

### **West Dorset and Weymouth & Portland Local Plan Review: Consultation on Issues and Options – Issues Raised by West Dorset’s Overview and Scrutiny Committee and Weymouth and Portland’s Policy Development Committee**

#### **Issues Raised by West Dorset’s Overview and Scrutiny Committee**

- 1 The draft Initial Issues and Options Consultation document was considered by West Dorset’s Overview and Scrutiny Committee on 22 November 2016 (as Appendix 1 to Agenda Item 6). Where the matters raised at the meeting have resulted in a suggested change to the consultation document, these are set out below. The suggested changes also reflect further discussions with members on how best to address the matters raised. A more comprehensive summary of the matters discussed at the meeting appears in the minutes of the committee.

#### ***Option Sites at Chickerell***

- 2 Section 8 of the draft Initial Issues and Options Consultation document deals with the issue of development at Weymouth and Chickerell. Figure 8.5 on Page 48 of the draft consultation document shows five options for growth at Weymouth and Chickerell. These options are all shown with a ‘W’ prefix although two of the option sites are actually in Chickerell.
- 3 Members of the committee felt that a distinction should be drawn between the sites in Chickerell and those in Weymouth. To address this issue it is suggested that sites W1: West of Southill and W5: Adjacent Budmouth College, which are shown on the map in Figure 8.5 on page 48 and in the table at the top of Page 49 should be given a ‘C’ or ‘CH’ prefix. The remaining sites in Weymouth would then be re-numbered.
- 4 Following further discussions with members it is suggested that the consultation document should include a separate chapter on Chickerell, which would enable more detailed commentary to be provided on proposals for the town, both from the adopted local plan and in the local plan review.
- 5 It is suggested that the new chapter should discuss the issue of phasing, particularly in relation to site W1: West of Southill. It should set out that in the event this option is taken forward, then it may be appropriate to phase its delivery to later in the plan period, given the significant level of housing growth already proposed at Chickerell in the adopted local plan.
- 6 In relation to Site W5: Adjacent Budmouth College, it is suggested that some text should be added to make clear that any housing in this area should not prejudice the future expansion of the college, which may be required to support growth in the local area. The text should set out that this option site should only be taken forward if sufficient space remains for

additional secondary education provision and associated sporting facilities at Budmouth College.

### ***Protection of Employment Sites***

- 7 Section 18 of the draft Initial Issues and Options Consultation document deals with the issue of the protection of employment land from other forms of development. Sites identified as 'key employment sites' are all listed in Figure 18.1 on page 107 of the document. This replicates the list of key employment sites in Table 4.1 (on page 82) of the adopted local plan. Such sites are protected by Policy ECON2 and receive a higher level of protection than 'other employment sites' which are protected by Policy ECON3.
- 8 Question 18-i asks "are there 'key employment sites' listed in figure 18.1 that should no longer be given the higher level of protection afforded to 'key employment sites'? Please tell us which ones and why."
- 9 Members of the Overview and Scrutiny Committee felt that there may be some other employment sites which are not currently identified as 'key employment sites' (and subject to Policy ECON2), which should be added to the list in Figure 18.1.
- 10 To address this issue it is suggested that an additional question should be asked seeking views on whether any existing employment sites should be added to the list of 'key employment sites' and protected by Policy ECON2 of the local plan.

### ***Green Infrastructure Network***

- 11 Section 20 of the draft Initial Issues and Options Consultation document deals with the issue of green infrastructure and Figure 20.1 on page 115 of the document sets out the different types of green infrastructure and their functions.
- 12 The primary function of 'green corridors' is identified as relating to 'creating a sustainable travel network ...'. Members recognised that green corridors could perform this function, but felt that this was not the primary function of such corridors. They felt that the primary function was to provide corridors for wildlife, including links between wildlife sites.
- 13 It is suggested that the text in Figure 20.1 should be amended to indicate that the primary function of green corridors is to create corridors for wildlife, including links between wildlife sites, whilst also recognising that such corridors could also contribute to the creation of sustainable travel networks.

### ***Modular Housing***

- 14 Section 21 of the draft Initial Issues and Options Consultation document deals with the issue of design and seeks views on enhanced standards of accessibility, adaptability, space standards and water efficiency.

