



Further Proposed Changes Consultation Summary

West Dorset, Weymouth and Portland Draft Local Plan

July-September 2014

Consultation on Further Proposed Changes to the West Dorset, Weymouth and Portland Draft Local Plan, July-September 2014

Produced by West Dorset District Council and Weymouth and Portland Borough Council

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The consultation

The Further Proposed Changes consultation

Residents and stakeholders across West Dorset, Weymouth and Portland were asked for their views on further proposed changes to the draft joint Local Plan. The changes were in response to new housing evidence prepared to address matters highlighted by the Local Plan Inspector Paul Crysell at an exploratory meeting held in January 2014. The changes were agreed by West Dorset Full Council on 3rd July and Weymouth & Portland Management Committee on 1 July 2014. The following table summarises the changes proposed.

FPC1-3	An independent review looking at the relationship between houses and jobs has recommended an increase in the rate of housing development using a single target for the plan area. As a result, it is proposed that the housing requirement will increase to 775 units per annum (FPC1), across the whole plan area (FPC2), and that the plan refers to an estimated increase to the resident labour force of 2,300 (FPC3) between 2011 and 2031.
FPC4	Reducing the plan period by 3 years from 2031 to 2028 will help us meet this increased level of housing provision without the need to identify and consult on additional development sites at this stage, which could further delay the delivery of those sites already identified in the plan. Additional development sites would be identified and consulted on in a future review.
FPC5-7	Revised housing land supply evidence has been prepared to help inform the Local Plan and ensure that the understanding of land supply is consistent and fully up-to-date across the plan area. As a result, some changes are proposed to the components of the supply to take account of the most recent information available.

The consultation period ran for a 6 week period from 31 July to 11 September 2014.

How we consulted

The further proposed changes were presented in a schedule (see appendix A). Hard copies of the schedule were sent to the district and borough council offices in Weymouth, Dorchester, Sherborne and Bridport, and to all town and parish councils/meetings within the plan area.

Letters or emails were sent to approximately 2,700 contacts and stakeholders including the following bodies, providing a website link and printed copies of the schedule on request:

- Dorset County Council
- All adjoining local planning authorities (in Dorset, Devon and Somerset)
- All adjoining parish councils / meetings
- National agencies listed as “specific consultation bodies” in the regulations (including English Heritage, the Environment Agency, the Highways Agency, the Homes and Communities Agency, the Marine Management Organisation, Natural England and Network Rail. The Coal Authority had previously notified the councils that they did not need to be consulted)
- Utility companies operating in the area (including National Grid, South West Water, Southern Electric, SSE Telecom and Wessex Water)
- Emergency service and healthcare providers operating in the area, including Dorset Police, Dorset Fire and Rescue and NHS Dorset.

The consultation was advertised in the Blackmore Vale, Dorset Echo and the View From newspaper in the week commencing 28th July 2014. A number of further articles appeared in local newspapers during the course of the consultation.

The councils’ joint website www.dorsetforyou.com was updated to include copies of the schedule of further proposed changes, sustainability appraisal update and a revised version of Chapter 3 Sustainable Pattern of Development. An online comments form was placed online along with details of alternative ways to comment. A direct link to the page <http://www.dorsetforyou.com/localplanexamination/west/weymouth> was promoted through the various methods of publicity.

Representations received

Approximately 100 respondents made valid representations during the consultation period. Approximately 50 valid responses were from individuals and a further 50 responses were from stakeholders included developers, landowners, town and parish councils and national agencies.

The Main Issues Identified

The following section provides an overview of all the individual issues raised through the consultation on the further proposed changes and the Sustainability Appraisal Update. Generally comments have been recorded against the most relevant further proposed change (FPC) on which they have a bearing. A table of all the respondents is shown in Appendix B.

Summary of main issues - Further Proposed Changes 1-3.

Name: Mr Tim Hoskinson

Representing: Hallam Land Management **ID:** 7

Further Proposed Change: FPC1-3

Representation: FPC1- We note the amended housing requirement to 775 dwellings per annum across the plan area, which is proposed in response to the 2014 Strategic Housing Market Report. As set out in our previous representations, we maintain that this target should be set out as a minimum requirement. The changes to the wording in Policy SUS1 in the June 2013 proposed modifications had addressed this point by including the words 'at least' in front of the housing provision figure, however, the latest Further Proposed Changes to Policy SUS1 revert to 'in the region of ...'. We consider that the expression of the housing target as a minimum would be more compatible with wider economic and housing objectives, and policy SUS1 should be amended accordingly. FPC2- We consider that setting a HMA wide housing land requirement represents a pragmatic response to the situation that the Councils find themselves in, where there is a slight surplus in housing land supply in the administrative area of Weymouth & Portland Borough Council and a deficit in West Dorset District Council's administrative area. It is nevertheless important that the plan recognises and addresses the development needs of each of the main settlements, in line with the settlement strategy and wider sustainability considerations. Given the large size of the MHA, and to assist with the monitoring and implementation of the plan, it would be useful to maintain a housing land trajectory which sets out targets for delivery for the key settlements and sites, including a breakdown of provision across the local authority areas. This could be included as an appendix to the plan. FPC3- The revised forecast for jobs growth arising from recent economic forecasting is recognised, however it should be noted that such forecasts are subject to considerable uncertainties and variation. It is unclear how the revised target relates to wider economic growth ambitions or planned interventions, and we are concerned that limiting ambitions for jobs and housing growth around such a forecast could restrict opportunities. It is therefore important that this target should be considered as a minimum requirement.

Name: Mr Lionel Bird

Representing: Individual **ID:** 30

Further Proposed Change: FPC1-3

Representation: The proposed changes are fully endorsed.

Name: Mrs Barbara Bird

Representing: Individual **ID:** 31

Further Proposed Change: FPC1-3

Representation: I fully support the proposed change to the new Local Plan.

Name: Miss Gwen Hawkins

Representing: Individual **ID:** 168

Further Proposed Change: FPC1-3

Representation: The increase in houses being built is not sustainable. Looking at Dorset as a whole is a mistake: housing should be dealt with on a local/small area basis as the housing demands vary so hugely within Dorset. There are areas where there are more houses built than are needed, which means that on a county scale it appears as though the council are providing the required number of new homes but they are not necessarily providing the right types of homes in the right areas.

Name: Mrs Ann Mason

Representing: Individual **ID:** 231

Further Proposed Change: FPC1-3

Representation: I feel the proposed plan is too much and needs reassessing: 1) Inadequate infrastructure 2) Lack of jobs 3) Hospitals too small 4) Need a larger doctors surgery 5) School is already overcrowded 6) Chickerell already floods from time to time with water and sewage 7) Why build on a flood plain 8) Need more shops 9) Existing roads are too narrow 10) Church is too small.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estate **ID:** 261

Further Proposed Change: FPC1-3

Representation: FPC1 – Whilst we welcome the increase in housing requirement, it still does not represent the full objectively assessed needs for housing across the plan area. The supporting evidence prepared by Turley Economics indicates that the housing requirement should be increased further but the Councils have not sought to identify a higher range in its revised evidence, or tested higher ranges in the supporting Sustainability Appraisal. FPC2 – We contend that the Councils have not adequately justified that it is appropriate to promote a single housing requirement in this case. The Councils appear to be adopting this approach in order to rely on upon supply in Weymouth & Portland to meet demands generated in West Dorset, as well as avoid having to reinstate allocations in West Dorset. This approach is not balanced with the reality of the proportionate split of need across the housing market area. FPC3 – The evidence to support a significant reduction in jobs target from 16,100 to 2,300 is not compelling. Further work is needed to properly consider the relationships with job growth and housing need.

Name: Mr David Lane

Representing: The Owners of Aldwickbury **ID:** 262

Further Proposed Change: FPC1-3

Representation: The increased housing requirement by the independent assessment of housing needs is supported and my clients' site (Land at Radipole Lane, Southhill, Weymouth

(see accompanying Report) is promoted to help meet the additional need. The site could be allocated or identified as a Reserve Site as required.

Name: Mr Steve Briggs

Representing: Salisbury Diocesan Board of Finance

ID: 328

Further Proposed Change: FPC1-3

Representation: Object - The Salisbury Diocese supports the proposed increase in the rate of housing development in the plan area and the commitment to meeting a single housing land requirement across the whole plan area. However, the Diocese does not feel the overall strategy for delivery of these homes is consistent with national policy or justified as the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Name: Mr David Wootton

Representing: Individual

ID: 435

Further Proposed Change: FPC1-3

Representation: FPC1- The methodology for assessing the increase in homes that are required seems to take no account of homes that become no longer available as part of the housing stock. For example, there appears to be no assessment of how many homes will be lost to Second Homes or Holiday Lets.

Name: Mrs Wendy Beeson

Representing: Individual

ID: 517

Further Proposed Change: FPC1-3

Representation: As the target number of new jobs in the area has been reduced so drastically (16,100 to 2,300) should there not be some slowing down in number of new homes to be built. As it is government policy that new homes should be close to employment sources, building large estates where there is already unemployment, as in Weymouth generally and Littlemoor in particular, cannot be an acceptable policy.

Name: Mr Keith Beeson

Representing: Individual

ID: 519

Further Proposed Change: FPC1-3

Representation: The WD&W combined planning areas contain very different types of community, with very different economic prospects. The South: Weymouth has higher levels of unemployed and unskilled people. The North: Sherborne has low levels of unemployment and high levels of education. The Central: Dorchester has a medium position. Hence The South wants more jobs and not more housing, the North can justify considerable expansion of housing provision, and the Central area a balance between the two. The current Draft Plan

brings the dreadful spectre of more housing to increase the levels of unemployment in Weymouth and insufficient housing in Sherborne

Name: Mr Tim Hoskinson

Representing: CG Fry & Son

ID: 526

Further Proposed Change: FPC1-3

Representation: FPC1- We note the amended housing requirement to in the region of 775 dwellings per annum across the plan area, which is proposed in response to the 2014 Strategic Housing Market Report. We consider that the expression of the housing target as a minimum would be more compatible with wider economic and housing objectives, and policy SUS1 should be amended accordingly. FPC2- We consider that setting a HMA wide housing land requirement with a reduced plan period represents a pragmatic response to the situation that the Councils find themselves in, where there is a slight surplus in housing land supply in the administrative area of Weymouth & Portland Borough Council and a deficit in West Dorset District Council's administrative area. Given the large size of the HMA, and to assist with the monitoring and implementation of the plan, it would be useful to maintain a housing land trajectory which sets out targets for delivery for the key settlements and sites, including a breakdown of provision across the local authority areas. This could be included as an appendix to the plan. FPC3- The revised forecast for jobs growth arising from recent economic forecasting is recognised, however it should be noted that such forecasts are subject to considerable uncertainties and variation. It is unclear how the revised target relates to wider economic growth ambitions or planned interventions, and we are concerned that limiting ambitions for jobs and housing growth around such a forecast could restrict opportunities. It is therefore important that this target should be considered as a minimum requirement.

Name: Mrs Gill Smith

Representing: Dorset County Council

ID: 544

Further Proposed Change: FPC1-3

Representation: FPC1 - Dorset County Council welcomes the change in approach and notes that it represents a significant increase in the annual rate of development (by 25% per annum) for the first 10 years of the plan period. From a County Council service provision perspective this will place more demands upon infrastructure over a shorter time period. However, this will be spread around a relatively wide geographical area and so there should be opportunities to take account of this through normal CIL / Section106 agreement mechanisms, while a subsequent review of the local plan should give advance warning of where any additional housing is likely to be located. Accordingly, it should not raise any significant concerns in principle for the County Council subject to suitable monitoring and infrastructure delivery mechanisms being in place. FPC2 A single plan area figure should not impact upon Dorset County Council on condition that this does not preclude continued monitoring at a district level (and in some cases smaller areas). This might be a matter that could be supported through the monitoring and implementation aspects of the local plan. Ensuring there is effective monitoring in place to determine if, how and where development is coming forward is vital to the County Council, particularly in relation to planning future education, transport, community and social services infrastructure provision. FPC3 - The fact that the job creation work has been linked with

housing is welcomed. It is important to Dorset County Council in planning accurately for infrastructure provision. Effective monitoring and implementation planning will be key to ensure that infrastructure is prioritised accordingly. It is noted that the latest ONS figures which came out in 2014 could suggest that a more optimistic view of an economic upturn is likely to result in more jobs (and thus may increase housing needs to match economic growth) later in the plan period. For this reason the County Council would advise that the implementation and monitoring parts of the plan are considered carefully. We could specifically suggest the following:

- i) Housing and job rates are monitored having regard to provision in neighbouring districts so that a future review of the plan can respond accordingly (based upon sound evidence) if necessary.
- ii) This could be supported by inclusion of a suitable implementation policy (to give the plan the necessary flexibility) which sets out how such monitoring information will be used in delivering / reviewing the strategy. From Dorset County Councils perspective this will relate to our ability to plan for and provide supporting infrastructure.

Name: Mr Peter Neal

Representing: Dorset CPRE - The Sherborne and District Society

ID: 570

Further Proposed Change: FPC1-3

Representation: We give our support to this amendment of the Draft Local Plan. The Councils should be commended for the work that has gone into producing these amendments. Against a background where many residents feel that too many houses are being allocated to the area and often, wherever they are built, they will be on contentious sites. The Councils have limited scope for brownfield site development and so housing need generally can only be met by building on beautiful open countryside, land with seascapes or on the edge of historic towns. Therefore, care has to be taken that there is the need for housing, in the area, in the first place. We contend that the Councils have exercised as much care as they can in this regard. The approach they have taken in examining various options is sound and based on clearly defined methodology.

Name: Miss Kathryn Crosby

Representing: Individual

ID: 576

Further Proposed Change: FPC1-3

Representation: FPC3- No objection to the revision in jobs for the target area.

Name: Mr Malcolm Brown

Representing: Betterment Properties (Weymouth) Ltd **ID:** 578

Further Proposed Change: FPC1-3

Representation: Whilst an increase in the housing requirement to 775 dwellings per annum across the housing market area is going in the right direction, it is not considered to represent the FULL objectively assessed need for market and affordable housing. Suffice to say for the

present that paragraph 3.2.9 still refers to a requirement of 170 dwellings per annum for Weymouth and Portland which is about half of what Turley previously assessed was a conservative estimate of future requirements if the plan is to meet its policy for economic growth. Paragraph 3.2.10 admits to an affordable housing requirement of 7,600 people on the housing waiting list across the HMA, with more in Weymouth and Portland than in West Dorset. That is inconsistent with only 21% (170pa) of the total housing requirement (775pa) being in Weymouth and Portland. The figures are also so much lower than the regional plan forecasts and actual delivery before the economic recession as not to be credible. It is also clear that this requirement does not include any possible overspill from Purbeck and East Devon who are not party to the 'memorandum of understanding' in respect of the Duty to Co-operate. I am aware of a significant shortfall in Purbeck's Local Plan which cannot go to Poole for example because that district is failing to meet its own requirements. Whilst it is agreed that the NPPF talks about HMAs it is in my opinion appropriate to bear in mind where the objectively assessed need is arising so that the supply is provided in sustainable locations. It would not be appropriate or sustainable to expect all those residents on the housing waiting list in Weymouth and Portland to be accommodated in a part of West Dorset remote from where they live/work/socialise/play now. If as I believe the lpa is underestimating the demand/need in Weymouth that should be recognised, just as the plan recognises that Weymouth is the "largest town". With regard to FPC3 it seems contrary to the objective of growing the economy to constrain economic development because the constrained housing proposals will result in a reduced estimate of the resident labour force. This is a recipe for a more unbalanced demographic profile.

