

## Achieving a Sustainable Pattern of Development

For the 'Achieving a Sustainable Pattern of Development' chapter a total of 333 responses were received. The individual comments were broken down as follows:

*Number of comments made:* 333  
*Object:* 244  
*Support:* 51  
*Neutral:* 38

<b>Specific and general consultation bodies</b>	<b>Key landowners / developers</b>
<i>The Beaminster Society</i>	<i>Owners of Aldwickbury</i>
<i>Bridport Town Council</i>	<i>Bellway Homes Ltd (Wessex)</i>
<i>Burton Bradstock Parish Council</i>	<i>C G Fry and Sons</i>
<i>Chideock Parish Council</i>	<i>Considerate Hoteliers Ltd</i>
<i>Dorchester Town Council</i>	<i>Dorset Planning Consultant</i>
<i>Dorset County Council: Children's Services</i>	<i>Duchy of Cornwall</i>
<i>Dorset County Council: Environment and Economy</i>	<i>Gladman</i>
<i>Dorset County Council: Minerals &amp; Waste</i>	<i>Hallam Land Management Ltd</i>
<i>Dorset County Council: Transport</i>	<i>Hanford Holdings Ltd</i>
<i>Dorset CPRE</i>	<i>Homes England</i>
<i>Dorset Local Nature Partnership</i>	<i>Luxury Family Hotels</i>
<i>Highways England</i>	<i>LVA (south West) LLP</i>
<i>Historic England</i>	<i>Neejam 165 Ltd &amp; Budworth Developments Ltd</i>
<i>Portland Town Council: Planning and Highways</i>	<i>North Dorchester Consortium</i>
<i>Sherborne and District CPRE</i>	<i>The Loyal Hand in Hand Lodge of Oddfellows</i>
<i>Sherborne Town Council</i>	<i>Persimmon Homes</i>
<i>South West Water</i>	<i>Portland Port Group</i>
<i>Sport England</i>	<i>Symondsburry Estate and the Watton Hill Trust</i>
<i>West Dorset CPRE</i>	<i>Warmwell Estate</i>

<i>Wessex Water</i>	<i>West Stafford LVA LLP</i>
<i>Weymouth Civic Society</i>	<i>Woodsford Farms</i>
	<i>Wyatt Homes</i>

### General Comments

- This chapter should set out the design principles that new development should be expected to accord with to enable / encourage sustainable, healthy and active lifestyles. The text should set out the expectation that development will accord with the Essex Design Guide or Sport England & Public Health England's Active Design Guidance. (Sport England)
- The 'social objective' text seems to be missing from the diagram in paragraph 3.1.2. (Dorset Local Nature Partnership).
- In practice WDDC does not demonstrate 'good community ownership and participation in the planning process' (as sought in paragraph 3.1.2).

**Responses on Question 3-i: The need for 794 dwellings per annum (15,880 homes in total) has been based on the Government's proposed new standard methodology. The need for employment land (51.6 hectares) has been based on the 2016 Workspace Strategy. Do you consider that these figures represent the 'objectively assessed need' for housing and employment land for the period 2016 to 2036?**

### Location of Growth

- The proposed growth does not appear to have been influenced by: the role and function of the area's settlements; the proximity and accessibility to existing communities, jobs and facilities; the supply of developable sites, including previously developed (brownfield) sites; and environmental constraints.
- There has not been a thorough investigation into alternatives because the 'full assessed local need for housing' has been focused on just 'ten locations'.

### Support for the Local Housing Need Figure

- Policy SUS1 and 794 dwellings per annum (dpa) are supported. (Bellway Homes Ltd (Wessex), Dorset County Council: Environment and Economy, Hallam Land Management Ltd, Wyatt Homes)
- The 'objectively assessed need' for housing, which is based on the government's new standard methodology, is supported. However, it should be noted that the government may amend the methodology to deliver 300,000 new homes per year nationally. (Owners of Aldwickbury)
- No concerns over the anticipated level of housing proposed. (South West Water)
- The method is being used throughout the country and is either fair or unfair to everyone. I have no particular problem with the figures used for new dwellings.

### **Local Housing Need Figure is a Minimum**

- The need for 794 dwellings per annum (dpa) represents the absolute minimum requirement. (C G Fry and Sons Ltd, Home Builders Federation, Homes England, LVA (South West) LLP, Persimmon Homes, Wyatt Homes)
- The overall housing target in the Local Plan should be considered to be a minimum figure. This will ensure that the Local Plan contributes towards boosting significantly the supply of housing. (Wyatt Homes)
- A reduction in the housing target to reflect the September 2016 household projections would not be supported. These are based on a period of under delivery and worsening affordability. (Bellway Homes Ltd (Wessex), Wyatt Homes)
- The housing need figure calculated using the standard methodology may change when the ONS updates household projections (every 2 years) and affordability ratios (annually). (Dorset Planning Consultant, Home Builders Federation)

### **Other Factors that should be Reflected in the Local Housing Need Figure**

- The Local Plan should incorporate the unmet needs of neighbouring authorities. (LVA (South West) LLP, Persimmon Homes, Wyatt Homes)
- The housing provision figure should support economic growth, which may be in excess of the 'minimum' need determined by the standard methodology. (Home Builders Federation, LVA (South West) LLP, Wyatt Homes)
- Without a significant employer moving into the area, the figure of 775 dpa in the adopted Local Plan would have created major commuting road traffic as workers drive to neighbouring towns for their jobs, a new population seeking employment benefit, or attract only retired people. All of these would have been undesirable outcomes contrary to the principle of sustainable development.
- The housing provision figure should aim to address affordable housing deficiencies, which may result in a level of provision in excess of the 'minimum' need determined by the standard methodology. (LVA (South West) LLP)
- Affordable housing needs will not be met by the 19,016 houses proposed. There are 3,149 people on the housing register (and more in private rented accommodation) but the proposed oversupply of houses is not likely to meet their needs.
- A 5-year housing land supply is needed to provide greater certainty in terms of the location of development matching infrastructure delivery. (Dorset Planning Consultant)
- The plan pays insufficient regard to the need for affordable housing in Bridport and the proposed increase in the number of houses at Vearse Farm, Bridport will not meet this need.

## Objections to the Standard Methodology for Assessing Local Housing Need

- The councils seem to be responding to central government as if it were some kind of socialist diktat.
- Is there any choice? Is there any way of ensuring that the land we supply will be developed to reflect local needs rather than those of a developer? (Dorchester Town Council)
- The projected housing need is a disputed government-set housing target, which has no regard for local circumstances. We should be planning for housing where there are documented needs, the best employment opportunities, and the best transportation infrastructure.
- Not publishing government targets that have been given to WDDC and not showing what percentage of these targets this plan achieves increases mistrust. What is the actual number of houses that the government requires to be built?
- The government's formulaic approach to arriving at target housing numbers is grossly excessive and not an objective way of assessing the housing needs of the area. (Burton Bradstock Parish Council, Sherborne and District CPRE)
- The ONS projection for household growth in England is 159,000 a year up to 2041, whereas the government's projections made in 2014 was for 210,000 households a year up to 2041. This becomes a serious overestimate of housing need when translated into District Council targets, having a profound effect on land take and congestion. (The Beaminster Society)
- The standard methodology shows an oversupply of about 4,000 dwellings over projected demographic need. This is meant to tackle affordability, but we disagree with the excessive scale of development. (West Dorset CPRE)
- The national numerical formula is unrelated to the specific needs of West Dorset. Object to more housing being proposed than the formula requires.
- The figure given for housing need (15,880) is a 'government target'. This is not an adequate definition of 'need' and does not reflect the actual need in this area. Such growth may be appropriate for urban or suburban area, but it is not appropriate for rural areas and small towns such as Bridport.
- The projections are the wrong basis for planning as life expectancy has stopped increasing. Also a significant proportion of young people will move away to work and most people moving in will be from outside the area. (Weymouth Civic Society)

The councils should commission a fresh OAN study, based on the latest population projections and local data. This would provide an opportunity for the councils to present evidence in respect of the local need for affordable housing, self-build housing and accessible and adaptable housing, in accordance with National Planning Practice Guidance (NPPG) requirements.