- 15 Whilst members felt that it would be useful to seek views on such matters, they were concerned that enhanced standards may have implications for meeting housing needs, particularly for those having difficulty in accessing the housing market.
- 16 Members felt that it would be useful to also seek views on the issue of modular housing (i.e. housing that is pre-fabricated off-site, which can be constructed quickly and at a lower cost).
- 17 The Housing and Planning Minister Gavin Barwell recently raised this issue expressing the view that modular housing could help to increase housing supply. The right kind of modular housing could also help more people to access the housing market.
- 18 It is suggested that an additional question should be asked in the Initial Issues and Options Consultation document seeking views on the role modular housing could play in meeting housing needs in the local plan area.

### ***Coastal Change***

- 19 Section 22 of the draft Initial Issues and Options Consultation document deals with the issue of coastal change. The text in paragraph 22.10 and question 22-i of the document refer to a number of named harbours (West Bay Harbour, Lyme Regis Harbour and Weymouth Town Centre). Members felt that it was unclear precisely which areas were covered by these terms.
- 20 Officers have sought to keep the Issues and Options document as short as possible, but it is recognised that some people may want more detail on particular issues. With that in mind it is intended to prepare a number of background papers, which will look at the issues in greater depth. These background papers are currently being drafted.
- 21 To address the issue raised by members, it is suggested that the harbour areas should be more clearly defined in the background paper on coastal change and that reference to the relevant background paper should be made in the main consultation document.

### ***Maps***

- 22 Members raised a general issue about the clarity of the maps in the draft Initial Issues and Options Consultation document and suggested that all maps should be shown on a detailed Ordnance Survey (OS) base. This issue was also raised by members of Weymouth and Portland Borough Council's Policy Development Committee.
- 23 The approach taken by officers had been to prepare three maps for each of the settlements where options for growth have been identified. The maps of the constraints have been shown on an OS base, but those of the 'broad areas of search' and 'potential options for growth' have been shown on simplified, less detailed, maps.

- 24 The approach taken by officers was with the aim of trying to highlight the potential option sites. It was felt that the less detailed maps were helpful in highlighting these sites. However, members took the view that the OS bases would make it easier for readers to understand the location of the potential site options.
- 25 As a result of the discussions with members of both councils it is suggested that all maps in the consultation document should be shown on OS bases.

### ***Sustainability Appraisal***

- 26 The draft Initial Issues and Options Consultation document is supported by a sustainability appraisal, which is linked from the agenda as a background document. Section 2 of the sustainability appraisal sets out the methodology for the appraisal of alternatives (including the appraisal of different site-based options at the larger settlements).
- 27 Figure 2.2 explains the system used to classify the magnitude of any impacts in a large number of matrices included in the document, ranging from 'strong positive' to 'strong negative'. Members were concerned that this is the only place in the document that this scoring system is explained, which could make it difficult for people reading the document and trying to understand how the councils had evaluated the different alternatives.
- 28 Officers are currently investigating how best to amend the document to address this concern, so that readers do not have to refer back to Figure 2.2 to understand the system used to classify the magnitude of any impacts. It is intended to reproduce Figure 2.2 (or a simplified version of it) throughout the document.

### **Issues Raised by Weymouth and Portland's Policy Development Committee**

- 29 The draft Initial Issues and Options Consultation document was considered by Weymouth and Portland's Policy Development Committee, on 28 November 2016 (as Appendix 1 to Agenda Item 9). Where the matters raised at the meeting have resulted in a suggested change to the consultation document, these are set out below. The suggested changes also reflect comments made by other members at the committee and subsequent discussions. A more comprehensive summary of the matters discussed at the meeting appears in the minutes to the committee.

### ***Low Impact Dwellings***

- 30 Section 16 of the draft Initial Issues and Options Consultation document deals with the issue of self-build housing. 'Low impact dwellings', which are buildings constructed from materials that are recycled, reusable and have low embodied energy (such as straw bales, re-used tyres etc.) would be a form of self-build housing. A member asked whether views should be sought on whether such dwellings could make a contribution to meeting housing needs.

