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Representation # \_\_\_\_\_

## NORTH DORSET LOCAL PLAN REVIEW

### Issues and Options Consultation

### 27 November 2017 to 22 January 2018

## Response Form

As part of the Local Plan Review (LPR), North Dorset District Council has prepared an Issues and Options Document for consultation. The Issues and Options Document, the Sustainability Appraisal and associated documents can be viewed online via:

<https://www.dorsetforyou.gov.uk/planning/north-dorset/planning-policy>

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

Post: Planning Policy (North Dorset), South Walks House, South Walks Road, Dorchester, DT1 1UZ

**Deadline: 5pm on 22 January 2018. Representations received after this time may not be accepted.**

### Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose. Personal details will not be visible on our website, although they will be shown on paper copies that will be available for inspection by members of the public and other interested parties.

\*If an agent is appointed, please complete only the Title, Name, Job Title and Organisation boxes in the personal details but complete the full contact details of the agent including email address. All correspondence will be sent to the agent.

Personal Details*		Agent's Details (if applicable)*
Title	Mr.	Mr.
First Name	Vernon	Malcolm
Last Name	Knapper	Brown
Job Title( <i>where</i> )		Director of Planning
Organisation ( <i>where relevant</i> )		Sibbett Gregory
Address	██████████ ████████████████████ ████	██████████ ██████████ ████
Postcode	████████	████████
Tel. No.		
Email Address		████████████████████

## 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.*

The planning authority is right to follow government advice on this issue

It is not agreed that in the long term, the highest level of housing provision of 366 (option C) is likely to result in significant adverse impacts upon the environment. I appreciate this is a matter of judgement but even 366 dwellings per annum would only require 0.04% of the total district area (based on 30 dwellings per hectare and a total district area of 60,920 hectares). It is hard to justify a strong negative effect on biodiversity, water, air, climate change landscape historic environment, all of which could be avoided. (Elsewhere districts are having to accommodate 10 times this level of provision).

### **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

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

Yes

No

### **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.*

The Sustainability Assessment is seriously flawed. It fails to identify **all reasonable alternatives**. It treats all 18 larger villages as being the same, offering the same benefits and having the same adverse Impacts. It fails to consider each settlement on its merits. A reasonable alternative would have been to consider the ability of each village to play a part in the economic growth of the district in a sustainable manner. Some might only be able to make a minor contribution. Others including Charlton Marshall could play a more significant role.

Not all the villages are within areas of high landscape value. Few are within areas of flood risk, and some are closer to employment locations with good public transport so their impact on climate change is less. The historic environment is different at each location. Development at some villages can deliver community and economic benefits. Stalbridge is a less sustainable location than some of the villages being remote from significant employment centres, higher level education and health facilities, significant shopping and from the primary road network.

The context map 2.1 is seriously flawed and gives a false impression of linkages to the main economic centres of the country and beyond. It fails to show national designations identified in footnote 9 which the NPPF indicates development should be restricted. Adding that information indicates that about half of the 18 villages are more sustainable than others.

Charlton Marshall is a good example of a more sustainable settlement. It is **not** within an AONB and is **not** subject to any other environment designations. There are significant opportunities for development outside any area at risk of flooding. It is on a regular frequency public transport route between Blandford and Poole. It is within easy cycling distance of employment areas, and the town centre of Blandford. Only part of the village is designated as a conservation area. Several sites are included within the SHLAA as being suitable for development.

### **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.*

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.*

**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.*

The planning authority should consider each of the 18 villages separately and assess the contribution each could make to meeting FOAN and economic growth without compromising environmental objectives. This is a reasonable alternative that the Sustainability Appraisal should have considered. The 18 villages are all different and are subject to different constraints and opportunities. They should not be treated as though they were all the same.

Applying figure 2.2 of the SA to the development of say 100 dwellings at Charlton Marshall would probably show **no** red blocks (strong negative effects) in that development of this scale at Charlton Marshall could :-

Be **beneficial** to bio-diversity

Be **neutral** in terms of soil quality

Have **no impact** on water

Have **limited impact** on climate change bearing in mind short distance to towns, access by other modes of transport even by comparison with the four main towns and Stalbridge. All of the towns are within the Housing Market Area of larger towns outside the district.

**Limited** landscape impact. The village is not within an AONB and lies in a wide river valley and partially screened by trees and existing housing. There are no significant long distance views into the village.

Have **no impact** on historic environment. There is a small conservation area but much of the existing development is modern.

Have a **neutral** impact and possible benefit to community. Increased population would help to sustain existing community facilities and may encourage new facilities.

