
WEST DORSET, WEYMOUTH & PORTLAND LOCAL PLAN:

COUNCILS' RESPONSE TO INSPECTOR'S 10 DECEMBER LETTER

STRUCTURE OF THIS RESPONSE

- 1 Introduction**
 - a. Aims and aspirations
 - b. What has been achieved
- 2 Duty to Cooperate**
 - a. South Somerset
 - b. Purbeck
 - c. East Devon
- 3 Housing Issues**
 - a. Plan end-date
 - b. Objective assessment of housing need
 - i. Changes in circumstances since the RSS
 - ii. Influence of local factors on housing need
 - iii. 2012-based national population projections
 - c. Housing land supply queries
 - i. Past performance
 - ii. Windfall and minor sites allowances
- 4 Affordable Housing**
- 5 Supplementary Planning Documents**
- 6 Consultation Process**
- 7 Inspector's Overall Concern**
- 8 Conclusion**

1. INTRODUCTION

1.1 West Dorset District Council and Weymouth & Portland Borough Council believe that all the issues raised are capable of being resolved through the examination, and are extremely concerned about the impact of any delay on the proper planning and delivery of development in the area.

1.2 The councils have taken the bold decision to prepare a joint plan, in order to address the strong relationships between the two areas and the significant cross-boundary planning issues. This has not been an easy task and has carried significant risks, but we have achieved a draft plan that: has been developed through extensive public consultation; meets the most up to date ONS household forecast requirements across the whole Housing Market Area for the next 16-17 years from 2014; and has been approved by the members of both councils, against the backdrop of strong opposition to new development amongst many of the local community.

AIMS AND ASPIRATIONS

1.3 In preparing the plan, the councils have been guided by the principles of community engagement, discussion, refinement and transparency. Both members and officers have been driven by the desire to adopt a fair, responsive and sound plan that meets all the legal requirements, and in particular the aims and intentions of the localism agenda. To this end, considerable effort has been put into community engagement, the results of which have fundamentally guided the preparation of the plan. A chronology of this community engagement is attached at [Appendix 1](#), and details are set out more fully in the consultation reports submitted with the plan. Particular attention is however drawn to the intensive and innovative consultation process that took place in autumn 2011 to guide the drafting of the plan, led by specialist consultation facilitators. This helped to ensure that the views of a wide range of stakeholders and members of the public were taken into account before the drafting of the plan began, and all these individuals have continued to be kept informed throughout the process. We are therefore particularly disappointed at the implication that we have somehow not engaged adequately or that there has been any confusion arising through the consultation processes.

WHAT HAS BEEN ACHIEVED

1.4 We would like to emphasise to the Inspector the enormous achievement that the submission plan represents. At the beginning of 2011, progress had taken place on two separate Core Strategies, including a large amount of the evidence base and considerable early consultation. Weymouth & Portland's officers had drafted a Core Strategy for pre-submission consultation which the Management Committee members had decided not to approve; West Dorset's Core Strategy preparation had been on hold while the final decisions on level of development at Dorchester were to be made through the Regional Spatial Strategy, and members had subsequently agreed to prepare a new-style Local Plan in keeping with the emerging changes to the national planning system.

1.5 The two authorities are very different in their characteristics and political composition, and the decision in June-July 2011 to prepare a joint local plan represented

a significant act of political will amongst members of all parties. (The committee report that went to the relevant meetings of both councils is attached as [Appendix 2](#)). In addition to the significant public consultation that has taken place since this decision was made, the development of the plan has involved a series of 19 informal briefing meetings with members, followed by six formal meetings at each statutory stage (publication and submission) to agree the plan.

1.6 The plan has been prepared in the context of an area where there are significant constraints to development that have had to be taken into account, and extremely strong public opinions about development. These will have been very clear to the inspector from the representations received on the plan, including those relating to Sherborne, Dorchester and the 'Markham & Little Francis' site in Weymouth. The level of public objection to any individual site has escalated in those cases where there has been more than one stage of consultation, as clearly evidenced in relation to proposals at Crossways. While the councils are proud of the active and thorough public consultation processes that they have carried out to guide the development of the plan, we are very conscious of the fact that the level of development required by the evidence is not supported by the vast majority of respondents, and that agreeing to the proposals in the plan has not been an easy task for members.

1.7 The plan puts forward a range of significant new development sites that could make an important contribution towards economic and social needs in the area, and which have been supported by statutory conservation and special interest bodies. These are deliverable sites, which the landowners and developers are keen to bring forward: delay to the local plan process is delaying the implementation of these sites and risking the loss of other less appropriate sites on appeal.

1.8 Detailed comments on each of the issues raised are set out below, but the councils would urge the inspector to take a pragmatic approach that recognizes the benefits of delivering development through a plan-led system and the difficulties that this involves.

2. DUTY TO COOPERATE

2.1 The legal duty to cooperate, created in the Localism Act 2011, requires that local planning authorities, county councils and other prescribed bodies engage '*constructively, actively and on an ongoing basis*' with each other in the preparation of plans, and have regard to each other's other relevant activities. We believe that the local plan has more than met this requirement, and that there are no unresolved issues that could have been addressed in the plan. We also believe, however, that it is important to consider the significance of the various specific issues to the strategy of the plan as a whole, as some are much more significant than others.

2.2 The most significant cross-boundary relationship for this local plan is that between the West Dorset and Weymouth & Portland areas, and it was precisely to address this that a joint plan has been prepared. We are not aware of any joint local plan having failed the duty to cooperate test, which is understandable when one

considers that the primary purpose of this duty is to ensure that authorities work together on the preparation of their plans, so that when two authorities come together to prepare a joint plan this clearly addresses the issue.

2.3 West Dorset and Weymouth & Portland between them constitute a single Housing Market Area. The Regional Spatial Strategy recognized the relationship between the towns of Weymouth and Dorchester in particular, and recommended joint working between the two local planning authorities. It also specifically proposed that some development to meet the needs of Weymouth was likely to be necessary over the boundary into the West Dorset area. The Inspectors' reports into both the last adopted local plans recommended joint working, for example on the development of retail policy. It is fair to say that there had been a history of tensions between the two authorities around matters relating to development on the boundaries, although these were gradually being resolved through joint working on the evidence base for the two core strategies.

2.4 The joint local plan, utilizing a common evidence base and consultation programme, introducing a common framework of development management policies and making development allocations across the boundary, has been an enormous achievement, requiring an extraordinary political will from members of both authorities and from all parties. The plan itself therefore resolves the most important cross-boundary issue that has been identified.

2.5 It is considered that the remaining cross-boundary matters referred to in the Duty to Cooperate Statement (in relation to West Dorset/Yeovil, Crossways/Moreton, and Lyme Regis/Uplyme), have all been fully investigated during the preparation of the plan and do not raise any problems with its strategy. The strategic significance of these matters varies widely, from the significant potential impact of major development at Yeovil, to the need to allow sufficient flexibility for neighbourhood planning in the Lyme Regis / Uplyme area, and this needs to be taken into account in assessing the extent to which the councils have met their duties.

2.6 Further explanation of each of these matters is set out below, and the councils would be happy to propose modifications to the text of the plan (or their submitted Duty to Cooperate Statement) to provide more detail if this would aid clarification. A plan indicating the locations of the adjoining authorities is attached as [Appendix 3](#).