- 31 Paragraph 5.7.4 of the current local plan provides some commentary on new low impact dwellings indicating that they may be acceptable, in principle: within defined development boundaries; on affordable housing exception sites; and if a scheme met the criteria for a rural workers' dwelling.
- 32 Officers suggest that the scope of Section 16 should be widened to seek views on whether low impacts dwellings, as a form of self-build housing, could (or should) play more of a role in meeting housing needs.

### ***Wave and Tidal Power***

- 33 Section 23 of the draft Initial Issues and Options Consultation document deals with the issue of onshore wind energy. Members raised the issue of whether the local plan review should also address the potential for wave and tidal power.
- 34 In general, coastal local authorities have administrative control and jurisdiction over areas down to low water mark, but in some cases this extends seaward of low water mark, for example in harbours, bays, inlets, creeks and channels. Opportunities for wave or tidal power are likely to be limited in such locations, but any such proposals would be considered under Policy COM11: Renewable Energy Development of the current local plan, which is generally supportive of the principle of such schemes.
- 35 Below low water mark, in locations where there is no local authority jurisdiction, any proposals for wave or tidal power would not be considered against the local plan (or any new policy in the review), but would be determined under the National Infrastructure Planning regime. Under this regime any proposal for wave or tidal power would be considered by a planning inspector against relevant National Policy Statements (NPSs). There is no technology-specific NPS for wave or tidal schemes, but any proposals would need to be consistent with NPSs EN-1: Overarching NPS for Energy; EN-3: Renewable Energy Infrastructure; and EN-5: Electrical Networks Infrastructure.
- 36 Since there are already national and local policies in place against which any proposals for wave or tidal energy would be considered, officers suggest that it would not be appropriate to seek views on this matter in the draft Initial Issues and Options Consultation document.

### ***Unclear Maps in Relation to Options on Portland***

- 37 Members considered that the maps in the draft Issues and Options Consultation document, particularly those relating to Portland, were unclear. Particular concerns were raised in relation to Figure 12.4 on page 87, which didn't show the names of the settlements or the roads on Portland.
- 38 The issue about the clarity of the maps in the draft Issues and Options consultation document was raised, as an issue more generally at the meeting of West Dorset's Overview and Scrutiny Committee. Following further discussion with members of both councils it is suggested that all maps should be shown on OS bases.

### ***Options on Portland – Loss of Gaps / Open Space***

- 39 Members expressed concern about the loss of gaps and open areas that would result if the option sites for Portland in the consultation document were taken forward. The potential loss of the remaining gap on Weston Street if Option Site P1: Eastern end of Weston Street was taken forward was of particular concern.
- 40 The highly constrained nature of Portland is recognised in paragraph 13.4 (on page 81) of the draft Initial Issues and Options Consultation document. The environmental constraints are listed in paragraph 13.10 (page 82) and are shown on a map in Figure 13.2 on page 83. Given the constraints, officers have found it difficult to find potential site options, as the analysis in paragraphs 13.12 to 13.14 shows and the total capacity of the three potential options identified is only 280 dwellings for the period to 2036. (See also below where it is suggested that Option Site P2: North of Southwell should be removed from the consultation document in the light of the submission of a planning application for the mining of stone. The capacity of the two remaining sites is 180 dwellings).
- 41 Option Site P1: Eastern end of Weston Street is one of the few potential options sites that is not subject to national or international designations, although it is recognised that it is subject to a local designation. As part of the review, a number of potential option sites across the plan area have been identified which impinge on local designations. A number of potential option sites at Bridport, Beaminster, Lyme Regis and Dorchester also impinge on the national designation of the Dorset Area of Outstanding Natural Beauty (AONB).
- 42 Officers suggest that Option Site P1: Eastern end of Weston Street should be retained in the draft Issues and Options consultation document and views should be sought from the public on its suitability. Officers also suggest that a further question should be added to the consultation document asking about further opportunities within existing built-up areas on Portland, as discussed in more detail below.

