

Other Issues

For other issues, we received a total of 61 responses. The individual comments were broken down as follows:

Number of comments made: 61

Object: 47

Support: 3

Neutral: 11

Specific and general consultation bodies	Key landowners / developers
<i>Clinical Commissioning Group</i>	<i>Gladman</i>
<i>Dorset County Council (Environment & Economy)</i>	<i>Land Value Alliance (South West) LLP</i>
<i>Dorset County Council (Transport)</i>	<i>Wyatt Homes</i>
<i>Dorset Local Nature Partnership</i>	
<i>South Somerset District Council</i>	
<i>Southern Gas Network (SGN)</i>	

General Comments: Consultation

Consultation Period

- The public consultation has been inadequate. The consultation period was only open during the holiday months when residents were away.

Form of Consultation

- You are consulting at the preferred options stage of the local plan review in accordance with the statutorily required period but not implementing the Joint Statement of Community Involvement (November 2014). The limited communication with stakeholders (i.e. one day exhibitions) is not acceptable. The planning authority should review the way in which they are conducting the preferred options consultation and implement their community involvement strategy fully in this process.
- The plan should detail the form of consultation that will take place with local parishioners, to ensure that a dialogue takes place and the suggestions and concerns are addressed, rather than the parishioners just being informed of the developments and progress.

Exhibitions

- With reference to the Sherborne exhibition, we are disappointed that it was not advertised in either the Western Gazette or the Blackmore Vale Magazine.
- The plans presented were lacking in detail and staff present at exhibitions were unhelpful in answering questions.
- Concerns raised at exhibitions were shrugged off as being invalid, rather than as presenting potential problems.

Making Responses / Website

- There was difficulty in registering comments and documents.
- Your website seeking views is solely for the computer literate. This means a whole section of the population is disenfranchised by your process.

General Comments: Plan Content

Issues Raised

- The document contains a large number of errors
- The document has not been updated in key areas.
- The councils have failed to challenge old-fashioned views (like an ever-increasing retail sector and improving life expectancy).
- The plan is based on ideas that the planners think will be proposed by other interested parties.

Chapter 1: Introduction

Paragraphs 1.1.1 to 1.1.5: What is a Local Plan?

- The local plan is not a plan; it is just a list of possible building sites. WDDC should withdraw the plan then carry out analysis to show the consequences of developing these sites including analysis as part of the consultation process. If WDDC does not have the resources to do this analysis then it should clearly state in the plan that the analysis has not been done.

Paragraph 1.1.2: The Development Plan for the Area

- The plan needs to state its relationship to the Minerals and Waste Local Plan as this forms part of the development plan. (Dorset County Council: Environment & Economy)

Paragraph 1.1.2: The Need for the Local Plan Review

- It is premature: the councils have until 2021 to complete the local plan review process.

Paragraph 1.1.3: Taking Account of National Policy

- Paragraph 35 of the revised National Planning Policy Framework 2018 (NPPF2) sets out four tests that must be met for local plans to be considered sound. They must be; positively prepared, justified, effective, and consistent with national policy. Whilst the present consultation marks a relatively early stage in the plan making process, a potential strategy for the future development of West Dorset, Weymouth & Portland is now emerging. It is therefore essential that these tests are carefully considered from the initial stages of local plan production.

Paragraph 1.1.6: Plan Period and Local Government Review (LGR)

- There is currently only mention of LGR related to transport within the Community Needs and Infrastructure Chapter. We understand that there are discussions taking place about the timing of developing a joint local plan for the Dorset Council area and whether current local plan reviews will continue. We presume that if the current review process continues that reference will be made to the development of a Dorset area local plan in relation to the local plan period (paragraph 1.1.6). (Dorset Local Nature Partnership)
- The two district councils are about to be replaced by a unitary authority, which may wish to reconsider the housing requirements across its whole area, as well as requirements being based on governmental housing projections which are five years old and take no account of Brexit.