SOUTH SOMERSET (EXPANSION OF YEOVIL)

2.7 After the cross-boundary relationships between West Dorset and Weymouth & Portland, the relationship between West Dorset and South Somerset District Councils, in the planning for the future expansion of Yeovil, is considered to be the primary matter to which the duty to cooperate has been relevant.

2.8 West Dorset District Council has been involved in the South Somerset local plan throughout its preparation, from early stakeholder meetings in 2009 to the recent modifications consultations. Proposals for the significant expansion of Yeovil were originally put forward in the Regional Spatial Strategy, which stated the need for a 360 degree area of search around Yeovil to be assessed, including land within West Dorset.

Liaison meetings between the councils took place during the preparation of the Regional Spatial Strategy, and South Somerset and West Dorset district councils have subsequently met regularly during the development of their local plans, at both officer and member levels. A list of dates is set out in [Appendix 4](#).

2.9 The land adjoining Yeovil but within West Dorset was one of three 'shortlisted' options in the site assessment process, and has been considered again recently in the revised sustainability appraisal. In both cases the site was eventually rejected for a number of reasons, including its relative separation from the rest of Yeovil, and the difficulties of mitigating against this.

2.10 West Dorset District Council has always recognized the potential of Yeovil as a sustainable location for growth and did not object in principle to the development proposal in the Coker area, subject to continued joint working so that visual, infrastructure and highway impacts on West Dorset could be addressed through the more detailed site planning stages. The current proposal is for two areas of development, one at Coker and one at Lydford Road to the north-east of Yeovil: the latter will have a greater visual impact on adjoining areas of West Dorset, as evidenced in the detailed landscape and visual assessments carried out to date, but these assessments indicate that this can be mitigated, and the councils intend to work together on the detailed site planning so that the necessary mitigation is secured.

2.11 Yeovil and Sherborne are in close proximity and there is commuting in both directions between them at present due to their different characteristics. The development proposed in each is appropriate in scale to that settlement, and includes a balance of housing and employment. Transport assessments have been carried out for both proposals (for Yeovil, as part of the assessment of strategic growth options, and for Sherborne as part of the planning application for the Barton Farm site). The scale of development at Yeovil will increase the choice of homes and jobs within reach of those living in the northern part of West Dorset.

PURBECK (DEVELOPMENT AT CROSSWAYS/MORETON)

2.12 In relation to cooperation with Purbeck District, the Inspector's letter primarily refers to evidence that the identified strategic issue relating to development in the Crossways/Moreton areas can be resolved. The proposed development at Crossways, in the West Dorset plan, is close to the boundary with Purbeck, and some of the community infrastructure likely to be used by the expanded community, in particular the local railway station, is outside the plan area. The impact of development on the internationally important heathland areas within Purbeck (specifically the Tadnoll Heath SSSI) have also had to be considered in developing this part of the plan.

2.13 To ensure a coordinated approach, we have liaised with Natural England, Purbeck District Council and the County Council throughout the plan preparation period, and Network Rail has also been involved. No issues have been identified that cannot be resolved through the detailed planning of the site, and the policy makes clear the intention to prepare a comprehensive masterplan, in conjunction with a wide range of stakeholders, in order to provide a mechanism for proper coordination and implementation. The development will also be subject to a Section 106 agreement (rather

than CIL) to enable clarity and agreement on the phasing, mitigation and contributions necessary for the development to come forward.

2.14 We have agreed with Natural England the Suitable Alternative Natural Greenspace provision, identified as part of the development proposal, in order to overcome any potential impacts on the heathlands.

2.15 We do not consider therefore that there are any cross-boundary matters relating to the development proposed at Crossways within West Dorset, that have not been resolved, or that cannot be addressed through the detailed planning stages.

2.16 There could be further cross-boundary issues arising through the partial review of the Purbeck Local Plan, on which work has just commenced. Consultation on issues and options is anticipated in Autumn 2014, with a draft plan published Autumn 2016, and adoption by Autumn 2017. This review will be considering the need for further housing development in Purbeck and the potential allocation of sites. This could involve the consideration of development in the Crossways/Moreton area (within Purbeck) which would require the cumulative impact of this and the development in West Dorset to be assessed. Our submitted local plan refers clearly to the intention to work with Purbeck District Council, amongst other stakeholders, in developing more detailed plans for the Crossways development. Should relevant proposals come forward in Purbeck, there would be the potential to undertake joint masterplanning work, or to work together on a later masterplan for the Purbeck land, following the West Dorset work and based on the established working relationships. It should be noted however that the original assessments of impact of development at Crossways considered a larger quantum of development, and indicated that this was deliverable.

2.17 There is the potential for issues to be raised from Purbeck around capacity to meet their total housing requirements in the forthcoming partial review, as the adopted Purbeck Local Plan Part 1 does not meet the full housing requirement that had been identified at the time. This is the only one of the adjoining planning authorities that does not have an adopted or emerging local plan identifying how its objectively assessed housing needs can be met within its own plan area. The Purbeck Local Plan was however adopted on the proviso that there would be an immediate partial review to reassess the housing needs and options for meeting them in the district, and this has now started. It is not known yet what the conclusion of this work will be or whether it will lead to requests for the needs to be met in other surrounding areas, and no such request to West Dorset has been made. It is however appropriate for options within the district to be assessed first, followed by options within the same Housing Market Area of South-East Dorset (a separate HMA to that comprised of West Dorset and Weymouth & Portland).

EAST DEVON (LYME REGIS / UPLYME)

2.18 The Lyme Regis / Uplyme issue is not fundamental to the soundness or strategy of the local plan, as the concern does not relate to any problem meeting district-wide development needs. The local plan has not set housing targets for each town, but there are strong views locally about the need for affordable housing at Lyme Regis, and a

significant number on the housing register, which have been a reason for seeking development allocations in the location.

2.19 Development opportunities at Lyme Regis are highly constrained by landscape, nature conservation, highway and land instability factors. The local plan has identified a site at Woodberry Down for housing development, as the most appropriate site within the West Dorset boundary. Land to the west of the town is within Uplyme parish and East Devon district. Ideally, options for development on all sides of the town would have been assessed together, but this was not achieved. West Dorset District Council has for some time been in correspondence and discussion with East Devon District Council, seeking recognition in the East Devon plan of the relationship between Lyme Regis and Uplyme, and asking to work jointly on examining development options for the longer term. Modifications have now been prepared to the East Devon plan to allow greater flexibility for this to be addressed through neighbourhood plans in future: Uplyme is now in the process of preparing a neighbourhood plan, having had their parish designated as a neighbourhood area. Both councils are clearly willing to work together in the longer term on the issue, but West Dorset District Council would like to have similar statements in both plans that recognize the need to work together in the longer term to understand and explore options to meet the development needs of the area locally.

2.20 The output sought is complementary statements in both plans that will enable joint working as part of the next review of plans, or on the preparation of the neighbourhood plans, so that opportunities for expansion of Lyme Regis are not lost. It is considered that this can be achieved through the modifications already suggested, and through the examinations taking place on both plans. Should this approach not be adopted, the potential implications are either that there are fewer opportunities for development at Lyme Regis, or that sites are developed in future that might be less appropriate and sustainable than options the other side of the boundary. It will not affect either authority's current housing land supply, or the provision of housing land in the broader area, as development opportunities are currently provided in both plans, through the site at Woodberry Down at Lyme Regis, and allocations in the nearby towns of Bridport in West Dorset and Axminster in East Devon. This issue affects both authorities and has not prevented the East Devon plan moving forward to examination.

