

# West Dorset, Weymouth & Portland Local Plan – Preferred Options

## Report to Burton Bradstock Parish Council at its meeting on 3

October 2018

I undertook to report on this matter at the last Parish Council meeting. I have reviewed what I believe are the major aspects that have a bearing on Burton Bradstock, and where we are asked to comment have noted suggested drafting in ***bold italics***. The deadline for making comments is midnight on 8 October 2018.

As advised by the local plan inspector, WDDC is consulting on its review of the joint (with Weymouth & Portland) local plan, which was adopted in 2015. The main page of the consultation website is:

<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/local-plan-review-consultation-west-dorset-weymouth-portland.aspx>

It contains the following extracts:

“The preferred options consultation is your opportunity to have a say on the preferred approach to meet future growth.

The [Preferred Options document](#) (and [separate policies map amendments](#)) sets out the overarching vision, strategic priorities, strategic approach and draft policies for the plan area. The document sets out a preferred approach to meet development needs. It also proposes to revise some other policies in response to changes in national policy and legislation.”

and...

“To support the Preferred Options consultation document, a [sustainability appraisal](#) has been produced which assesses the potential environmental, social and economic impacts associated with the draft policies, evaluates their overall performance in terms of sustainability, and suggests ways to reduce the adverse effects and maximise the beneficial effects of these policies. The reasons for selecting the Preferred Options, given the alternatives considered at the Issues and Options stage, are also provided in this report.”

The Preferred Options document (referred to as LPR) is 312 pages long, excluding maps, and the sustainability document a further 286 pages. Fortunately the Council has also produced 17 “Display Boards” summarising the changes proposed and the questions on which it is consulting. While I have “skimmed” the LPR, I have relied mainly on the Display Boards as a basis of this report, and refer to them extensively. The full versions of the Display Boards and LPR will be emailed with this report and can also be found by following the links on the main consultation page.

Additionally I report on changes to the plan’s approach to the presumption in favour of sustainable development towards the end of this report.

**Display Board 1:** sets out the context of the review, development of the preferred options and the consultation.

**Display Board 2:** sets out the proposed Vision and Strategic Priorities.

These are generally non-contentious, being similar to motherhood and apple pie, although I don't really see how improving "network efficiency for ... and equestrians" will help reduce car use.

***We are asked if we agree with the Vision and Strategic Priorities, and I suggest we say "yes".***

**Display Board 3:** sets out the proposed settlement hierarchy, as below, and notes that the spatial strategy, directs greater development towards the larger settlements.

Level 1: the 'main towns' of Dorchester and Weymouth (including outlying areas of Chickerell and Littlemoor);

Level 2: the 'market and coastal towns' of Beaminster, Bridport, Lyme Regis and Sherborne; the settlements on Portland; and the village of Crossways;

Level 3: settlements in 'rural areas' with Defined Development Boundaries

Level 4: Settlements of 200+ population without a Defined Development Boundary

In addition, development will be permitted within settlements where a Defined Development Boundary has been introduced by a Neighbourhood Plan

No changes are proposed to our DDB, so that provided the local plan meets the government's residential development targets, there will be a presumption against development outside it – with some exceptions noted later.

The spatial strategy builds on the 2015 plan's, focussing development on areas where the existing infrastructure is more able to sustain it, e.g. by constraining increased car journeys, and introducing Neighbourhood Plan implications where new DDBs have been agreed.

***We are asked if we agree with the proposed spatial strategy, and I suggest we say "yes".***

**Display Board 4:** deals with new housing and employment land supply. The housing targets are based on the government's formula. This results in a "need" for 794 new homes each year across the 20-year plan period, a total of 15,880, and there is a table that sets out where this growth should arise.

The need for employment land of 51.6 hectares has been based on a 2016 Workspace Study. I have not considered this aspect of the proposals.

We are asked whether we consider that these figures represent the 'objectively assessed need' for housing and employment land for the period 2016 to 2036.

***I suggest we say that we do not consider that the government's formulaic approach to arriving at target housing numbers is in any way objective in assessing the housing needs of the area.***

**Display Board 5:** deals with retail and town centre development, which I have not considered.

**Display Boards 6, 7, 8, 9, 11, 10, 12, 13 and 14:** deal with the proposed allocation of residential, employment and associated development at Dorchester, Sherborne, Crossways, Chickerell, Bridport, Beaminster, Lyme Regis, Weymouth, and Portland. Further details are included in the LPR at paragraphs 3.3 et seq. I have not considered these except to note that in Bridport the total homes proposed for the Vearse Farm site has increased from 760 to 930 with the identification of 3 further adjacent sites, and that as part of the proposals improvements are to be implemented at the Miles Cross junction (the Symondsburry turn off on the A35).

***We are asked whether we have any comments on the additional capacity identified at Vearse Farm. I have not, but suggest we underline the need for safety improvements at Miles Cross and that this could be achieved by installing traffic light controls or a roundabout or both.***

**Display Boards 15 and 16:** deal with other proposed policy changes, which I note below, on all of which we are asked if we have any comments.