The brief resume of the further proposed changes is misleading. The full proposed changes should have been more clearly and accurately set out . I stumbled across the proposed wording of chapter 3 of the Joint Local Plan. The study by Peter Brett Associates whilst better than that previously relied on falls short of the FULL objective assessment of the need for market and affordable housing required by paragraph 17 of the NPPF. A critique of that report will follow. The apparent increase in the annual housing requirement is welcomed but does not go far enough. There are inconsistencies. Clearly the space on this form is wholly inadequate. TBC

Name: Mr Andrew Lowe

Representing: Betterment Properties (Weymouth) Ltd

ID: 578

Further Proposed Change: FPC1-3

Representation: The Further Proposed Changes (1 – 3) are not considered sound as the Local Plan fails to evidence the economic needs of the area and with regard to the requirements of the PPG the likely future level of job growth. The evidence underpinning FPC 1 and 3 does not demonstrate that economic needs have been considered or justified in full. This should have been undertaken through an update to its employment land evidence with a specific employment target for the plan period identified. This in turn should have then informed the objective assessment of housing need. The evident failure to have adopted this approach has resulted in a clear failure to align the employment and housing aspects of policy SUS1. This renders the policy proposed through the Further Proposed Changes unjustified and therefore unsound, it also serves to undermine the robustness of the Local Plan as a whole. fails to respond to evidenced historic imbalances between the supply and demand for housing. These are clearly indicated in a review of market signals and in particular in relation to the assessed scale of affordable need (Part 2 2014 SHMA). The assembled evidence base indicates that younger, working age households are migrating out of the area. The absence of sufficient

housing choice, including market housing, represents an important contributor. It is evident that recent levels of housing provision have proven inadequate to address affordable housing need historically. The failure to set a policy which seeks to respond to the NPPF's need to 'boost significantly' the supply of housing will simply serve to perpetuate historical market challenges and issues which in turn will have a significant detrimental impact on ensuring the area can realise economic growth. The Local Plan does not, with regard to FPC 1, on the basis of a number of the points above, ensure, in line with Paragraph 14 of the NPPF that there is 'sufficient flexibility to adapt to rapid change'. The approach taken through FPC 1 to establish a requirement across the plan area fails to take into account the fundamental drivers of need and demand and their geographic basis. Whilst an overall requirement across the plan area could be appropriate there needs to be considerably more evidence to support the division of needs to ensure that affordable needs will be met where they arise and that residents are not displaced outside of local market geographies. A failure to respond positively to meeting the needs of households across the plan area will further exacerbate affordability issues and long-term challenges associated with retaining younger working age households; unsustainable commuting patterns are not compounded and exacerbated through a failure to adequately balance business and housing needs; and potential unmet needs from surrounding authorities with which strong local market linkages are apparent are taken into account. A failure to recognise the impact of a creation of unmet needs in the future will further exacerbate market imbalances. The current failure of the authorities to assess or anticipate the existence of unmet needs within the updated evidence base raises questions as to the extent to which they have satisfied the duty to cooperate requirement and the robustness of the proposed housing requirement contained within the Local Plan. This is reinforced through the views expressed by the Inspector considering the East Devon Plan and highlights the importance of further co-operation and consideration within the evidence base.

The review of the Further Proposed Changes and in particular the evidence base upon which changes are based has also raised significant concerns as to the level of transparency in the methodology adopted. The absence of key modelling input assumptions and an explanation of the processes adopted means that it is not possible to ensure that the outcomes and conclusions derived from the evidence are justified or

Name: Mr Alan Rowley

Representing: Dorchester Civic Society

ID: 611

Further Proposed Change: FPC1-3

Representation: The Society considers that the revisions now made to the draft plan and in particular to Chapter three and housing land need and supply meet the concerns of the Society in that no additional land is allocated for development beyond the existing limits for development. The changes to Policy SUS1 based on the SHLAA update July 2014 and Strategic Housing Market Report July 2014 are noted along with the change in the plan period to end in 2028 rather than 2031. The Society considers these changes to be soundly based and will give certainty to the future planning of Dorchester along with a more than adequate supply of housing land for the plan period.

Name: Mr David Fordham

Representing: Individual **ID:** 629

Further Proposed Change: FPC1-3

Representation: FPC3- No objection to the revision in jobs for the target area.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Further Proposed Change: FPC1-3

Representation: The increase in the number of houses appears aimed at the “potential” increase in inward economic migration with the forecast increasing numbers moving into the area. However, the need is for affordable housing for local people who are being priced out of the market and the increased housing allocation would not appear to be intended to meet that demand. The Town Council would also question whether the forecast employment provision will be sufficient for the additional housing numbers. There does appear to be insufficient employment to meet the demands from the increased housing.

Name: Mr Andrew Elliott

Representing: Grainger PLC (part of the North Dorchester Consortium) **ID:** 648

Further Proposed Change: FPC1-3

Representation: FPC1 - Grainger has jointly commissioned, with Persimmon Homes, an objective assessment of the housing requirements of the HMA using the Chelmer Housing and Population Model. This work has been prepared by Pegasus Group. Details of the findings of this work and associated commentary is attached, but in summary this identifies that there is a need to consider a significantly higher housing requirement for each of the authority areas. Notwithstanding this, it is identified that the councils’ proposed housing requirement has not been considered by reference to a comprehensive analysis of labour supply needs in the two authority areas, or a clear economic development strategy for the future vitality of the area. The work for the councils does not indicate how cross boundary matters and the duty to co-operate have been fulfilled in arriving at the housing requirement. This would include an exploration of unmet needs in adjoining authorities, in addition to those within West Dorset, Weymouth & Portland. Similarly the figure and associated strategy is not informed by a comprehensive analysis of travel to work areas and commuting patterns within the two authority areas and across adjoining authorities. FPC2 - Disagree. There is a risk that housing will not be provided where it is needed, when it is needed. The use of a single target will not allow for monitoring to take place on a district basis (as it has done in the past), and is being used – inappropriately - to respond to under provision in West Dorset where significant capacity does exist for further growth. The final paragraph of page 7 of the July 2014 sustainability appraisal states that “a joint target provides greater flexibility in terms of providing the housing supply. Should the target be split between these two areas, some of the existing allocations in Weymouth & Portland would need to be removed and some of the previously rejected allocations in West Dorset would need to be added to the Local Plan”. This does suggest that the strategy that is being consulted upon is relying on Weymouth & Portland to meet West Dorset’s needs. It is noted that the housing market area covers both districts and functionally Dorchester and Weymouth relate closely with each other in terms of travel to work area. However the same cannot be said, for example,

for Sherborne. There is a risk that a single plan target will lead to an unsound approach where important geographical patterns and issues within different parts of the authorities are overlooked. FPC3 - The reduction in the target for new jobs from 16,100 to 2,300 is a very significant change. The Plan does not have a strategy for economic development. It does not consider issues surrounding the need for growth, the implications for the future vibrancy of the area as the result of a 'business as usual/do nothing' strategy, or the potential benefits to the local economy through specific planned intervention. For example, housing and employment balance issues associated with current commuting patterns (particularly in commuting to Dorchester) are not identified or addressed.

Name: Mr Giles Harvey

Representing: Individual **ID:** 670

Further Proposed Change: FPC1-3

Representation: The SHMA reports that: (1) In West Dorset around 400 more people die than are born. Between 2001 and 2011 on average natural change was -428 (2) Inward migration has been falling since 2001. (3) No evidence of undersupply of housing. Despite these facts the report arrives at a demand for more housing. What is really going on here is a political agenda to boost supply in the vain hope that this will reduce prices and this report has been constructed to attempt to support that agenda. In West Dorset there is much talk of affordable housing but no evidence that it is affordable for local people or those who are economically active. The report states that the inward migration has been the older age groups and notes the desirability for having more economically active migration. However, identifying housing land supply is not going to make jobs happen. The evidence from elsewhere is that the creation of jobs which would bring about this desirable migration is more to do with establishing enterprise zones and providing real start up incentives. The evidence from the NE of England where there is a good supply of low cost housing is that this does not create jobs or inward migration. The policy set out here will merely ensure that middle aged, middle class people will move into West Dorset and nothing desirable will have been achieved, at the cost of some overdevelopment. Over the life of the plan the stated requirement here is for 13,179 new houses. There is absolutely no evidence in the plan on how this sort of number could be accommodated without compromising the character of West Dorset.

Name: Mr M N Hill

Representing: Individual **ID:** 677

Further Proposed Change: FPC1-3

Representation: FPC1- 1. I have is discussed the annual housing requirement extensively in my review of the Peter Brett Associates (PBA) 2014 Strategic Housing Market Report Part 1: Objectively Assessed Housing Needs report dated July 2014, and in my comments on the Sustainability Appraisal (SA). 2. Recommendation FCP1: I recommend that the housing requirement should be 679 per annum. FPC2- I have explained in my comments on the SA that West Dorset and Weymouth and Portland are markedly different local authorities and it would make far more good sense to treat them as separate authorities, the SA acknowledges is acceptable within the NPPF. 4. Recommendation FCP2: I recommend that the plan treats the

housing for Weymouth and Portland and for West Dorset as two separate local authorities and not as one Housing Market Area.

Name: Mr Robin Legg

Representing: Individual **ID:** 723

Further Proposed Change: FPC1-3

Representation: FPC1: Achieving 775 dpa is contingent on the housing components making up the total housing supply figure of 14,040 in new Table 3.2 being achieved. I believe some of those elements are questionable. It is particularly difficult to reconcile the figures and categories which now appear in Table 3.2 (Housing Land Supply 2011-2028) with Table 3.1 (Summary table, housing supply and demand) in the 2013 draft. The categories Submitted / large identified sites within settlements 3,350 and Minor identified sites within settlements likely to be built 892 now replace the minor sites category in Table 3.1 which proposed 3,431 dwellings in the period to 2031. The figure in the 2013 draft at least had the merit of appealing to past performance. The new minor sites category has been prepared by the simple expedient of a planning officer adding dots to parish plans without knowing the views of landowners. The larger sites shown coloured green on SHLAA appendix F plans are a mix of submitted sites and those identified by the planning authority. Local knowledge reveals that a number of these would be highly controversial. The Cross Farm, Yetminster site where 18 units are said to be achievable within 1 to 5 years is one such location. The way in which this information has been 'hidden' on the consultation web-site guarantees that you will get few comments on the changes now proposed to the Plan. Without proper exposure to public scrutiny the suitability, availability and achievability of land to meet identified housing need will not be properly tested. FPC1 as described in Appendix 1 also refers to "update accompanying text". It is disappointing that in making these changes the Councils have chosen to undertake a wholesale revision of the text of Chapter 3 such that it is now impossible to compare or contrast the present text with what was in the plan just a year ago. It is entirely unclear how objections and comments made on the 2013 submitted draft are to be carried forward or dealt with. FPC3: SUS1 makes provision for 60.3 ha of deliverable employment land. The same amount as in the 2013 submitted draft. There is no apparent explanation why this quantity of supply is thought necessary for the creation of 2,300 additional jobs when previously it was thought sufficient for 16,100 additional workers.

Name: Miss Alison Appleby

Representing: Natural England **ID:** 782

Further Proposed Change: FPC1-3

Representation: In relation of the revised housing figures, we advise that you must be able to demonstrate that you are satisfied that the increased housing would not require improvements in road infrastructure on Portland that would affect internationally designated sites.

Name: Mrs Sarah Hamilton-Foyn

Representing: Persimmon Homes **ID:** 797

Further Proposed Change: FPC1-3

Representation: FPC1 - An objection is made to the revised housing requirement of 775 dwellings per annum and the reduced plan period of 2011 – 2028 i.e. giving a total housing provision of 13,175 dwellings. The issue of accommodating future levels of growth has been widely discussed in the last 7 years and it is not acceptable to justify a reduction in the plan period on the basis that more time is required and that development is extremely controversial locally and it will be difficult to agree additional land allocations. These circumstances are not unique to West Dorset. This is not a sound approach and does not accord with national government guidance nor meet the Inspector's concerns. The proposed housing target of 775 per annum does not represent a 'significant boost' in housing delivery compared to historical levels of planned supply. The PBA SHMA which informs the proposed housing provision assumes that household formation rates will continue to be stifled (as seen in the last 5 years as a result of the economic recession) until 2021 when they will start to return to the long term trend. As the economy recovers to pre-recession levels, it is expected that household formation rates will return to the long term trends (supply permitting). The Local Plan is therefore planning for pessimistic trends in economic growth and household formation which will not significantly boost housing supply and secure economic growth in accordance with national policy. In order to objectively assess housing need Pegasus has prepared a Chelmer Demographic and Housing Review which considers alternative economic growth scenarios and their implications for housing need. Based on unconstrained work place growth projections, which identifies future growth based on existing past growth levels, the housing requirement for the HMA, is a figure of circa 1,350 dwellings per annum i.e. 27,000 dwellings (rounded) over the plan period 2011 – 2031 including unmet need (See Scenario 4 in Part 1 of Appendix A). FPC2 - There is no evidence to justify that the requirements cannot be met in West Dorset and that they need to rely on the surplus in Weymouth and Portland to meet needs. The Council state in the Committee report of 9th June at para 5.26 "Using a whole plan area target, and the existing housing land supply, we would be able to demonstrate sufficient supply to 2028 for the whole plan area. With separate targets there would be a significant shortfall in the supply for West Dorset. Adopting the plan with less than ten years' post-adoption supply would not be a sound option.". FPC3 - An objection is made to the reduction in the target for new jobs from 16,100 to 2,300; this will not support the economic objectives of the plan.

Name: Mr Vic Dominey

Representing: Redwood Partnership **ID:** 827

Further Proposed Change: FPC1-3

Representation: We acknowledge and support the further proposed changes to the new local plan for West Dorset, Weymouth & Portland.

Name: Mr Alex Bullock

Representing: Summerfield Homes **ID:** 853

Further Proposed Change: FPC1-3

Representation: We note that the housing requirement has been amended to a single figure (775 per annum) across the plan area and the plan period adjusted to 2011-2031 (Further Proposed Changes (FPC) 1, 2 & 4). Summerfield considers that on the whole these changes should be welcomed in line with the Inspectors initial feedback. We do however consider that the annual housing requirement should be expressed as a minimum so as to help ensure that the Plan both meets the objectively assessed needs but with sufficient flexibility to adapt to rapid change as advocated by Paragraph 14 of the National Planning Policy Framework.

Name: Ms Felicity Tozer

Representing: SW HARP Planning Consortium **ID:** 884

Further Proposed Change: FPC1-3

Representation: FPC1- The SHMA indicates an annual affordable housing need of some 785 per annum. This is significant when compared with the annual requirement of 775 per annum. We have a number of comments to make in respect to the SHMA (2014). The approach used to 'refine' the affordable housing need is questionable. In particular reference is made below in respect to the affordability and role of the private rented sector. It is unclear as to the distinction between the supply figures associated with current housing stock (paragraph 5.25), future supply through relets (paragraph 5.29), and refinement 3's relet figure (paragraph 5.42). It seems that a degree of double counting results from these calculations. It is unclear if the calculations take appropriate account of potential concealed households. Concealed households are accounted for in the 'current' housing need, however the approach to attributing existing households falling into need, by applying historical trends from 2011-2014, perpetuates the position that the recent economic recession has led to significant increases in concealed households which have not presented themselves. The further application of the 2001-07 trend based population projections extenuates this position, with the headship rates from recessionary trends applied until 2021. The PPG clearly indicates that consideration must be given as to concealed households in the calculation of housing need, and this must include consideration of the impacts of applying historical trend data.

