

SHF/CIR.D.0326

17th September 2015

Planning Policy
North Dorset District Council
Nordon
Salisbury Road
Blandford Forum
DT11 7LL

Dear Sir

North Dorset Local Plan - Part 1 Main Modifications Consultation
Submission on behalf of Messrs Drake

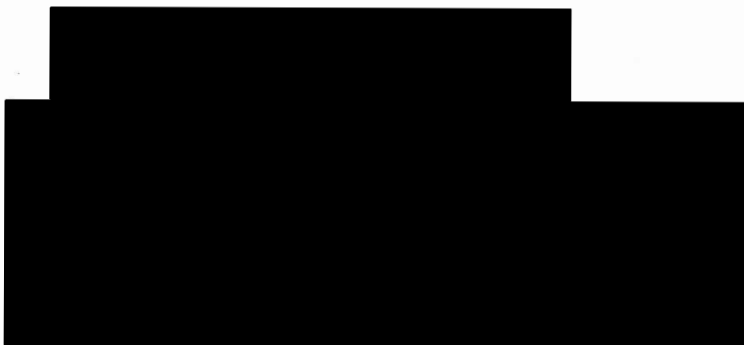
Pegasus Group has been instructed by Messrs Drake to submit representations in response to the following Main Modifications:

- Main Modification 1
- Main Modification 2
- Main Modification 3
- Main Modification 5
- Main Modification 6
- Main Modification 15
- Main Modification 18
- Main Modification 19

I will email electronic (PDF) versions of this letter and our representations.

I trust the submission is in order. Should you have any questions or queries please do not hesitate to contact me.

Yours faithfully



Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM1

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy
- It does not comply with the law

4. What would you like to happen?

- Delete the proposed modification
- Amend the proposed modification – you should suggest amended wording below
- Add a new policy or paragraph - you should suggest new wording below

(Please give further details or suggested wording in box for Question 6)

5. If there is an additional Examination Hearing session, would you like to verbally express your views to the Inspector?

Yes

No

6. Your Comments.

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
- What changes to the proposed modification wording/new wording you are suggesting.
- What additional policies or wording you are suggesting.

To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

Pegasus welcomes the proposed extension of the plan period as it provides for a 15 year time horizon as preferred by paragraph 157 of the NPPF and is consistent with the representations we have previously submitted.

However, the extension of the plan period needs to be accompanied by a housing target that will comply with policies of the NPPF and advice in Planning Practice Guidance on the assessment of housing needs, and by a settlement strategy that will deliver the higher housing target and provide a better distribution of housing to reflect the needs of the rural areas as well as those of the four main market towns. The proposed approach to housing supply increases the concentration on the four main towns by relying primarily on adjustments of the capacity of broad locations for growth in Blandford St Mary and Stumincer Newton, the modifications do not address the Inspector's concerns about the soundness of the Plan's strategy, in terms of complying with the NPPF and PPG in respect of the approach to the rural areas.

The Inspector asked the Council to assess the need for growth and re-assess the policy approach to housing and employment in the rural areas, in the light of the aims of NPPF paragraphs 17 and 28: 'supporting thriving rural communities,' and 'to support a prosperous rural economy.'

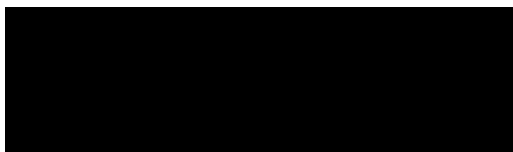
The Council's response (in paragraphs 3.20 and 3.21 of MHD006) comprises 96 dwellings on SHLAA sites within Stalbridge and the eighteen larger villages and 'residual need' of at least 177 dwellings to be allocated in the rural areas through neighbourhood plans or Local Plan Part 2. (We have already though our representations and at the Hearing Sessions objected to the fact that a separate Site Allocations DPD or Part 2 Local Plan will be prepared).