- The plan should include figures for the number of dwellings and the area of employment land split between West Dorset and Weymouth & Portland Districts. (Bridport Town Council)

- What is the basis for the population figures produced by government? Have they been independently examined to reach sensible conclusions about accuracy and therefore need? Are the translations into housing need accurate?

### **Alternative Figures for Housing Need**

- The OAN figure needs to be updated to reflect the most up to date household projection figures. Using the 2016-based household projections, the OAN would be 15,460 new houses, or 773 dwellings per annum. Taking account of significant under delivery (below 85% of the housing requirement) the resultant OAN should be 5 to 10% higher at 812-850 dwellings per annum.
- The 2014-based average annual rate for dwellings of 589 is a more appropriate figure to use as the objectively assessed need for housing, given the uncertainties around Brexit and the reduction in tradesmen working in the building trade. This is also closer to the average completion rate over the last 10 years (of 549 dpa). A reduced housing need figure means that growth could be achieved to meet local needs in a more sustainable manner appropriate to a largely rural area with less detrimental impact on the open countryside.
- The figure of 794 dwellings per annum (dpa) is significantly above the forecast need for 580dpa in the 2017 housing need assessment. The figure of 794 dpa is unsustainable and should be replaced by 586 dpa.
- The plan should be for 25-35% of what is being proposed because the underlying macro climate is changing. Extrapolating the current trend is wrong because national population trends are flattening and may reverse post-Brexit.

### **Objection to the Level of Housing Provision**

- Housing provision of 15,880 houses, 794 dwelling per annum, is too high. This level of housing growth, to bring inward migration to West Dorset, far exceeds what can be accommodated without harming the special landscape and putting demands on infrastructure and services. (The Beaminster Society)
- There is no explanation for why the level of housing provision (19,016 homes) significantly exceeds the exaggerated assessed local housing need figure (15,880) or any justification for how the figure was reached (West Dorset CPRE).
- These figures cannot be supported as they are way above anything needed by demographics: 30 to 40% up. (Dorset CPRE)
- Major concern that the over-supply of land for development (and excessive development targets) might open up the rest of Dorset for speculative development if policies become out of date, particularly in the light of the Housing Delivery Test and 5-year housing land supply, which may make a local plan become out of date. (West Dorset CPRE)

### **Housing Comments**

- There should be a commitment to build on brownfield land.

- Policy SUS1 should be amended to draw down more sites from a wider area to be developed in the first five years of the plan review period.
- There should be far greater decentralisation of building, catering for very local assessments of needs.
- Policy-compliant housing sites outside strategic allocations should come forward, particularly where they involve the redevelopment of disused sites and / or involve medium-sized sites that will boost housing supply and increase choice and competition in the housing market. (Homes England)
- We haven't got a housing crisis, but a demand glut brought on by the availability of cheap money to borrow and the rise in second and retirement homes, for example at Poundbury, Dorchester.
- There should be much more detailed community involvement for large sites. Without it, there will be little variation, design quality, innovation or sustainable building. There should be Supplementary Planning Guidance for all large sites drafted with extensive local consultation and enforced by continuing involvement.
- All local authorities in Dorset will be undergoing a local government reorganisation as of the 1 April 2019, which is likely to have an impact on the housing need of West Dorset and the housing need of the new unitary authority. (Wyatt Homes)

### **Housing at Beaminster**

- The growth in Beaminster in the last 18 years has been only 167 dwellings. The new allocations on BEAM1 and BEAM3 would deliver over 400 dwellings over the next 18 years. (The Beaminster Society)

### **Housing at Weymouth**

- Given its stagnant population it is unclear why any further housing development should take place at Weymouth at all. When people reach working age or leave education they move out of Weymouth, due to limited employment opportunities. Nothing in the plan gives hope for attracting significant inward investment.

### **Support for Employment Land Figures**

- The method that is now being used is one used throughout the country and either fair or unfair to everyone. I have no particular problem with the figures used for employment land.

### **Objections to the Objectively Assessed Need for Employment Land**

- 62–63 hectares of employment land is a rather precise figure for a 20-year prediction. How was this forecast and modelled?
- There is no need for this level of employment land as many units on current business parks are empty. (Dorset CPRE)

- The employment land figure is flawed due, inter alia, to self-employment, part time working, Brexit and other structural factors. It is not based on any evidence of need. (Sherborne and District CPRE)
- The negative impacts of a skewed age range in inward migration (primarily in the older age ranges) have not been factored into the assumptions for growth. (Chideock Parish Council)
- The Bournemouth, Dorset and Poole Workspace Strategy (October 2016) is not an objective assessment. It indicates that 15,100 new jobs will require 260 hectares. So, how does the local plan review come up with a figure of only 63 hectares? In order to accommodate the predicted jobs and provide an element of choice, the number of new allocations needs to be at least doubled. (Hanford Holdings Ltd)
- There is a need for flexibility in change of use categories. Sites vacated should be treated flexibly as brownfield land on which either housing or small starter units could be developed. (Sherborne and District CPRE)
- 15,880 new homes with 15,100 new jobs implies less than 1 new job per household. This indicates a reliance on economically inactive (and probably older, retired) people, which is not sustainable. (Chideock Parish Council)
- The balance of housing and employment land should be considered in the context of the government's recent industrial strategy and emphasis on future jobs. (Portland Town Council: Planning and Highways)
- Policy SUS1 should plan for the staged delivery of employment land over the plan period. (Bridport Town Council)
- In terms of economic growth, there does not appear to be any sensitivity testing to take account of uncertainties, such as Brexit and other major geo-political risks.

### **Employment Balance with Housing**

- Policy SUS1 should include a measure for jobs / housing balance, and a firm commitment to achieve a balance in each (town) area by 2036. (Chideock Parish Council)
- Housing should be aligned as closely as possible with employment. We should be looking to move as much employment as possible to where people already live, rather than building more houses (and employment space) in areas that already have a surplus of employment. (Weymouth Civic Society)
- 51.6 hectares appears to equate to 293 new jobs per hectare, but it is not shown how this provision would relate to new housing land allocations to deliver a balance between local jobs and local housing. There is a pressing need for specific targets for 5-year periods to be detailed at the local area level (town and hinterland), so that actual delivery at the local level can be monitored. (Chideock Parish Council)
- The review does not provide a specific area-by-area set of plans to redress the homes / jobs imbalances and reduce the need to travel outside of the local area.

Specific targets are needed for the co-location housing and jobs for each area and to reduce the total amount of commuting, especially car-based travel.  
(Chideock Parish Council)

### **Workforce**

- My experience is that there is no shortage of local workforce and therefore no need to cater to bring in an external workforce.
- The current economy has near full employment so significant new housing is not required to maintain the current economy. It is not acceptable to seek an unspecified and unproven element of economic growth and then plan for a highly specific number of new homes.

### **Concern about Infrastructure**

- The utility services will not be able to deal with the additional residents and it will not be possible to provide all the amenities that will be needed, such as hospitals, doctors, social services and schools.

### **Vearse Farm, Bridport**

- The Sustainability Appraisal is a sham as the 50 hectare scheme at Vearse Farm (including 4 hectares of employment land) in the AONB (BRID2) is given a landscape impact result of 'strongly positive'.

### **Portland Port**

- Further dialogue is required to fully understand how employment land at Portland Port has been factored into the workspace strategy. (Portland Port Group)

**Responses on Question 3-ii: The sites listed in Table 3.3 include both allocations from the current local plan and new 'preferred options' which have not previously been allocated. Do you consider that these are the most appropriate housing (or mixed use sites) sites to allocate to contribute towards meeting the objectively assessed need for housing for the period 2016 to 2036?**

### **General Support**

- The Preferred Options are probably the best options available at this time.
- Broadly support the Preferred Options. (Dorset County Council: Environment & Economy)

### **Plan Period**

- Why does Table 3.3 cover a period 2016-2021 when the plan is for the period 2020-2035? The phasing does not make sense, the implication being that all houses are built between 2020-2026 assuming planning permission is given



instantly.