Name: Mr P J Golding

Representing: The Beaminster Society **ID:** 885

Further Proposed Change: FPC1-3

Representation: Objection to the higher target figure of 775 dwellings per annum in SUS1 for the reasons set out in the objection to the Sustainability Appraisal Preferred Option D. The new housing requirement of Policy SUS1 is substantially higher than the pre-submission draft plan (12340-13220 dwellings 2011-2031).

Name: Mr Paul Tomlinson

Representing: Individual **ID:** 904

Further Proposed Change: FPC1-3

Representation: FPC2 - Is presumably intended to allow over provision in the south of the plan area to be offset against under supply in West Dorset in terms of setting growth targets. I am doubtful if the market actually works that way, the glacially slow rate of sales of the units within the former Hardy Barracks at Portland suggests that people are not in fact prepared to travel that far. Even if they are, the commuting mileage involved must surely count against your sustainability objectives. I would prefer to see WDDC admit that the current site designations within their area fall short of what is required in the guidance.

Name: Mr Andrew Harrison

Representing: Winterborne Farrington Parish Council

ID: 917

Further Proposed Change: FPC1-3

Representation: While the parish council acknowledges the requirements on the district and borough councils to increase the rate of housing development within the plan area, we find it difficult to correlate this with the drastic cut of the estimated increase to the resident labour force over the plan period from 16000 to only 2300. Such a figure appears to be unambitious when the proposed rate of housing development aims to cope with a period of strong economic growth. We do not object to proposed change FPC2 but remain objected to policies advocating the onward outward growth of major towns while infill development remains unexploited.

Name: Mr Roger Tustain

Representing: Woodsford Farms

ID: 933

Further Proposed Change: FPC1-3

Representation: Based on a reasonable interpretation of the Councils' evidence base its objective assessment of market and affordable housing needs in full is 2,301 new dwellings per annum over the period 2011 to 2031. However, once market factors such as delivery have been taken into account a reasonable interpretation of the Councils' evidence base is that the objectively assessed housing requirement within Policy SUS1 should be a minimum of 1,368 new dwellings per annum between 2014/15 to 2018/19 and 1,000 new dwellings per annum between 2019/20 to 2030/31. The housing requirement and planned level of job growth within Policy SUS1 is significantly too low to support the Plan areas projected sustainable economic growth needs or potential. Through the duty to cooperate an appropriate mechanism for delivering the Councils' unmet housing need should be put in place. In preparing the Further Proposed Changes the Councils' have not sought to put in place such a mechanism. The Councils' have therefore failed to appropriately discharge the duty to cooperate. The Further Proposed Changes with the Submitted Local Plan is therefore unsound as it has not been positively prepared, is not justified, nor consistent with national policy. To appropriately address each of these fundamental issues the Councils' must withdraw the Further Proposed Changes and the Submitted Local Plan and Sustainability Appraisal from examination. For further detail on this matter, please refer to Section's 5, 6 and 7 of our accompanying representations Supporting Report.

Name: Mr Doug Cramond

Representing: Wyatt Homes **ID:** 934

Further Proposed Change: FPC1-3

Representation: The theoretical increase in overall annual provision to 775pa based on the needs assessment would be welcomed but the implementation and delivery of this lacks credibility

Name: Mrs Sarah Davies

Representing: Charminster Parish Council **ID:** 954

Further Proposed Change: FPC1-3

Representation: We agree to the revised housing requirement subject to not including any extra sites. We have no idea about the resident labour force figure.

Name: Ms Michelle Harding

Representing: Burton Bradstock Parish Council **ID:** 955

Further Proposed Change: FPC1-3

Representation: The Council have no objections to the consultation on the increased annual number of dwellings and shorter term Plan so therefore have no further comments to make

Name: Mr Barry Thompson

Representing: Individual **ID:** 1579

Further Proposed Change: FPC1-3

Representation: FPC1 - On the increase of housing to 775 per annum, I fully support this, on the proviso that the WDDC guidelines of 35% of any development is affordable housing. FPC 2 - I do not agree to separate West Dorset from Weymouth and Portland, allowing development to focus on Weymouth as the largest town. Dorchester town centre and districts need affordable housing! Not just confined to Poundbury. West Dorset and Weymouth and Portland should have separate housing targets.

Name: Mr Adrian Stuart

Representing: Dorchester Town Council **ID:** 2516

Further Proposed Change: FPC1-3

Representation: Changes to Q1a and Q1b noted by Planning and Environment Committee 1 September 2014 Q1c - The Town Council was extremely concerned at the large reduction in the target for new jobs from 16,100 to 2,300. It considers that new skilled jobs are needed to help redress the age imbalance in the West Dorset area and to reduce the housing cost/wage ratio.

Name: Mr Barry Bates

Representing: Individual **ID:** 3504

Further Proposed Change: FPC1-3

Representation: FPC 1 – No justification for the increased figure of 775 other than the attempt to mollify the Inspector. The report does however show a number of factors which would question the numbers of proposed housing. Firstly migration - if you build houses in West Dorset, people from outside will buy them. That does not however mean that these were actually needed. It certainly will not fulfil the requirement to meet local housing need. Secondly - the completion figures are consistently below target. FPC 3 - Where will these jobs actually come from? If you are accepting a more modest target for job growth who will actually buy the houses? In what way will this distorted housing market create a balanced demographic? The report is focussed on housing, population, creation of households. These issues need to be fed into all the other factors - employment, environment, transport ...

Name: Mr Richard Freer

Representing: Individual **ID:** 3508

Further Proposed Change: FPC1-3

Representation: FPC1 - I cannot see how this can be deemed to be correct ? A recent publication by Dorset County Council; Research Matters-population estimates (August 2014) indicates that since 2012 the population of the County Council area, that excludes Poole and Bournemouth (416,700) has increased by 0.2%. That equates to 830 individuals. So how (in FPC1) is there justification to increase build at Vearse Farm, Symondsburry, for example ? Furthermore it cites the fact that over the decade to 2013, with the exception of North Dorset, population growth was below average !

Name: Mr Matthew Dickins

Representing: East Devon District Council **ID:** 3511

Further Proposed Change: FPC1-3

Representation: FPC 1 - Welcomes the proposed changes to Policy SUS1. The housing needs report has been critically reviewed and is regarded as providing a robust evidence base to inform the changes to plan policy. FCP2 - Changes are welcomed. It is critical to understand and plan for strategic delivery of housing and this requires cross-boundary assessment and agreement by adjoining authorities. We endorse the fact that the whole plan area forms a defined Housing Market Area (explicitly noting and endorsing Para 2.5 of the needs assessment report). The HMA logically abuts the Exeter HMA which has boundary definition that conforms to the same assessment you use and provides for rational Devon-Dorset cross boundary working. This explicitly includes at Lyme Regis, an area where our collective assessments indicates limited development is appropriate and very significant constraints exist. FPC3 - In response to the needs assessment work undertaken this amendment is a rational and sensible adjustment to the plan. The changes are welcomed.

Name: Mr Barry Bates

Representing: ADVEARSE **ID:** 3517

Further Proposed Change: FPC1-3

Representation: FPC 1 - No justification for the increased figure of 775 other than the attempt to mollify the Inspector. The report does however show a number of factors which would question the numbers of proposed housing. Firstly migration - if you build houses in West Dorset, people from outside will buy them. That does not however mean that these were actually needed. It certainly will not fulfil the requirement to meet local housing need. Secondly - the completion figures are consistently below target. FPC 3 - Where will these jobs actually come from? If you are accepting a more modest target for job growth who will actually buy the houses? In what way will this distorted housing market create a balanced demographic? The report is focussed on housing, population, creation of households. These issues need to be fed into all the other factors - employment, environment, transport ...

Name: Ms Barbara Simons

Representing: Individual **ID:** 3522

Further Proposed Change: FPC1-3

Representation: FPC1 - With reference to the estimated housing needs – I find it staggering that your projections appear not to take into account that we are indeed still in recession. This seems both reckless and irresponsible and an opportunity for you to create the number you desire without actually indentifying a genuine need for housing in this area. There are few jobs here and such limited transport links with no rail and already overcrowded roads, your estimates are unrealistic, which makes your motives questionable.

I believe that your projections are not reliable, especially in a time of such economic flux. We have very few jobs now and because of the profile of this area of West Dorset this level of growth I believe is unrealistic and is just being used to justify building on this land. As this is such a unsubstantiated estimate you cannot justify the destruction of this green field Area of Outstanding Natural Beauty on a guess. The town will become completely imbalanced and overwhelmed by the change.

Name: Mr Glenn Crawford

Representing: Individual **ID:** 3523

Further Proposed Change: FPC1-3

Representation: FPC3: revising the labour force figure downward on the basis that there are currently fewer jobs available is false logic and runs the risk of sustaining the current locally high unemployment. The Local Plan should encourage business (particularly start-up and small enterprises) and base its forecasts on sustaining or increasing the number of people in work, not cutting them down.

Name: Ms P Hall

Representing: Individual **ID:** 3524

Further Proposed Change: FPC1-3

Representation: I do not see where the extra jobs are to come from. As far as I can see, you are proposing to build houses for jobs that as yet don't exist, and may or may not ever exist. Surely employment should come first, or are you building houses for second homes and retirement, which we already have more than enough of.

Name: Mr Robert Avant

Representing: Individual **ID:** 3810

Further Proposed Change: FPC1-3

Representation: It would make more sense if the aim was to reduce overall housing prices by provision of more houses of all types than the number actually required. This might be achieved by producing say three times the number actually required. The labour force figure is questionable as it depends on government policy on unemployment and the view business takes of whether they wish to set up in the area. Many workers in West Dorset and Weymouth also commute to areas such as Yeovil and Poole/Bournemouth for employment.

Name: Dr Jon Orrell

Representing: Transition Town Weymouth and Portland **ID:** 3812

Further Proposed Change: FPC1-3

Representation: It is not fair that Weymouth should shoulder the greater burden of new housing. Already the borough is overcrowded with less green space and pleasant rural woods and views. Jobs are being moved to Dorchester. The Weymouth council office is being run down. New offices are in Dorchester. There are two new shopping schemes in Dorchester. The new houses should be where the jobs are or you will just cause more pollution through commuting. Either move the jobs to Weymouth or the housing to Dorchester. You should look more seriously at options in West Dorset. The more articulate incomers and village NIMBYs should not be allowed to bully the council planners into dropping all substantial schemes in West Dorset but approving massive developments in overcrowded Weymouth and Portland.

Name: Mrs Shirley Deeney

Representing: Individual **ID:** 3813

Further Proposed Change: FPC1-3

Representation: We do not need all this housing, there is plenty of stock for sale and plenty of outstanding planning permission which is not being taken up. Why do the builders not have to use their existing permissions before being given more. The Inspector does not have to live here. Portland is sinking under the weight of new houses and we do not have the services to support them. Using a whole area approach for housing is better, although again all extant planning permissions should have to be used before more are agreed. The whole of Dorset will be under concrete before the Planning Inspectors are satisfied. It has to end somewhere!

Name: Mr John Hubbard

Representing: Individual **ID:** 3815

Further Proposed Change: FPC1-3

Representation: It is wrong to assume ongoing annual increases in houses which could easily cause degradation of the environment and appalling traffic congestion

Name: Mrs Maureen Wootton

Representing: Individual **ID:** 3819

Further Proposed Change: FPC1-3

Representation: FPC1 - identifies targets for building new homes. However, the Plan does not take a holistic view of the challenge of providing sufficient homes - the targets take no account of the loss of existing homes to Second Homes or Holiday Lets. This means that targets will fail to meet local need. The Plan should include policies that emphasise the importance of retaining family homes and control the conversion of homes to Holiday Lets. The loss of homes to second homes and Holiday Lets is a significant factor in West Dorset and needs to be addressed to ensure that there are homes for local residents. Unless this is done, targets for new homes at FPC1 will not meet local need.

Name: Mr Roger Jose Goudge

Representing: Individual **ID:** 3829

Further Proposed Change: FPC1-3

Representation: FPC1- A study of the WDDC own statistics on population estimates titled "Research Matters" dated August 2014 reports some interesting growth figures on immigration, or lack of it over the last decade, 2,000 younger people aged between 20 and 40 have left the area, no jobs, larger than the natural average and 3,200 people aged 60 and over have immigrated into the area also above the national average. This probably explodes the necessity for additional housing in this beautiful area; also over the past decade 92% of new build has been purchased by immigrants.

Name: Dr Michael Banham

Representing: Individual **ID:** 3832

Further Proposed Change: FPC1-3

Representation: I disagree with the whole plan of an annual increase of the size proposed and was not consulted in the initial stage, therefore by disagreeing with the proposed alterations in will appear that I agree with the original plans - which I do not. The infrastructure of Bridport will not be able to cope with the proposed density of the housing at Vearse Farm disregarding the fact that part will be built on a flood plain. I seriously question the need to house so many locals and suspect most of the housing will go to people moving out from the London area and elsewhere. I do not believe this should be our remit.

Name: Ms Jane Cornwell

Representing: Weymouth College **ID:** 3839

Further Proposed Change: FPC1-3

Representation: FPC 1 Agree: Support for the increase in housing requirement following independent review of the objectively assessed housing needs for the plan area and its recommendation for an increase in the rate of housing development across the plan area to allow for a potential increase in economic in-migration. FPC 2 Agree: Support for a single housing land requirement across the whole plan area rather than separate targets for each district to allow greater flexibility for meeting need across the area. This is because the NPPF requires housing needs to be met across the HMA (para 47) and it is not therefore appropriate to disaggregate the housing supply to separate parts of the Plan area. It would also focus development on the largest and most sustainable town of Weymouth, in line with the NPPF presumption in favour of sustainable development.

Name: Ms Sue Green

Representing: Home Builders Federation **ID:** 3840

Further Proposed Change: FPC1-3

Representation: Summary: FPC1 - The Councils should acknowledge the new NPPF world with its greater policy emphasis on housing provision and its approach to start with full OAHN. There are valid reasons to justify a higher housing requirement figure as proposed by other parties. A higher figure would boost significantly the supply of housing (NPPF Paragraph 47) as well as securing a workforce and addressing identified problems associated with a declining and ageing population and worsening affordability. FPC2 - The NPPG specifies that “where there is a joint plan, housing requirements and the need to identify a 5 years supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan” (ID : 2a-o10-20140306). However in this case the housing need appears to be arising in West Dorset and the surplus housing supply occurring in Weymouth & Portland. There is an argument that identified housing needs should be accommodated in the location where it arises as highlighted under Key Points (Paragraph 9.9) of the Planning Advisory Service (PAS) Technical Advice Note “Objectively Assessed Need and Housing Targets” by Peter Brett Associates dated June 2014 which states “this should help understand what kinds of people live in the area, who moves in and out and why. Hence it should help decide where housing should be located so it provides what people want”. Moreover the NPPF requirement to meet the full objectively assessed needs for market and affordable housing is an absolute one except insofar as there is any inconsistency with other policies set out in the NPPF therefore local controversy over future housing development should not overly influence plan making decisions. The following extracts from Committee Report West Dorset Council dated 9th June 2014 illustrate that such controversy may have overly influenced the setting of a single land target :-

“development has been extremely controversial locally and it will be difficult to agree additional land allocations” (Paragraph 5.24) ; “New housing development and the choice of locations for it are extremely controversial. The level of development that the evidence indicates is necessary to enable some growth in the local workforce is significantly higher than that which most of our

local communities regard as acceptable, and these decisions are therefore extremely difficult” (Paragraph 10.2).