3. HOUSING ISSUES

3.1 The issues raised about housing relate to the end-date of the plan, the figures used as the basis for the objective assessment of housing need, and queries about some aspects of the housing land supply. Again, it is considered that these are quite capable of being dealt with through the examination and through modifications to the plan if necessary.

3.2 The inspector's concerns about the two end-dates of the plan, raised in his paragraphs 2.1 and 2.2, could be resolved through modifications. The assumption that this has arisen as a result of the joint local plan format is correct: this has been a pragmatic approach to dealing with the different housing land supply position in the two council areas, as a result of difficulties in bringing sites forward in West Dorset, which have not affected Weymouth & Portland.

3.3 The Plan started out with the deliberate intention of covering a twenty-year plan period, exceeding the 'preferably 15 year' time horizon referred to in paragraph 157 of the National Planning Policy Framework (NPPF). The NPPF in paragraph 47 states that councils should identify specific developable sites or broad locations for growth for years 6-10 and 'where possible for years 11-15'. Providing twenty years' supply, with the allocations in the form of specifically identified sites rather than 'broad locations' therefore significantly exceeded that requirement. While this was not twenty years from adoption, and while the adoption date will now be later than originally envisaged, there is still scope to amend the end-date to 2029, fifteen years from adoption, which is a perfectly reasonable plan period. Most adjoining authorities with emerging plans have shorter plan periods than this: South Somerset's is 2028, East Devon's is 2026 and North Dorset's is 2026. This has not prevented the first two from progressing to examination.

3.4 The requirement in the NPPF (paragraph 47) is that local planning authorities should ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing *in the housing market area*. The Local Plan covers the entire Housing Market Area, and demonstrates that across the whole area, there is between 19.3 and 20.7 years' housing land supply from 2011. From 2014, there is between 16.3 and 17.7 years' supply, to 2030 or 2031. Taking the lower end of the range (ie the latest ONS forecasts extrapolated forward) as the target, there would be sufficient supply for the entire original plan period to 2031. With an amended end-date of 2029 the plan would exceed the fifteen-year supply.

3.5 The plan shows the individual authority targets and supply as well as the plan area total, because it was not intended that either authority would be meeting the other's needs over the long term plan period. As long as the Housing Market Area combined target is being met, however, we would be meeting the requirements of national policy, even though this potentially means that in the earlier phases, a greater proportion of this would be coming from Weymouth & Portland and that the first review, as stated in policy SUS1, would focus on development sites in West Dorset. Both authorities agreed, in their decisions to approve the plan for submission in 2013, *'to work together to deliver the housing land requirements across the Housing Market Area comprising both council areas, and on the implementation of the joint plan's policies'*.

3.6 Looking at each authority area individually, however, shows that West Dorset has between 17.5 and 18.6 years' supply from 2011 (14.5-15.6 years' supply from 2014). Weymouth & Portland exceeds its requirements, with between 24 and 26.6 years' supply from 2011 (21-23.6 years' supply from 2014). The advantage of addressing West Dorset's future needs in a subsequent review is that it would allow additional time to be spent working with the local communities and addressing the technical issues that have

arisen (such as the heritage constraints associated with development at Dorchester) whilst allowing a substantial number of new development sites to be released beforehand, in order to maintain a five-year land supply.

3.7 The supply compared with the requirement across the plan area and each council area is summarized below. (The summary table from the plan, with the breakdown of supply, is also reproduced later in this statement).

	West Dorset	Weymouth & Portland	HOUSING MARKET AREA
Requirement 2011-31	9,100-9,640	3,240-3,580	12,340-13,220
Requirement per annum (averaged over 20 years)	455-482	162-179	617-661
Supply in plan	8,463	4,309	12,772
Number of years' supply from 2011	17.5-18.6	24-26.6	19.3-20.7
Number of years' supply from 2014	14.5-15.6	21-23.6	16.3-17.7
Supply until (end-date)	2028/9 – 2029/30	2035-2037/8	2030 – 2031/2

OBJECTIVE ASSESSMENT OF HOUSING NEED

3.8 The councils have sought to use the most up-to-date and relevant information as the basis for their objective assessment of housing needs, as required by the NPPF. The draft ('beta') National Planning Policy Guidance (NPPG) states that wherever possible, local needs assessments should be informed by the latest available information, and refers specifically to the 2011-based Interim Household Projections which have been the basis for the figures now used in the Local Plan.

3.9 While the Strategic Housing Market Assessment was carried out prior to the revocation of Regional Strategies, the 2011 update and the subsequent work published in 2013 and based on the 2011 interim projections have both considered the changes that have taken place since the examination into the now-abandoned draft Regional Spatial Strategy (RSS).

CHANGES IN CIRCUMSTANCES SINCE THE RSS

3.10 While the draft revised RSS (incorporating the Secretary of State's proposed changes, 2008) had passed through the examination process, providing a rigorous and independent testing of its assessment of housing needs, circumstances have significantly changed since its examination in 2007, and it no longer provides a sound

basis for the objectively assessed needs. In particular, it was based on outdated projections; it assumed levels of economic growth that are no longer considered to be realistic; and its distribution of growth was policy-led and based on factors other than locally generated demand.

3.11 The level of growth proposed within this plan area in the draft revised RSS was influenced by the fact that both Dorchester and Weymouth had been identified within the category of 'strategically significant cities and towns' at which the majority of the region's growth was to be concentrated.

3.12 The most up-to-date population and household forecasts to be considered by the examination Panel and subsequently in the RSS Proposed Changes had a mid 2004 base date (compared with the 2003-based ONS population projections and pre-2001 based household headship rates used in developing the submission draft). This data was well before the 2007-8 credit crunch and ensuing recession: the draft revised RSS was based on '*the continuation of strong economic growth at a rate of 3.2%*', and the 2008 SHMA assumed a growth rate of 2.8%. While the economic situation will hopefully improve from its current position, it would be unwise to assume that it will do so to the full blown extent prior to the recession.

3.13 The 2011 update to the Strategic Housing Market Assessment (SHMA) was based on 2008-based household forecasts, updated to a 2011 start date. Household formation rates have fallen since 2008 and this is reflected in the 2011-based projections. The recent report by Alan Holmans (New estimates of housing demand and need: England, September 2013) concluded that the 2008-based household projections had significantly over-estimated housing demand in 2011 in England, by 375,000. While economic factors accounted for 175,000 of the 350,000, the remaining 200,000 was due to other factors such as the effect of international migration. Even assuming a full economic recovery, therefore, there is evidence that the 2008 based figures were overestimated. These were the most recent projections prior to the 2011-based interim projections published in April 2013, and this evidence suggests that they should be treated with particular caution. This all therefore seriously questions the wisdom of relying upon past plan housing rates, especially the draft revised RSS, as a guide to future rates of provision.

3.14 The various household projections published since the draft revised RSS are set out below for comparison (please note that these are household projections and not dwelling numbers).