### **Dorset AONB**

- Welcome the recognition in paragraph 3.3.4 that further housing will need to be provided within the Dorset AONB, given the need for growth from both a national and local perspective. (Gladman)

### **Heritage**

- The strategic approach to identifying suitable areas for growth fails to consider the pattern, form and distribution of the area's historic settlements. The Plan should respond to this history, identity and character of West Dorset, Weymouth and Portland to ensure that the integrity of the area's historic settlements and landscape settings are safeguarded and inform the location and character of future development. The historic pattern and form of settlements should not be seen as a constraint but a positive and important influence. (Historic England)

### **Infrastructure**

- Infrastructure needs and connectivity must be addressed more carefully to ensure our needs are met - not the developer's. (Dorchester Town Council)

### **Road / Transport Capacity**

- Proposals for site allocations should be accompanied by a robust transport evidence base in order to assess the potential impact and propose mitigation, if required. (Highways England)
- The Moreton / Crossways/ Woodsford Traffic Impact Assessment (2016) concluded that 2,800 new dwellings in the Crossways / Moreton area would result in an 81.3% increase in trips across the network, suggesting that substantial development at Crossways would result in increases in traffic congestion on the road network, particularly traffic using the A35 (south). North Dorchester has the capacity to relieve congestion on the A35 (south) by creating a northern link road between the A35 and A37 and utilising alternative transport methods. (North Dorchester Consortium)
- The proposed housing sites have not been selected having regard to local road / transport infrastructure capacity. Weymouth, Dorchester, Sherborne and Crossways are well served by roads, buses and rail. However, no others are connected to the rail network and Portland, Lyme Regis and Beaminster are poorly served by major roads and buses. A pro-rata allocation of housing between these settlements will have a disproportionate impact on car usage and the local road infrastructure for those settlements that are poorly served by rail and bus.
- For those settlements with insufficient local employment capacity to absorb the growth in population, there will be a disproportionate impact on car usage, as

this will affect how far the additional residents will have to travel to find work, go to school or access shops, services and amenities.

### **Education Provision**

- The response and solution to a new housing development may not need to be based around the nearest Primary and Secondary school as additional provision could be developed more efficiently through the extension and / or development of capacity at another school. For example in the Weymouth area S106 agreements may make reference to the provision of additional capacity at a generic Weymouth Primary or Secondary School. (Dorset County Council: Children's Services)
- The Local Authority is limited in its ability to expand any given school, as the Department of Education is clear that schools that are classed at Category 3 or 4 in their OFSTED rating should not be subject to expansion. These categories will almost certainly change during the course of the Local Plan period and there needs to be flexibility to address this occurrence when it manifests itself. (Dorset County Council: Children's Services)

### **Sewage Treatment Works Capacity**

- Sewage from development at Dorchester and Crossways will be treated at Dorchester STW, which can accommodate the flows from planned developments to 2036. The STW has sufficient treatment capacity to around 2030. Additional treatment plant is proposed to meet a more stringent Phosphorus consent in the investment programme. (Wessex Water)
- Sewage from development at Weymouth, Portland, Chickerell and Littlemoor will be treated at Weymouth STW, which can accommodate the flows from planned developments up to 2036. Weymouth STW has capacity to post 2030. There may be a need for additional treatment capacity around 2036 and additional land may be required to allow for expansion. (Wessex Water)
- Sewage from development in Bridport will be treated at Bridport STW, which can accommodate flows from planned developments up to 2036. Bridport STW has sufficient treatment capacity to around 2030. There is likely to be a need for additional capacity after 2030. (Wessex Water)
- Sewage from development in Sherborne will be treated at Sherborne STW, which can accommodate the flows from planned developments up to 2036. Sherborne STW has sufficient treatment capacity to around 2030, after which there is likely to be a need for additional treatment capacity. Additional treatment plant is proposed to meet a more stringent Phosphorus consent and provide additional stormwater storage within the investment programme. (Wessex Water)

## **Minerals**

- Policy SG1 of the Bournemouth, Dorset and Poole Minerals Strategy (MSA - 2014) applies to the relevant proposals within the MSA, the aim of which is to prevent the unnecessary sterilisation of important mineral resources. It is considered that where development options coincide with the MSA this should be flagged up within the Plan. (Dorset County Council: Minerals & Waste)
- Where sand and gravel is present an assessment of the mineral resources on site is expected. An agreed level of prior extraction may be required before the site is developed. In such cases, this requirement should be referred to within the Local Plan, subject to further discussions in relation to each of the options. (Dorset County Council: Minerals & Waste)
- For development options within the MSA for building stone, the Mineral Planning Authority is unlikely to object on mineral safeguarding grounds but would request that consideration is given to re-using onsite some or all of any stone extracted as part of the site development. (Dorset County Council: Minerals & Waste)

## **A More Concentrated Strategy**

- If additional growth is required it would seem appropriate and more sustainable to provide this within the areas of the existing larger towns and settlements.

## **A More Dispersed Strategy**

- This appears to be a very unequal distribution when Dorchester is taking the bulk of the housing allocation. It would be better to expand the many towns and villages incrementally and provide the business infrastructure to attract businesses.
- New homes should be dispersed to as many sites as possible, rather than building a gigantic housing estate at Dorchester. A dispersal strategy would meet local needs and enable towns and villages to grow organically. New residents would integrate into existing communities rather than being parked in soulless urban sprawl.
- The role of villages and flexibility around housing provision aspirations should be considered against the likely employment growth areas and technology advancement. (Portland Town Council - Planning & Highways)

## **Too Much Development in West Dorset**

- The housing allocations need to be rebalanced because at the moment West Dorset is effectively providing houses for Weymouth and Portland's housing need. At Crossways only CRS2 (South of Warmwell Road) should be allocated. Dorchester's housing allocation should also be reduced. (Moreton Parish Council)

### **Additional Allocations / Sales Outlets**

- The widest possible range of sites, by size and market location, are required so that house builders of all types and sizes have access to suitable land in order to offer the widest range of products. Large strategic sites should be complimented by smaller scale non-strategic sites because a good mix of sites: provides choice for consumers; allows places to grow in sustainable ways; and creates opportunities to diversify the construction sector. (Home Builders Federation)
- Increasing delivery requires more than just allocating one or two large sites, where one national housebuilder operates one outlet. The key is to allocate a larger number of sites that will meet the needs of a range of developers including national housebuilders and SMEs. This will increase the number of outlets, thus increasing delivery. It will also provide a wider choice of housing and prices.
- Additional allocations should be made including small / medium sized sites, to provide flexibility and a responsive land supply. Large-scale housing sites such as those at North Dorchester, Chickerell and Vearse Farm, often have long lead-in times and delivery rates can be slow. (Gladman)

### **Previously Developed Land**

- The 'supply of developable sites, including previously developed (brownfield) sites' which are 'in a suitable location' for development have not been investigated by WDDC or included in this LPR.

### **Neighbourhood Plans**

- The statement in para 3.3.8 that the principle of development on a strategic allocation cannot be changed through a neighbourhood plan is contrary to the 2011 Localism Act, which was intended to give local communities more say.
- Instead of taking account of neighbourhood plans, WDDC simply ignore them.

### **Beaminster**

- A strategic assessment of the main settlements (including Beaminster) should be carried out to identify the constraints imposed by existing local infrastructure, transport, employment, schools and local amenities to determine the capacity for growth and the infrastructure improvements needed to achieve it. (The Beaminster Society)
- Are the sites chosen appropriate? (The Beaminster Society)

### **Bridport**

- The plan should recognise the demand for affordable housing in Bridport, even if there is a good overall balance between housing and employment in the town. Almost 90% of the housing is proposed on a single site where there are significant infrastructure challenges. That concentration takes no account of the

need for affordable housing in the town and will not deliver the required housing numbers within the plan period. (Symondsbury Estate and the Watton Hill Trust)

- Proposals for housing at the Flood Lane and Fisherman's Arms sites, and other sites in Bridport that have been considered for housing/mixed use (for example the Bus Station) should be listed in Table 3.3. (Bridport Town Council)
- Land at Dottery Road offers a suitable and sustainable location to deliver housing to meet Bridport and West Dorset's housing needs. The site is deliverable, offers a suitable location for development, and is achievable. Development could reduce flood risk to neighbouring properties; good pedestrian connectivity to Bridport's facilities could be achieved; and any adverse impacts on wildlife or the Dorset AONB could be mitigated. (Gladman)
- There is no justification for excluding Site BR<sub>4</sub> (land north of Watford Lane / Gore Lane) as a preferred option. It is a small / medium site supported by the NPPF; provides an opportunity to increase the number of separate developer outlets in Bridport; and would therefore help to increase delivery where needs are greatest.