### ***Option Site P2: North of Southwell - Recent Planning Application for the Mining of Stone***

- 43 Members advised officers that a planning application for the mining of stone had recently been submitted for part of the land under Option Site P2: North of Southwell and were concerned that this had serious implications for this option site.
- 44 Application WP/16/00818/NOTS proposes the mining of stone within part of Coombefield Quarry on the northern side of Avalanche Road. The application is also accompanied by a unilateral undertaking to revoke the existing consent for surface quarrying in that area.
- 45 The supporting statement to the application sets out the proposals in more detail and indicates that the applicant is seeking a consent that would last until 2042, which is the same end date as the surface quarrying consent that is being offered for revocation. Further information in the application

suggests that on the basis of planned rates of extraction, mining would continue for between 8 and 25 years, although it also suggests that the mine would only operate intermittently to provide stone for specific jobs, because the main dimension stone production area will still be from Perryfields.

- 46 Whilst the current application has yet to be determined, it is clear that in the event of consent being granted, much of Option Site P2: North of Southwell would not be available for housing development for all or most of the plan period (i.e. to 2036). On that basis officers suggest that the Initial Issues and Options Consultation document should be amended to exclude Option Site P2: North of Southwell.

### ***Options on Portland – Impacts on Landscape and Archaeological Sites***

- 47 Members expressed concern that development on Option Site P3: South of Southwell would intrude into an area designated as Land of Local Landscape Importance. Concern was also expressed about the potential impact on 'Lawnsheds', including areas which are designated as a Scheduled Monument.
- 48 The constrained nature of Portland and the difficulty in finding potential option sites is discussed above and those issues are also relevant to this site. A Scheduled Monument is a national designation and the potential site option has been drawn to avoid this designated area, although clearly any impact on the setting of the Scheduled Monument covering 'Lawnsheds' is an issue that needs to be taken into account.
- 49 Officers suggest that Option Site P3: South of Southwell should be retained in the draft Issues and Options consultation document and views should be sought from the public on its suitability. Officers also suggest that a further question should be added to the consultation document asking about further opportunities within existing built-up areas on Portland, as discussed in more detail below.

### ***Options on Portland – Capacity within Existing Built-up Areas***

- 50 Members asked officers whether they had considered the potential for development within the Defined Development Boundaries (DDBs) on Portland. Members were particularly keen to know whether the capacity of vacant (or soon to be vacant) school sites had been taken into account.
- 51 The current local plan makes provision for 14,855 homes to be provided across the plan area by 2031 (as discussed in paragraphs 3.3.9 to 3.3.16 of the local plan). Figure 3.4 shows that this includes extant planning permissions and likely 'windfall' development from large and small sites within settlements. These figures include any sites identified on Portland.
- 52 The situation with regard to planning consents and windfall development is dynamic and changes from year to year and with this in mind, the more immediate 'five-year supply' is monitored and annual reports setting out the five-year land supply position are available online - <https://www.dorsetforyou.gov.uk/article/421799/West-Dorset-Weymouth--Portland-monitoring>. All the sites on Portland with permission that are

included in the five year supply are set out in Appendix A of the latest 2016 monitoring document.

- 53 As part of the preparation of the draft Initial Issues and Options Consultation document a 'call for sites' was made to landowners and developers to suggest sites that would be available for housing development to be included in the Strategic Housing Land Availability Assessment (SHLAA). Dorset County Council (DCC) did not submit any sites on Portland through that process, however, subsequent informal discussions with DCC officers have indicated that they are investigating the development potential of sites in their ownership as part of a Government initiative to make better use of public land.
- 54 Given the difficulty in finding potential option sites on Portland, it is suggested that a question should be added to the draft Issues and Options consultation document asking for the identification of potential brownfield sites for housing within existing built-up areas.

### ***The Settlement Hierarchy and Portland***

- 55 Members expressed concern about how it was proposed to describe the settlements on Portland, as set out in paragraphs 5.39 to 5.44 and in Question 5-viii on pages 23 and 24 of the draft consultation document.
- 56 Members were concerned that the proposed definitions did not reflect the way in which the identities of the settlements on Portland were perceived locally. In particular, members were concerned over what appeared to be the 'merging' of Easton and Weston and the merging of Fortuneswell and Castletown.
- 57 At the meeting officers clarified that there was no intention to merge the settlements on the ground: it was only intended to try and describe the settlements to more accurately reflect how the Defined Development Boundaries (DDBs) are drawn on the policies map, which forms part of the current local plan.
- 58 Given the confusion caused by the wording in paragraphs 5.39 to 5.44 and in Question 5-viii, it is suggested that they are re-drafted to focus on the following proposed changes:
- To amend the second bullet point in Policy SUS3(i) of the Local Plan to clarify that the settlements on Portland, rather than the whole of the Isle of Portland or the 'coastal town' of Portland, should be the focus for growth outside the main towns of Dorchester and Weymouth; and
  - To provide a more comprehensive list of the settlements on Portland in the box after paragraph 3.3.26 of the local plan. Currently this box lists Easton, Fortuneswell, Grove, Southwell and Weston, but omits Castletown, Wakeham and Chiswell. It is suggested that all eight settlements should be listed (separately) in the box after paragraph 3.3.26 of the local plan.