Name: Ms Georgina Tibbs

Representing: Barton Willmore **ID:** 3841

Further Proposed Change: FPC1-3

Representation: FPC1 - The proposed increase to 775 dwellings per annum is welcomed as the most appropriate option that has been tested by the LPA. However the 775 should be viewed as a minimum requirement. The Strategic Housing Market Report Part 1 refers to other scenarios that justify an increased requirement. FPC2 - the NPPF states that objectively assessed housing needs must be met across the HMA. However, identified housing need should be provided in the location where it arises. Development is needed in West Dorset where there is housing need, not just in Weymouth. FPC3 - A target of 2,300 jobs for both districts is low and does not proactively encourage sustainable economic growth.

Name: Mr Christopher Lindley

Representing: Catesby Property Group **ID:** 3842

Further Proposed Change: FPC1-3

Representation: It is submitted that whilst the changes proposed as part of FPC1 are welcomed by our client as they recognise that an increased housing requirement is necessary, the approach to delivering that requirement across the HMA through FPC2 is flawed. The change proposed at FPC2 would result in a highly convenient scenario whereby the Councils would not be required to adopt a “positive” approach to the identification of sites for new housing. Whilst it would allow the Councils to respond to housing land supply across the HMA, the approach completely ignores the need to respond at lower geographic levels to market signals and challenges that simply cannot be dealt with on a strategic HMA basis. Furthermore the approach to labour force considerations at FPC3 underplays the link between jobs and housing in the climate of an ageing population and does not adequately reflect the evidence base which assesses the issue over a longer period than the proposed plan period which is subject to modification as part of FPC4.

Name: Mr Alistair Macdonald

Representing: Taylor Wimpey UK Ltd **ID:** 3843

Further Proposed Change: FPC1-3

Representation: The proposed increase (FPC1) in the identified housing requirement remains insufficient to meet a robust assessment of Objectively Assessed Need. That the Evidence Base underpinning the overall housing requirement, specifically in the form of the Strategic Housing Market Report 2014, is significantly flawed. There are significant concerns regarding the implications of adopting a single housing land requirement across the JLP area as proposed by FPC 2 given that it is evident that a significant proportion of the need is arising in West Dorset as opposed to Weymouth and Portland. Notwithstanding our overall

concerns on the use of a single housing land requirement, for reasons set out below we consider that the JLP is inconsistent in setting out the approach that is being proposed and is therefore both confused and confusing.

Name: Mr Peter Dutton

Representing: Gladman Developments **ID:** 3846

Further Proposed Change: FPC1-3

Representation: FPC1- Whilst welcoming the preparation of an updated SHMA for the West Dorset, Weymouth and Portland HMA, Gladman are concerned that this may not provide a robust assessment of the authorities' housing needs. FPC2- We further question the adequacy of the decision to now progress a combined Local Plan housing requirement, which avoids the need to identify and bring forward further housing sites in West Dorset, and the soundness of reducing the Plan period post-adoption to 13 years. Gladman recognise that a housing market area can be an appropriate basis on which to set an area's housing needs, however we submit that the decision of the Councils to advance a combined housing requirement rather than the separate targets previously proposed unjustifiably masks deliverability issues that affect the Local Plan, and in particular the under-provision of housing in West Dorset. The progression of a joint requirement significantly avoids the need to properly assess and bring forward further sites in West Dorset, which would be more appropriately located to meet this shortfall and the 605 homes per annum that the Councils' 2014 SHMA evidence suggests are needed in the district. To be found sound at Examination Gladman submit that more emphasis should be placed on identifying and bringing forward further housing sites in West Dorset to meet the district's housing needs. To meet the requirements of the Framework, the Local Plan period should be extended by at least two years, to 2030, to cover a 15 year post adoption time horizon.

Name: Mr Patrick Atherton

Representing: Individual **ID:** 3847

Further Proposed Change: FPC1-3

Representation: FPC1- The Councils' explanations for the proposed housing land supply figures and calculations are not adequately explained in the text of the SHLAA update July 2014 and the Sustainability Appraisal July 2014. The latter seeks to justify the preferred Option D figure of 775 dpa, whereas a much larger figure is required by the NPPF to take account of long term inadequate supply of housing land (caused by restrictive planning policies) and persistent under-delivery of housing completions over many years. The NPPF therefore requires additions of 20% and to take account for the shortfall in housing supply since 1 April 2011 when the Local Plan period commenced. Does not take into account the additions of 20% and the shortfall in housing completions since April 2011, as required by the NPPF.

Name: Mr Robert Pritchard

Representing: Individual **ID:** 3849

Further Proposed Change: FPC1-3

Representation: What West Dorset needs is Low cost housing for local population to retain the youth and start up job opportunities as could be developed at St. Michaels trading estate. not more housesfor in-comers to retire to or use as second homes. This is a huge and unwelcome experiment which will result in the destruction of yet more of the AONB.

Name: Mrs Victoria Stride

Representing: Individual **ID:** 3850

Further Proposed Change: FPC1-3

Representation: Job opportunities need to be available.

Name: Mr Stephen Tapscott

Representing: Stephen Tapscott **ID:** 3852

Further Proposed Change: FPC1-3

Representation: FPC1 - 3.2.11 - indicative minimum targets for employment that are lower than the required 60.3ha don't provide certainty that the full requirement will be delivered. The lack of certainty is further compounded by table 3.1 saying that not all the sites with permission will come forward. I was left asking myself why this is and how much will actually come forward. Perhaps this could all be made clearer.

Summary of main issues - Further Proposed Change 4.

Name: Mr Tim Hoskinson

Representing: Hallam Land Management **ID:** 7

Further Proposed Change: FPC4

Representation: The shortening of the plan period to cover the 2011-2028 represents a pragmatic solution to the current situation which provides the opportunity to put an adopted plan to be put in place, thereby helping to secure the delivery of strategic allocations to address immediate housing needs and address the shortfall in five-year land supply.

Name: Mrs Ruth Hardwick

Representing: Individual **ID:** 158

Further Proposed Change: FPC4

Representation: Can't see that a 3 year period would make any significant difference.

Name: Mrs Ann Mason

Representing: Individual **ID:** 231

Further Proposed Change: FPC4

Representation: 3 years is not going to make a difference.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estate **ID:** 261

Further Proposed Change: FPC4

Representation: FPC4 – The proposed amending of the plan period is simply a mechanism to avoid having to reinstate allocations such as the extended SHER1 Barton Farm site in the context of an increased housing requirement. This demonstrates that the plan will not meet objectively assessed needs (the supporting evidence is up to 2031) and therefore fails to meet the NPPF's positively prepared, justified and effective tests of soundness.

Name: Mr David Lane

Representing: The Owners of Aldwickbury **ID:** 262

Further Proposed Change: FPC4

Representation: Paragraph 157 of the NPPF advises that Local Plans should preferably be drawn up over a 15 year time horizon, to take account of longer term requirements. With specific regard to housing, paragraph 47 of the NPPF requires that LPAs provide supply of specific deliverable sites sufficient to provide five years worth of housing against their housing

requirements and should also identify a supply of specific, developable sites or broad locations for growth, for years 11-15. Even if the LPAs' supply figure is accepted it provides only a 13 year supply of housing, such that additional sites, such as my clients' should be considered at this stage.

Name: Mr Melvyn Warner

Representing: Individual **ID:** 407

Further Proposed Change: FPC4

Representation: Act in haste and repent at leisure. Populations go up and down. West Dorset is part of God's waiting room, all it needs is a flu pandemic and the area's population could be decimated - an extreme example admittedly. If the area becomes so overpopulated would any body wish to retire to the area, because the main increase in population is people retiring here.

Name: Mrs Ghislaine Warner

Representing: Individual **ID:** 408

Further Proposed Change: FPC4

Representation: Does the need for housing always increase? In Beaminster, for example official figures showed that over a recent 10m year period the population went up as well as down and at the end more houses were built than the increase in population.

Why should the need for housing increase, which is the implication in this question. Recent figures for Beaminster, for example showed the population fluctuate, while the number of houses steadily increased, at the end of a 10 year the number of houses had increased by more than the increase in the population.

Name: Mr John Montgomery

Representing: Wessex Delivery LLP **ID:** 414

Further Proposed Change: FPC4

Representation: This just fudges the issue and demonstrates that the LPAs are not willing to identify sufficient housing land to incorporate into the Local Plan. The LPAs should identify a 25 year housing land supply now - see separate representation JM/3902/1111 attached at end and e-mailed today.

Name: Mr David Wootton

Representing: Individual **ID:** 435

Further Proposed Change: FPC4

Representation: There is an understandable desire to increase the number of homes at a particular rate. Simply taking the original number of new homes and shortening the timetable seems like an arithmetic adjustment designed to achieve a target. It does not have the hallmark of a well-considered plan.

Name: Mrs Wendy Beeson

Representing: Individual **ID:** 517

Further Proposed Change: FPC4

Representation: While I can see that this delays difficult consultations it would inevitably increase the costs, having to go through more frequent periods of consultation.

Name: Mr Keith Beeson

Representing: Individual **ID:** 519

Further Proposed Change: FPC4

Representation: The problem I outlined above will not get better over the years. The issue of unbalanced development in the area needs to be addressed now. Look at train travel times between Waterloo and Sherborne, Dorchester and Weymouth it is possible to understand why the economic prospects are so different. The South of the area has a very poor rail and road structure. Until this issue is addressed this area will remain a UK holiday area (declining) and a retirement area. In the South all expansion needs to be in the form of one and two bedroomed properties for older persons whilst the North needs family size properties.

Name: Mr Tim Hoskinson

Representing: CG Fry & Son **ID:** 526

Further Proposed Change: FPC4

Representation: The shortening of the plan period to cover the 2011-2028 represents a pragmatic solution to the current situation which provides the opportunity to put an adopted plan to be put in place, thereby helping to secure the delivery of strategic allocations to address immediate housing needs and address the shortfall in five-year land supply.

Name: Mrs Gill Smith

Representing: Dorset County Council **ID:** 544

Further Proposed Change: FPC4

Representation: From a service provision perspective the shorter Plan period and higher rate of development should not pose any significant difficulties subject to Dorset County Council being given clear and timely notification of where the housing provision is likely to be made.

Name: Miss Kathryn Crosby

Representing: Individual **ID:** 576

Further Proposed Change: FPC4

Representation: Object to the change of the end date of the plan from 2031 to 2028. Consultation on the subsequent plan to this should commence well in advance of the end date of this plan when adopted.

Name: Mr Malcolm Brown

Representing: Betterment Properties (Weymouth) Ltd. **ID:** 578

Further Proposed Change: FPC4

Representation: It is clearly the Government's intention to boost significantly the supply of housing over a period in excess of 15 years. The reduction in the plan period appears to be a device to minimise the increase in total number of required dwellings appearing in Policy SUS 1. It is not significantly more than the minimum end of the range previously identified and BELOW the upper end of the range.

Disagree. In the absence of a regional spatial strategy it is incumbent on the planning authority to take on the role of long term planning. This proposed change is more about not increasing the overall number of dwellings proposed in the plan rather than facing up to the future requirements to release additional greenfield sites.

Name: Mr Alan Rowley

Representing: Dorchester Civic Society **ID:** 611

Further Proposed Change: FPC4

Representation: The Society remains concerned that there are sites outside that current approved limits of development for Dorchester (and indeed in other settlements in other parts of the District) being promoted by landowners/developers. The revised Chapter 3 makes reference to the housing land supply position beyond 2028 at Paragraph 3.2.1 as follows: "The plan will be reviewed in order to provide additional allocations to continue meeting development needs beyond the plan period. Such a review will be informed by updated evidence of the objectively assessed needs, and by monitoring of the delivery of development under the policies of this plan." The Society believes this wording should be strengthened to avoid the situation where the promotion of individual sites takes precedence over a thorough strategic review and asks that the following wording be incorporated in Paragraph 3.2.1 "Accordingly, no further major housing development sites should be allocated or approved without a comprehensive, District-wide appraisal of all available options." Dorchester Civic Society considers that the Draft Local Plan is 'sound' and should be approved and adopted at the earliest opportunity.

Name: Mr David Fordham

Representing: Individual **ID:** 629

Further Proposed Change: FPC4

Representation: Object to the change of the end date of the plan from 2031 to 2028. Consultation on the subsequent plan to this should commence well in advance of the end date of this plan when adopted.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Further Proposed Change: FPC4

Representation: The Town Council has no comment on the time period although it would wish to emphasise that any additional development within the Bridport area should be agreed as part of the neighbourhood plan process.

Name: Mr Andrew Elliott

Representing: Grainger PLC (part of the North Dorchester Consortium) **ID:** 648

Further Proposed Change: FPC4

Representation: The approach is unsound. Assuming plan adoption in 2015 it would lead to the lifespan of the plan being 13 years, less than the 15 years preferred by the NPPF. It is inappropriate to 'kick the can down the road' in terms of identifying long-term directions for additional growth. There is a need now to identify more sites, with the county town being an obvious location for additional strategic growth as identified previously by the Regional Spatial Strategy process. Given the lead in times for larger scale development it is not appropriate put off decisions, particularly where they relate to the most sustainable locations within the market area.

Name: Mr M N Hill

Representing: Individual **ID:** 677

Further Proposed Change: FPC4

Representation: I have shown in my comments on the SA that to achieve a housing total of 13,220 using the 679 option would need a plan period of 19y years. This would result in a plan period of 2011 – summer 2030. If a whole number is preferred the annual housing requirement could be raised to 696 resulting in a plan period of 2011 – 2030

Name: Mr Robin Legg

Representing: Individual **ID:** 723

Further Proposed Change: FPC4

Representation: The reason given in Appendix 1 (see FPC2 of the appendix) for this change is that it will allow the Councils further time to identify development sites in the course of a later review of the Plan. Such sites are most likely to be those identified in appendices C and F of the SHLAA as ones which but for present policies would be potentially developable. Some of these are highly controversial having been rejected in the course of earlier consultation. Others have been introduced by planning officers without reference to landowners, elected members or the public. Shortening the Plan period to leave the difficult decisions to the end can't be good plan making.

Name: Mrs Sarah Hamilton-Foyn

Representing: Persimmon Homes **ID:** 797

Further Proposed Change: FPC4

Representation: Pegasus on behalf of Persimmon Homes object to the FPC4. This is not consistent with government guidance the Local Plan should “be drawn up over an appropriate timescale, preferably a 15 year time horizon, take account of longer term requirements and be kept up to date.” If adopted in 2015 the Local Plan would only have a life of 13 years. The plan fails to address the strategic issues for West Dorset; there is a lack of strategic sites in the most sustainable location in the West Dorset District Council area i.e. at the county town of Dorchester. Instead the plan relies on existing commitments to meet needs for the plan period.

Name: Ms Felicity Tozer

Representing: SW HARP Planning Consortium **ID:** 884

Further Proposed Change: FPC4

Representation: It is entirely inappropriate to amend the plan period at this stage of the Local Plan. The NPPF is clear that Local Plans should take a 15-year time horizon (paragraph 157). Based upon adoption in 2015, the draft Local Plan will have just a 13 year horizon. The Councils' justification that moving the plan period is necessary to prevent delay is not compatible with national planning policy. It is clear, as per paragraph 47 of the NPPF, that identification of housing land supply for the latter part of the plan period can be identified at a later stage either through a separate site allocations DPD or through Local Plan review. It is not clear from the NPPF, what additional remit a Local Plan Review would have. It would seem questionable how review of an adopted Local Plan could amend its plan period. Evidently, later review of the Local Plan including extending the plan period, would require a new assessment of objectively, assessed housing need, whereas recently Local Plan reviews have usually centered on the analysis of indicators in an attempt to monitor the appropriateness and effectiveness of an adopted housing target. The current evidence base allows for a plan period to 2031. The additional 2,325 units (3 x 775) required between 2028 and 2031, can be identified at a later part of the plan period. We would draw attention to the Examination of Lichfield's Local Plan, where the Inspector requested the plan period be amended, at the modifications stage, to account for a 15 year plan period.