Paragraphs 1.1.8 and 1.1.9: Plan Preparation

- There should be a pause to progress on the council's preferred options and the focus should be on producing a joint plan for the new unitary authority. This will be important as it will set the strategic housing and employment requirements for the new unitary authority area. Considering the strategic need would be of greater value than pursuing a plan which will never be adopted. The council should be using the time between now and April 2019 to prepare a joint evidence base. (LVA (South West) LLP).

Paragraph 1.1.13: Site-specific Policies

- None of the site allocation proposals include an indication of the number of new homes and / or the amount of employment land expected to be delivered. This only appears to be identified in Table 3.3. It is suggested that in order to provide clear guidance to those using the local plan review, including decision makers, the inclusion of these figures with the proposals themselves would be helpful. (South Somerset District Council)

Box Following Paragraph 1.1.15: Use of the Words 'Will' and 'Should'

- We have a recurrent concern across the preferred options document relating to the use of 'should' 'will' and 'must'. We do not find the explanatory box to be of adequate reassurance. This is because we are concerned that landscape

protection or the provision of infrastructure (for example) may be lost through the application of flexibility in response to developers' claims of exceptionality.

Paragraphs 1.2.24 to 1.2.26: Duty to Co-operate

- In accordance with paragraph 27 of the NPPF (2018) we look forward to working with West Dorset (or any successor organisation) on a statement of common ground. (South Somerset District Council)

Section 1.3: Vision and Strategic Priorities

- The plan lacks a coherent strategic view and is, perhaps, why the individual policies often do not support the stated strategic targets of increased and affordable housing, good employment in future businesses and reducing the level of commuting.

Chapter 2: Environment and Climate Change

ENV1: Landscape and Seascape (AONB)

- For sites where it is proposed to build on the AONB (e.g. Bridport and Littlemoor) we draw attention to the fact that the land has not been removed from the AONB through specific public consultation.

ENV2: Sites of Geological Interest (World Heritage Site)

- The World Heritage Status given to the Jurassic Coast should be rescinded as an example for other parts of the country to reflect on.

Section 2.3: Wildlife Habitats and Species

- We are not commenting on site specific proposals, but recommend that stronger wording is made in terms of biodiversity enhancements and access to greenspace for all sites. (Dorset Local Nature Partnership)

Section 2.6: Achieving High Quality and Sustainability in Design

- It is recommended that a policy supporting electric vehicles charging points in new developments should be added.

Chapter 6: Community Needs and Infrastructure

Public Health / Prevention at Scale

- We recommend adding a policy on public health and the 'Prevention at Scale' agenda. New development should encourage healthy places which support active lifestyles and create a high quality environment. This may mean prioritising walking and cycling and digital over driving and parking. (Dorset County Council: Environment & Economy)

COM2: New or Improved Local Community Buildings and Structures (Health Infrastructure)

- At this stage we have undertaken an initial analysis of the anticipated impact of the overall level of development on NHS infrastructure and the likely implications for the area. As and when individual developments are approved and funding is made available from developers, the location of any additional clinical room(s) would need to be considered. When planning applications are approved, financial contributions should be provided to fund the additional NHS primary care infrastructure from the Community Infrastructure Levy or Section 106 agreements in place with developers. (CCG)

COM5: The Retention of Open Space and Recreational Facilities

- We would not support any sites which are allocated to or come forward for development which would result in the loss of all or part of any playing fields or pitches. This would include any educational sites without the local authority first carrying out a robust strategy. (Sport England)

COM7: Creating a Safe and Efficient Transport Network

- Reducing the volume of unnecessary traffic in town centres is fundamental to achieving a better quality of place, while recognising that in rural areas, alternatives to the private car are limited. (Dorset County Council: Environment & Economy)
- Funding for walking and cycling infrastructure is likely in future to be aligned to Local Cycling and Walking Investment Plans (LCWIP). Therefore where an LCWIP or other area-based walking and cycling strategy is in place, developments should support or contribute to their delivery. (Dorset County Council: Transport)
- The only way of implementing the declared strategy locally (i.e. for a safe and efficient network) is through the construction of the Chideock by-pass. A lot of local research has been considered and representations have been made to Highways England as part of their public consultation on their road investment strategy. Local engineering and cost studies have shown that a very cost effective bypass is feasible for Chideock, which could be part funded from planning obligations and the Community Infrastructure Levy, as mentioned in paragraph 6.2.2.