Source	Data Used	Households per year (W&P)	Households per year (WDDC)
'What Homes Where' http://www.howmanyhomes.org/index.html	DCLG 2008 Household projections	144 households	461 households
SHMA update (2011)	DCLG 2008 household projections updated to a 2011 base	160 households	470 households
A review of future housing requirements for West Dorset and Weymouth and Portland (2013)	2011 Interim ONS projections	153 households	419 households

INFLUENCE OF LOCAL FACTORS ON HOUSING NEEDS

3.15 The Inspector in his paragraphs 2.5-2.6 suggests that the councils' latest housing requirement figures are based on national trends rather than how these had been affected by local circumstances. The councils have not however taken the 2011-based ONS projections as an automatic basis for their assessment of housing demand. We have in fact done exactly what the draft National Planning Policy Guidance suggests, in starting with the 2011-based interim projections and then assessing likely trends after 2021. The figures have been rigorously tested and this is set out in the document [A Review of Future Housing Requirements for West Dorset, Weymouth and Portland](#) (April 2013).

3.16 In this report, employment-led scenarios are considered but it is concluded that there are significant factors that balance against their use. The particular matters that need careful consideration include future rises in state retirement age; increased future economic activity of older workers due to worsening pension investment returns and improved fitness of older people; persistent high unemployment amongst the young; low recent economic activity rates; increased levels of part-time and lower paid work; and high levels of under employment. These will help to ameliorate the effects of a potential future age-related decline in the local labour force, particularly bearing in mind improving health but poorer pension prospects.

3.17 The local plan provides enough jobs to meet the need generated by the proposed housing growth in the plan. We have planned for additional job numbers over and above this requirement, in order to provide choice and flexibility, and to boost the local economy. It is also sensible to have a certain level of contingency, bearing in mind the much lower delivery rates on employment development in comparison with housing.

3.18 We do not have up-to-date evidence on commuting patterns, having to rely still on evidence from the 2001 census¹. This evidence however indicates that the plan area as a whole is a net exporter of labour, so if any over-provision of employment were to occur this could help to redress the imbalance. While West Dorset had a net gain of around 2,500 commuters and Weymouth & Portland a net loss of around 7,800, there are very strong commuting links between the two areas. In 2001, Weymouth & Portland accounted for more than half of in-commuters (52%) and a fifth of out-commuters in West Dorset. Similarly in 2001, West Dorset accounted for 70% of in-commuters and was the destination for almost two thirds of Weymouth & Portland out-commuters (64%). The net loss of 5,363 commuters across the plan area as a whole represented 5.8% of the 2001 working age population.

3.19 The POPGROUP model (used by some of the objectors) takes a simplistic and unrealistic approach to the availability of jobs in the economy and the make-up of the incoming migrant stream. Relying heavily on a methodology that under-estimates the proportion of economically active in the inward migrant flows in areas of this nature is not sound. The fact that it tends to exaggerate the effects of population ageing on the local labour market means that it also will overestimate the estimated housing requirement that results from this.

3.20 In conclusion the relatively low housing figures for West Dorset and Weymouth come from the fact that in the future migration into and out of the area remains relatively balanced, particularly for Weymouth and Portland. The population is ageing but there is latent demand within the existing workforce to take up the jobs planned for and the plan area is a net exporter of labour so this could help to create more sustainable commuting patterns.

3.21 A number of other local circumstances, such as household formation rates and vacant and second homes have also been taken into account in the April 2013 report that formed the evidence for the current figures. Local migration rates as well as local economic circumstances have also been considered. The councils would be willing to undertake some further analysis of the relationship between jobs and housing if this would assist the Inspector on this point.

2012-BASED NATIONAL POPULATION PROJECTIONS

3.22 The new projections published in November 2013 do indeed show a slightly accelerated rate of growth for England as a whole, until about 2026, due to higher birth rates and changing patterns of international migration. Most of this growth is due to the effects of past immigration (e.g. higher births to recent migrant households) and will mainly affect the larger cities. However, even for England as a whole this only adds 1% to the total population by 2031 and is therefore unlikely to have a noticeable effect on housing demand in this area, which has previously had very low rates of international immigration. The upper end of the housing requirements range identified in the plan (and in the 2013 housing requirements paper) is in any case considerably higher than the lower end.

¹ The figures used here are taken from the Economy and Labour Market Profiles produced by DCC

HOUSING LAND SUPPLY QUERIES

3.23 The inspector in his paragraph 2.8 has queried the housing land supply situation, in particular referring to information on past performance, and the relationship between windfall and minor sites. The councils would be very willing to provide an additional paper summarising the housing land supply position if this would assist the inspector, but in the meantime the specific points raised are covered below.

PAST PERFORMANCE

3.24 Housing development targets for both West Dorset and Weymouth & Portland from 1994 to 2011 were derived from the Bournemouth, Dorset and Poole Structure Plan (Housing Policy A). These targets were about 9,500 gross (or about 9,000 net) for West Dorset, and about 4,700 gross (or about 4,200 net) for Weymouth & Portland.

3.25 Net housing completions over the Structure Plan period (1994-2011) totalled 7,941 in West Dorset and 4,238 in Weymouth & Portland, with the detailed breakdown set out below. Compared with the net targets (9,000 West Dorset, 4,200 Weymouth and Portland), this indicates an underprovision of 1,059 in West Dorset but an over provision of 38 in Weymouth & Portland. *(Source: Dorset County Council)*

Year	94-5	95-6	96-7	97-8	98-9	99-00	00-01	01-02	02-03
WDDC	473	357	502	463	639	559	490	555	544
WPBC	191	268	212	150	260	260	190	258	251
	03-04	04-05	05-06	06-07	07-08	08-09	09-10	10-11	TOTAL
WDDC	486	530	564	517	345	383	204	330	7,941
WPBC	364	290	359	188	275	410	150	130	4,238

3.26 This shows that West Dorset has underperformed against the Structure Plan target figures over the whole period on average, but the figures demonstrate that this has largely taken place over the final four years as a result of the economic recession, when a number of major development sites that had been allocated in the local plan were stalled or progressing very slowly. Weymouth & Portland had no underprovision. During this 17-year structure plan period, average annual completions were 469 in West Dorset and 248 in Weymouth & Portland. We were advised during the preparation of the plan that it was not necessary to plan to meet such previous underprovision in the new plan, as any resulting increase in demand would be reflected in the latest population and household forecasts, though the draft National Planning Policy Guidance indicates that this needs to be considered. It is however clearly relevant in determining whether there is a past record of underprovision.

3.27 Actual completions since 2011 have been counted against the supply in the local plan, as shown in the summary table 3.1 on page 57 of the most recently published text of the plan. (This table is reproduced below).

	West Dorset	Weymouth and Portland	Plan area
Housing demand (2011-31)	9,100-9,640	3,240-3,580	12,340 – 13,220
Completions (2011/12)	377	169	546
Existing supply permissions	2,949	1,286	4,235
empty homes	60	40	100
rural re-use / NDPs	200	30	230
minor sites	1,947	1,484	3,431
New allocations	2,930	1,300	4,230
Housing supply (2011-31)	8,463	4,309	12,772

3.28 This means that the underprovision in this first year, against the requirements proposed in the local plan, is taken into account and will be compensated for in the subsequent provision. The first five years' supply is based on specific deliverable sites, most of which have planning consent. The published five year supply (1 April 2012-31 March 2017) demonstrated that at that time there was a five-year supply against the emerging local plan requirement, regardless of whether a 5% or a 20% buffer was applied.