These issues should be addressed in Local Plan Part 1 which should provide the policy framework for development in the rural areas consistent with the NPPF and PPG, this plan clearly does not. The changes proposed do little more than what is currently in the plan. In recognising the development potential of the 18 larger villages, the LP Part 1 should review the settlement boundaries or at least facilitate development coming forward on the edge of the settlement, if it is sustainable and consistent with other policies of the plan.

It is clear from all the 'Additional Mid-Hearing Written Material' that the Council has not been prepared to re-consider its approach to overall housing provision or its settlement strategy in response to the Inspector's requests.

Continue on a separate sheet if necessary

Signature



Date: 11th September 2015

If submitting the form electronically, no signature is required.

Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM2

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy
- It does not comply with the law

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- Add a new policy or paragraph - you should suggest new wording below

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5. If there is an additional Examination Hearing session, would you like to verbally express your views to the Inspector?

Yes

No

6. Your Comments.

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
- What changes to the proposed modification wording/new wording you are suggesting.
- What additional policies or wording you are suggesting.

MM2 proposes that the Council commence a review of the Local Plan shortly after its adoption. However this proposal is only set out in supporting text rather than actual policy. It is suggested that this proposal is incorporated into policy. It is also suggested that MM2 is more precisely defined as the wording “commence a review shortly after its adoption” is too vague and non-comital. The Council should commit to the preparation and submission to the Secretary of State for examination the Local Plan review by a specific date.

Furthermore, the proposed early review of the Local Plan does not obviate the need for a realistic and effective strategy to provide for a significant boost to housing supply and to provide for rural housing needs now.

The proposed housing requirement of 5,700 homes does not reflect the objectively assessed need for housing as set out in the response to MM3 and the distribution of housing to meet rural needs is not based on robust evidence as set out in the response to MM5. These result in the policies of the Local Plan being unjustified and not positively prepared and this cannot be addressed by an early review. The housing requirement and its distribution should be justified and positively prepared within the Local Plan Part 1 in order for the plan to be found sound.

Furthermore, as there is not a sufficient housing supply to address the identified housing requirements, particularly in the sustainable villages, the Local Plan as drafted will not be effective in meeting even these constrained figures. This is covered in greater detail in the response to MM6. Again this should not be postponed and addressed by an early review as it is an issue of soundness now and this approach would result in needs not being met for an indeterminate period before the early review is adopted.

Paragraph 153 of the NPPF requires a single Local Plan. However, the Council’s proposed approach is to avoid taking important strategic decisions on housing needs and provision, and on the settlement strategy in the Local Plan Part 1. Instead the Council propose to review the housing requirement in a review of Local Plan Part 1 which enables a closer alignment of the local plan production across the HMA (based upon the revised Eastern Dorset SHMA - interim findings were produced for two of the local planning authorities within the SHMA earlier in the year but the final report has yet to be published).

MHD006 outlines the relationship between Local Plan Part 1 and Local Plan Part 2 and the scenarios for a review of the plan. Clearly the new SHMA will provide the OAN for the review of the Local Plan, but the form of the review seems as though it will depend on the extent of the OAN, if a similar figure or lower figure is required this would lead to a “light touch review” and LP 2 would continue. If the increase is more significant then LP 1 and LP 2 would be combined. As proposed the Local Plan still does not address the needs of the larger villages as the settlement boundaries have not been removed.

This approach is not only inconsistent with the NPPF but also provides for an ineffective strategy that enables needs to go unmet in the interim.

It is understood that the Councils of North Dorset, West Dorset, Weymouth and Portland are undergoing re-organisation with the result that they will have a joint planning team serving the 3 authorities. However, the authorities are within different HMAs and are progressing separate plans, both in need for early reviews. The Inspector for West Dorset Weymouth and Portland Local Plan has recently stated in his report (August 2015) that Modifications should be made so that a plan review should be put in place no later than 2021. There are concerns that delivering both reviews will be challenging from a resourcing perspective and could well be delayed, resulting in housing needs not be met.

The Local Plan Part 1 needs to reflect the objectively assessed need for housing and provide for a robust spatial strategy including a policy framework that allows for these needs to be met. Although in principle an early review is supported we do not agree that Local Plan Part 1 should proceed to adoption on the basis of an inadequate overall supply of market and affordable housing and a settlement strategy that fails to take account of housing needs in the rural settlements especially where such a review is likely to be significantly delayed.