### ***Options at Chickerell - Option Site W1: West of Southill***

- 59 The committee was informed of discussions that had taken place with West Dorset members and the proposal to amend the draft consultation document to include a separate section on Chickerell. Members did not object to this approach, but wished to be assured that residents of Weymouth would have the opportunity to comment on Option Site W1: West of Southill.
- 60 If a separate section on Chickerell is included in the draft Initial Issues and Options Consultation document, a number of consequential changes will need to be made to Section 8, which as currently drafted deals with both Weymouth and Chickerell.
- 61 Whilst the bulk of Option Site W1: West of Southill falls within Chickerell parish, a small part is located within Weymouth and Portland Borough where it adjoins the existing built up area. Officers therefore suggest that some commentary on this site should be retained in Section 8 to ensure that residents of the Borough are aware of the potential option site that has been identified in the neighbouring parish (i.e. Chickerell).

### ***Population of Sutton Poyntz***

- 62 A member expressed concern that the figure for the estimated population of Sutton Poyntz, set out as 'c.300' in Figure 5.1 on page 19 of the draft Initial Issues and Options Consultation document, was incorrect.
- 63 Local people are currently preparing a neighbourhood plan for Sutton Poyntz. The application for the designation of the neighbourhood area and forum indicated that "the Neighbourhood Plan area contains about 230-240 properties and has an estimated population of around 500 persons".
- 64 On that basis it is suggested that Figure 5.1 on page 19 of the draft Initial Issues and Options Consultation document should be amended to indicate that Sutton Poyntz has a population of about 500.

### ***Coastal Change and Coastal Protection***

- 65 Members expressed concern that paragraphs 22.9 and 22.10 and Question 22-i only sought to defend a limited number of coastal locations, including Weymouth Town Centre, West Bay Harbour and Lyme Regis Harbour. A member considered that Bowlease Cove and Sandsfoot Castle should also be defended.
- 66 Section 22 of the draft Initial Issues and Options Consultation document seeks to take forward national policy in relation to coastal change, as set out in paragraphs 106 to 108 of the National Planning Policy Framework (NPPF). Paragraph 106 indicates that local planning authorities "should identify as a Coastal Change Management Area (CCMA) any area likely to be affected by physical changes to the coast".
- 67 Paragraphs 22.9 and 22.10 explain that all areas of the coast in the local plan area are likely to be affected by physical changes except those that are currently defended, namely Weymouth Town Centre, West Bay

Harbour and Lyme Regis Harbour. Since Bowlease Cove and Sandsfoot Castle are not currently protected they are not listed.

- 68 Section 22 seeks views on the identification of CCMA's and how best to manage proposals for new residential and other forms of new development that could be at risk from coastal erosion in the future. Identifying CCMA's would not preclude proposals coming forward separately for coastal protection works for existing development, although they would need to be in line with the strategic approach to managing the coast set out in the current Shoreline Management Plan (SMP2), as mentioned in paragraph 22.8 of the consultation document. It is not proposed to make any further changes to the draft Initial Issues and Options consultation document in relation to this issue.