3.29 The NPPF definition of where a 20% rather than 5% buffer should be applied to the five-year land supply is where there has been '*a record of persistent under delivery of housing*'. This is not defined any further, but it specifically refers to persistent under-delivery, rather than having failed to meet a particular previous target, and the fact that one of the two councils has undersupplied as a result of the national economic recession is not in itself considered to constitute 'persistent under delivery' – particularly as this has been measured against a target that was higher than that arising from the current evidence. If required, however, a 20% buffer would be added to the West Dorset five-year requirement.

WINDFALL AND MINOR SITES ALLOWANCES

3.30 The allowance made for 'minor sites' (as set out in the table reproduced above) is made up of small SHLAA sites within the proposed defined development boundaries of both council areas, together with an additional supply from 'minor identified sites' in West Dorset and a small element of windfall calculation for Weymouth & Portland.

3.31 The ‘minor identified sites’ in West Dorset arose from an exercise carried out as part of the West Dorset SHLAA study, to predict the amount of housing likely come forward through the conversion of buildings, building on back gardens and intensification of under used sites. It was based on the identification of actual potential sites through site surveys of all the settlements, of which a proportion were estimated as likely to come forward. Details of all the sites were not however listed in the SHLAA, partly because it was not assumed that all would come forward, and partly because the identification of individual small sites in residential areas is quite personal information and was not intended to demonstrate landowners’ intentions. Sites that have been identified individually in the SHLAA have obviously been excluded.

3.32 As an equivalent exercise had not been carried out in Weymouth & Portland, an allowance for small-scale windfall based on past rates (but excluding any identified SHLAA sites) has been added for Weymouth & Portland only. This is explained in the SHLAA report but we can clearly provide further explanation during the examination.

3.33 In addition, and shown separately in Table 3.1 above, a small allowance for the potential delivery from neighbourhood plans and the implications of the relaxation of policies for the reuse of rural buildings has been included, over the entire Plan period (230 units). Given that the first neighbourhood plan in the District at Cerne Abbas is proposing to extend the development boundary in two places, potentially delivering in the region of 1.8ha land (which could reasonably accommodate 50 dwellings or more) and that there are 5 further neighbourhood areas designated and two areas proposed at the current time, with 11 further groups also showing interest or starting work, we do not feel this is unrealistic.

NEIGHBOURHOOD PLAN PROGRESS ACROSS PLAN AREA

Cerne Valley	Submitted for examination 4 December 2013. Formal consultation on draft plan began 10 January 2014. Changes to development boundaries could deliver around 50 dwellings
Buckland Newton	Area designated 4 February 2013
Loders	Area designated 4 February 2013
Piddle Valley	Area designated 12 March 2013
Cam Vale (Longburton)	Area designated 3 June 2013
Portland	Area designated 5 November 2013
Bridport, Symondsburry & Allington	Area designation consultation November 2013-January 2014
Puddletown	Area designation consultation November 2013-January 2014
Interest has also been expressed at: Charminster; Charmouth; Chesil Bank; Chickerell; Holwell; Litton Cheney; Lyme Regis, Maiden Newton & Frome Vauchurch; Sherborne; Stratton; Thornhackett; and Toller Porcorum.	

4. AFFORDABLE HOUSING

4.1 The inspector's letter refers to the councils' conclusion that it is impossible to deliver sufficient affordable housing to meet existing and future needs, and queries what other options for provision have been considered – including discussion with adjoining districts.

4.2 It is well-known that the DCLG methodology for identifying affordable housing needs is completely separate from that used to identify general market demand, and comes out with results that cannot be compared. It could be described as identifying the level of affordable housing provision that would be necessary to solve affordability problems permanently.

4.3 As advised in the draft ('beta') National Planning Policy Guidance, household projections published by the Department of Communities and Local Government have formed the starting point estimate for overall housing need. These are produced by applying projected household representative rates to the population projections published by the Office for National Statistics. Projected household representative rates are based on trends observed in Census and Labour Force Survey data. The projections are trend based and do not predict the impacts of changes to government policies or economic circumstances, which need to be assessed in determining the overall housing need in a plan area. But this overall housing need is still an assessment of demand that can realistically be met by the market.

4.4 The DCLG methodology of assessing affordable housing need, however, is based on primary data gathered from household surveys, to identify those who are currently in housing need, those who are likely to be in housing need in the future, and their capacity to afford housing. This will include expectations greater than are likely to be met.

4.5 The SHMA update document (2011) states (paragraph 19) that *'the level of housing need is high and it is not realistic that this need can be met in the current investment climate. The wider operation of the market should be understood to put this finding into context. In particular, data analysis suggests that the private rented sector makes a significant contribution to meeting households' needs, through the Local Housing Allowance system which subsidises housing costs for them; the fact that some households choose to spend more than 25% of their income on housing; and that parts of the private rented sector also offer poor quality housing at sub-market rents'*. It should also be noted that the draft National Planning Policy Guidance encourages authorities in future to use existing secondary data sources and *'avoid expending significant resources on primary research'*, so the methodology for assessing affordable housing need is likely to be different in future.

4.6 The 2011 SHMA update identified an affordable housing need of 1,657 per annum across the plan area (753 for West Dorset and 904 for Weymouth & Portland). This is nearly three times higher than the total housing need (market and affordable) from the recent ONS forecasts (617 dwellings, 455 in West Dorset and 162 in Weymouth

& Portland), and significantly higher than has ever been achieved as a total rate of housing development in the area. Previous surveys have regularly come up with results that are at least twice the forecasts of total housing provision.

4.7 The option of allowing land for development of sufficient total housing to supply the required amount of affordable housing is not feasible: this would be nearly 5,000 per annum across the plan area. Not only would the environmental consequences be very significant, but the market would not stand this amount of development and the level of affordable housing would not therefore be achieved. The plan would not be sound as it would not be deliverable.

4.8 National government funding for affordable housing provision has dropped by 60% in recent years, significantly reducing the opportunities for provision by means other than planning agreements. The councils' recently-adopted joint Housing Strategy goes through the variety of approaches intended to be taken, including work to make greater use of the private rented sector, but concludes that planning agreements will continue to be the most significant source of provision of new affordable housing units.

4.9 The councils have thoroughly tested the potential viability of development across the plan area during the preparation of the plan, to ensure that we are maximizing the proportion of affordable housing gained through planning agreements. We are confident that this evidence demonstrates that the affordable housing policies of the plan are achievable, but raising the proportions higher would be counterproductive and risk preventing sites coming forward. The recent government announcement that consideration may be given to stopping affordable housing being sought on sites of fewer than 10 homes is regrettable, as our evidence indicates that such provision is viable, and if it goes through this will clearly reduce our supply. In addition, many developers across the country are now being permitted by the Secretary of State to appeal successfully against the affordable housing requirements in existing section 106 agreements on the grounds of reduced viability.

4.10 As far as the duty to cooperate is concerned, we have prepared evidence of affordable housing need jointly across the whole of the Dorset area. This clearly demonstrates that surrounding districts have similar problems of their identified affordable housing needs exceeding the total provision identified – again due to the nature of the methodologies used for the two calculations. The need figures for each of the Dorset local plan areas, together with the other adjoining districts of South Somerset and East Devon, are shown in the table below for comparison (though it should be noted that those outside Dorset have not been undertaken using the same methodology – East Devon's in particular took a different approach).