To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

Continue on a separate sheet if necessary

Signature: _____



Date: 11th September 2015

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Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM3

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy
- It does not comply with the law

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(Please give further details or suggested wording in box for Question 6)

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Yes

No

6. Your Comments.

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
- What changes to the proposed modification wording/new wording you are suggesting.
- What additional policies or wording you are suggesting.

To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

Main Modification 3 amends the text in the submission draft of the Local Plan Part 1 to exclude Stalbridge and the eighteen larger villages from the countryside. It also identifies that these villages (including Stalbridge) will form the focus for growth outside of the four main towns. This is supported as it provides the opportunity for some of the rural needs to be addressed as requested by the Inspector. However, MM3 goes on to identify that “Settlement boundaries around the larger villages are retained while settlement boundaries around the District’s remaining villages are removed.”

The settlement boundaries in the previous Local Plan were adopted in January 2003 and were drawn to meet the development needs of villages until 2011. Paragraph 1.50 of the Local Plan 2003 identified that these “settlement boundaries will be reviewed at each Plan revision and may be enlarged or reduced to allow for new allocations for development”. However, these have not yet been reviewed with the effect that they are now time expired, out of date and will not provide for the development needs of the District. Despite being out of date already these settlement boundaries are proposed to be reinstated in the Local Plan.

It is noted that in the Schedule of Additional changes pages 26 and 27 Change reference 3/2/26 policy 2 page 39 para 3.55 that the settlement boundaries may be reviewed either: through Part 2 of the Local Plan or a neighbourhood Plan.” Whereas Change reference 3/2/4 Policy 2 page 39 para 3.55 states that “The settlement boundaries will be reviewed either: through site allocations in Part 2 of the Local Plan or a neighbourhood plan...” (My emphasis). As can be seen there is an inconsistent approach to settlement boundaries and clear guidance is not provided which is contrary to para 154 of the NPPF. In order to provide opportunities for sustainable development at the larger villages the settlement boundaries should be revised in Local Plan Part 1, especially given the uncertainties about the timing of any review.

The Council’s reasons for restricting rural development in the submitted Local Plan Part 1 included concerns about excessive infill development changing the character of rural settlements by the loss of gardens and other existing open spaces. However, the Main Modifications now reflect the need for rural development to meet rural needs, but the out of date settlement boundaries are maintained with the effect of promoting development on these existing open spaces. Policy 2 should be amended to enable appropriate developments on the edges of settlements which would avoid placing excessive pressures on undeveloped land within the existing settlement boundaries. As we have promoted throughout the preparation of the Local Plan land at Child Okeford is available and deliverable and can assist in meeting housing needs in the larger villages.

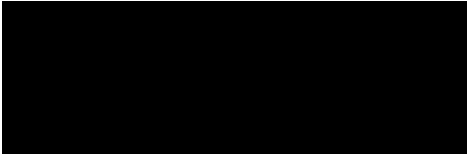
The failure to review these boundaries which play an essential role to provide for the full objectively assessed needs and to significantly boost the supply of housing, is not justified or positively prepared. The result is that the Local Plan Part 1 will not be effective in providing for even the constrained rural needs identified within the Local Plan and will promote the development of open spaces which may erode the rural character of settlements.

The Council has recognized that Stalbridge and the eighteen larger villages are more sustainable than other rural settlements and proposed that they should have settlement boundaries reinstated rather than being treated as open countryside. The Council propose in MM3 that a minimum of 825 new dwellings are located in these settlements between 2011 and 2031 (41 per annum). This need is an element of a proposed housing requirement of a minimum of 5,700 dwellings which does not represent an objective assessment of need as required by paragraph 47 of the NPPF. This is detailed in the response to MM5.

The housing requirement for North Dorset or for Stalbridge and the larger villages does not reflect an objective assessment of need and is not justified or positively prepared. The result is that the Local Plan will not be effective in meeting the housing needs of the District and it will be inconsistent with paragraph 47 of the NPPF.

