to take account of long term inadequate supply of housing land (caused by restrictive planning policies) and persistent under-delivery of housing completions over many years. The NPPF</p>	<p>The SA does not seek to justify an approach to housing land supply, but instead provides an assessment of the impacts associated with each and feeds this into the decision making process.</p> <p>The options for housing supply considered though the SA were identified as explained in the section titled ‘Identification of reasonable alternatives’ in Chapter 10 of the Local Plan (M Mod 5). The level of housing supply taken forward for the Local Plan is NPPF compliant.</p> <p>The purpose of the SA is to appraise the impacts</p>

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<p>therefore requires additions of 20% and to take account for the shortfall in housing supply since 1 April 2011 when the Local Plan period commenced. The Sustainability Appraisal says nothing about the NPPF requirements.”</p>	<p>of the Local Plan, not the NPPF.</p>
<p>“I have no faith that the issues of traffic problems, flooding, impact on services, impact on the designated area of outstanding beauty or the impact on the availability of good agricultural land has been taken into account. It will be too late after the decisions are found to be faulty.”</p>	<p>Whilst it is appreciated that not all of the recommendations with respect to traffic, services and facilities and landscape receptors in the SA have not been incorporated into the Local Plan, the main findings of the SA have been taken into account in the development of the Local Plan.</p>
<p>Feb – March 2015: Sustainability Appraisal of Post-Examination Modifications</p>	
<p>Summary of consultation responses</p>	<p>How these comments were addressed in the Environmental Report</p>
<p>“The SA does not take consider the changes made in respect of MM 60 as the Council consider that this change does not represent a considerable change in the direction or approach towards the policy area. However, it is considered that this does represent a considerable change as the plan is now saying that there are sufficient development sites in Dorchester to 2031 (with the assistance of development proposed at Crossways) whereas previously in the plan it had acknowledged that only the needs of the early part of the plan period could be met and fell short of meeting the needs towards the end of the plan period, in which case further investigations were proposed in the plan area post 2026.”</p>	<p>MM60 does not represent a change in policy approach or policy. Instead, it provides an update in the preamble to the policy which explains that the situation in terms of land supply has changed. This is outside the scope of the SA.</p>
<p>“There is nothing in place to sustain these homes (CHIC 2) and the families that they will generate. The existing town will only suffer as a consequence.”</p>	<p>The ensure that there is sufficient infrastructure provided with the proposed development of the urban extension at Chickerell, the local plan will require the appropriate facilities and services to be provided with the development.</p>
<p>“The sustainability appraisal still fails to consider the sustainability merits of growth at Dorchester versus growth at Crossways. The North Dorchester option has not been considered fully as part of a positive planning approach.”</p>	<p>The SA considered development at the land north of Dorchester and at Crossways as options for possible inclusion as allocations in the Local Plan in September 2011 (Chapter 6 of the SA (M Mod 5)) and whilst considering alternative land allocations in West Dorset in February 2013 (Chapter 8 of the SA (M Mod 5)).</p>