### ***A354 Weymouth to Portland Relief Road***

- 69 Members referred to paragraphs 13.6 to 13.9 of the draft consultation document, which set out the comments made by the local plan inspector in relation to Portland. A member noted that the inspector felt that there was not sufficient justification for safeguarding a route for the A354 Weymouth to Portland Relief Road, but felt that such a route should be defined in the local plan review in order to increase the likelihood of its delivery.
- 70 This issue was discussed at the local plan inquiry and considered by the local plan inspector relatively recently. In the light of members concerns, officers have informally discussed the issue with officers from DCC and their position has not changed.
- 71 Whilst schemes have been prepared in the past, there is currently no defined alignment for the route of the road. Without a defined alignment it would be difficult to justify the protection of a specific corridor on the policies map of the local plan. Most of the route would run through the Heritage Coast, which current local plan policies seek to protect. This limits the potential threat to the future implementation of any road scheme.
- 72 Evidence given by the council at the local plan examination noted that the A354 Weymouth to Portland Relief Road is not in any funding stream and is therefore extremely unlikely to be delivered within the plan period. Although the review would extend the plan period by five years, it remains extremely unlikely that any road would be delivered before 2036. The local plan inspector noted that the identification of a safeguarded route, with major uncertainties over the timescale for delivery and possible future funding, could lead to land and properties being unreasonably blighted. Given the situation outlined above, it is not proposed to make any further changes to the draft Initial Issues and Options Consultation document in relation to this issue.

### ***Growth and Dorchester and Sherborne***

- 73 Members felt it was important that the local plan review addressed the local plan inspector's concerns in relation to Dorchester and Sherborne. He wished to ensure that adequate provision for growth was made at these towns in order to ensure that pressure was not put upon Weymouth and Portland to accommodate any shortfall.

- 74 Sections 6 and 7 of the draft Initial Issues and Options Consultation document relate to Dorchester and Sherborne respectively. A number of option sites have been identified at both towns with the capacity to accommodate a significant amount of housing development. It is not proposed to make any further changes to the draft Initial Issues and Options Consultation document in this respect.

### ***Elderly Persons Accommodation***

- 75 Members were keen to ensure that adequate provision for elderly persons accommodation was made through the local plan review.
- 76 Paragraphs 5.5.1 and 5.5.2 and Policy HOUS5 of the current local plan relate to the provision of residential care accommodation, including extra care housing. This policy is broadly supportive of such provision, particularly in areas that are easily accessible for visitors and staff and where residents can access community facilities and public transport.
- 77 At later stages of plan production, it may be appropriate for the councils to consider whether provision should be made for elderly persons accommodation within major allocations once they have been identified. However, it would not be appropriate to do so at this early 'issues and options' stage.

### ***Wheelchair Access***

- 78 Members referred to paragraphs 21.14 and 21.15 and Questions 21-iii and 21-iv on page 119 of the draft consultation document. Members were keen to ensure that a proportion of new houses are designed to be suitable for wheelchair users.
- 79 Since Question 21-iii already asks "should a requirement for a proportion of new houses to be suitable for wheelchair users be included in the Local Plan", it is not proposed to make any further changes to the draft Initial Issues and Options Consultation document in this respect.

### ***Existing Consents for Housing and Minerals***

- 80 Members felt that the consultation should ensure that people are aware of existing planning permissions for housing and for existing mineral consents on Portland. Members also wished to be assured that the consented development at Curtis Fields had been taken into account in the housing figures.
- 81 There are a large number of existing planning consents throughout the plan area and showing them all on the maps in the draft Initial Issues and Options Consultation document would make the maps very difficult to interpret. However, in relation to Portland, where opportunities for further development are limited, it may be helpful to provide greater clarity on the key sites that already have planning permission for housing, in particular the Hardy Complex, sites on Osprey Quay and Bumpers Lane.

- 82 It is suggested that this could be done by including some brief commentary in the text in Section 13 of the consultation document and enhancing the maps of Portland to show all sites above a certain size (perhaps 30 dwellings) with planning permission. It is also intend to produce more detailed background papers that will accompany the public consultation starting in February 2017. The background paper relating to Portland could include a more comprehensive discussion of the planning permissions that are currently granted but not yet implemented.
- 83 Officers can confirm that the consented development at Curtis Fields has been taken into account in the housing figures.

***General Improvement Area at Fortuneswell***

- 84 A member expressed a possible need for a General Improvement Area (GIA) at Fortuneswell.
- 85 The concept of a GIA was introduced in the 1969 Housing Act. This gives local authorities the power to designate GIAs, which are predominately residential areas in which a housing authority considers that it should improve or help to improve living conditions by improving existing homes or amenities (or both).
- 86 The legislative power is in place to create a GIA so the designation of such an area would not need to be promoted through the review of the local plan.