#### **Vearse Farm, Bridport**

- Vearse Farm should be limited to 760 homes. (Bridport Town Council)
- 930 homes are proposed at Vearse Farm, a 22% increase over the adopted plan. This further increase would be folly, as the development would place a load on services and it would be difficult to integrate so many new residents at once.
- There is no documentation to support increasing the housing supply at Vearse Farm (BRID<sub>2</sub>) from 760 to 930 dwellings. Although reports supporting the planning application considered the effects of increasing the allocation to 850 dwellings, there was no analysis for 930. The ability of services such as health care to cope with this increase has not been addressed.
- In limiting allocations at Bridport to Vearse Farm, the council is putting all its eggs in one basket. Any delays will impact the council's ability to meet District housing need and local need in Bridport. This is inconsistent with Bridport's position as a main town where future development should be focussed. (C G Fry and Son)  
BRID<sub>2</sub> does not take account of Bridport's role as a market and coastal town and Symondsbury and Eype as villages. It will create an imbalance with a majority of people being retired. Any employment opportunities will be negated by the lack of low-cost housing for young local people.
- Table 3.3 points to 1,172 jobs on Vearse Farm, which is more than the number of new households proposed. This implies in-commuting and an impact on peak time car travel. In this context, the new primary school and a possible relocation of Sydney Gale House care centre would be broadly neutral in terms of new jobs.

- The 'highest status of protection' is supposedly given to AONB landscapes, but AONB designation has provided no protection at all at Vearse Farm. There are no exceptional circumstances to justify this development.
- Infrastructure and services are already strained to capacity. There is only one road in and out of Bridport, a poor bus service and no train station. There is no choice but the car and congestion and parking difficulties are set to worsen.

### **Former Tented Camp, Chickerell**

- The inclusion of the site as a housing allocation is welcomed, but the capacity of the site, which is considered to be far higher than the number included in Table 3.3, should be reviewed. (Persimmon Homes)
- Building on the former tented camp might make the future provision of the relief road to Portland more difficult for very small gain. (Weymouth Civic Society)

### **Southill, Chickerell**

- Land west of Southill (CHIC4) is an appropriate site for housing development which is available, relatively unconstrained, in one ownership and deliverable. (Owners of Aldwickbury)

### **Crossways**

- Crossways should be deleted from Table 3.2 as it does not fit the definition as a location for a strategic housing growth given in paragraph 3.3.1. The 2011 census shows that 87% of the population travel by car to work outside Crossways. Only 1.9% use the train and, before the service was reduced, only 2% travel by bus. (Moreton Parish Council)  
Crossways is surrounded by proposed housing developments, quarries and a solar farm. No other community in Dorset is so surrounded and imposed upon. Sherborne, Dorchester, Weymouth and Portland all need housing but have been given lower relative or absolute increases than Crossways, which does not need any more houses. (Moreton Parish Council)
- Purbeck's 490 house allocation at Redbridge Pit should be added to the 1,114 homes allocated at Crossways in Table 3.3 to give a true representation of the number of new homes proposed in the area (1,604). (Moreton Parish Council)
- Allocations CRS5 (Woodsford Fields) and CRS6 (West of Crossways) should be deleted and the proposed housing allocation in Purbeck reduced to 200 houses because of the consequent increases in traffic from all the development in the Crossways area, which creates a negative impact which Policy COM7 i) and ii) attempt to prevent. (Moreton Parish Council)
- Allocations CRS5 (Woodsford Fields) and CRS6 (West of Crossways) should be deleted because Crossways is already contributing more to meeting West Dorset's housing supply than other settlements in Table 3.3, most of which are towns. (Moreton Parish Council)

- Housing allocations at Dorchester and Crossways should be reduced because growth has been disproportionately directed to West Dorset and to these locations in particular. Sherborne has been consistently underdeveloped in the past and there is scope to increase the size of the allocations at Littlemoor and Charminster in accordance with the Halcrow Report. (Moreton Parish Council) Crossways also has other developments imposed upon it, including 1,000 holiday homes at the Silverlake development and two very large sand and gravel quarries in addition to the extremely large Woodsford quarry. (Moreton Parish Council)

#### **Woodsford Fields, Crossways**

- The Woodsford Fields site should show a capacity of up to 387 dwellings, rather than 275 dwellings reflecting the capacity of the Suitable Alternative Natural Greenspaces (SANGs) proposed at Frome Valley Road and on land west of Crossways. This number of homes can be accommodated as well as 3.04ha of open space and land for expansion of the primary school. (Woodsford Farms)

#### **Frome Valley Road, Crossways**

- The inclusion of Frome Valley Road in Table 3.3 is supported. The site has a resolution to grant for 140 dwellings and a housebuilder is positioned to purchase the site once the decision has been issued. The site is deliverable within the next five years. (Woodsford Farms)

#### **West of Crossways**

- The inclusion of land west of Crossways to deliver 150 dwellings within table 3.3 is supported. (Woodsford Farms)

#### **Dorchester**

- Housing allocations for Dorchester are too high. Less sensitive sites at Crossways should be allocated (2,600 houses approx.); more use should be made of the brownfield sites register; and there should be some small allocations (ca. 25) at villages with a Post Office and school. (Dorset CPRE)
- Dorchester has already seen disproportionate growth with the average population growth across the plan area since 1991 of 13.5%, whereas Dorchester has experienced 33%. Weymouth, by far the largest town in the plan area, which probably has far greater potential to grow in order to help diversify its economy, has experienced only 10% growth in that time.
- Object to the omission of land at Castle Park as an allocation for 225 homes. There is an over-reliance on large strategic sites in Dorchester and insufficient provision of sites capable of being delivered within the first five years of the plan. (Duchy of Cornwall)
- Given that retail is in decline the Charles Street brownfield site in the heart of Dorchester should not be reserved for retail development. It should be

designated as an affordable housing exception site, which would provide a more balanced population and reduce pressure for greenfield development.

- Dorchester needs to enlarge to reduce the deficit of affordable housing, but this will not be solved by covering massive areas with houses.
- Persimmon does not hold a high reputation in quality of development.

### **North Dorchester and Charminster**

- The spatial strategy put forward by the Councils, allocating a large proportion of housing within North Dorchester is supported. North Dorchester offers a more sustainable growth option for the town, which will deliver a number of benefits for both its residents and Dorchester. Allocating substantial housing within Crossways to meet the needs of Dorchester is not an appropriate sustainable response. (North Dorchester Consortium)
- Proposed development north of Dorchester is wrong in principle and should be deleted. New development should instead be distributed much more equitably around the plan area to those areas which have the need and the capacity for new development. Dorchester has taken more than its share in recent years and should be allowed a period to adjust to the growth it has already experienced.
- DOR15 will become a new separate settlement detached from Dorchester but close to Charminster and Stinsford. If there are no other suitable areas then development should be restricted to the areas indicated on the plan and no development should encroach on to the areas shown as green.
- There are severe flood risk, landscape, transportation and heritage impacts at North Dorchester.
- The site at North Dorchester is not the most appropriate. It is aesthetically inappropriate and is not in any way discrete. The geographic aspects of the site present problems. Communication between the site and Dorchester will be very difficult. It is ecologically, culturally and aesthetically sensitive. The current site includes the Dorchester Showground. Infrastructure costs will be prohibitively high and sufficient finance may not be made available to deliver the necessary community infrastructure.
- The allocation at DOR16 for 320 dwellings is supported. The proposed phasing is realistic and the housing may be delivered earlier than proposed. Charminster is one of the larger villages in the District, and is well served by local facilities. It should be considered as a main settlement in Tables 3.2 and 3.3. (Wyatt Homes)
- DOR16 will increase the size of Charminster, where there is already approved development to the west. No further expansion of Charminster should be permitted. To minimise the impact on the Conservation Area and conflict with school traffic, access to the sites on the west of Charminster should be via the A37. Paragraph 11.6.4 should remain in the LPR to ensure no further development that would increase traffic to East Hill and West Hill which are wholly unsuitable.