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<p>“We need affordable housing, we need social housing, we need more services, if Vearse Farm is to be built in some form, we need a community/cultural centre, we will need more roads, sewage and a larger medical centre, we will need the youth centre to be supported and properly funded and we need to ensure that the reason why people want to come and live here which is the beauty of the surrounding area, the rich culture and arts centres and theatres, the market and the local shops are guarded. May I just add to this that our local doctor’s surgeries and the community hospital are already heavily subscribed with local elderly people as well as the rest of us. As social services are being cut to bring in hundreds more pensioners is going to create an unsustainable burden on what already exists in this area. We have just heard the rumour that the Tory led DCC are now considering closing Dorchester hospital to save money. This all just adds up to a complete lack of thorough thinking and planning and just looks like an add on without concern and without serving the people.”</p>	<p>The SA aims to prevent significant social, economic and environmental impacts as a result of the Local Plan. In terms of the provision of services and facilities, The SA ensures that access to services and facilities is provided through sustainability objective 7, which is “to encourage the development of sustainable, safe and vibrant communities to improve quality of life”, by considering whether a policy will improve access to services and facilities. Policy COM1 of the Local Plan ensures that new development makes provision for suitable community infrastructure.</p>
<p>“On page 289 it still states "Approximately 7.2ha of land reserved for employment uses..." and "the provision of 1,200 to 1,500 new homes". These need to be corrected to the reduced area of land for employment use (3.5ha) and the provision of 500 new homes.”</p>	<p>Page 289 of the SA presents the findings of the assessment of the CRS1 policy in the pre-submission draft of the Local Plan from June 2012. At this time, the proposal was for the allocation to include approximately 7.2ha and between 1,200 and 1,500 new homes. Further SA was undertaken for the reduced area of allocation at the later stages of the SA.</p>
<p>“The updated SA has not tested the reasonable alternative of allocating more land against the Council’s proposed strategy of meeting the additional 2,325 dwellings through greater reliance on SHLAA sites and windfall sources. Given the context, there are clear merits of allocating more land on sustainable sites (such as the extended Barton Farm land) that can provide certainty of delivery and a significant contribution to meeting affordable housing needs (particularly acute in Sherborne). Without this reasonable alternative being tested in the SA, we contend that the Council’s strategy does not meet the NPPF’s positively</p>	<p>The SA considered a range of options for housing supply and land allocations throughout the development of the local plan, including the option to allocate an extended area of land at Barton Farm.</p>

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<p>prepared or justified tests of soundness.”</p>	
<p>“It should be noted that the appraisal states a "strongly negative effect upon biodiversity and habitats", "landscape impacts" and "the loss of agricultural land and habitats" which furthers the need for policy safeguarding greenfield sites outside of the Defined Development Boundary. (Chickerell)”</p>	<p>The SA identified potential negative impacts upon landscape, soil and water quality and habitats and species at the options stage of the SA in September 2011. When this allocation was taken forward for inclusion in the draft Local Plan in June 2012, the policy addressed the previously identified issues for the Chickerell Urban Extension as it included measures to prevent such impacts from occurring. For the CHIC 1 (Putton Lane) policy, an adverse impact upon habitats and species was noted. The Local Plan includes policy which restricts development outside the development boundaries.</p>
<p>“The Sustainability Appraisal contains some good planning principles. The problem is that they are either frequently ignored or the evidence is bent to suit a desired objective. I could illustrate numerous other examples throughout the entire Sustainability Report, including the update, where the report's sustainability principles are either ignored or perversely interpreted. Whilst it is a government requirement to produce a Sustainability Appraisal it would appear that its principles are often applied illogically.”</p>	<p>It is noted that not all of the recommendations of the SA have been incorporated into the Local Plan, the main findings of the SA have been taken into account in the development of the Local Plan.</p>
<p>“As repeatedly set out within our representations and examination statements and also stated on numerous occasions throughout the examinations sessions the Sustainability Appraisal for Policy CRS1 is in clear breach of the SEA Directive and SEA Regulations. As such, it is unlawful and these breaches are fatal to the legality of the Local Plan. It is therefore regrettable that the Councils’ Main Modifications Sustainability Appraisal has failed to address these breaches. The Councils should withdraw the Local Plan and Sustainability Appraisal to rectify the legal and soundness failings.”</p>	<p>Justification for the assessment of the options for development at Crossways has been presented previously in this appendix.</p> <p>The SA of the Local Plan fully complies with the SEA directive and SEA regulations. The Council commissioned an independent review of the SA which concluded that the SA was fundamentally sound. The Inspector’s Report on the Local Plan and accompanying SA concurred with this view, stating that “there has not been a failure to adequately consider reasonable alternatives or key aspects of the plan.</p>
<p>“M Mod 5 - WDWP Local Plan Sustainability Appraisal Update: Pages 89, 92, 189, 287 and 345 and M Mod 6 - WDWP Local Plan Sustainability Appraisal Non-technical Summary: Page 34. For the sake of consistency</p>	<p>The DOR 10 allocation (Dorchester Transport and Environment Plan) refers to the park and ride site, without reference to the Trunk Road Service Area, to prevent confusion and ensure consistency with the Local Plan, which simply</p>

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all references to Park and Ride should also include reference to 'Trunk Road Service Area'."

refers to the park and ride site.



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