Have a housing **benefit** for all sectors of the community and

Have an economic **benefit** creating jobs in the village, business to local suppliers and trades and long term spending in the local economy.

**To suggest that an unspecified quantum of development at Charlton Marshall would have a strong negative effect demonstrates that the planning authority have failed to carry out a Sustainability Appraisal specific to the village.**

The SA states:-

*Both options would result in the provision of housing. However, since housing need is generally greater at the larger settlements, focusing development at the larger villages (option C) is less likely to meet the community's housing need.*

This statement is far too generalised. It is not suggested that the main focus for development should not be on the main towns. However some villages have a close relationship with employment, retail and community facilities in nearby towns both within the district and beyond .

Community housing need is not limited to low cost housing. There is a good demand/need for housing in the nearest villages to towns. In the case of Charlton Marshall there is strong market evidence of need for market evidence following the development at Church Road. There is a good, level walk and cycleway into Blandford. There is also a regular frequency bus service through the village to Blandford and Poole. There is a strong need for housing closer to the conurbation with a very diverse range of employment opportunities.

### **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

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

**There is a reasonable alternative that has not been considered** which is to make sufficient housing land allocation to remove the need for exceptions sites other than at those settlements where environmental considerations outweigh the need for housing. (For example at villages within an AONB or other national designations such as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, designated heritage assets; and locations at risk of flooding or coastal erosion.) Charlton Marshall has only a small conservation area and only partially subject to flood risk. By allocating land in this way landowners are likely to be more willing to bring land forward and developers more willing to engage. The result is likely to be more affordable housing. Exceptions sites are less likely to come forward and there fewer developers of such sites, particularly when there is little or no grant funding.

### **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

### **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**

If you have any comments about the Issues and Options Document or the Sustainability Appraisal please set them out in the box below. If your comments are in relation to a specific question or chapter of the Issues and Options Document then please state which question or chapter your comments relate to.

The Sustainability Appraisal is seriously flawed in that

- (a) it fails to identify all of the reasonable alternatives. In doing so it has not assessed fairly all of the Options for Future Development. (sections 2.2 and 2.3.1)
  - (b) It also fails to consider all of the aspects of Sustainability set out in the National Planning Policy Framework. (sections 5.2, 11.2 and 12.1)
  - (c) The assessment of impacts is far too subjective. Sections 5.2, 11.2 and 12.1)
  - (d) It fails to have regard to factors outside of the District. (sections 2.3.1 and 5.2)
  - (e) It fails to objectively assess the contribution to housing of restricting villages to local needs only and exceptions sites which only have a small proportion of market housing. (section 12.2).-----
- (a) The Sustainability Appraisal treats all 18 villages as having identical characteristics. They are spread across the district. They are subject to a variety of constraints. They have differing relationships with other settlements and employment centres. They have differing levels of accessibility to public transport. An obvious alternative is to consider the scope for some development at each of the villages. In some cases that will be very little but in other cases there will be scope to make a significant contribution.
  - (b) The NPPF indicates 3 dimensions to sustainable development. The SA fails to examine the economic and social dimensions for each of the villages and fails to consider the components of the environmental dimension in respect of each village. It breaks down environment into seven categories giving undue weight to this dimension. In reality it rejects this alternative on a simplistic approach to climate change which equates only to self-contained settlements.
  - (c) The SA treats any adverse impact as a “Strong Negative Effect” without any rationale for its subjective assessment. This is particularly true of Climate Change, Landscape, Historic environment, Community and Economy. Villages outside any AONB are rated as the same as those within. Villages remote from centres of employment and education are treated the same as those with good access by cycle or bus. Villages with less historic heritage are not distinguished from those with significant heritage assets.
  - (d) Villages remote from major employment, education, health, other community and social facilities are treated the same as those with good connection by road and public transport. E.g. Links to the Bournemouth Poole conurbation and its Housing Market Area and to Salisbury and its Housing Market Area.
  - (e) Restricting housing development in villages to local needs only will not encourage land owners to bring forward land for development because of the lack of a financial incentive to do so. Developers are not encouraged to develop in areas where the planning system is more demanding of resources and time. The SA needs to consider how much local needs housing will actually be delivered on exceptions sites by comparison with

allocations where there is a balance of market and affordable housing. Exceptions should be just that, exceptions.

As a result of the serious failings of the Sustainability Appraisal, the Issues and Options are seriously flawed.

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

Yes

No

Signature: M.D. Brown FRICS, MRTPI

Date: 17/01/2018 \_\_\_\_\_

*If submitting the form electronically, no signature is required.*

When completed please send form to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)