Local plan / Core Strategy	Status and Plan Period	Annual need for all housing, from local plan	Annual affordable housing need identified	Affordable need as % of total need
Poole	Adopted February 2009 <i>(2006-2026)</i>	500	1,710	342%
Bournemouth	Adopted October 2012 <i>(2006-2026)</i>	730	4,974	681%
Purbeck	Adopted November 2012 <i>(2006-2027)</i>	120	520	433%
East Dorset and Christchurch	Examination (post-hearings) <i>(2013-2028)</i>	566	758	134%
South Somerset	Examination <i>(2006-2028)</i>	725	659	91%
East Devon	Proceeding to examination <i>(2006-2026)</i>	750	237	32%
West Dorset, Weymouth & Portland	Submitted <i>(2011-2031)</i>	617	1, 657	269%
North Dorset	Publication <i>(2011-2026)</i>	280	387	138%

4.11 All but two of these local plans (and all of those using evidence from the joint Dorset SHMA work) have annual affordable housing needs that exceed the total housing requirements. None of them (with the possible exception of East Devon whose affordable needs have been calculated by a very different methodology) can possibly meet their own full needs for affordable housing, so they are clearly not going to be able to meet those from this plan area. Of those that have been through public examinations (including those recently in East Dorset & Christchurch, South Somerset, and Bournemouth) there has been acceptance from all the Inspectors that it is not possible to meet the full level of need. While it is recognized that read literally, paragraph 47 of the NPPF requires us to meet the full level of assessed affordable housing need or to ensure that it can be met in an adjoining area, this has not been taken literally by any of the previous Inspectors (and should perhaps be read in conjunction with the statements in the draft NPPG discouraging the use of assessment methodologies based on primary data). As referred to earlier, discussions have taken place with East Devon about the potential for land in the adjoining part of East Devon to help meet Lyme Regis's affordable housing needs, but these have not been fruitful to date.

4.12 Development to go towards meeting these needs is almost entirely dependent on the market and on significantly depleted government grant. The plan has to be driven by the realities of the market place if it is to be deliverable, as has been accepted in all the surrounding areas that have had plans adopted or progressed through examinations.

5. SUPPLEMENTARY PLANNING DOCUMENTS

5.0 There is absolutely no intention to plan through Supplementary Planning Documents by using them to introduce new policy or allocate sites: this is simply an issue of wording in the text of the plan, which can be amended through a simple modification. It is entirely accepted that if the Coastal Change Management document is to define Coastal Change Management Areas, it would need to be prepared as a Development Plan Document. The text of the plan could readily be modified to reflect this. Similarly, if future work on Green Infrastructure were to identify a need to allocate new areas of land on which some form of development restraint would apply, then this would need to be prepared as a Development Plan Document.

6. CONSULTATION PROCESS

6.1 The inspector's concerns about the consultation process relate to the risk that potential respondents may have been confused about the changes made to the plan following (and resulting from) the pre-submission consultation. The councils however fundamentally disagree that there has been any confusion as a result of these changes, which were of course made in order to respond to the issues raised through consultation, or that there should be any doubt about the adequacy of their consultation processes.

6.2 As stated in the introduction to this document, the councils have been firmly committed throughout the plan preparation process to thorough and meaningful public consultation that met all the statutory requirements.

6.3 The legal process for the adoption of local plans is set out in the 2004 Act and 2012 Regulations. This forms the Government definition of what is appropriate for consultation, and has been followed to the letter. A chronology of all the consultation is set out in [Appendix 1](#), but the innovative and intensive public consultation that took place in 2011, preceding the drafting of the plan, particularly demonstrates the councils' commitment to consultation as a guiding principle behind the plan preparation.

6.4 We do not accept the suggestion that the changes to the plan have been confusing or that any respondents did not understand what was in the plan as a result. The reason that changes to the development allocations were put forward and published for consultation following the consultation on the pre-submission plan was in order to respond as far as we could to the views that people had taken the trouble to express. Despite the extensive and focused consultation in 2011 that had guided the drafting of the 2012 plan, there were some strong concerns expressed in the pre-submission consultation responses in 2012, particularly around development allocations in West Dorset, which the council was anxious to respond to. Recognising the need to maintain the housing land supply, an alternative strategy was published for consultation.

6.5 The January 2013 consultation on this alternative strategy was based on a very straightforward summary leaflet describing the proposed changes to the plan, involving the reduction in scale of three development allocations and the introduction of a new site at Dorchester. These were widely publicized and led to a significant level of responses, which again the council was keen to respond to, particularly in relation to the important historic landscape issues raised in relation to Dorchester.

6.6 We have remained in contact with a wide range of community and stakeholder groups throughout the various consultations and had very few complaints about their ability to understand the plan. From the Proposed Modifications Consultation, which was based on the tracked changes document, only 8 people out of a total of 159 respondents (including both valid and invalid representations) complained about the format of the plan or the consultation process. A further 3 people complained without making any representation. 9 of the 11 complaints came from Bridport residents opposed to the Vearse Farm development, whose primary complaint was that they had not found out about the 2012 consultation on the full plan at the time, and wished to raise concerns about the principle of allocating this site, rather than comment on the changes. Full details of these complaints can be found in [Appendix 5](#).

6.7 While we appreciate the inspector's concern that the 'tracked changes' plan might be difficult to read due to its complexity, we are not convinced that this has prevented people from responding. This format was used with the best of intentions, in order to take a fully transparent approach to the changes being made, and save people from having to cross-refer between two documents (the original plan plus a schedule of changes). It was of course a standard practice under the previous local plan system at the 'revised deposit' stage, and indeed in the government's revised regional strategy. Consultations on the revised plan have always been accompanied by summary information on the main changes, including through the web pages and press releases, to make very clear what was proposed. The only clearer alternative would be, as the Bridport objectors had requested, to have consulted again on the entire plan. But this had to be weighed up against the major risks to the timescale of the plan that would have resulted from a further full consultation – as well as the risk that it would have been very difficult for members to agree sites all over again. Of course had we decided to repeat the pre-submission consultation completely, the comments made during the first consultation would not have been required to be brought to the examination, and this could also have led to criticisms of unfairness to the original respondents.

7. INSPECTOR'S OVERALL CONCERN

7.1 We are disappointed that the Inspector appears to regard a willingness to respond and react to the results of public consultation as a flaw in the plan-making process. The preparation of local plans is an art as well as a science, and rightly includes a political element. The plan has evolved as a result of listening and responding to the views expressed on it, but has been underpinned throughout by

evidence and technical work. It must be understood that the development plan process, as established in law, is an iterative process made up of proposals, consultation and amendment.

7.2 The views expressed through consultation do change over time, with a marked tendency throughout this local plan process for the strength of opposition to development to increase as consultation continued, but the councils have striven to overcome these objections as far as possible.

7.3 The councils do not however believe that the changes made to the plan following the pre-submission consultation have fundamentally changed the strategy of the plan. We maintain that the spatial strategy is a realistic and deliverable one that is supported by evidence.

8. CONCLUSION

8.1 As referred to in the introduction to this document, West Dorset District Council and Weymouth & Portland Borough Council are both committed to the positive planning of development in their areas, in consultation with local communities and stakeholders, through a proper plan-led approach. We have taken significant risks in preparing a joint plan, which we considered to be outweighed by the benefits of developing a joint plan across the whole Housing Market Area and having the opportunity to deal with the main cross-boundary planning issues in a logical and coordinated way. We have made good progress on the development of a joint plan, building on the work that had taken place on both core strategies previously, including a considerable joint evidence base, but also undertaking significant new community engagement processes.

