

Part B – Representations

Please answer as many questions or as few questions as you wish. There is a box at the end of the form where you can provide any comments that you may have.

Housing

1. Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset? If not, please set out what you consider to be an appropriate figure and provide reasons for this.

Yes

No

If you have answered 'No' please set out an alternative housing figure and provide reasoning to support your answer.

At the current time this is based on a draft figure provided by Government. Until such time that it is confirmed by Government and tested through the Local Plan process in terms of the area's environmental and infrastructure capacity, it is too soon to agree that this is an appropriate figure. The previous SHMA figure took into account local factors and should not be completely discounted at this stage.

Employment

2. Do you consider that additional employment land should be allocated for development at Blandford as part of the Local Plan Review?

Yes

No

Although it may be prudent to identify where future expansion could take place, whether sites should be allocated should depend on more robust evidence of demand, and availability of appropriate sites. It was clear from the statements made by Savills at the Blandford Plus Neighbourhood Plan that demand for the employment site was from an existing business that would therefore be relocating, so if approved would have freed up a significant site in Pimperne village.

3. Do you consider that there is a need to allocate additional employment land in any other part(s) of the District?

Yes

No

Provided that there continues to a mechanism for Neighbourhood Plans to make such allocations.

Spatial Strategy

4. Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?

Yes

No

5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.

Yes

No

If you have answered 'Yes' please set out your alternative spatial strategy and provide reasoning to support it

It is clear that significant growth in these locations is not easy to achieve on sites that would be acceptable in environmental and infrastructure terms and achieve real community benefits. Any target suggested for rural areas, if continued, needs more scrutiny than previously had through the 2016 plan, to take into account the different circumstances of the 18 villages in terms of constraints, opportunities etc. It should make clear that simply because they are named in this 'larger village' category does not suggest that these are sustainable communities of that further housing would be sustainable – as this will depend on the specific needs and constraints of that village.

Blandford (Forum and St Mary)

6. Do you agree with the conclusions regarding the areas of search identified at Blandford?

Yes

No

7. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

There is no recognition of the importance of maintaining a gap between Blandford and Pimperne, in order to ensure Pimperne village retains its separate and distinct character. This is disappointing given that the Local Authority have been aware of the importance of this factor through the emerging Neighbourhood Plan. Although para 1.20 states that in producing the consultation NDDC has taken into account the neighbourhood plan that are being progressed, and is not seeking to undermine those neighbourhood plans, this does not seem apparent in the appraisal of options.

See also 'other comments' which highlights concerning discrepancies in the overall scoring and site selection in the SEA – this has only been checked in comparing the northernmost 3 sites, and further discrepancies could also exist.

8. What are the additional infrastructure requirements that are likely to result from potential future development at Blandford?

Please set out what you see as the additional infrastructure requirements.

The Blandford NP highlighted the importance of increased education provision. Although this is not disputed, the potential impact on Pimperne Primary School, which includes a significant number of town-

based children on its roll, needs to be taken into account.

The other infrastructure issue is in relation to the transport network. Increased traffic generation in Blandford will increase traffic on the A354 through Pimperne, making it more difficult for local residents to cross this road safely. However discussions with the highways authority as part of the Neighbourhood Plan process suggest that DCC do not consider traffic management measures that would slow the traffic down within the village section of the A354 appropriate or likely to be delivered through planning-related developments – so there is as yet no infrastructure solution identified.

Gillingham

9. Do you agree with the conclusions regarding the areas of search identified at Gillingham?

Yes

No

10. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

11. What are the additional infrastructure requirements that are likely to result from potential future development at Gillingham?

Please set out what you see as the additional infrastructure requirements.

Shaftesbury

12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury?

Yes

No

13. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

14. What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?

Please set out what you see as the additional infrastructure requirements.

Sturminster Newton

15. Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton?

Yes

No

16. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

17. What are the additional infrastructure requirements that are likely to result from potential future development at Sturminster Newton?

Please set out what you see as the additional infrastructure requirements.

Stalbridge

18. Do you agree with the conclusions regarding the areas of search identified at Stalbridge?

Yes

No

19. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

20. What are the most important infrastructure requirements that are likely to result from potential future development at Stalbridge?

Please set out what you see as the additional infrastructure requirements.

The Villages

21. Do you agree with the Council's proposed approach in relation to future development at the eighteen larger villages within the District or do you think that the Council should consider an alternative approach?

Yes

No

If you have answered 'No' please set out your alternative approach and information/reasoning behind this.

Although the intention may be that local housing needs will be met primarily through rural exception affordable housing schemes coming forward over the plan period, it is clear that the promotion of such sites by local landowners is not high on their agenda – in our case no such sites were offered. This is particularly concerning at times when the district does not have a 5 year housing land supply, as if Neighbourhood Plans have not allocated sites they are targeted by developers as sustainable locations, and Planning Officers have appeared bound by the ‘presumption in favour of sustainable development’ to allow open market housing regardless of whether it delivers any affordable housing, let along the levels that would be delivered had the site been a rural exception site.