### **Littlemoor**

- Table 3.3 shows Littlemoor delivering homes from 2021 until 2036. Development could start sooner with the housing in the current application being built out in 10 years, rather than 15. This housing needs to come at an early stage to support / subsidise the commercial area. (Neejam 165 Ltd & Budworth Developments Ltd)
- The number of houses on at Littlemoor urban extension should be raised to 975 because the site has few constraints (apart from the AONB) and presents the opportunity to provide high quality public transport services. As a result allocations CRS5 (Woodsford Fields) and CRS6 (West of Crossways) could be deleted. (Moreton Parish Council)

### **Lyme Regis**

- Object to the lack of housing directed towards Lyme Regis: a sustainable settlement and one that falls within the hierarchy of settlements that should meet the strategic needs of the Local Plan area. (Hallam Land Management)

### **Puddletown**

- Table 3.3 should allocate land at Three Lanes Way, Puddletown for about 40 dwellings. Sustainable development can be delivered in this location, with no significant harm or impact to the settlement. The development can also be delivered early to assist the housing delivery position. (Wyatt Homes)

### **Sherborne**

- The projected needs for both employment and new homes should be revised downwards, particularly in the case of Sherborne.
- Housing allocations for Sherborne are too high. More use should be made of the brownfield sites register and there should be some small allocations (ca. 25) to the villages with a Post Office and School. (Dorset CPRE)
- A 35% population increase and over 1,150 extra cars will ruin Sherborne. The infrastructure needed for these developments should be considered first before plans for building and estates are promulgated. In particular, the following areas should be looked at: traffic flows, road works and access to public transport; primary and secondary education; surface water and sewage; the geology; medical facilities; and affordable housing. (Sherborne and District CPRE)
- Sherborne Hotel Policy ref SHER3 should read SHER2 and Former Gas Works Policy SHER4 should read SHER3. (Sherborne Town Council)

### **West Stafford**

- Land at West Stafford is both deliverable and developable and presents an opportunity for sustainable development as an allocation in the emerging plan. (West Stafford LVA LLP)

### **Weymouth**

- Jubilee Sidings and/or the Bus Station are appropriate for a considerable number of housing units. Releasing some empty shops on the edge of the town to residential use would provide a further increase, and improve the viability and vitality of the town centre. (Weymouth Civic Society)

### **Wey Valley South, Weymouth**

- The site at Wey Valley South (reference WEY15) has been omitted from the housing allocations in Table 3.3 unreasonably and without justification. This is a site that was supported by the Council and represents a sustainable source of housing supply as identified in the evidence and background papers, up to the point of the meeting of 26th July 2018 Council. (The Loyal Hand in Hand Lodge of Oddfellows)

### **Wyke Oliver Farm, Weymouth**

- The identification of WEY14 as a preferred option for housing is supported. The site is well located to meet the needs of Weymouth and contribute towards wider strategic needs. Technical investigations are underway and this information will be shared with the Council as soon as possible. (Bellway Homes Ltd (Wessex))
- WEY14 has been incorrectly appraised in the Sustainability Appraisal in the light of information provided to the Council. It should be replaced with a more sustainable site such as Redlands Farm (previously called WEY15) or a possible site in the open ground between the Haven Holiday caravan parks in Preston.

**Responses on Question 3-iii: Table 3.3 (and the supporting text that follows) sets out (and explains) the different sources of housing supply to meet (and exceed) the objectively assessed need for housing for the period 2016 to 2036. Do you have any comments on the overall level of provision made or the sources of supply identified?**

### **Support for the Level of Housing Provision**

- The level of housing growth, which exceeds the objectively assessed need for the period 2016 to 2036 is supported. (Owners of Aldwickbury)
- Support this policy. (Dorset County Council: Environment & Economy)

### **Objections to the Level of Housing Provision**

- The overall quantum is too great. North Dorchester should be struck out.
- The numbers are excessive. (Sherborne and District Society CPRE)
- The seemingly gross oversupply of housing, particularly that to be built on AONB land, is totally unacceptable considering the rural nature of West Dorset and the fact that the proposed large-scale developments are not designed to meet genuinely affordable local housing need.

- It is an unreliable assumption that the population growth trend will be maintained over a twenty-year period. (West Dorset CPRE)
- There are concerns over the potential effects of the intentional oversupply of homes on the capacity for agricultural production, as we are not self-sufficient in many important areas of food production. (West Dorset CPRE)

### **Housing Provision Figure Should Not Exceed Objectively Assessed Need**

- The 19,016 new homes proposed in the plan significantly exceeds the objectively assessed need and has been inflated without any justification, resulting in several unnecessary developments being promoted on greenfield sites, irrespective of any opposition or cost to the countryside.
- There is no explanation why 3,136 houses above the SUS1 requirement (of 15,880 homes) are being provided. Adherence to the SUS1 requirement could potentially reduce the amount of housing proposed (Moreton Parish Council).
- How many other councils are 'exceeding' their requirement for housing, which will not meet affordable housing needs? This implies that these houses will be for retirees or second homes.

### **Standard Methodology**

- The requirement for 15,880 new homes is not 'objectively assessed'. It is arbitrary, far exceeds actual need, and is based on government guidelines without accounting for local factors.
- The standardised methodology for assessing housing needs is likely to be subject to further change to ensure that 300,000 homes are built per year by the mid 2020s. Future iterations of the Plan will need to take account of any changes to the standard method for calculating housing. (Gladman)
- When considering whether the standard method provides a true reflection of the demand and need for housing within the local area, the councils should have regard to past delivery rates and previous assessments of need. An uplift in the housing requirement may be appropriate. (Gladman)

### **Ensuring Sufficient Housing Supply**

- There should be a clear strategy for bringing forward sufficient land at a rate to address housing needs over the plan period. A Strategic Housing Land Availability Assessment (SHLAA) should be used to identify a sufficient supply and mix of housing sites taking into account availability, suitability and economic viability. A supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 should be identified. Deliverable and developable sites should accord with the definitions in the NPPF Glossary. (Home Builders Federation)
- Sufficient site allocations should be provided to meet the housing requirement and to support the delivery of an ongoing 5 year supply of housing land, rather

than relying on unallocated SHLAA sites (windfall) to deliver part of the housing requirement. (Gladman)

- Evidence should be provided to support the assumption in Paragraph 3.3.13 that all sites with planning permission will be developed within the plan period. Since it is unlikely that all existing commitments will be delivered during the plan period, non-implementation rates, or a slippage / lapse factor of between 10 and 20%, should be applied. (Dorset County Hospital, Gladman)
- A large contingency (>20%) is suggested in case assumptions on lapse rates, windfall allowances and delivery rates prove to be incorrect. Large housing sites may be held back by numerous constraints (Home Builders Federation).
- I don't think the sites in Table 3.3 will deliver the housing required and we will still be open to speculative developers. (Dorset CPRE)

### **Housing Trajectory**

- The Local Plan Review should include a trajectory illustrating the expected rate of housing delivery over the plan period. (Home Builders Federation)

### **Duty to Co-operate**

- Strategic priorities that arise from cross-boundary working should be considered from an early stage in the plan making process. Cross-boundary issues should not be deferred for consideration at a later date. (Gladman)

### **Small and Medium-sized Sites**

- At least 10% of the housing requirement should be identified on sites no larger than one hectare or else strong reasons for not achieving this target should be demonstrated. (Home Builders Federation)

### **Brownfield Sites**

- I hope the windfall sites are mainly brownfield and these should be actively pursued. (Dorset CPRE)

### **Windfall**

- Due to the high level of windfalls in the land supply, the Plan could fail to meet housing requirements. The windfall allowance should be realistic, having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends. (Gladman)
- How the windfall figure has been derived should be explained. (Moreton Parish Council)

### **Neighbourhood Plans**

- All available evidence, including evidence from Neighbourhood Plan Groups should be used to calculate the District's housing supply over the plan period. The Puddletown Neighbourhood Plan Group's housing needs assessment from

May 2018 found the housing need of Puddletown to be 124 homes, or approx. 10 dwellings per annum. (Wyatt Homes)

### **Affordable Housing**

- The mix should be skewed towards affordable housing.
- The plan fails to provide the low cost social housing that is needed, as far more money will be made by building luxury houses.