Continue on a separate sheet if necessary

Signatur



Date: 11th September 2015

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Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM5

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
- It is not justified
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- It does not comply with the law

4. What would you like to happen?

- Delete the proposed modification
- Amend the proposed modification – you should suggest amended wording below
- Add a new policy or paragraph - you should suggest new wording below

(Please give further details or suggested wording in box for Question 6)

5. If there is an additional Examination Hearing session, would you like to verbally express your views to the Inspector?

Yes

No

6. Your Comments.

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
- What changes to the proposed modification wording/new wording you are suggesting.
- What additional policies or wording you are suggesting.

To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

The housing requirement within the Local Plan Part 1 has been increased for a number of reasons. Firstly, a corrected allowance for unoccupied dwellings to include second homes and vacant dwellings is included and this is supported. Secondly the housing requirement has been increased to reflect the extended plan period.

However, neither of these adjustments reflect the issues raised at the Hearing sessions in March 2015 and set out in the Hearing Statements including the influence of restrictive planning policies on past trends, the need to consider employment growth and market signals, and the fact that a rate of new housebuilding of a minimum of 285 dwellings per annum would represent a reduction on recent levels of house building in the District which would not serve the Government's aim in paragraph 47 of the NPPF; "to boost significantly the supply of new housing". Indeed, turning to the revised housing trajectory proposed in MM6 the supply is planned to continue to decrease from 2018. Furthermore, this proposed rate of housebuilding would not deliver the supply of affordable housing shown to be required by the SHMA and would not allow for the accommodation of any unmet needs from neighbouring districts that are tightly constrained such as Poole and Purbeck. Indeed, the 2012 SHMA Update indicates a need for 387 affordable dwellings per annum which could clearly not be delivered as part of the total planned provision of a minimum of 285 dwellings.

MM5 also proposes amendments to Figure 5.1 which now identifies a requirement for a minimum of 825 dwellings in Stalbridge and the larger villages. This provides for only 14% of the total housing requirement despite the fact that the rural areas currently accommodate about half of the District's population. The policy approach can therefore be seen as one of increasing concentration on the four main towns to accommodate the remaining 86% of the District's housing needs without considering the needs of rural areas.

The figure of 825 has been derived from analysis of population projections in Appendix 1 to MHD007. However, this analysis is deeply flawed and cannot be relied upon as being indicative of rural needs. The premise of this analysis is that population and housing growth in North Dorset is driven by net in-migration and that this does not apply in the rural areas. The assessment therefore assumes natural growth only scenarios in the rural areas with all of the net in-migration occurring in the urban areas. However, the 2011 Census (Table UKMIG008) ward level information demonstrates that of the 1,143 net in-migrants to North Dorset in 2010/11, 570 were in rural wards (approximately half). This clearly demonstrates that the premise of this analysis is flawed and that net in-migration plays a similar role in both the urban and rural areas. Migration will continue to occur in the rural areas and this should be allowed for in the distribution of the housing requirement.

The effect of artificially constraining rural development such that no migration is allowed for will not provide for rural needs, especially as local residents will often be priced out of the market by more affluent in-migrants. The distribution set out in Figure 5.1 will therefore serve to force younger rural households out of the countryside and will result in a greater proportion of rural dwellings being occupied by people with no connection with the rural area on a potentially seasonal basis.

The distribution of growth is clearly not justified as articulated above, being based on the assumption that people do not migrate to rural areas when the evidence indicates otherwise. It also provides for a strategy which will compromise rural communities and is therefore ineffective and not positively prepared. It is also contrary to paragraph 54 of the NPPF which requires that "local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs."

MM5 goes on to reduce the number of affordable homes required (from 1,480 to 1,350 in the main towns). This revised requirement averages a total of 68 affordable homes per annum. The 2012 SHMA Update indicates a need for 387 affordable dwellings per annum in North Dorset. This modification therefore serves to unjustifiably reduce the delivery of affordable homes even further below the objectively assessed need.