It is clear that significant growth in these locations is not easy to achieve on sites that would be acceptable in environmental and infrastructure terms and achieve real community benefits. Any target suggested for rural areas, if continued, needs more scrutiny than previously had through the 2016 plan, to take into account the different circumstances of the 18 villages in terms of constraints, opportunities etc. It should also make clear that simply because they are named in this ‘larger village’ category does not suggest that these are sustainable communities of that further housing would be sustainable – as this will depend on the specific needs and constraints of that village.

There is no question here on infrastructure requirements – however if the strategy is that the villages are to accommodate housing growth the infrastructure requirements should be considered through this review.

Affordable Housing

22. Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?

Yes

No

If you have answered 'No' please set out your alternative approach and information/reasoning behind this.

Larger scale developments (in excess of 9 houses) are significant in scale to most of the villages. Also, by raising this cap, areas which have or are progressing Neighbourhood Plans are at risk of being undermined, as this could very well be seen as a ‘second best’ option for a developer on sites that have been rejected by the Neighbourhood Plan process (and the community at referendum) as less preferable. The best mechanism for such larger sites would be as a Neighbourhood Plan Development Order (or CRBO) where the community have a real say in such a larger scale of development.

23. Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?

Yes

No

24. Do you consider that the Council should continue with its existing policy approach, which allows for a small number of market homes on rural exception sites?

Yes

No

The existing incentive did not produce any offers in Pimperne, which would suggest that a starting point of 100% affordable housing would potentially deliver more, rather than less, numbers of such housing.

Self-Build and Custom-Build Housing

25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?

Yes

No

a. Allowing serviced plots to come forward under the current development plan policies.

Yes

No

b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing.

Yes

No

c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site.

Yes

No

d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties).

Yes

No

e. Identifying land in public ownership which would be sold only for self-build development.

Yes

No

f. The use of Local Development Orders to facilitate self-build development.

Yes

No

26. Are there any other approaches that could be used to meet the demand for self-build housing?

Yes

No

If you have answered 'Yes' please outline the other approaches which the Council could pursue.

Ensuring the Vitality and Viability of Town Centres

27. Do you consider that the existing hierarchy and network of centres, as set out in LPP1, should be amended to include Stalbridge as a 'local centre'?

Yes

No

Important Open or Wooded Areas (IOWAs)

28. Do you agree that those IOWAs, which are protected from development by other planning policies or legislation, should be deleted?

Yes

No

If you have answered 'Yes' please outline the other approaches which the Council could pursue.

Deleting IOWAs where they lie within a Conservation Area are not necessarily going to be protected by Policy 5 (The Historic Environment). This is because very few Conservation Area Appraisals have been carried out or exist from the time the area was designated – so there is no understanding of the historic significance of those green spaces from a heritage basis. Furthermore the reason for that IOWAs designation may not have been heritage-based – and there appears to be no record kept explaining their original reason for designation. Many communities are progressing Neighbourhood Plans and it is believed that all, without exception, have review their local green spaces as part of this process. It therefore makes sense to leave the review to Neighbourhood Plans, other than in those locations where such work is not being progressed by communities, where NDDC could simply work with the local Parish Council in undertaking a review and consulting local people on the value they place on those local spaces. It would also make sense for NDDC to commit more resources to undertaking Conservation Area Appraisals where these are long overdue.

The A350 Corridor

29. Do you consider that the land which is identified and safeguarded for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass should continue to be identified and safeguarded for such purposes?

Yes

No

Comments

Do you wish to be contacted about future consultations relating to the Local Plan Review?

Yes

No

It is not clear from Figure 6.4 of the SEA (which is a table showing the areas of search surrounding Blandford which have some possible development potential) the evidence that has been used to substantiate the conclusions reached

For example – site A has the following issues:

Impacts on the AONB and the landscape.

Possible highways/access constraints.

The distance to local services and facilities located within the town centre.

And is marked as having possible development potential. The table does not mention the high grade agricultural land impact noted in the text, or its sensitivity to groundwater flooding. From page 98 the overall impression is that the ‘balanced’ view should be a negative one, as it contains negative outputs in 4 categories and only positive outputs in relation to housing. This could also be said of Site B.

In comparison, site K also has

Impacts on the AONB and the landscape.

The distance to local services and facilities located within the town centre.

Listed in the table, but does not have possible highways/access constraints, yet is marked as not having possible development potential. Nor does the table mention the heritage impact noted in the text in conjunction with site K. On pg 108 it has far fewer negative scores than either sites A or B.

This inconsistency, and the inability to track the findings back to the evidence source is a concern, given the possible weight that will be placed on the SEA findings on the options to be pursued.

Signature: _____

Date: _____

If submitting the form electronically, no signature is required.

When completed please send form to planningpolicy@north-dorset.gov.uk