### **Residential Care Institutions**

- Paragraph 3.3.13 indicates an element of delivery from residential institutions (C2), which can mean residential care homes with bedspaces or student accommodation. Supply from this source must not be over-estimated and should be based on an assessment of C2 needs. (Persimmon Homes)

### **Housing to Meet Tourism Needs**

- Are you able to allow for demand created by accommodation technology development (e.g. Airbnb) given tourism as a rural economy growth sector? (Portland Town Council: Planning & Highways)

### **Bridport**

- Almost 90% of the housing at Bridport is proposed on a single site where there are significant infrastructure challenges. That concentration takes no account of the need for affordable housing in the town and will not deliver the required housing numbers within the plan period. (Symondsburry Estate and the Watton Hill Trust)

### **Southill, Chickerell**

- The identification of land west of Southill for around 400 dwellings is supported. Table 3.3 should show delivery in the 2012-2026 column, as well as the 2026-31 column, as there are no major impediments to earlier delivery. (Owners of Aldwickbury)

### **Sites on Portland**

- Homes England is progressing planning applications for residential development at the former Southwell School and Royal Manor College on Portland. They are both medium-sized sites providing opportunities to support strategic allocations and 5-year housing land supply. (Homes England)

### **Warmwell**

- The village of Warmwell would benefit from a modest level of growth and a site with potential for 32 units is confirmed in the SHLAA as being available, suitable and achievable. (Warmwell Estate)

## Comments on Paragraphs 3.3.19 TO 3.3.21

### Five Year Housing Land Supply

- A minimum 5 years supply of specific deliverable sites including a buffer should be maintained. (Home Builders Federation)
- Failure to maintain a five-year housing land supply invalidates the Local Plan and results in speculative planning applications. The new unitary authority must maintain the five-year land supply. (Considerate Hoteliers Ltd)
- The councils are currently unable to demonstrate a five-year supply of deliverable housing sites and this must be addressed through the Local Plan Review. The Councils need to make some tough decisions about planning for higher levels of growth, however unpalatable this might be for some elements of the community.
- West Dorset has consistently under delivered for the past three years and therefore must apply a 20% buffer in housing land supply calculation in accordance with paragraph 73 of the revised NPPF. (Wyatt Homes)

**Responses on Question 3-iv: Table 3.4 identifies the different sources of employment land supply and Table 3.6 identifies the allocations that will contribute to that supply to meet (and exceed) the objectively assessed need for employment land for the period 2016 to 2036. Do you have any comments on: the overall level of provision made; the sources of supply identified; or the sites allocated?**

### Support

- The policies are supported. (Dorset County Council: Environment & Economy)

### General Comments

- Are the sites chosen appropriate? (The Beaminster Society)
- Flexibility of provision is needed. (Dorchester Town Council)
- 'Table 3.4' in Question 3-iv, which identifies the different sources of employment land supply, should read 'Table 3.5.' (Bridport Town Council)

### Too Much Employment Land

- There is far too much employment land which is mainly greenfield, agricultural land. Sites should be cut back or deleted completely as there is much empty accommodation now and with low levels of unemployment it is not clear where these employees will be coming from to the fill such sites. (Dorset CPRE)
- The overall quantum is too great and North Dorchester should be struck out.

### Too Little Employment Land

- The provision in Table 3.6 is wholly inadequate to provide the workspace needed to meet predicted job growth. Sites are identified where officers think they should be located, not where employers want to be. Over half the

allocation is at three locations, two remote from an employers point of view and one requiring significant infrastructure likely to make it unviable. (Hanford Holdings Ltd)

### **Calculation of Figures**

- How has the employment land requirement been calculated? Have any major businesses expressed a desire to locate to West Dorset?

### **Jobs on Employment Land**

- Table 3.6 should include an additional column to show the estimated number of jobs expected from each area of employment land. (Chideock Parish Council)

### **Employment Land at Bridport**

- What is the intention for the 4 hectares of employment land at Vearse Farm (BRID2)? If retail, it will take much-needed business away from the town centre. If industrial, why is no access to B3162?
- Why is the Bus Station site in Bridport excluded from Table 3.6? (Bridport Town Council)

### **Employment Land at Crossways**

- Crossways is a dormitory with little employment land and almost all its economically active people leave the village for work, 87% by car. The village cannot sustain itself and is not a sustainable location, so should not be a strategic location for growth. Other locations, such as Weymouth and Beaminster have much more employment land allocated with much less housing development. (Moreton Parish Council)

### **Employment Land at Dorchester**

- About 36% of the allocated employment land is in Dorchester, which already has surplus employment. This would make the problem worse and is a reaction to commercial interests, without thinking through the conflict with strategic principles such as reducing the level of car travel. (Weymouth Civic Society)
- Will the 6 hectares of employment land proposed at Poundbury and the 10 hectares proposed at North Dorchester be allocated before or after the empty business sites in the existing Poundbury site are actually occupied?

### **Employment Land near Piddlehinton**

- Recent developments in and adjoining the Enterprise Park at Piddlehinton demonstrate the attraction of that location to employers. (Hanford Holdings Ltd)

## Employment Land on Portland

- An additional key employment site has been identified within the Portland Neighbourhood Plan to emphasise the commitment to economic development. Changing patterns of employment and site use are also anticipated. (Portland Town Council: Planning & Highways)

**Responses on Question 3-v: Policy SUS2 and supporting text have been revised: to more clearly set out how growth will be directed to different levels of the settlement hierarchy; and to set out the approach to growth at settlements where new DDBs have been introduced in neighbourhood development plans. Do you have any comments to make on these changes, or any other changes to Policy SUS2 and supporting text?**

## Support

- Support the spatial strategy. (Burton Bradstock Parish Council)
- Do not object to the approach of a settlement hierarchy, which is a well-established spatial planning tool. (Warmwell Estate)
- Support the Councils' decision to direct development to key locations. (Gladman)
- Agree with the spatial arrangement of the majority of additional growth proposed for the period to 2036 in principle, assuming that impacts on the Strategic Road Network are identified to ensure that the cumulative impacts are not severe. (Highways England)
- Support the approach to prioritise development where there are already good transport links or at locations where new high-quality links can be created. (Dorset County Council: Transport, Dorset County Council: Environment & Economy)
- Support the settlements on Portland being listed within the second tier of the settlement hierarchy (including Easton and Southwell) as a focus for future growth. (Homes England)

## General Comments

- The document should be updated to reflect the final version of the 2018 NPPF, rather than the draft. If not done, this may undermine the status of the consultation. (West Dorset CPRE)
- Further consultation will be needed if these preferred options change. In particular, if a new preferred options is identified at a later stage, as a result of a current preferred option being deleted. (West Dorset CPRE)
- The DDB is a tool used to circumvent the protections afforded to designated important landscapes.