Continue on a separate sheet if necessary

Signature:  _____

Date: 11th September 2015

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Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM6

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
- It is not justified
- It is not effective
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- It does not comply with the law

4. What would you like to happen?

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5. If there is an additional Examination Hearing session, would you like to verbally express your views to the Inspector?

Yes

No

6. Your Comments.

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
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Main Modification 6 introduces a revised housing trajectory. It is assumed that this includes potential extensions to the main towns as set out in paragraph 27 of Agenda Item 6 of the Council meeting of 28th November 2014. At this meeting it was proposed to include an additional modification (3/2/4) in the Local Plan Part 1 on the basis that this would “enable the Council to argue that such sites should be included in the five year land supply”.

This additional modification is now proposed in the Local Plan Part 1 on the basis that the extensions beyond the settlement boundaries which would be contrary to Policy 2 should be included in the deliverable supply despite the fact that these are not allocated and are contrary to policy. If such sites are critical to ensure that a five year land supply is able to be demonstrated these should be allocated now or the settlement boundaries reviewed such that these extensions would not be contrary to policy, rather than postponing this to a subsequent review as proposed by the Local Plan.

The proposed postponement of strategic decisions that would provide for a sound Local Plan that is consistent with national policy is not justified or positively prepared and will be ineffective in providing for the needs that currently exists or arise prior to a review of the Local Plan.

The revised housing trajectory also clearly demonstrates how a reduced number of housing completions are being planned for. Indeed, from 2000 to 2013 an average of 343 net dwellings were built per annum. However, the housing trajectory shows that from 2021 a maximum of circa 285 will be built. This clearly demonstrates that the Local Plan Part 1 does not significantly boost the supply of housing as required by paragraph 47 of the NPPF.

Continue on a separate sheet if necessary

Signature: 

Date: 11th September 2015

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Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM15

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
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5. If there is an additional Examination Hearing session, would you like to verbally express your views to the Inspector?

Yes

No

6. Your Comments.

Please provide more details as to

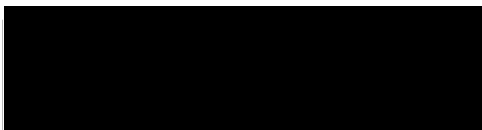
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MM15 reduces the proportion of affordable housing sought in Gillingham to reflect the viability of delivery. However, such an adjustment will inevitably reduce the amount of affordable housing delivered in Gillingham and therefore across North Dorset. This will result in an even greater discrepancy between the objectively assessed need for affordable housing (387 per annum) and the number that will be delivered. In accordance with the PPG (2a-029) this further supports the requirement to increase the overall housing requirement to facilitate the delivery of additional affordable homes to contribute to the objectively assessed need for affordable housing.

Without such an uplift, the Local Plan Part 1 will be ineffective in meeting affordable needs and as a result is not positively prepared or consistent with the NPPF (paragraph 47) which requires that the Local Plan meets the full, objectively assessed needs for market and affordable housing.

Continue on a separate sheet if necessary

Signature: 

Date: 11th September 2015

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For office use only	
Batch number: _____	Received: _____
Representor ID # _____	Ack: _____
Representation # _____	

North Dorset Local Plan – Part 1

Main Modifications Consultation

24 July to 18 September 2015

Town and Country Planning (Local Planning) (England) Regulations 2012

Response Form

For each representation you wish to make a separate response form will need to be completed.

This is a formal consultation on the legal compliance and soundness of the Local Plan as amended by main modifications. The Inspector produced a note on his preliminary findings into the North Dorset Local Plan Part 1 and this was published on 9 June 2015. The Inspector and the Council wish to be informed about any representations on the proposed main modifications to the Local Plan. Details of the Main Modification documents are available on the Council's web page below:

www.dorsetforyou.com/northdorsetlocalplanmainmod

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Deadline: Midnight on 18 September 2015. 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**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. 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 web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

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

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title	Messrs	Mrs
First Name		Sarah
Last Name	Drake	Hamilton-Foyon
Job Title(<i>where relevant</i>)		Regional Director
Organisation (<i>where relevant</i>)		Pegasus Group
Address		██████████ ██████████ ██████████ Road, ██████████
Postcode		██████████
Tel. No.		██████████
Email Address		██████████k

Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM18

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
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Yes

No

6. Your Comments.

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To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

Main Modification 18 amends the text in the submission draft of the Local Plan Part 1 to exclude Stalbridge and the eighteen larger villages from the countryside. It also identifies that these villages (including Stalbridge) will form the focus for growth outside of the four main towns. This is supported as it provides the opportunity for some of the rural needs to be addressed.