Name: Mr Andrew Harrison

Representing: Winterborne Farrington Parish Council

ID: 917

Further Proposed Change: FPC4

Representation: While we understand that this change is proposed in the interests of expediency, we find it hard to support putting off the task of identifying future development sites, given the controversy that this exercise has caused in the preparation of the currently proposed plan. We do however appreciate that further sites may become available within the plan period.

Name: Mr Roger Tustain

Representing: Woodsford Farms

ID: 933

Further Proposed Change: FPC4

Representation: The Councils' decision to reduce the Local Plan period where there is identifiable housing need and deliverable and developable land over the longer term is irrational and unsound as it results in a Local Plan that is not positively prepared, justified or consistent with national policy. There is identifiable developable land such as the three Woodsford Farms sites at Crossways that should be reallocated to help bridge the housing land supply shortfall between 2028 and 2031 dwellings. For further detail on this matter, please refer to Section 3 of our accompanying representations Supporting Report.

Name: Mr Doug Cramond

Representing: Wyatt Homes

ID: 934

Further Proposed Change: FPC4

Representation: The NPPF aims for a 15+ year plan and not a 13 year one: The delay on consulting on 'new' sites is simply not a good enough reason for failing to plan adequately; the Councils should have been more robust and followed the proper procedures and assessments in the first place – numerous submissions over the years warned they were under-providing. The solution to the matter is to:

Hold back proceedings – (re)plan properly for a longer period with new allocations. Make an accurate and credible analysis of supply throughout the life of the Plan. Undertake a proper 5 year housing supply exercise and positively plan to overcome the shortfall. Look again at credible, short-term delivery, sustainable sites at suitable settlements - such as Charminster Farm.

Name: Mrs Sarah Davies

Representing: Charminster Parish Council

ID: 954

Further Proposed Change: FPC4

Representation: Meets the new housing numbers.

Name: Mr Philip Leach

Representing: Individual **ID:** 984

Further Proposed Change: FPC4

Representation: I feel that at this stage, with the complete lack of clarity in the existing plan, and the complex and numerous changes to the plan, there must be a clear and CONCISE summary of what the plan actually is, before any review dates should be set. It would appear to me that the whole process of planning has been badly handled by the committee, and bringing forward the review date would not assist in resolving the planning issues in the area. What is required is an in depth professional reassessment of housing requirements in the area, and appropriate public consultations and public meetings, to explain the situation

Name: Mr Matthew Dickins

Representing: East Devon District Council **ID:** 3511

Further Proposed Change: FPC4

Representation: We endorse the fact that the plan defines sites for the first ten years. Public engagement forms a critical part of the plan making process and it is recognised that through such engagement rational and logical site choices can be made for later plan years.

Name: Ms Barbara Simons

Representing: Individual **ID:** 3522

Further Proposed Change: FPC4

Representation: I believe much more time is needed to consider additional developments sites and also to re-examine the West Dorset site more thoroughly to provide a more transparent presentation with a higher public profile. I believe the subtlety in which this plan has progressed hidden with technical language and will not great community input demands more time be taken both in consultation, preparation and finally delivery. There is no hurry, The demand is not proven and can't be, this is simply fulfilling a general demand, which should be more widely spread across Dorset, specifically in towns with Rail connection such as Sherborne and Dorchester.

Name: Ms P Hall

Representing: Individual **ID:** 3524

Further Proposed Change: FPC4

Representation: I think for proper planning decisions to be made, the opposite of your proposal would be far more sensible - you seem to be proposing to develop sites whether or not they are appropriate for the needs or the population or in the right places for employment.

Name: Mr Peter Atfield

Representing: Hayward & CO **ID:** 3808

Further Proposed Change: FPC4

Representation: Although we are not objecting we are concerned as to whether reducing the period of the Local Plan will be regarded by the appointed Inspector as sound. If adopted in 2015, the Local Plan will only have a thirteen year horizon. Whilst it is noted that an early review could occur, the approach does not fully meet the requirements of the NPPF (Paragraph 157).

Name: Mr Robert Avant

Representing: Individual **ID:** 3810

Further Proposed Change: FPC4

Representation: It will be more flexible and enable figures to be vastly increased.

Name: Mr John Hubbard

Representing: Individual **ID:** 3815

Further Proposed Change: FPC4

Representation: Again, I think these "targets" should be reviewed every two or three years.

Name: Ms Jane Cornwell

Representing: Weymouth College **ID:** 3839

Further Proposed Change: FPC4

Representation: The NPPF states (para 157) that plans should preferably be drawn up over a 15 year time horizon as well as taking into account longer term requirements. Sites should be allocated to promote development and provide detail on the quantum of development. FPC4 gives as a reason for shortening the Plan period to 2028 (which could represent less than 14 years post adoption), the need to identify additional development sites and that these will be achieved through the next review of the Plan in order to avoid further delay in bringing the currently proposed sites forward. Public consultation is the reason given for unacceptable delays.

However, the lpa already has the ability (and indeed should to be seeking to approve such planning applications without delay as well as boosting significantly the supply of housing) to approve planning applications which come forward in compliance with the emerging Local Plan. The lpa has also recently published a new SHLAA Report wherein sites have been considered suitable, available and achievable.

There are such suitable sites within the SHLAA which could easily be included within the Plan and consulted on without significant delay. One such example is that of land at Weymouth College (SHLAA Sites WP/MELC/014; WP/MELC/017; WP/RADI/007) which falls within the defined settlement of Weymouth, the largest and most sustainable town within the District.

Consequently the Plan period should remain to 2031 with the requisite allocations to meet objectively assessed housing needs. This will effect minimal further delay to the Plan. Alternatively, should that minimal delay be considered unacceptable, the Plan period should still be retained at 2031 along with the requirement for 775 dpa but with allocations for the final 3 year period 2028 – 2031 to come forward under a separate review / Site Allocations DPD. That way, the intention to retain as long a plan period as possible and the certainty of the annual housing requirement of 775 dpa can be maintained.

Name: Ms Sue Green

Representing: Home Builders Federation **ID:** 3840

Further Proposed Change: FPC4

Representation: The same controversy may also have influenced the decision to shorten the plan period :-

“ a number of sites have been subject to consultation previously and subsequently taken out of the plan and the majority of these would all need to be brought back into the plan if the requirement to 2031 were to be met. This will need to be addressed in the next review of the plan” (Paragraph 5.27) ; "the plan progressed with reduced period of supply rather than additional housing” (Paragraph 5.31).

The Councils could have progressed the Joint Local Plan with the original end date of 2031. The NPPG states that “as set out in the NPPF LPAs should identify a supply of specific, developable sites or broad locations for growth, where possible, for years 11 – 15. Local Plans can pass the test of soundness where LPAs have not been able to identify sites or broad locations for growth in years 11 – 15” (ID 3-027-20140306). The NPPG also envisages that “most local plans are likely to require up-dating in whole or in part at least every five years ... Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption” (ID 12-008-20140306). There are significant risks to the Council’s proposed course of action as identified in Paragraph 9.1 of the Committee Report which states “there could be adverse consequences on the local economy and housing affordability. If the allocated sites in the plan do not come forward at the rates anticipated then we will not achieve the rate of development intended, and will have difficulty demonstrating a five-year land supply in future. And if we do not make sufficient progress with the review of the plan – which will need to include a significant amount of new housing development – we will continue to be at risk of failing to provide for development that the local economy needs, or of losing sites on appeal. If we do not allocate sufficient land for development, we risk exacerbating the current trend of a decline in the workforce”.The Councils should have retained the original plan period end date at 2031 in order to address the identified “need to increase the land supply to address affordability concerns” as well as meeting the overarching objective of Paragraph 47 of the NPPF “to boost significantly the supply of housing”.

Name: Ms Georgina Tibbs

Representing: Barton Willmore **ID:** 3841

Further Proposed Change: FPC4

Representation: The original plan period of 2031 could have been retained, but an early review scheduled. The proposed end date of 2028 will not accord with the NPPF guidance suggesting that LPAs should identify a supply of specific, developable sites or broad locations for growth in years 11-15.

Name: Mr Christopher Lindley

Representing: Catesby Property Group **ID:** 3842

Further Proposed Change: FPC4

Representation: In respect of FPC 4 it is considered that the proposed reduction in plan period is in direct conflict with the NPPF, the evidence base and advice from the Planning Inspector. There are compelling reasons why a Local Plan should provide for at least a 15 year lifespan from the date of adoption and it is widely acknowledged that compelling reasons must exist to deviate from this. In the case of this plan, the reduction in plan period would appear to be borne out of convenience rather than a serious approach at “positive and effective” planning.

Name: Mr Alistair Macdonald

Representing: Taylor Wimpey UK Ltd **ID:** 3843

Further Proposed Change: FPC4

Representation: In respect of FPC4, we consider that the reduction in the Plan period from “2011 to 2031” to “2011 to 2028” is unjustified and appears to be justified solely on the basis of identifying additional sites. It is also contrary to the National Planning Policy Framework which encourages Local Plans to have at least a 15 year horizon.

Name: Mr Peter Dutton

Representing: Gladman Developments **ID:** 3846

Further Proposed Change: FPC4

Representation: The Councils’ 2014 SHLAA indicates that the authorities can identify a total supply of 14,040 dwellings against the proposed housing requirement of 13,175 dwellings for the modified plan period of 2011-2028, an oversupply of 865 homes. If the Councils were to plan to meet their housing needs over the submitted Plan period of 2011-2031, there would be a shortfall of 1,460 dwellings. The Councils’ decision to reduce the end date of the proposed Plan period from 2031 to 2028 therefore appears to be based on the assumption that it will not be required to identify additional supply up to 2031.

Name: Mr Patrick Atherton

Representing: Individual **ID:** 3847

Further Proposed Change: FPC4

Representation: The Plan period is proposed to be reduced to 17 years with 10 years housing land supply to meet housing needs. This is made possible by not considering the supply of housing land required over a longer period. No long term vision over the original Plan period of 20 years is demonstrated.

Name: Mrs Carol Perilli

Representing: Individual **ID:** 3848

Further Proposed Change: FPC4

Representation: As far as I am concerned you have not consulted enough and in a way that ordinary folk (council tax payers/voters) like me can engage with. To reduce the consultation would be a totally unacceptable to me.

Name: Mrs Victoria Stride

Representing: Individual **ID:** 3850

Further Proposed Change: FPC4

Representation: Consultation with the public in the area is important

Summary of main issues - Further Proposed Changes 5-7.

Name: Mrs Ruth Hardwick

Representing: Individual **ID:** 158

Further Proposed Change: FPC5-7

Representation: I'm very concerned at the amount of housing planned for future years. What happened to the 'Green Belt'. Are we to have any green areas left?

Name: Mrs Ann Mason

Representing: Individual **ID:** 231

Further Proposed Change: FPC5-7

Representation: How much green space will be left? Not just for children to enjoy but also the adults we all need space to balance our lives.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estate **ID:** 261

Further Proposed Change: FPC5-7

Representation: FPC5, 6 and 7 – We contend that the Councils need to monitor housing land supply separately in each district rather than seek to rely on supply in Weymouth & Portland to meet demand in West Dorset. We also do not consider that the Councils have provided the additional evidence requested by the Inspector to show that the sources of non-allocated supply can be relied upon. The absence of such evidence indicates an urgent need to allocate more land such as the reinstatement of the extended area of SHER1 Barton Farm previously included in the original draft plan.

Name: Mr David Lane

Representing: The Owners of Aldwickbury **ID:** 262

Further Proposed Change: FPC5-7

Representation: Of the total housing supply of 14,040 dwellings identified in Table 3.2 of the Local Plan, 3,350 are derived from 'Submitted/large identified sites within settlements' and 892 are taken from 'Minor identified sites within settlements likely to be built', giving a total of 4,242 dwellings. These sites are identified in the SHLAA update Report of July 2014. It is noted that the introduction to the SHLAA advises that the assessment identifies land that may be suitable for development and potential issues, but does not make judgements about whether it should be allocated for development. The suitability of all these sites cannot therefore be assumed. Similarly the LPA's identified 5 year supply of 5,621 dwellings, set against a requirement for 5,471, includes 1,334 dwellings from 'Submitted/large identified sites within settlements' and 162 from 'Minor

identified sites within settlements likely to be built'. This gives a total of 1,496 dwellings identified in the SHLAA, comprising around 25% of the predicted supply, particularly set in the context of the acknowledges historical shortfall.

Name: Dr Christopher Pike

Representing: Individual **ID:** 277

Further Proposed Change: FPC5-7

Representation: Inadequate account has been taken of strong local opposition to 'mixed use' development of St Michael's Trading Estate, Bridport (~600 local people voiced opposition to redevelopment plans). The largest, and oldest employment site in Bridport with a diverse, highly-interconnected network of small businesses working in close relationship with nearby town centre businesses. Redevelopment for housing will adversely affect the network to the detriment of the local economy. This should be a protected employment site. The housing allocation of 93 units is a new / arbitrary figure that has not been subject to adequate public consultation.

Name: Mr Melvyn Warner

Representing: Individual **ID:** 407

Further Proposed Change: FPC5-7

Representation: With increasing population and the NFU's concern that the country is producing less of the food we eat, surely the need is to make sure the land supply for agriculture is met, given that the last census figures for West Dorset showed that over 2,000 dwellings were unoccupied and that there were nearly 3,000 second homes. Have we got our priorities right?

Name: Mrs Ghislaine Warner

Representing: Individual **ID:** 408

Further Proposed Change: FPC5-7

Representation: The area's population increases mainly through the influx of people wishing to retire. Why should this area continue to be a place where people would like to live. Fashions change, many would be retirees are looking for alternative life styles than slowly decaying in the countryside, especially as local health provision for the elderly is stretched and other services such as buses are reduced. Let individual communities decide what they can accomodate.

There are other calls on our land other than housing, important as it is; given figures from the lasy census showing over 2000 dwellings uninhabited in West Dorset and almost 3000 second homes, housing land supply may not be as great as implied, especially if unoccupied housing is addressed.

Name: Mr Charles Wild

Representing: Bridport Area Development Trust **ID:** 488

Further Proposed Change: FPC5-7

Representation: FPC7: The Bridport Area Development Trust objects to the FPC to Chapter 3 Table 3.2 (FPC7), which allocates St Michael's Trading Estate for residential development and proposes a housing target of 93 dwellings, together with all consequential amendments which refer to this specific site allocation. St Michael's is Bridport's largest industrial suburb – its use, character and buildings are a significant element of Bridport's industrial heritage and represent an important historic asset to the town. Its allocation as a residential site is contrary to its historic character. The Trust recognises that some residential development to underpin the future regeneration and restoration of St Michael's may be appropriate, but considers a target of 93 excessive. No acceptable scheme of regeneration and restoration has been brought forward by the Council or developers so it is difficult to understand how a specific allocation of 93 dwellings can be made.

Name: Mr Keith Beeson

Representing: Individual **ID:** 519

Further Proposed Change: FPC5-7

Representation: The "bedroom" tax highlights the 1/2 bedroom shortage. An extension of this tax to the whole population would bring an even bigger shortage whilst making huge numbers of larger properties available for families. I have not seen any study of the owner-occupiers, but guess in West Dorset an average bedroom vacancy of over 50%. The Plan must refer to bedroom numbers to provide a combination of home sizes to maximise the community benefit of existing assets.

