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19 July 2013

### **Inspector's Initial Questions to the Councils 19 July 2013**

Dear Ms Jordan,

I have now had an opportunity to familiarise myself with the West Dorset and Weymouth and Portland Local Plan and I have identified some matters where I would appreciate clarification. I have not had a chance to look at all the evidence to date so the answer to some of my questions may be covered elsewhere. Hopefully, you will be able to address the following points to my satisfaction and reassure me that they are unlikely to undermine the soundness of the Plan. If you have any doubts I would like to know as soon as possible.

To begin with I would welcome confirmation that my summary of key stages in plan preparation over the last 12 months is correct:

- a) Consultation took place on a Pre-Submission version of the Local Plan during June/July 2012;
- b) Further consultation followed in the autumn of 2012 on sites put forward by other parties. None of these were subsequently included in the Plan;
- c) An Alternative Strategy was published for consultation purposes during January-March 2013. This forms the basis for a number of modifications the Councils are recommending be made to the Plan;
- d) A Policy Scrutiny Committee of West Dorset District Council on 13 May 2013 has now put forward further changes. These have resulted in a site to the South East of Dorchester (DOR11) and an allocation at Beaminster (BEAM2 – Land off Hollymoor Lane) being deleted from the Alternative Strategy;
- e) As a consequence of these changes it has proved necessary to adjust the housing land supply information meaning the Plan is unable to meet likely housing targets to 2031. Instead, provision would fall some 1.25 – 2.5 years short, according to your figures;
- f) To demonstrate how this shortfall would be tackled, it was recommended a new policy (SUS1a) and supporting text be added to the Plan.

If my synopsis is correct I would appreciate a response on the following 3 questions:

1. The late changes introduced via the Scrutiny Committee may not, from the Council's position, appear to be particularly significant. However, in the absence of details regarding the Committee report I found it difficult to understand the final form of the Plan which would emerge if I were to find the proposed modifications acceptable. I am concerned that other parties who have been engaged with the Plan previously may be equally uncertain as to the intended status of some of the sites in the Plan. I am aware, for instance, that at least one other party has raised concerns about this

and appears to have reached erroneous conclusions as to what is now being proposed. I think you should give serious consideration to clarifying how the changes made by the Scrutiny Committee would affect the Plan by publishing these changes and providing an opportunity for those who wish to do so to comment on them. I do not consider this should delay the examination process much, if at all, because I have other commitments which would make it unlikely that I could commence hearing sessions before October (please also see my comments under point 11).

2. In any event I am not clear why the proposed policy **SUS1a - Development Post 2026 in West Dorset** – has not been included as one of the modifications in the Alternative version of the Plan [CD/SP2] although the supporting text to accompany this policy has been?
3. Furthermore, draft policy SUS1a confirms it will no longer be possible to meet the projected housing target unless further work is undertaken. In effect the plan period will have changed and I question whether it would not be sensible to adjust the duration of the plan accordingly?

#### Other issues

4. I am also concerned that you have yet to develop a Green Infrastructure (GI) network. I am unclear how this work will be progressed and integrated with the Local Plan. Proposed policy on this topic appears to prevent development which could be harmful to a GI network but I have doubts that this is a legitimate approach when the GI Network is not fully defined.
5. Monitoring information is included as part of the proposed changes to provide baseline indicators for assessing policy effectiveness. This is welcomed and there is some information regarding key infrastructure requirements and responsibilities in chapter 6 of the Plan. I appreciate the Infrastructure Delivery Plan provides further information but it might be helpful if some additional detail could also be included in the Local Plan either in chapter 6 or as an appendix to it. I would welcome your thoughts on this.
6. I understand that a County-wide study is in progress on Gypsy and Traveller needs and that it is your intention to carry policy forward through a separate planning document. In light of this and national policy in 'Planning Policy for Traveller Sites' you are proposing to delete policy HOU5. I am concerned that the Local Plan will be silent on this matter until the new policy is adopted. How will you assess proposals which come forward in the interim period?
7. I am not aware reference has been made to Sustainable Community Strategies or is this covered by the reference to Community Plans? If so, how do the latter differ (if they do) between those produced by the Councils and the West Dorset Partnership and the Weymouth and Portland Partnerships? How have the Community Plans been taken into account?
8. Figure 3.3 refers to a strategic diagram/key diagram but it is too small to be helpful. In the absence of a fully revised Policies Map a larger A4 sized key diagram would make it far easier to appreciate the location and relative scale of the allocations as well as the broad areas constrained by various designations.
9. There are major environmental constraints affecting West Dorset and Weymouth and Portland. Is there sufficient information in the Plan to show that these have been

taken fully into account when assessing development options and that a clear and agreed mitigation strategy exists to minimise the impact of the proposals. Is there also sufficient evidence to explain why there are 'exceptional circumstances' which would allow development to take place in the AONB as required by paragraph 116 of the NPPF?

10. I would also welcome clarification that you do not envisage using Supplementary Planning Documents to address any current deficiencies in policy or to introducing new policy in the intended SPD for Coastal Change Management, for instance.
11. Finally, I am concerned by the problems in the consultation databases. There appears to be more than one identification number for the same respondent in some cases. I have also found it difficult to determine whether a respondent is supporting or objecting to an issue and there are a number of instances where additional statements are referred to but the key matters have not been teased out. While I appreciate that councils are only required to provide a list of main issues, I need to be sure I have an accurate list of respondents and that all issues and potential participants have been identified. The Programme Officer is attempting to resolve these problems but until both she and I are satisfied the representations are properly catalogued and accurate, I am not prepared to move beyond the preparatory stages of the examination process.
12. I would be grateful for your comments, in due course, on these matters. Please do not hesitate to let me know if there are any other issues you would like to bring to my attention.

Yours etc

Paul Crysell  
Inspector