### **Affordable Housing**

The display board says:

“The Council’s approach to affordable housing provision (Policy HOUS1) has been updated to reflect changes in National Planning Policy.

- Affordable housing provision will be sought on major sites (10 dwellings or more) and a financial contribution will be sought for developments of 6-9 dwellings in rural areas.
- Affordable housing contributions on site will be 25% on Portland and 35% in Weymouth and West Dorset.
- Where one or more affordable homes are being sought these should be provided on the open market site. A financial contribution will be sought for any provision shortfall.
- A viability assessment will be required to justify a lower level of affordable housing provision.
- Within any affordable housing provision, a minimum of 70% affordable rental products and a maximum of 30% affordable home ownership products will be sought.
- On sites of 10 dwellings or more at least 10% of all new homes will be required to be affordable home ownership products.
- The types, size and mix of affordable housing should address the affordable housing needs of the local area.”

Within our DDB, development sites are scarce and are likely to comprise less than 10 dwellings. Any significant market housing development is more likely to stem from a local plan without the requisite land supply identified and so the presumption in favour of sustainable development required by the NPPF. Whatever the locations, a financial contribution to affordable housing from any sites with 6 – 9 dwellings is unlikely to be helpful in providing additional affordable housing

within the Parish. Bullets 2, 5 and 6 above also seem to me to be unnecessarily rigid. ***I suggest that we comment:***

***“The level and balance between affordable rental and home ownership projects should be discussed and agreed with Town and Parish Councils concerned and any other appropriate local bodies, such as Community Land Trusts. The affordable housing contributions sought, whether on site or financial, should be adjusted in accordance with the outcome of these discussions.***

***Where provision is to be made on site, to secure the affordable housing benefits into the long term, the land concerned should where possible be transferred to a community land trust or similar organisation.”***

### **Wind Energy**

Re our Parish Plan aspirations for renewable energy, the proposed policy requires community consent to small scale wind energy development.

### **Optional Technical Housing Standards**

Councils have the option of setting additional technical standards in respect of accessibility and adaptability, wheelchair access, water efficiency, and an optional nationally described space standard. Responses to the previous consultation are noted as having been mixed, but with more support for applying additional ‘accessibility and adaptability standards’ and the ‘optional nationally described space standard’. The councils intend to gather further evidence on the need for these two standards to help to determine whether the inclusion of policies applying them in the local plan review would be justified. I suggest we support this.

### **Coastal Change Management Area**

New Policies ENV8 and ENV9 have been drafted to set out the approach to development proposals at risk from coastal erosion. They say that:

- New residential development will not be permitted within Coastal Change Management Areas (CCMA).
- Any development that is permitted will be subject to time limited permission.
- Policy ENV9 allows the replacement and relocation further inland of existing homes and farm buildings threatened by coastal erosion in the next 50 years. For Burton Bradstock, any such replacement homes or buildings would be in or adjoining to the DDB (see LPR52 & 53).

There are also a number of policy changes noted which I have not considered as I do not consider them as particularly relevant to Burton Bradstock. These are in relation to self build and custom build housing, protection of key employment sites, the green infrastructure network, the re-use of buildings outside of DDBs, and the effective and efficient use of land.

**Display Board 17:** deals with how to find out more, how to comment and what happens next.

In addition to the changes noted on the Display Boards, the LPR details proposed changes in

## **The presumption in favour of sustainable development**

Paragraphs 1.4.4 to 1.4.13 of the LPR together with the policy statement INT1 set out the policy and supporting text to this. This is important for us in that when the local plan's housing land supply has fallen short of requirement, we have sought to use, inter alia but mainly, the impact on the AONB to resist proposed residential development in the Parish that is located outside our DDB.

We are asked whether the revised drafting provides clarity on how the presumption in national policy will be applied locally. There are two key parts to the drafting concerned:

1. The NPPF's policy statement that "great weight" should be given to conserving landscape and scenic beauty in AONBs; and
2. In deciding "whether the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits" (INT1) that "the 'weight' to be given to any particular policy that forms part of the development plan will be a matter for the councils [WDDC], having regard to all the circumstances of the case, including the implications of the 'tilted balance' where appropriate." (Paragraph 1.4.13).

***I suggest that we comment along the following lines:***

***"While the Council fully accepts that determining "weight" is a sometimes difficult matter of judgement, the drafting sheds little if any light on how such judgements are to be made. It would be helpful if the supporting text contained examples of how the judgements of weight on a development proposal, particularly at the small end of the scale, would in relation to draft Policy INT1 iii:***

- 1. Trigger a "great weight" refusal in relation to conserving the landscape and scenic beauty of the AONB (as in the NPPF); and***
- 2. Tilt the balance against a proposal in relation to development plan policies.***

***It would also be helpful if the Council would engage in discussion with the Town or Parish Council concerned in such cases, so that the very local knowledge of those bodies could be brought to bear and help form the judgements."***

Councillor Graham Moody

26 September 2018