Name: Mr Tim Hoskinson

Representing: CG Fry & Son **ID:** 526

Further Proposed Change: FPC5-7

Representation: The identification of land at Wey Valley (Policy Wey 12) as a housing allocation site for 320 dwellings to be delivered between 2016 and 2026 is supported. In the light of the reduction in housing capacity for this site that has been identified in the further proposed changes, and taking into account the lower jobs growth forecasts referred to in FPC3, we do not consider that the requirement for the site to provide an element of employment use is justified.

Name: Mr Charles Wild

Representing: Bridport Environment Group **ID:** 534

Further Proposed Change: FPC5-7

Representation: FPC7: The Bridport Environment Group previously objected to the 2006 Local Plan figure of 80 residential units for the St Michael's Trading Estate as excessive and at odds with the 2002 Regeneration Framework, which stated that "the amount and distribution of residential development should not conflict with the objectives of retaining and increasing employment opportunities and the protection of the area's industrial heritage. The BEG has never opposed the inclusion of an element of residential development, but objects to the proposed figure of 93 in the FPC on the same grounds.

Name: Mrs Gill Smith

Representing: Dorset County Council

ID: 544

Further Proposed Change: FPC5-7

Representation: The updated figures provide greater certainty about housing supply in the first part of the plan period. This is helpful in relation to infrastructure planning and should also provide enough time to consider future supply through a subsequent review of the plan as and when this takes place. This ability to plan for housing need is important to the County Council as it will assist in ensuring it is able to anticipate future infrastructure needs.

Name: Mr Malcolm Brown

Representing: Betterment Properties (Weymouth) Ltd.

ID: 578

Further Proposed Change: FPC5-7

Representation: The facts about completions and permissions are not disputed. However there is an issue as to when if ever some of the permissions will deliver houses. The permission for housing at the Hardy complex has been in existence for many years. It was never a sustainable development in the respondent's view. The owners now appear to be seeking public money to enable them to complete a development which is not viable. With regard to the allocations in the Local Plan whilst it is accepted that most of these are likely to be delivered in the plan period the delivery rate assumed is at best optimistic and reliant on information from the stakeholders. In reality those same stakeholders will respond to market conditions. My experience over many years is that house builders are reluctant to release too many houses on any one site for fear of depressing prices. The planning authorities' estimate for supply from sites identified by the SHLAA exercise is lacking in empirical evidence with regard to delivery. Some sites appear to be contrary to national planning policy. The increase in supply from town centre sites appears to be aspirational, to ignore potential impacts and in locations of high flood risk. Several are public car parks the loss of which would be highly controversial with residents and town centre traders. Residential development at the Weymouth pavilion site is controversial. It has already been shown that high density residential development at the Ferrybridge Inn is unviable. On the other hand, the planning authority appears to have ignored a potential increase in capacity on LP allocation WEY10 following the Supreme Court ruling to de-register the Town Green. The estimate of supply from small

sites is inconsistent with the NPPF and the guidance in the NPPG in that whilst in the past there has been a significant level of housing on windfall sites there is no evidence as to future provision from this source. Rural exception sites are frequently controversial and cannot be relied on. The LPA's calculations are not robust. A robust calculation will demonstrate that the planning authorities do not have a five year supply of deliverable housing land.

The proposed changes are not accepted. We have reason to believe that not all of the sites with planning permission will be delivered within 5 years and in some instances within the plan period. The expectations with regard to deliver of allocated site, particularly within the town centre are unrealistic failing to have regard to viability and other factors. The potential from as yet unallocated sites is at best aspirational. Some conflict with NPPF.

Name: Cllr. Gilbert Berry

Representing: Beaminster Town Council **ID:** 639

Further Proposed Change: FPC5-7

Representation: FPC5- a. The construction of new housing units in Beaminster during the plan period should, on average, be the same annual level of 11 units a year as was realised in the period 1998-2012, and should include a significant element of affordable housing

b. Sites identified as having potential for development within the Defined Development Boundaries, plus the 'exceptions site' for affordable housing at Flaxfield extension, appear to have sufficient capacity to meet this level of growth

c. The sites identified in the SHLAA as having potential for housing development outside the Defined Development Boundaries have either been already proved to be unsuitable (sites WD/BEAM/02 , 013 and 020); or are better suited to industrial use (WD/BEAM/008); or should be regarded as premature in the light of expected development on other preferable sites (EWD/BEAM/012 and 019).

d. For this reason, the District Council should exclude from lands within the scope of proposed policy change FPC5 the lands identified for development outside the Defined Development boundaries, except for the site at Lane End Farm which should be proposed for industrial, rather than residential, development.

Name: Mr Bob Gillis

Representing: Bridport Town Council **ID:** 641

Further Proposed Change: FPC5-7

Representation: FPC7 refers to housing numbers for St Michaels and the Town Council has commented previously that it does not agree with the "mixed use" designation for St Michael's Estate and, as stated in previous responses, members felt that housing should not be allocated for this site. This historic site should be designated as an employment

allocation. FPC5 includes a figure of 198 houses to be derived from neighbourhood plans. How was this figure calculated?

Name: Mr Andrew Elliott

Representing: Grainger PLC (part of the North Dorchester Consortium) **ID:** 648

Further Proposed Change: FPC5-7

Representation: Greater emphasis is being provided upon delivery in the Weymouth and Portland Borough area in the early years of the plan. As such housing may not always be provided where it is needed, when it is needed. We have significant concern about the robustness of the new SHLAA. There has been no input to this updated work from the development industry (through for example a SHLAA Panel), and it is considered that suitable and achievable sites have been inappropriately discarded from further consideration by this document. The SHLAA findings read as a 'post-rationalisation' of the current plan content – rather than a tool to properly inform its strategy. As per the response above to FPC2, it is considered that five-year housing land supply should be assessed by reference to the individual districts, not just the plan area.

Name: Mr Robin Legg

Representing: Individual **ID:** 723

Further Proposed Change: FPC5-7

Representation: The prospect of the Councils achieving a housing supply target of 5,621 units in the period 2014-19 must be highly questionable. Housing completions in the period 1994 to 2011 show that throughout that time completions averaged 716 a year. Even excluding the data for the recession from 2007 the annual average completions totaled 765. The very best year for housing delivery was 2005-06 when a delivery of 923 units was achieved. This data is taken from the Councils response to the inspector's letter of 10 December 2013. In the three most recent years completions have been running at little more than 500 a year. Yet the Councils claim that over 1,000 units a year may be achieved in the next five year period. Furthermore the housing trajectories (see figures 3.1 and 3.2 of the Plan) show that delivery will peak at 1,609 completions in 2018-19 – more than double the proposed figure of 775 dpa of the Plan period and considerably more than the highest ever figure achieved in the last twenty years. This is unbelievable.

Name: Mrs Sarah Hamilton-Foyn

Representing: Persimmon Homes **ID:** 797

Further Proposed Change: FPC5-7

Representation: Pegasus notes that the revised SHLAA has been published to coincide with the start of the consultation; the housing supply is 14,040 dwellings. The updated SHLAA has not been produced with the input of any SHLAA Panel. The Inspector raised questions about the evidence of housing land supply in particular the amount proposed to

come from minor sites within the built up areas. It is noted that additional work has been done to address the Inspector's concerns, but it is not clear whether the deliverability and viability of the housing supply has been assessed.

Name: Mr Alex Bullock

Representing: Summerfield Homes

ID: 853

Further Proposed Change: FPC5-7

Representation: We note through FPC 5 & FPC 6 that the Council considers that upon the adoption of the new Local Plan it will be in a position where it can demonstrate an appropriate five year housing land supply. Summerfield consider that this is ultimately a matter for the Inspector to conclude upon we would note that even after the adoption of the Local Plan the proposed land supply of 5,621 is only marginally higher than the documented 5,471. As a consequence there is little flexibility for the Council and therefore the Council could quickly find itself back in a position where it could not demonstrate an appropriate supply. Accordingly we believe that the Council would be merited in making further allocations which would increase the total supply and give greater flexibility to the delivery of housing across the Plan area. With the above in mind and the FCP 7 which proposes amendments to some of the existing allocations Summerfield are disappointed that the opportunity to re-include their site at Hollymoor Lane, Beaminster has been missed.

Name: Miss Kirsty Riglar

Representing: Stinsford Parish Council

ID: 868

Further Proposed Change: FPC5-7

Representation: The Parish Council have no objection to the housing land supply changes.

Name: Mr P J Golding

Representing: The Beaminster Society

ID: 885

Further Proposed Change: FPC5-7

Representation: The preferred Option D now proposes 13175 dwellings up to 2028 - 'the highest possible level of housing supply'. We are concerned about the consequences of this higher target: on the distortion of the balance of economic, social and environmental impacts in development planning in favour of the economic. On the negative impact on all of the sustainability objectives shown in Figure 5.1, except for the economic. On the Council's continued difficulty in allocating sufficient housing land because of the environmental constraints, which must be respected. A higher target can only make this problem worse and may increase the pressure to build on the AONB. We question whether it is wise to increase the housing requirement from 661dpa to 775 dpa to achieve

economic goals sooner than they might otherwise be achieved, and at the expense of all the other sustainability objectives. (661 dpa will create considerable economic activity).

Name: Mr M. R. Martin

Representing: Weymouth Civic Society

ID: 914

Further Proposed Change: FPC5-7

Representation: FPC7- We wish to raise a formal objection to the imposition of a further 200+ houses, additional to the already quoted target figure of 400 for Weymouth Town Centre. This is in our view patently unreasonable, considering Weymouth's shortage of available space when compared with the land available in West Dorset. We do not think that the Borough has sufficient available land in the Town Centre to avoid 'urban cramming', whereas adjacent West Dorset does. The housing load should be more equitably spread between the two authorities. Development of inner urban spaces such as car parks (which are the only unbuilt land in the town centre) can, we believe, only result in apartment-style accommodation. This does not meet the requirements of the majority seeking family homes. Moreover, the more desirable harbourside sites are liable to become second or holiday homes, marketed as prestige waterfront apartments.

Name: Mr Roger Tustain

Representing: Woodsford Farms

ID: 933

Further Proposed Change: FPC5-7

Representation: The National Planning Policy Framework requires Local Plans to be able to demonstrate that a five-year supply of housing is available at the time of adoption, and maintained through the plan period. However, using the 775 housing requirement (which is significantly too low), the Councils' only have at best 4.33 years housing land supply from adoption (between 2014/15 to 2018/19). Furthermore the Councils' housing trajectory assumptions for this period are also wholly unreliable, the implication of which, will inevitably result in a five-year land supply position from adoption being considerably worse. The Local Plan is unsound as it has not been positively prepared, justified or consistent with national policy. Notwithstanding our fundamental concerns that the Councils' proposed housing requirement of 775 dwellings is significantly too low, in order to address the five year-land supply shortfall between 2014/15 to 2018/19 the Councils must allocate additional deliverable sites such as the three Woodsford Farms sites at Crossways. For further detail on this matter, please refer to Section 4 of our accompanying representations Supporting Report.

Name: Mr Michael Holm

Representing: Environment Agency

ID: 2529

Further Proposed Change: FPC5-7

Representation: We have no objection to the proposed changes, and therefore consider them to be sound. However, we note that the updated documentation indicates that there will be increase from 400 to 600 dwellings in Weymouth Town Centre. Any new development in this area must make a suitable contribution towards the future flood risk management solutions required to protect the long term sustainability of this area.

Name: Mr Barry Bates

Representing: Individual **ID:** 3504

Further Proposed Change: FPC5-7

Representation: Tinkering with the figures is largely irrelevant.

Name: Mr Matthew Dickins

Representing: East Devon District Council **ID:** 3511

Further Proposed Change: FPC5-7

Representation: FPC5 - These changes that relate to housing supply are seen as appropriate. FPC6 - These changes that relate to housing supply are seen as appropriate. FPC7 - These changes that relate to housing supply are seen as appropriate.

Name: Mr Barry Bates

Representing: ADVEARSE **ID:** 3517

Further Proposed Change: FPC5-7

Representation: Tinkering with the figures is largely irrelevant.

Name: Ms Barbara Simons

Representing: Individual **ID:** 3522

Further Proposed Change: FPC5-7

Representation: I'm afraid once again you have used such technical language in this area it is impossible for the lay person to decode. However once again the provision seems way over anything realistic.

Name: Mr Glenn Crawford

Representing: Individual **ID:** 3523

Further Proposed Change: FPC5-7

Representation: FPC5 and FPC6 are too abstruse for me to make any sense of. FPC7 proposes for BRID5 (St Michael's Trading Estate) a change to 93 housing units. This number is wholly at odds with the nature of the site, which is a Trading Estate employing

200 (FTE) local people in around 92 enterprises. Turning over such a high proportion of employment land to housing is completely at odds with not only the NPPF but also the statements in 13.1.4 "Vision For Bridport".

Name: K.J & E.R Harding

Representing: Individual **ID:** 3546

Further Proposed Change: FPC5-7

Representation: FPC7- The number of houses in St Michaels is still too high, 83 were originally specified although with the enormous provision put forward for Vearse, I question the retention of thid site within the housing section.

Name: Mr Peter Atfield

Representing: Hayward & Co. **ID:** 3808

Further Proposed Change: FPC5-7

Representation: FPC 7 reduces the amount of housing on the St Michael's site from 105 to 93; a reduction of 12. This revision emanates from the latest SHLAA. However, the SHLAA gives no detailed analysis of why the reduction has occurred. If it related to the changed circumstances of the Lilliput Building, this is not considered sound as (1) the original proposals for the building only envisaged the construction of 8 dwellings, and (2) it pre-supposes that no residential development will be incorporated into any future new proposals. Hayward & Co. consider that the Local Plan should still allow for the St. Michaels site to be developed for up to 105 dwellings; this being consistent with the description of development for the planning application for the site. It also reflects the potential to accommodate some element of residential development at the Lilliput Building, subject to how the new proposals emerge. We therefore now object to the following FPC's, and suggest changes to satisfy our representations: FPC 5 - revise the figure for the sites allocated in the Local Plan from 3,757 to 3,769. FPC 6 - revise the figure for the allocations deliverable in five years from 1,287 to 1,299. FPC 7 - revise the figure in Table 3.2 for St. Michaels from 93 to 105; and undertake consequential amendments within the site specific chapter of the plan.

Name: Mr & Mrs Hugh & Gill Woodeson

Representing: Individual **ID:** 3809

Further Proposed Change: FPC5-7

Representation: St Michael's Trading Estate is designated for mixed use including housing. This takes no account of the huge potential for developing the existing use, as a unique and vibrant centre for small to medium sized businesses. Nothing will kill off its unique character quicker and more effectively than housing. At present some 200 persons are employed there. Properly managed this could greatly increase over the years to the benefit of the community. Already it is well known regionally and visited from far and

wide. The draft Local Plan deals with the provision of more housing for Bridport at other sites. There is no pressing local need for St Michael's to deliver yet more housing. There is no housing there at present and there should be none in the future. (SUMMARISED)

Name: Mr Vince Adams

Representing: dorsetenergized **ID:** 3811

Further Proposed Change: FPC5-7

Representation: The Council has not taken enough time to assess existing brownfield sites that could be used and there is little direct consultation on making the installation of renewable energy integral throughout all the development.

Name: Dr Jon Orrell

Representing: Transition Town Weymouth and Portland **ID:** 3812

Further Proposed Change: FPC5-7

Representation: We do need more housing. As a nation we have failed to build enough public and social housing for the last 30 years. This has been a bonanza for rich landowners, property speculators and landlords. It is a disaster for the poor and young. Land designated for building that has not been built upon by greedy speculators who hold back supply to keep prices high should be stopped. Land left undeveloped should be opened for social self builders.