However, as addressed in the response to MM3, the Local Plan Part 1 does not undertake a settlement boundary review, but rather relies upon the time expired and out of date settlement boundaries of the previous Local Plan. The effect of this is two-fold. Firstly, there is insufficient identified capacity to meet the identified rural needs, which in themselves are constrained and will not provide for the needs of the rural areas (forcing newly forming rural households out of the area) within the time expired settlement boundaries. This is evident from MHD008 which identifies that even if all SHLAA sites within the settlement boundaries were delivered, there would be a remaining requirement for 177 dwellings. This is proposed to be addressed through a Local Plan Part 2 which will allocate sites for delivery after 2020, and will therefore constrain development in the interim; or neighbourhood plans which cannot be relied upon to deliver as they will not be progressed in all areas. Indeed, there is little interest in Neighbourhood Planning away from the main towns, and only 13 of the 74 parishes within North Dorset currently have a designated Neighbourhood Area.

Secondly, given the need for rural housing to provide for rural communities, the out of date settlement boundaries will serve to promote infill development on existing open spaces which may erode the rural character of settlements. This has been highlighted as being an issue in North Dorset and yet the Local Plan Part 1 serves to exacerbate the situation.

The Local Plan Part 1 restricts all development in the countryside (other than in certain exceptional circumstances) and MM18 has adjusted how the countryside is defined. The inclusion of Stalbridge and the larger villages in paragraph 3.45 is supported although rural development is still constrained. Indeed, Policy 20 prevents development adjacent to the main towns or large villages regardless of the sustainability credentials of any particular development proposal. This clearly does not allow for a presumption in favour of sustainable development as required by paragraph 14 of the NPPF.

The settlement boundaries need to be reviewed or a policy adopted which facilitates sustainable development on the edge of settlements. However, without this the Local Plan Part 1 will be ineffective in addressing rural needs and is therefore not positively prepared or consistent with the NPPF. Furthermore, the adoption of settlement boundaries which are now time expired and out of date is not justified.

Continue on a separate sheet if necessary

Signature: 

Date: 11th September 2015

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Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document):

Please use a separate form for each proposed modification you are commenting on.

MM19

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed modification?

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy
- It does not comply with the law

4. What would you like to happen?

- Delete the proposed modification
- Amend the proposed modification – you should suggest amended wording below
- Add a new policy or paragraph - you should suggest new wording below

(Please give further details or suggested wording in box for Question 6)

5. If there is an additional Examination Hearing session, would you like to verbally express your views to the Inspector?

Yes

No

6. Your Comments.

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
- What changes to the proposed modification wording/new wording you are suggesting.
- What additional policies or wording you are suggesting.

To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

MM19 reduces the proportion of affordable housing sought in the southern extension to Gillingham to reflect the viability of delivery. However, such an adjustment will inevitably reduce the amount of affordable housing delivered in Gillingham and therefore across North Dorset. This will result in an even greater discrepancy between the objectively assessed need for affordable housing (387 per annum) and the number that will be delivered. In accordance with the PPG (2a-029) this further supports the requirement to increase the overall housing requirement to facilitate the delivery of additional affordable homes to contribute to the objectively assessed need for affordable housing.

Without such an uplift, the Local Plan Part 1 will be ineffective in meeting affordable needs and as a result is not positively prepared or consistent with the NPPF (paragraph 47) which requires that the Local Plan meets the full, objectively assessed needs for market and affordable housing.

Continue on a separate sheet if necessary

Signature: 

Date: 11th September 2015

If submitting the form electronically, no signature is required.