8.2 The joint plan will have very significant benefits for the plan area: releasing considerable areas of land for new development of housing and employment uses; ensuring that this development takes place to appropriate standards and with realistically achievable levels of community infrastructure; and providing an up-to-date policy framework for the joint development management service.

8.3 The councils are struggling to see how the process could have been carried out differently, unless they had deliberately decided that they had no intention of taking any account of the consultation undertaken. There is minimal public support for new development, and none for that of the scale proposed. Further public consultation on development proposals, as would be necessary as a result of withdrawal, or suspension to explore options for meeting a higher level of housing requirement, would lead to a huge level of opposition, as very clearly demonstrated by the consultation responses such as those received on the Sherborne and South East Dorchester sites – and indeed by the number of subsequent requests for the Vearse Farm allocation in Bridport to be reconsidered. There is a huge risk of such proposals not being approved by members, and even taking the most optimistic assumptions, undertaking the consultation and properly considering the responses would take a great deal of time.

8.4 The consequences of withdrawing the plan, or otherwise significantly delaying its adoption, will be that: West Dorset will be without a five-year land supply; both councils' five year land supplies will be disputed due to the uncertainty over the appropriate target;

neither area will have any reasonable certainty over emerging planning policy; sites that the councils have supported as being appropriate for development will be held back from progressing; and less appropriate sites will come forward through the appeal process as a result of the uncertainty. The resources required to defend such appeals would then further delay the prospects of progressing the plan to adoption.

8.5 The councils are willing to work with the inspector to explore how his concerns can be overcome during the course of the examination, and have both formally agreed their willingness to invite the inspector to recommend modifications to the plan, where this would ensure that it can be made sound (West Dorset's Executive Committee on 8 October 2013, and Weymouth & Portland's Management Committee on 1 October 2013). We would however urge the inspector to recognize the benefits that progressing the plan through examination to adoption will have for the proper planning of the future of the West Dorset, Weymouth and Portland area – and the serious implications of any other course of action.

To conclude by summarising the councils' position therefore:

- **We strongly believe that we have complied with all the legal, regulatory and procedural requirements imposed on the two authorities;**
- **In the light of the Inspector having raised these concerns, and our response to them, it would be of critical importance to the two authorities to have a clear steer from the inspector following the exploratory meeting, within an efficient timescale, as to whether he takes the same view or not.**

Hilary Jordan
Spatial & Community Policy Manager
West Dorset District Council and Weymouth & Portland Borough Council

17 January 2014

APPENDIX 1: SUMMARY OF CONSULTATION

2005-2009 Earlier consultation on Core Strategies

- **Weymouth & Portland**
 - 21 January 2005 Future of South Dorset conference, Weymouth College
 - 2007 'Your Place Our Future' conference at Weymouth College
 - Summer 2007 Issues and Options consultation
 - Summer 2009 Core Strategy Options consultation
- **West Dorset**
 - 21 January 2005 Future of South Dorset conference, as above
 - December 2006 meetings with town and parish councils
 - 19 January 2007 major stakeholder consultation event
 - March-June 2007 consultation meetings with young people, older people's forums and disability forums
 - July-September 2007 Issues and Options consultation
 - June-August 2009 Land Around Weymouth Development Options consultation

Autumn 2011 consultation to inform joint plan

- Advertisements in local press (full-colour half-page advertisement) – these appeared in a range of publications between 27 August and 2 September 2011, inviting people to a series of consultation events in late September / early October.
- Direct invitations also sent to wide range of organisations and consultees
- Pre-consultation event information sent out to people who had registered to attend the events (16 Sept)
- Consultation events held – 2 in eastern area (26 Sept afternoon and evening, Dorchester); 2 in northern area (28 Sept afternoon and evening, Sherborne); 2 in western area (3 October afternoon and evening, Beaminster); plus one in Weymouth. 380 attendees
- Event participants invited to set up and attend smaller working groups – 20 groups set up, 125 people involved, most groups met twice.
- Business breakfast consultation events also held in Dorchester, Bridport and Sherborne, and consultation at schools
- Final round of 'consensus' events across the 4 areas (east, west, north and Weymouth) – including the western area one held at Bridport (Colfox school). These included discussion/comment on all the development site options including Vearse Farm. At these events people were able to look at the conclusions of the working groups and add their own further comments about them.
- Feedback from all this consultation was used to inform the drafting of the plan.

Summer 2012 consultation on published plan

- Advertisements in local press (again, full colour half-page advertisements) – appeared week commencing 25 May, in range of publications including Bridport News and View From papers.
- Direct notification to range of organisations and consultees, including everyone on local plan consultation database
- Hard copies to all parish and town councils, local libraries and local council offices
- Further press articles also appeared in a number of papers including Bridport News on 13 June
- Consultation period was for eight weeks from 1 June to 27 July 2012
- During the consultation period, 12 drop-in events were held, including one at Bridport on 20 June
- About 1,400 people in total attended the events. 920 individuals or organisations responded with written comments on the plan.

November-December 2012 Alternative Sites consultation

- Consultation on the omission sites proposed by developers during the June-July 2012 consultation on the draft plan
- Document published online, and advertised through local press as well as direct notification to all previous respondents and those who had asked to be kept informed.
- 6 week consultation period between 8 November and 20 December

January 2013 ‘Alternative Strategy’ consultation

- Based on short written document (with maps) published online and made available in libraries and town council offices
- Advertised in local press as well as direct notification to all previous respondents and those who had asked to be kept informed
- Drop-in events held in Dorchester, Sherborne, Crossways and Beaminster
- 6 week period for comments (31 January to 14 March 2013)

August-October 2013 Consultation on all post-2012 modifications (post-submission)

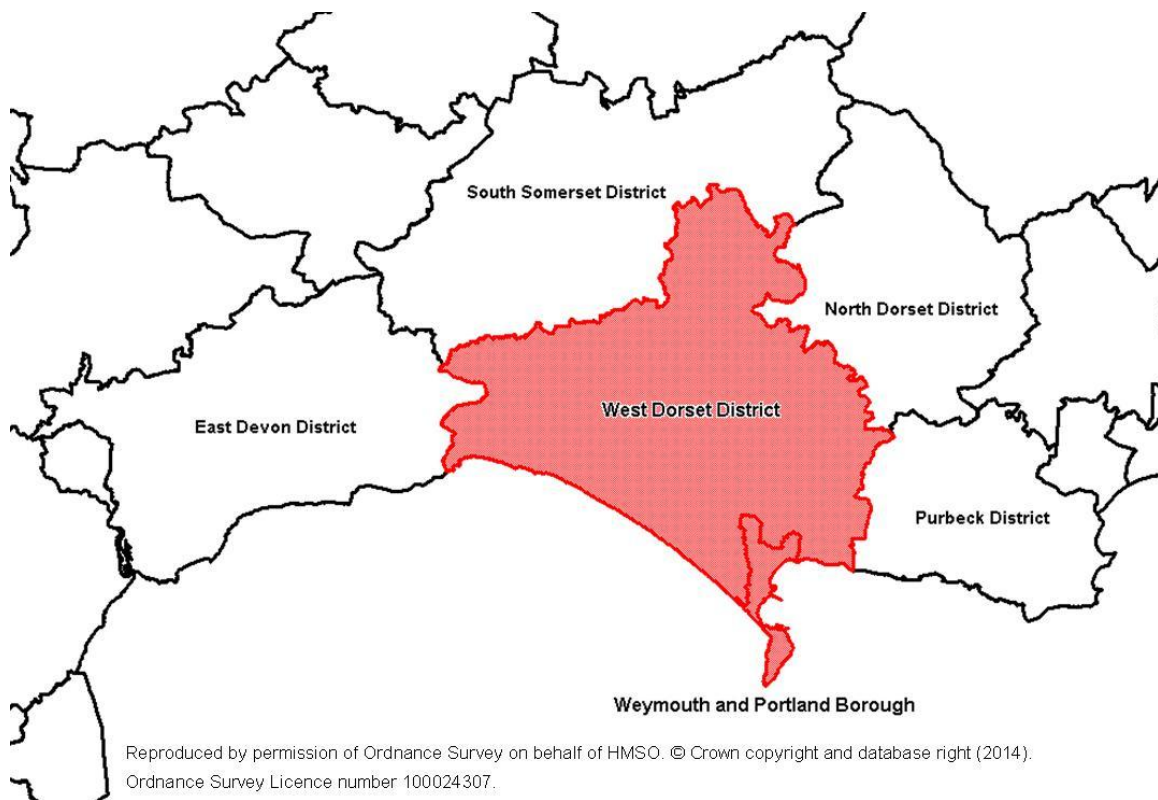
- Based on ‘tracked changes’ plan, accompanied by summary of changes on website, and press notices and press releases.
- 9 August to 25 October consultation period