Name: Mrs Shirley Deeney

Representing: Individual **ID:** 3813

Further Proposed Change: FPC5-7

Representation: Use only infill and brownfield sites. Building on Markham and Little Francis is criminal. Where will the children play?

Name: Mr John Hubbard

Representing: Individual **ID:** 3815

Further Proposed Change: FPC5-7

Representation: I believe the St. Michael's area should be clearly dedicated to Employment, not Mixed-use, as there is sufficient space for housing in other areas, a total according to this survey, of some 840 homes. I also must object to the lack of public consultation on this matter to date. The new proposals are a step forward and welcome and stress the importance of maintaining employment areas near the town centre, such as St. Michael's. Please stick to this!

Name: Mr Nicholas Underhill

Representing: Individual **ID:** 3816

Further Proposed Change: FPC5-7

Representation: I am stongly opposed to the current designation of the St Michael's Trading Estate as suitable for mixed-use re-development. In my view the way forward for this important site is to retain its existing character as a commercial area, generating employment opportunities near the centre of town. Any substantial residential development will result in a loss of jobs and will prejudice the special character of the area. It would also represent a serious wasted opportunity to develop plans such as those proposed by Enterprise St Michael's.

Name: Ms Margaret Toft

Representing: Individual **ID:** 3817

Further Proposed Change: FPC5-7

Representation: There are currently 200 local jobs based in St Michaels. This must have an influence on a previous policy that has not changed since the 1990's, where it was originally designated a 'mixed use' when there were few jobs there. The current situation with the 200 jobs is boosting the economy of Bridport. It makes St Michael's a possible sustainable trading area. Why would it be suggested that this be cut back and limited because of being blind to the reality of the current situation? I thought that employment was important? How did the number of '93' new houses creep into this plan? It was never agreed or recommended. Even the figure of '80' which crept in, in an earlier draft is too many to be alongside some businesses on the Trading Estate that make noise and have much traffic coming in and out. How do you make any residents (particularly with small children, or elderly) - safe in these circumstances? So I suggest that the idea to squeeze in 93 houses is completely un-thought through (unless you are trying to meet the developer's requests for profit, at the expense of common sense, employment opportunities and care of community assets, of course). Infrastructure required to support so many houses would take away buildings and areas that now support and house jobs.

Name: Mrs Lawrence Hansen

Representing: Individual **ID:** 3818

Further Proposed Change: FPC5-7

Representation: The only possible justification for inserting housing into this commercial area would be a desperate shortage of housing land. This is simply not the case: the Vearse Farm development alone will increase Bridport's population by some 10%. Through this development the town would be making a major contribution towards relieving the housing shortage - more so than in other Dorset towns. So there is no 'housing need' reason to insert a further 93 homes into the middle of St Michael's. The proposed housing development for the estate is not only inappropriate, it jeopardises the

proposals of Enterprise St Michaels to expand its commercial activity and produce significant new employment of the desired quality: fine grained and locally generated.

Name: Mrs Valerie Balfour

Representing: Individual **ID:** 3820

Further Proposed Change: FPC5-7

Representation: FPC7- St Michael's has long been a trading estate. Its importance to the surrounding area cannot be underestimated. I think you should prioritize St Michael's employment contribution to the business sector above all other considerations. People need work to earn money in order to afford housing and this should be the priority. There is employment in St Michaels and the opportunity to create more. This cannot be emphasized enough. Therefore I am asking you to amend the local plan so that it's no longer suggested that housing could be built on St Michael's.

Name: Mr J B C Balfour

Representing: Individual **ID:** 3821

Further Proposed Change: FPC5-7

Representation: FPC7- St Michael's has long been a trading estate. Its importance to the surrounding area cannot be underestimated. I am writing to you because I think you should prioritize its contribution to the business sector above all other considerations. St Michaels has a large community made up of specialist and unusual occupations that add to the area not only colourfully but financially. The loss of any of these jobs would be detrimental not only to the individual but to Bridport as we already have a large unemployment problem. People need work to earn money in order to afford housing. There is employment in St Michaels and the opportunity to create more. This cannot be emphasized enough. Therefore I am asking you to amend the local plan so that it's no longer suggested that housing should be built on St Michael's.

Name: Ms Jennifer Crockford

Representing: Individual **ID:** 3822

Further Proposed Change: FPC5-7

Representation: While I agree that there must be redevelopment to include some housing on St Michael's Trading Estate in Bridport, the building of 93 houses is too many on this site. There must be a balance between economic activity and tourism and domestic use and the building of so many houses in a sensitive area such as St Michael's Trading Estate would upset the balance.

Name: Mr Lawrence Moore

Representing: Individual **ID:** 3823

Further Proposed Change: FPC5-7

Representation: FPC7- I cannot believe that the original idea was to erect 105 dwellings beside the river (which of course floods). The consequent reduction to 93 seems meaningless. There are developments that can integrate the creative employment elements with housing. The people involved in work on such a site could live there, next door to their studio, or workshop. That way, the integrity of the site is ensured, and it doesn't become yet another haven for second home owners, or those who have little or no connection with the activities at the site. The St Michael's area is an exciting, quirky and unique place for the townspeople and visitor alike - antique shops, printmakers, artists, costume design, graphic design, the Red Brick Café - all focussed in this area alongside the river. It echoes the uniqueness of Bridport as a town, and why it is attractive to residents and tourists. For it to become a manicured residential area with the odd employment use would completely destroy the quality of the estate.

Name: Mrs J Wilson

Representing: Individual **ID:** 3828

Further Proposed Change: FPC5-7

Representation: FPC7- St Michael's Trading Estate for a mixed development, thus including houses, I feel this is so wrong as at the present time and more so in the future this site supports 200 jobs and should be treated as the other businesses areas in the district.

Name: Ms Ann Sydney

Representing: Individual **ID:** 3830

Further Proposed Change: FPC5-7

Representation: St Michaels Estate is an area of small business units that provides not only unparalleled opportunities for start-up businesses but brings in tourists and provides a lively colourful focus for Bridport's residents. Replacing these industrial units or adding housing will be to its detriment.

Name: Mr Jerry Smart

Representing: Individual **ID:** 3831

Further Proposed Change: FPC5-7

Representation: Ref. paragraph FPC7 I disagree with the proposal to put 93 homes on the St. Michael's Trading Estate (policy "BRID 5"). This trading estate should be designated for local small business employment and should have the same protection as other employment zones in the town. This is an issue for the health of the local economy and powers for any decisions on the St. Michael's Trading Estate should be devolved to the local authority.

Name: Ms Jane Cornwell

Representing: Weymouth College **ID:** 3839

Further Proposed Change: FPC5-7

Representation: FPC 5: Object: The Proposed Change is not adequate in that it has not been properly justified: FPC5 states that 'Consequential changes will need to be made to the phasing shown in Table 3.2 and the trajectory diagrams in Figure 1.' Without the detailed changes being set out in full, particularly in relation to the trajectory, the proposed change is not clear and cannot therefore be properly responded to. FPC 6: Object: The Proposed Changes is not adequate – it is not clear or properly justified and cannot therefore be properly responded to. It seeks to demonstrate that the Plan has a five year land supply from the time of adoption but does not set out the basis for the figures cited. Without doing so it is not possible to ensure that the basis on which these figures have been made, is robust. FPC5 states that 'Consequential changes will need to be made to the phasing shown in Table 3.2 and the trajectory diagrams in Figure 1.' It is not clear what consequential changes might be made. Without the detailed changes being set out in full, particularly in relation to the trajectory, it is not possible for the Plan to demonstrate that a robust supply has been made. FPC 7: Object – the Proposed Change is not properly justified: Again, Table 3.2 should be set out in full with the proposed changes highlighted. Whilst the proposed change indicates the indicative figures for various sites, they are, as indications of yield, far too precise (93, 521 etc). It would be more appropriate to give approximate figures rounded down. This would be more realistic and give greater flexibility. The relevant development allocations should be cited as 'approximately x no. new homes' to reflect this.

Reference to 'phasing over the plan period' should be deleted as there is now no phasing (FPC 1). This will give greater flexibility in line with the NPPF requirement to boost significantly the supply of housing.

Name: Ms Georgina Tibbs

Representing: Barton Willmore **ID:** 3841

Further Proposed Change: FPC5-7

Representation: FPC6 states that 1,334 dwellings from larger identified sites in built up area will help provide a five year supply. Planning applications for these sites set out in the SHLAA update should be welcomed by the LPA. Sites such as Happy Island Way (SHLAA ref: WD/BRID/020) can help the councils five year land supply. The 20% buffer is a welcomed addition.

Name: Mr Christopher Lindley

Representing: Catesby Property Group **ID:** 3842

Further Proposed Change: FPC5-7

Representation: With regard to the proposed changes to Housing Land Supply at FPC5 and FPC6, it is considered that the Councils' assumptions with regard to a supply across the HMA should be treated with caution. At the time of writing, no substantive answer have been provided to a question seeking more clarity with regard to components of housing land supply on a "disaggregated" basis. Nonetheless, it is considered that in respect of West Dorset District, there are serious doubts as to whether a 5 year supply can be demonstrated. This is compounded by continued under performance in respect of housing completions in West Dorset. In addition numerous fundamental flaws are evident with regard to the consideration of potential housing sites in the evidence base (SHLAA). There appears to be little consistency between the assessment of potential development sites and the application of assessment criteria. This is particularly evident with regard to strong deficiencies in the assessment of our clients' landholding which, when considered on its own merits (and also against "suitable" alternatives) represents an entirely appropriate option for the delivery of housing over the next 5 years in a sustainable location.

Name: Mr Alistair Macdonald

Representing: Taylor Wimpey UK Ltd

ID: 3843

Further Proposed Change: FPC5-7

Representation: With respect to FPC5 and FPC6, we consider that the land supply components are overly optimistic and that the actual delivery of new homes will be significantly less. This is particularly the case in respect of many of the larger allocations in the JLP which have yet to be the subject of planning applications or permissions and yet are relied on to deliver both within the five year period and over the wider Plan period. Consistent with our concerns on FPC's 5 and 6, we consider that Strategic Housing Land Availability Assessment does not represent an objective or realistic assessment of the potential supply of sites. This will result in a need for additional sites to be identified if sufficient new homes are to be delivered. Likewise, we object to the findings of the SHLAA in respect of our client's site.

Name: Mrs Victoria Stride

Representing: Individual

ID: 3850

Further Proposed Change: FPC5-7

Representation: We need jobs in Bridport and employment opportunities. Housing is not appropriate in the centre of town in an established commercial, industrial and retail area, which needs to be protected and conserved. It attracts many visitors to the area. Incomers will buy the properties, not first time buyers. They will be used as second homes or rental properties. The housing development will not help local families who wish to get on the property ladder. The St Michaels Trading estate offers much employment. Housing will interfere with the business zone.

Name: Mr Stephen Tapscott

Representing: Stephen Tapscott **ID:** 3852

Further Proposed Change: FPC5-7

Representation: FPC7 - In table 3.2 it is not clear what assumptions have been made about extant permissions coming forward. I've seen several examples of local plans recently that have applied a 10% discount to allow for sites not coming forward. In Purbeck, it's incredibly rare that an applicant doesn't implement a permission, so this isn't a problem for us. The case may be the same for West/Wey, but that isn't clear here. Similarly, 3.3.12 talks about assumptions that have been made on delivery rates, etc., but it's not clear what these assumptions are. Perhaps this could be made clearer.

Summary of main issues – Sustainability Appraisal Update.

Name: Miss Gwen Hawkins

Representing: Individual **ID:** 168

Further Proposed Change: Sustainability Appraisal Update

Representation: The selection of option D should be reviewed. the level of housing development in Dorset and the quality of development (poor and not designed to meet the demands of the dorset house buyer) are unsustainable when compared to the infrastructure and employment of the county.

Name: Mr Nick Perrins

Representing: Sherborne Castle Estate **ID:** 261

Further Proposed Change: Sustainability Appraisal Update

Representation: It is evident that the Councils SA is flawed and has not tested all reasonable alternatives.

Name: Mrs Ghislaine Warner

Representing: Individual **ID:** 408

Further Proposed Change: Sustainability Appraisal Update

Representation: With the ever increasing population not just in the UK but worldwide, is there any such thing as sustainable? We will not only run out of land for building but for food production. A much more radical approach to managing our land is required, do we have the politicians are up to the challenge?

Increasing worldwide population suggests that sustainability is unattainable. How can we feed ourselves and house ourselves with finite resources? This begs the question do we have the politicians capable of tackling these issues?

Name: Mr Keith Beeson

Representing: Individual **ID:** 519

Further Proposed Change: Sustainability Appraisal Update

Representation: The addendum's logic fails in the area of employment and growth as it does not take into account of areas' different potentials and social issues. Sherborne will have reduced growth should housing numbers be too low whilst Weymouth will have increased unemployment if housing levels are too high. In the Central area where retirees are very significant, the number of new homes would unlikely to impact either growth or employment, just property prices.

Name: Mr Charles Wild

Representing: Bridport Environment Group **ID:** 534

Further Proposed Change: Sustainability Appraisal Update

Representation: Para 3.3.6 – The Bridport Environment Group is conscious of the pressures on local planning authorities to set what appear in effect to be centrally imposed housing targets (contrary to the principles of Localism and evidenced local need), and is appreciative of the conscientious efforts of the councils to deliver an effective Local Plan in testing circumstances. However we cannot accept that the “need for growth from both a national and local perspective” constitutes the “exceptional circumstances” required to justify major development in the AONB, which we questioned in our initial response in 2012. The “need for growth” is too vague a concept and if this is accepted as a precedent will render designations such as the AONB meaningless, contrary to para. 116 of the NPPF.

Name: Mr Peter Neal

Representing: Dorset CPRE - The Sherborne and District Society **ID:** 570

Further Proposed Change: Sustainability Appraisal Update

Representation: We are particularly impressed with the rigour that has gone into the sustainability appraisal. The table in section 5 page 13 shows very well the problems in the Councils' area, of demonstrating sustainability across a wide range of criteria. On the basis of this appraisal it is clear that the option chosen of 775 dwellings per annum over 17 years is the best way of meeting housing need in the future. It is the only option which shows any positives.

Name: Mr Malcolm Brown

Representing: Betterment Properties (weymouth) Ltd. **ID:** 578

Further Proposed Change: Sustainability Appraisal Update

Representation: The sustainability appraisal is flawed. There is too much reliance on subjective opinion.

We would challenge the sustainability of developing many unallocated residential sites included within the councils' calculations of land supply.

Name: Cllr. Gilbert Berry

Representing: Beaminster Town Council **ID:** 639

Further Proposed Change: Sustainability Appraisal Update

Representation: In order to honour the statement in the Sustainability Appraisal that “The local plan will ensure that new local services and facilities are provided with new development so that the additional demands that new development places on local services and facilities are fully met”, the District Council should put in hand an analysis of the capacity of Beaminster’s infrastructure - notably the schools, the disposal system for foul and storm water, and the town’s internal road system – before the next phase of major housing development takes place.