COM9: Utilities (Gas)

- Southern Gas Networks (SGN) is the owner and operator of significant gas infrastructure within the area and due to licence holder obligations: should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer; and should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as

- such, any diversion requirements should be established early in the detailed planning process. (SGN)
- Where required, we will look to manage the provision of any off-site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring low pressure (LP) reinforcement in addition to that required for intermediate pressure / medium pressure (IPMP) networks, and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system, but may also include the installation of above ground apparatus involving land purchase. (SGN)

COM10 Renewable Energy Development

- SGN request that where the council are in discussions with developers via the local plan, early notification requirements are highlighted. SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. (SGN)

Glossary

Definition of Affordable Housing

- The definition of affordable housing is completely inadequate and simply follows national generic definitions. Locally average wages are £280pw and in proposing the use of land to deliver local housing needs more account must be taken of local not national affordability. The South Somerset Local Plan, for example, includes the national definition but says that of the 35% affordable provided, 67% should be social housing and 33% intermediate rent, affordable rent and shared ownership. The South Somerset Local Plan recognises that viability will then be an issue but accepts that it may have to negotiate for less than 35% but at least provision will meet local needs. The definition in the Glossary should include definitions of social housing (40-60% market rent) and shared ownership housing (which should be opportunities to purchase a share of equity in a property at a level commensurate with local salaries and without a rent of 1-1.5% equity on the remainder). Co-operative housing should also be mentioned.

Alternative / Omission Sites

Casterbridge Trading Estate, Dorchester

- I would like the Casterbridge Trading Estate, Dorchester to be considered for housing (social and private) through the next review.

Three Lanes Way, Puddletown

- This site should be considered as an omission site, which would be deliverable in the next five years. The site is currently the subject of a planning application for the erection of 42 dwellings and would contribute to the council's housing land supply, if consent is granted. The applicant is a housebuilder and therefore the delivery of the site is considered to be certain. (Wyatt Homes)
- The development of the site would not give rise to issues of flooding or present an unacceptable impact. It would not result in detriment to highway safety and the site can be safely accessed on foot. The proposed development would also not have an adverse impact on biodiversity as demonstrated by a supporting ecological report. The proposed additional trees would present an increase in biodiversity. (Wyatt Homes)

Land East of Yeovil (Site Y1 in the Issues and Options Document): Objection to Deletion

- I object to the removal of Site Y1 from the preferred options consultation and ask for it to be re-instated as the most 'sustainable option for meeting growth needs' within northern West Dorset and South Somerset. The preferred options set out ambitious new developments that will take longer to deliver, will require significant investment in infrastructure and could distort the economies of West Dorset and South Somerset.

Land East of Yeovil (Site Y1 in the Issues and Options Document): Support for Deletion

- The decision not to progress Option Y1: East of Yeovil (within Bradford Abbas parish) to the preferred options stage is supported. We are pleased to see that our comments made in response to the Issues and Options consultation have been taken into account and are in agreement with the reasons for not taking the option further as set out in paragraph 10.2 of your Background Paper – Edge of Yeovil (August 2018). The development option has been excluded on the basis of landscape impact on wider views, proximity to the Babylon Hill SSSI and access concerns (junction capacity and the impact on the wider transport network). Part of the site is also unsuitable for residential development as it is located in the flood zone. (South Somerset District Council).
- Following this current round of consultation, should Option Y1 or another similar proposal on the eastern edge of Yeovil be bought back into scope, we request that in line with the Duty to Co-operate we are informed at the earliest

convenience and would refer to this council's previous comments. (South Somerset District Council)

- There are many issues against the development of that parcel of land. Perhaps the most important is access at the roundabout at the bottom of Babylon Hill, which is already a source of congestion from the A30 and is aggravated by the heavy traffic to the retail park, which is only accessible by car. Overall we are pleased that it has been taken out of the equation.