Full reports on all the consultation stages up to submission are included within the document library submitted with the plan in June 2013.

APPENDIX 2: COMMITTEE REPORT PROPOSING JOINT LOCAL
PLAN

See separate attachment

APPENDIX 3: PLAN SHOWING ADJOINING LOCAL AUTHORITY AREAS



APPENDIX 4: CHRONOLOGY OF MEETINGS AND CONSULTATION RESPONSES WITH ADJOINING AUTHORITIES

SOUTH SOMERSET

Date	Nature of meeting / report
30 November 2009	SSDC Consultation 'cluster meeting' on Yeovil area – attended by Malcolm Woodward of WDDC
14 December 2009	SSDC Consultation 'cluster meeting' on Yeovil area – attended by Hilary Jordan of WDDC
10 March 2010	SSDC consultation workshop on Yeovil options, attended by Hilary Jordan of WDDC
29 March 2010	Meeting between Andy Foyne of SSDC and Hilary Jordan of WDDC
15 April 2010	Joint meeting of SSDC and WDDC members and officers: attended by Andy Foyne, Nick Cradnell and Cllr Tim Carroll of SSDC, and Hilary Jordan, David Evans and Cllr Robert Gould of WDDC
14 December 2010	WDDC Executive agreed response to consultation on SSDC Draft Core Strategy Preferred Options
July 2010	Presentation of results of historic environment assessment of Yeovil – attended by Hilary Jordan
6 July 2012	Joint meeting of SSDC, NDDC and WDDC members and officers: attended by Andy Foyne, Jo Manley and Cllr Tim Carroll of SSDC; Trevor Warrick and Cllr David Walsh of NDDC; and Hilary Jordan, Jo Witherden, Cllr Sarah East and Cllr Teresa Seall of WDDC.
21 June 2012	WDDC Response to consultation on SSDC Proposed Submission Local Plan
19 December 2013	Response to consultation on SSDC local plan modifications
28 January 2014	Provisional date for further officer meeting to discuss implications of SSDC modifications and WDDC exploratory meeting

PURBECK

Date	Nature of meeting / report
May 2010	Officers from both councils met in Crossways to visit potential development sites being considered in West Dorset
March 2012	Officer meeting at PDC offices to discuss likely strategic allocation of up to 1,500 homes at Crossways, and potential infrastructure requirements in Purbeck (link to railway station, in association with Woodsford Fields site)
October 2012	Purbeck local plan inspector's report proposes Partial Review to start in 2013, and refers to cooperation with West Dorset on development at Crossways as a necessary part of that review
20 January 2013	Further officer meeting taking place to discuss cross-boundary matters on the Partial Review

EAST DEVON

Date	Nature of meeting / report
June 2010	Meeting of West Dorset District Council, East Devon District Council, Dorset County Council and Lyme Regis Development Trust to discuss cross-boundary planning policy and education issues
July 2010	East Devon District Council LDF Panel meeting – briefing note from WDDC considered
Autumn 2010	East Devon issues and options consultation – WDDC responded
18 November 2010	East Devon LDF Panel meeting – Hilary Jordan and Jo Witherden attended, to discuss cross-boundary issues with East Devon members
10 August 2012	West Dorset response to East Devon Villages planning policy document
11 January 2013	West Dorset response on pre-submission East Devon plan, raising objection due to lack of reference to relationship with Lyme Regis, and lack of flexibility to allow options for longer term growth of Lyme Regis to be explored during plan period.
2 July 2013	West Dorset response to Uplyme Neighbourhood Plan area designation, suggesting joint working
10 July 2013	Meeting between East Devon DC, West Dorset DC and Dorset CC to discuss duty to cooperate – considered that Lyme Regis / Uplyme issue not fundamental to soundness of either plan

APPENDIX 5: COMPLAINTS RECEIVED ON THE LOCAL PLAN MODIFICATIONS CONSULTATION PROCESS

VALID REPRESENTATIONS

There were a total of 109 respondents to the Summer/Autumn 2013 modifications consultation. Out of these 109, 5 (5%) complained about the format of the plan or the consultation process. The comments included:

- It was very difficult and time consuming to relate the Council's summary of responses and their proposed changes to the Draft Pre-Submission Local Plan June 2012 to representations.
- I think that not only have you not publicised the new local plan in the Bridport area sufficiently, but you have made it practically impossible to comment.
- The fact that though the statutory consultation process was carried out local people do not feel informed or consulted about the scale of this proposed development
- I reject the condition that comments should be made only on changes to the plan as there was no open consultation with Bridport Town Council and the local community in formulating the plan. The process is therefore flawed.

INVALID REPRESENTATIONS

There were a total of 50 respondents who made representations that were wholly invalid. Out of these respondents, 3 (6%) complained about the format of the plan or the consultation process. The comments included:

- I suspect that the due democratic processes have not been followed by the consultation. The people of Bridport don't know about what is being planned.
- Attempting to find the information and read and interpret it so that it is clear is very difficult. I believe many people who would like to have a say would not be able to navigate the 'system'
- The whole (consultation) procedure was flawed and we will now take this to the ombudsman

These respondents received a letter from the Council explaining why their response was invalid and offering them a chance to resubmit (if the response was received before the end of the consultation period).

OTHER COMPLAINTS

In addition to the above, the following additional comments were received on the format of the plan or the consultation process, outside any representations:

- I have spent a considerable amount of time trying to find my way round all the different track changes and what appears to be superfluous colouring (in purple) on some text.
- The whole process is bogged down in procedural mechanisms. If a plan is changed then surely you should be looking for comments on the new plan, not just changes to it? On reading the document that has lines in red and drawn through it's very difficult to follow. How can you only be allowed to comment on changes? Ordinary people are being excluded from the democratic process. It seems that the whole consultation process is designed to confuse and prevent reasoned argument.
- I find it quite extraordinary that you cannot check your documents for errors before you send them out for consultation. "Could cause some confusion to respondents" is the understatement of the year.