Name: Mr Andrew Elliott

Representing: Grainger PLC (part of the North Dorchester Consortium) **ID:** 648

Further Proposed Change: Sustainability Appraisal Update

Representation: The sustainability appraisal (SA) assesses annual housing provision number options only. There is a very significant omission in that the implications of a change of planned new jobs from 16,100 to 2,300 (FPC3) have not been assessed. Even though housing option D offers the highest increase in the housing supply of the options tested, there is uncertainty that the selection of the preferred housing option D will provide adequate workforce to develop a sustainable local economy and stimulate recovery. This suggests that higher growth options require testing (for example the outcome of the Chelmer model work by the North Dorchester Consortium, Grainger and Persimmon). It is noted also that the implications of a reduced plan period are not tested by the SA. The final paragraph of page 7 of the July 2014 sustainability appraisal states that “a joint target provides greater flexibility in terms of providing the housing supply. Should the target be split between these two areas, some of the existing allocations in Weymouth & Portland would need to be removed and some of the previously rejected allocations in West Dorset would need to be added to the Local Plan”. This does suggest that the strategy that is being consulted upon is relying on Weymouth & Portland to meet West Dorset’s needs. However the implications of this strategy for each district have not been assessed in the SA.

Name: Mrs Sarah Hamilton-Foy

Representing: Persimmon Homes **ID:** 797

Further Proposed Change: Sustainability Appraisal Update

Representation: The SA does not examine the alternatives of separate housing requirements for West Dorset and Weymouth and Portland – instead a single target is used. A joint target is not consistent with the need to monitor the housing land supply in each LPA in accordance with the NPPF. It can be concluded that the plan is not satisfying the requirements of national policy. It is clear from the evidence that the proposed provision fails to significantly boost housing land supply, the plan does not provide for 15 years post adoption and does not take into account the longer term requirements. The SA is therefore flawed and fails to accord with national policy.

Name: Mr Andrew Harrison

Representing: Winterborne Farrington Parish Council **ID:** 917

Further Proposed Change: Sustainability Appraisal Update

Representation: We have no further comments to make on the sustainability appraisal. We retain all our previously lodged objections to policies LITT1, LITT2, ECON10 and DOR10.

Name: Mr Roger Tustain

Representing: Woodsford Farms **ID:** 933

Further Proposed Change: Sustainability Appraisal Update

Representation: Within the Further Proposed Changes Sustainability Appraisal the Councils have failed to assess (either properly or at all) all reasonable alternatives. It has not identified the full objectively assessed housing needs within the housing market area and the extent to which unmet housing need within the market area could be met within neighbouring housing market areas. The Sustainability Appraisal also does not rectify legal flaws previously brought to the Councils' attention, namely the failure to assess the four individual alternative strategic sites at Crossways. The Further Proposed Changes Sustainability Appraisal is therefore wholly unsound as it has not been positively prepared, nor is it justified. Moreover, by not assessing all reasonable alternatives the Sustainability Appraisal is in clear breach of the SEA Directive and the SEA Regulations. As such, it is unlawful and these breaches are fatal to the legality of the Further Proposed Changes and the Submitted Local Plan. To appropriately address each of these fundamental issues the Councils must withdraw the Further Proposed Changes and the Submitted Local Plan and Sustainability Appraisal from examination. For further detail on this matter, please refer to Section 8 of our accompanying representations Supporting Report.

Name: Ms Barbara Simons

Representing: Individual **ID:** 3522

Further Proposed Change: Sustainability Appraisal Update

Representation: In fact the motives are clear, money. The Sustainability Assessment is clear that all the effects to the landscape and environment are negative, you proudly display this and then proceed to ignore and disregard the evidence provided. Continuing thus shows no respect for the environment nor any desire to protect this Area of Outstanding Natural Beauty and all it contains. I look out on this glorious landscape and see ancient hedgerows, deer, an abundance of birds and wildlife, yet you find it acceptable to destroy existing farm land, build on a flood plain, and increase consumption and pollution in a way that changes the character of a beautiful town irrevocably.

Name: Ms Barbara Simons

Representing: Individual **ID:** 3522

Further Proposed Change: Sustainability Appraisal Update

Representation: I am deeply disturbed that your own Sustainability Appraisal shows a negative impact across the board to the community, environment, wildlife, agricultural land. You know the parameters, and your own study is comprehensive. It also shows VERY negative impact from the specific plan you are selecting. This must be totally against all the ideals of West Dorset regarding conservation, protection of land and community. Building here is reckless and shameful

Name: Mr Glenn Crawford

Representing: Individual **ID:** 3523

Further Proposed Change: Sustainability Appraisal Update

Representation: 3.2.4 cites lack of suitable housing as a reason young people move away; actually, it is lack of employment opportunities. Home building is a worthy aim but developing the local economy by better supporting business aspirations is just as deserving. This is not reflected in the Sustainability Appraisal which reads as if it has been written by a house building company.

Name: Mr Vince Adams

Representing: dorsetenergized **ID:** 3811

Further Proposed Change: Sustainability Appraisal Update

Representation: Renewable energy as an integral part of the plan could make for increased sustainability, allotment space for food and cycle paths for local commuting

Name: Dr Jon Orrell

Representing: Transition Town Weymouth and Portland **ID:** 3812

Further Proposed Change: Sustainability Appraisal Update

Representation: I warmly welcome the sustainability addendum. It has exactly the right ideas. To combat climate change we need local resilience, local energy production 3, food growing on allotments 4 and community growing schemes. Good cycle links 7, I cannot see how the proposed local plan takes any of these into account. There is a total disconnect between the local plan and the sustainability appraisal. The appraisal should direct the plan, not be a tick box add on.

Name: Mr John Hubbard

Representing: Individual **ID:** 3815

Further Proposed Change: Sustainability Appraisal Update

Representation: I always feel these appraisals sound compelling but all too often are forgotten when commercial pressures are exerted on the planning authority. One must believe it when one sees it happening.

Name: Ms Jane Cornwell

Representing: Weymouth College **ID:** 3839

Further Proposed Change: Sustainability Appraisal Update

Representation: Support for Option D: Options A, B and C would under-provide housing which would have an adverse impact on the economy and housing sustainability objectives in the short term but would also have a continuing adverse impact in the medium and long term. Consequently, the Plan would be contrary to the objectives for growth set out in the NPPF. Conversely, Option D is identified as having a strongly positive impact by the end of the plan period and long term and complies with the NPPF objectives of

meeting objectively assessed housing needs and encouraging growth. There is an assumption that the greater rates of development proposed in Option D will produce greater impacts on the natural environment, historic and cultural features. However this does not necessarily follow i) where there are opportunities for (re-)development within the defined settlement boundaries these should either be identified and sites allocated or their potential recognised. This will minimise greenfield land take; ii) Development proposals can bring with them mitigation and compensatory proposals which will neutralise adverse impacts as well as enhancements to yield a betterment in habitat; iii) Mitigation through good design can in any event neutralise such potential impacts. No allowance has been made for this within the SA. Accordingly the long term impacts of SA Objectives 1-6 should be re-classed as (-) amber.

Name: Mr Patrick Atherton

Representing: Individual **ID:** 3847

Further Proposed Change: Sustainability Appraisal Update

Representation: FPC1- The Councils' explanations for the proposed housing land supply figures and calculations are not adequately explained in the text of the SHLAA update July 2014 and the Sustainability Appraisal July 2014. The latter seeks to justify the preferred Option D figure of 775 dpa, whereas a much larger figure is required by the NPPF to take account of long term inadequate supply of housing land (caused by restrictive planning policies) and persistent under-delivery of housing completions over many years. The NPPF therefore requires additions of 20% and to take account for the shortfall in housing supply since 1 April 2011 when the Local Plan period commenced. The Sustainability Appraisal says nothing about the NPPF requirements.

Name: Mrs Carol Perilli

Representing: Individual **ID:** 3848

Further Proposed Change: Sustainability Appraisal Update

Representation: I have no faith that the issues of traffic problems, flooding, impact on services, impact on the designated area of outstanding beauty or the impact on the availability of good agricultural land has been taken into account. It will be too late after the decisions are found to be faulty. I also have no faith that affordable housing (that is to say houses affordable to Bridport and immediate area people) will be built. How will this be ensured?

Name: Mr Robert Pritchard

Representing: Individual **ID:** 3849

Further Proposed Change: Sustainability Appraisal Update

Representation: The only people who gain from this plan are the landowners/builders financially. Perhaps also there will be some jobs created locally whilst building goes on. It would seem that it is all negative unless Poundbury is built on the side of Bridport. A HUGE GAMBLE to try and attract the right kind of person into West Dorset to boost the economy without any

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discussion on where all the jobs for all these people will be provided. Savills plans made more sense.

Appendix A: Further Proposed Changes to West Dorset, Weymouth & Portland Local Plan: 31 July 2014

The majority affect Chapter 3 (Sustainable Pattern of Development) only

Ref no	Section of Plan	Proposed Change	Reason for Change
FPC1	Policy SUS1 and related text, including box after para 3.1.3 ('Strategic Approach') – first paragraph	Amend housing requirement to 775 per annum across the plan area, and update accompanying text to explain reasons.	An independent review of the objectively assessed housing needs for the plan area has been undertaken. This recommends an increase in the rate of housing development in the plan area, in order to allow for potential increase in economic in-migration. Full details are in the report published alongside this consultation document at <i>(link to be inserted)</i>
FPC2	Policy SUS 1 and related text, including table after para 3.2.8 (Delivering Growth), table after para 3.3.2, and summary table 3.1	Amend so that plan commits to meeting a single housing land requirement across whole plan area, rather than having separate targets for each district	In keeping with the National Planning Policy Framework which states that objectively assessed housing needs must be met across Housing Market Areas. This provides a greater flexibility for meeting the need across the area, and allows development to be focused currently at the largest town of Weymouth, where economic regeneration is a particular priority.
FPC3	Para 3.2.3	Revise text on target for new jobs (16,100) to indicate that more recent evidence suggests that a more modest growth, with an increase in the resident labour force of around 2,300, is more likely.	The target figure of 16,100 was based on previous economic forecasting that took an optimistic view of economic conditions, and is based on earlier housing numbers. The further work undertaken on the relationship between housing and jobs during the review of housing needs suggests that a figure of 2,300 is more likely to be what might be achieved, bearing in mind that there has been a decline in jobs in the area over the last few years.
FPC4	Policy SUS 1, Table 3.1 and related text	Amend plan period to 2011-2028	In order to meet the revised level of need across the original plan period to 2031 it will be necessary to identify additional development sites. It is proposed that this will be achieved through the next review of the plan, so as to allow sufficient time for further public consultation on the

Ref no	Section of Plan	Proposed Change	Reason for Change
			options, whilst at the same time avoiding further delay in bringing the currently proposed sites forward. The National Planning Policy Framework indicates that plans must have sites identified for the development needed in the first ten years, and ideally for fifteen years. This indicates that ten years' supply post-adoption is acceptable, and the plan includes sufficient land supply to meet the new target figures over a thirteen year period from adoption.
FPC5	Table following para 3.3.2; summary Table 3.1; consequential changes to Table 3.2 and Fig 1.	Revise detail of housing land supply, to demonstrate the total supply of 14,040 dwellings, comprising 1,504 completions; 4,042 permissions; 3,757 from sites allocated in this plan; 3,350 from larger identified sites in the built-up areas; 892 from minor identified sites in the built-up areas; 170 from rural exception sites; 127 from rural conversions and 198 from neighbourhood plans. Consequential changes will need to be made to the phasing shown in Table 3.2, and the trajectory diagrams in Figure 1.	To reflect the additional work carried out on evidence of housing land supply, including updating it to a 2014 base date
FPC6	Table following para 3.3.2, and summary Table 3.1	Include a new section demonstrating the five year land supply of 5,621 (2,752 from permissions; 1,287 from allocations deliverable in the five years; 1,334 from larger identified sites in the built-up areas; 162 from minor identified sites in the built-up areas; 63 from rural exception sites; and 23 from rural conversions) against the requirement of 5,471 (3,875 five year requirement, plus 20% buffer of 775, plus shortfall of 821	To demonstrate that the plan has a five year land supply from the time of adoption

Ref no	Section of Plan	Proposed Change	Reason for Change
		from previous years).	
FPC7	Table 3.2 (plus consequential amendments to text of development allocation policies in later chapters)	<p>Amend the indicative figures for the following allocations in Table 3.2:</p> <p>BRID5 (St Michaels) to 93, not 105</p> <p>DOR6 (Brewery site) to 521 not 560</p> <p>PORT2 (Osprey Quay) to 69 not 35</p> <p>WEY12 (Wey Valley) to 320 not 400</p> <p>WEY1 (Weymouth Town Centre) to 600+, not 400</p> <p>Update references to indicative figures and phasing of individual development allocations, within the site-specific chapters of the plan, in line with the above figures and phasing over the revised plan period.</p>	To update the indicative figures for remaining supply and phasing on these sites, in line with the latest revised SHLAA work.
FPC8	Section 3.3: paras 3.3.1-3.3.12	<p>Revise structure of this section on the need for new housing and employment land allocations, from the current order</p> <ul style="list-style-type: none"> • existing supply and unmet demand; • the approach to distributing unmet need; • strategic allocations and phasing 	<p>To simplify the explanation of development land supply, setting out and then explaining what is proposed in the plan, rather than going through the process of identifying 'existing' supply and the 'unmet demand' to be met by allocations.</p> <p>NB Details of this revised structure are shown in the draft revised text for the first half of chapter 3, which accompanies this list of changes.</p>

Ref no	Section of Plan	Proposed Change	Reason for Change
		to an alternative: <ul style="list-style-type: none"> • Background – the distribution of development; • employment land supply; • housing land supply; • five year housing land supply; • strategic land allocations and phasing 	

Appendix B: List of respondents:

By name / organisation (alphabetically)

Adams (3811)
ADVEARSE (3517)
Atherton (3847)
Avant (3810)
Balfour (3820)
Balfour (3821)
Banham (3832)
Barton Willmore (3841)
Bates (3504)
Beaminster Town Council (639)
Beeson (517)
Beeson (518)
Betterment Properties (578)
Bird (30)
Bird (31)
Bridport Area Development Trust (488)
Bridport Environment Group (534)
Bridport Town Council (641)
Burton Bradstock Parish Council (955)
Catesby Property Group (3842)
CG Fry & Son (526)
Charminster Parish Council (954)
Crawford (3523)
Crockford (3823)
Crosby (576)
Deeney (3813)
Dorchester Civic Society (611)

Dorchester Town Council (2516)
Dorset County Council (544)
Dorset CPRE (570)
East Devon District Council (3511)
Environment Agency (2529)
Fordham (629)
Freer (3508)
Gladman Developments (3846)
Goudge (3829)
Grainger Plc (part of the North Dorchester Consortium (648)
Hall (3524)
Hallam Land (7)
Hansen (3818)
Harding (3546)
Hardwick (158)
Harvey (670)
Hawkins (168)
Hayward & Co (3808)
Hill (677)
Home Builders Federation (3840)
Hubbard (3815)
Leach (984)
Legg (723)
Mason (231)
Moore (3823)
Natural England (782)
Perilli (3848)

Persimmon Homes (797)
Pike (277)
Pritchard (3849)
Redwood Partnership (827)
Salisbury Diocesan Board (328)
Sherborne Castles Estate (261)
Simons (3522)
Smart (3831)
Stinsford Parish Council (868)
Stride (3850)
Summerfield Homes (853)
SW HARP Planning (884)
Sydney (3830)
Tapscott (3852)
Taylor Wimpey UK Ltd (3843)
The Beaminster Society (885)
The Owners of Aldwickbury (262)
Thompson (1579)
Toft (3817)
Tomlinson (904)
Transition Town Weymouth and Portland (3812)
Underhill (3816)
Warner (407)
Warner (408)
Wessex Delivery LLP (414)
Weymouth Civic Society (914)
Weymouth College (3839)
Wilson (3828)
Winterborne Farrington Parish Council (917)
Woodeson (3809)

Woodsford Farms (933)
Wootton (3819)
Wootton (435)
Wyatt Homes (934)