### **Development within DDBs**

- SUS2 ii) refers to development within DDBs meeting the 'needs of the local area'. How local? (Dorchester Town Council)
- Policy SUS2 ii states that residential development within DDBs will 'normally be permitted', but the phrase 'normally' is not defined. It is proposed that there should be a presumption in favour of sustainable development within DDBs with criteria for assessment clearly set out. (Homes England)

### **Development outside DDBs**

- Many of the proposed developments (and the preferred options) lie outside DDBs. However, the consultation document does not draw attention to this fact. This should be made clearer so that people can understand what is being changed. (West Dorset CPRE)
- SUS2 takes an overly restrictive approach outside DDBs, in seeking to 'strictly control' development. There should not be a de-facto restriction on bringing forward acceptable and sustainable development outside DDBs. (Gladman)
- Policy SUS2 should not continue to strictly control development outside DDBs.
- The spatial strategy should be as permissive as possible by allowing development adjacent to and within DDBs, in order to recognise the difficulties facing rural communities, such as housing supply and affordability. (Home Builders Federation)
- It should not be necessary to build affordable houses outside DDBs because they should be built in adequate numbers inside DDBs. (West Dorset CPRE)

### **DDBs Defined in Neighbourhood Plans**

- In the statement 'settlements with a newly defined development boundary in a neighbourhood development plan, may have some growth to meet their local needs' is confusing, because when something ceases to be "newly defined" is not stated. (West Dorset CPRE)

### **Definition of Development 'at an Appropriate Scale'**

- The attempt to clarify what is meant by 'at an appropriate scale' is welcomed, but falls short of what would be helpful. What is meant by 'of a strategic nature' is not clear. It would be helpful if this could be defined, for example using a % uplift in the number of dwellings where housing development is being considered. (Dorset Planning Consultant)
- SUS3 i) bullet point 3 that developments 'will take place at an appropriate scale to the size of the settlement' lacks clarity and definite meaning. (Sherborne and District Society CPRE)
- Levels of development in settlements need to be capped, both by size per project and by cumulative total in order to prevent villages from becoming swamped. There should be two caps: the first on the size of each development (fixed at 2.5% of the households in the village); and the second on the

cumulative amount of development in the plan period (of 5% again on households). (Sherborne and District Society CPRE)

### **Level of Provision / Standard Methodology**

- The supply of sites is a gross over inflation over and above an inflated figure, which will result in more retired people moving into the area and / or increased second home ownership. Given the pressures on landscape, green space and agricultural land some preferred options need to be removed or pared back, by at least 3,136 and up to 7,000 homes. (West Dorset CPRE)
- The housing target will increase when the standard methodology is applied and additional land will have to be identified. All genuinely reasonable alternative options for growth have not been considered, not just to meet the Councils' own needs, but also to meet neighbouring councils' needs under the Duty to Co-operate. (West Stafford LVA LLP)

### **Five Year Supply**

- In practice it is difficult to apply Policy SUS2 once the 5 year land supply is an issue, as evidenced by recent developments at Yetminster and Thornford. (Dorset CPRE)

### **Growth at Larger Settlements**

- If additional growth is required it would seem appropriate and more sustainable to provide this within the areas of the existing larger towns and settlements.

### **Need for Proportionate Growth**

- It is important for each town and village to receive proportionate growth, providing they are in a sustainable location, to enable services and facilities to be supported throughout the plan period and beyond. (Wyatt Homes)

### **Need to Consider Other Factors**

- Population size should not be the sole or main criterion to determine the distribution of development at the lower order settlements. The needs and aspirations of these settlements should not be ignored.

### **Development at Villages**

- The SUS2 settlement hierarchy is far too restrictive and should be widened to allow development in the majority of villages. By concentrating on just Dorchester, Crossways, Weymouth, Bridport and Sherborne it distorts these communities, overloads their services and leaves the rest of Dorset, in particular the villages with very little development. There are many villages which could contribute, such as Puddletown, Broadmayne, Cattistock, Evershot, Frampton, Maiden Newton and others that could accept 50 to 200 houses. Also a number

of the villages listed in Figure 3.9 should be given DDBs. (Moreton Parish Council)

- A more dispersed pattern of development should be considered, by directing development to sites: within or adjoining other settlements (not Tier 1, 2 & 3) or where development would meet a locally-identified need and help to secure new or improve existing services and facilities and increase self-containment.
- The settlement hierarchy should be reviewed, in particular policies relating to development within rural areas, which would help to sustain rural communities, spread the benefits of development and prevent rural communities from falling into a 'sustainability trap' where development can only occur in places already considered to be 'sustainable' in narrow terms. (Warmwell Estate)
- Decentralised development would have the effect of revitalising villages which are already semi-dormitories in many instances and help them to retain facilities, such as shops and post offices.
- It might be better to allocate a small amount of housing to all villages with a DDB (5% of current dwellings) rather than relying on neighbourhood plans. (Dorset CPRE)
- A small amount of growth should be considered at all settlements with a DDB: to enable younger people to remain within their communities; to enable these settlements to grow in a controlled manner: to restrain the increase in house prices: and to reduce the need for additional infrastructure including roads.
- Object to the level of restriction for settlements without DDBs in rural areas. An arbitrary constraint is being placed on smaller rural communities, whereas the approach of Policy SUS2 should be to allow for the sustainable development within all settlements, including those without DDBs in rural areas. (Warmwell Estate)

#### **Small and Medium-sized Sites**

- Small sites should be identified from the SHLAA that could be developed without compromising other policies. The local plan review has not allocated any small sites (9 dwellings or less), even though 10% provision is required by the NPPF. A minimum of 97 small sites should be allocated.
- With the introduction of the Housing Delivery Test, the housing supply position should be strengthened with more small and medium-sized site allocations, to spread the benefits of development more widely. They are also often built-out quicker, maintaining housing land supply. (Warmwell Estate)

#### **Groups of Smaller Settlements**

- Where settlements share facilities this must be taken into account in devising a development strategy, otherwise opportunities for sustainable development will be missed. (West Stafford LVA LLP)
- Policy SUS2 is too inflexible in its current form because it does not take into account the proximity and functional relationships between some lower level

and higher tier settlements. This is an example of a disjoint between the strategic priorities and the actual strategy. (West Stafford LVA LLP)

### **Charminster**

- Charminster should be considered on its own merits, whilst recognising the relationship it has in supporting the growth of Dorchester. The village is in a very accessible location with both cycle and public transport links to Dorchester, and development could potentially reduce the need to travel. (Wyatt Homes)

### **Crossways**

- Crossways should not be considered in the same category as other 'Level 2' settlements as it does not have the same amenities as settlements such as Bridport, Sherborne and Portland. Crossways should be in Level 3 as this 'village' in a rural location with a DDB.
- Allocations at Crossways should be reduced to reflect that it is a village, is last in the SUS2 settlement hierarchy, has only 2 shops, little employment and 87% of the working population commute to work by car. It is the only village in the list of 10 named locations, all of which are larger than Crossways. (Moreton Parish Council)

### **Portland Port**

- The retention of the DDBs around the Portland Port ECON2 sites is supported. Other operational land with planning consents not currently shown should be included in the same way. Expanding DDBs to include land within our ownership would be welcomed. (Portland Port Group, Portland Harbour Authority)

### **Puddletown**

- Puddletown provides a range of services and facilities which makes the village a highly sustainable location. The village is also in a very accessible location with both cycle and public transport links to Dorchester, therefore development in Puddletown would potentially reduce the need to travel. (Wyatt Homes)

### **West Stafford**

- The site off Wynd Close, West Stafford is less than 3 miles from the centre of Dorchester and under 2 miles from its eastern fringe. It is closer to the centre of Dorchester than other options being considered as part of the long-term strategy for the Dorchester area. It has been overlooked simply because of the unintended consequence of the settlement hierarchy. (West Stafford LVA LLP)

**Responses on Question 3-vi: Overarching objectives in relation to the re-use of buildings outside DDBs are established in the supporting text and Policy SUS3 has been revised to set out how any scheme for re-use would be judged against these objectives. The policy has been amended to generally permit the re-use of existing**

**buildings outside DDBs for residential purposes and to more closely reflect national policy on residential re-use in isolated locations. Do you have any views on the proposed changes to Policy SUS3 and supporting text?**

#### **Support**

- This policy is supported. (Dorset County Council: Environment & Economy, Luxury Family Hotels)
- Support, provided applied correctly. (Dorset CPRE)

#### **General Comment**

- May be too restrictive, encouraging dilapidated buildings to be allowed to decay further when an alternative use is possible. (Dorchester Town Council)
- Additional safeguards are needed around potential planning creep if housing delivery rates fall. (Portland Town Council: Planning & Highways)

#### **Isolated Location**

- Including more supporting text on what is meant by 'isolated location' would be beneficial in ensuring a standard approach to interpreting this policy. (Dorset Planning Consultant)

**Responses on Question 3-vii: It is proposed to delete Policy SUS4 in the current local plan because it unnecessarily duplicates the provisions of Policies HOUS6 and ECON1, which deal with the issues of replacement dwellings and replacement employment buildings, respectively. Do you have any views on the proposed deletion of Policy SUS4 in the current local plan?**

#### **General Comment**

- Additional safeguards are needed around potential planning creep if housing delivery rates fall. (Portland Town Council: Planning & Highways)

#### **Protection of Heritage Assets**

- Policy SUS4 in the 2015 Local Plan referred specifically to measures to protect against the loss of a heritage asset, and this is not replicated in either HOUS6 or ECON1. This should be reinstated. (Bridport Town Council)

**Responses on Question 3-viii: former Policy SUS5 (now SUS4) has been updated to provide clearer advice on how neighbourhood development plans should be prepared to meet the 'basic conditions' and comply with national guidance. Do you have any comments on new Policy SUS4?**

#### **Support**

- The increase of participation and the empowerment of local communities through neighbourhood planning is supported. Homes England has two

applications on Portland and wish to positively engage with the town council. (Homes England)

- This policy is supported. (Dorset County Council: Environment & Economy)

### **Neighbourhood Plans and Housing Supply**

- Neighbourhood plans should make a much bigger contribution to meeting the housing supply of 19,016 than supplying just 0.24% of the total (i.e. 45 houses, as shown in Table 3.4). (Moreton Parish Council)

### **Need for Conformity with Strategic Policies**

- This effectively neuters the neighbourhood plan as it cannot decide anything different to WDDC's wishes.
- If neighbourhood plans are only allowed to permit more development than the Local Plan, not less, this would be contrary to the 2011 Localism Act, which was intended to give local communities more say in matters that directly affect them.

### **Evidence Based Approach**

- It is perverse that an evidence-based approach is expected for neighbourhood plans, but the same matters are ignored by WDDC in relation to Vearse Farm, Bridport.
- Although paragraph 3.6.10 requires neighbourhood plans to be supported by evidence, no such evidence was supplied for the Local Plan. The Vearse Farm planning application was based on out-of-date evidence regarding the need for utility provision, transport infrastructure and local healthcare provision.

### **Applying Neighbourhood Plans**

- Once made, neighbourhood plans must be applied when looking at applications and given real weight. (Dorset CPRE)

### **Engagement with Neighbours**

- Neighbourhood Plans should involve 'the neighbours' in discussions, not just landowners and developers. Elected councillors should, if necessary, set up sub-groups of their local constituents to shape and appraise any plan being put forward by the developer. A more inclusive policy which engages with the residents that are most likely to be affected is required.

### **Infrastructure**

- Neighbourhood plans can identify growth potential and community commitment but often do not have the resources to quantify the infrastructure improvements needed. This could be a constraint to achieving levels of sustainable growth. (Portland Town Council: Planning & Highways)

## Housing

- Is there any mechanism for assessing more carefully the type of housing needed locally and including a policy to ensure such needs are addressed? (Dorchester Town Council)

## Monitoring Indicators

- The annual increase in housing land supply should not be a monitoring indicator. It is not incumbent upon a Neighbourhood Plan to identify any new land at all.

## Responses on Question 3-xi: Do you have any comments on the proposed approach to establishing housing requirement figures (and indicative figures) for designated neighbourhood areas?

### Support for the Proposed Approach

- Support the approach (Dorset County Council: Environment & Economy, Warmwell Estate). Broadly in support of the approach as a seemingly reasonable way forward. (Dorset Planning Consultant)
- Support the statement in paragraph 3.6.19 that 'Neighbourhood development plans for these (main) settlements would not need to identify any additional land to meet the overall plan review area housing need figure.' (Bridport Town Council)
- Support the inclusion of the word 'minimum' in the statement that neighbourhood areas including settlements without DDBs should plan for housing growth which would increase the population by a minimum of 2% over a 20-year period. This helps to manage expectations of what is likely to be a compliant scale of development in the smaller settlements, while allowing flexibility that the percentage could be higher, provided there was justification. This statement should be included in a policy, not just in supporting text. (Warmwell Estate)

### Objection to the Proposed Approach

- Neighbourhoods should be encouraged to determine the extent of local need themselves so there is greater buy into the process otherwise it can become a remotely calculated figure. (Portland Town Council: Planning & Highways)
- The approach to establishing housing requirement figures for designated Neighbourhood Areas should accord with the NPPF paras. 65 & 66. (Homes Builders Federation)
- The Council should ensure Neighbourhood Plans do not promote less development than set out in the strategic policies or undermine those strategic policies, in accordance with para. 29 of the NPPF. (Wyatt Homes)
- There remains a concern that the original (Plan-wide) housing numbers calculated were incorrect. (Sherborne Town Council)

- The formula for calculating the housing requirement figure is unsound, being based in part on completions since 2016. Recent completions and current planning permissions etc. do not lead to a reliable forecast for future requirements. A more robust method is needed.

### **Object to the Possible Deletion of Non-strategic Sites**

- Paragraph 3.6.19 intimates that local plan allocations can be de-allocated through neighbourhood plans, which is not appropriate. This would not provide certainty for the development industry and there is no guarantee that sites will be allocated or de-allocated on sound planning grounds. (Persimmon Homes)

### **Need to Consider Other Factors / More Ambitious Approach**

- For smaller villages, a viable (but sustainable) scale of development may be more than 2% of the existing population. It may be appropriate to include other considerations such as declining populations due to, affordability issues, lack of choice of accommodation (i.e. accommodation that would enable down-sizing). (Warmwell Estate)
- There should be a more ambitious policy for promoting community-led growth, which would increase the prospects of meeting the overall housing requirement and help to disperse the benefits of development throughout the rural area. (Warmwell Estate)

### **Figures Should be Based on Evidence**

- It would be useful to have a list of the neighbourhood plan areas with the suggested targets for each based on this method, as this would help to flag up any issues with the proposed approach. (Dorset Planning Consultant)
- The Council need to look more closely at local need and not set a blanket approach to housing requirements. As currently drafted, the plan only allows for a scenario of 5% growth, or strategic scale development. Housing requirements should be based on evidence, for example, in Puddletown the evidence base shows a requirement for 124 dwellings over the plan period. (Wyatt Homes)

### **Need to Engage with Neighbourhood Plan Groups**

- There may need to be some variation from the method proposed to take account of particular local circumstances. Discussion with the Neighbourhood Plan Groups is advisable before setting figures in stone. (Dorset Planning Consultant)
- The Council must work with Neighbourhood Plan Groups to ensure the most sustainable and suitable sites are allocated, and need to consider larger villages such as Puddletown which contain services and facilities to support growth. (Wyatt Homes)



### **Group Parishes**

- Consideration of groups of villages within a parish should also be permitted, rather than settlements in pure isolation, recognizing, as the NPPF does, groups of villages often share services and facilities. (Warmwell Estate)

### **Bridport Area Neighbourhood Plan**

- The emerging Bridport Area Neighbourhood Plan will not bring forward any additional housing sites, but will focus policies on ensuring that housing allocations deliver 'affordable' homes of a tenure and mix that responds to defined local housing needs and maintains a balanced community. (Bridport Town Council)

### **Broadwindsor Neighbourhood Plan**

- In a grouped parish such as Broadwindsor, should the 2% uplift apply to parts and 5% to others? (Dorset Planning Consultant)

### **Stinsford Neighbourhood Plan**

- Although Stinsford does not currently include Dorchester in its remit, how would the North Dorchester extension be treated in calculating their requirement? (Dorset Planning Consultant)