

For office use only

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

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*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	Mr
First Name	Daniel
Last Name	Weaver
Job Title(<i>where relevant</i>)	Director
Organisation (<i>where relevant</i>)	Pegasus Planning Group Ltd
Address	
Postcode	
Tel. No.	
Email Address	

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)

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 main 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 6)

5. If there is an additional Examination Hearing Session, would you like to participate?

- No, I do not wish to participate
 Yes, I would like to participate

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.

Please see attached letter

Continue on a separate sheet if necessary

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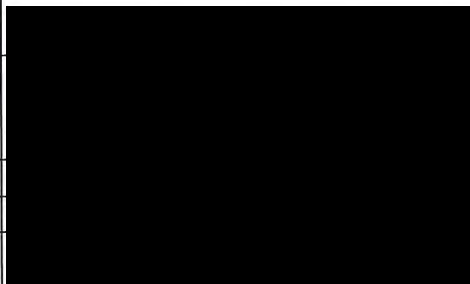
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Last Name	Weaver
Job Title(<i>where relevant</i>)	Director
Organisation (<i>where relevant</i>)	
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Postcode	
Tel. No.	
Email Address	

Part B – Representation

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

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 main 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 6)

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No, I do not wish to participate

Yes, I would like to participate

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Job Title(<i>where relevant</i>)	Director
Organisation (<i>where relevant</i>)	Pegasus Planning Group Ltd
Address	
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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)

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 main 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 6)

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No, I do not wish to participate

Yes, I would like to participate

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Title		Mr
First Name		Daniel
Last Name		Weaver
Job Title (where relevant)		Director
Organisation (where relevant)	Lightwood Strategic Ltd	Pegasus Planning Group Ltd
Address		[Redacted]
Postcode		[Redacted]
Tel. No.		[Redacted]
Email Address		[Redacted]

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)

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 main modification?

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It is not justified

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4. What would you like to happen?

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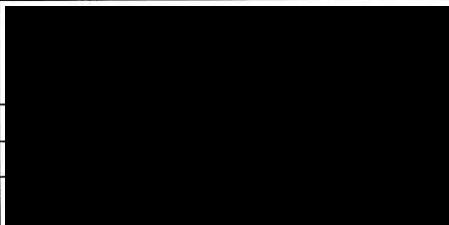
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Organisation (<i>where relevant</i>)	Lightwood Strategic Ltd	Pegasus Planning Group Ltd	
Address			
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Part B – Representation

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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 main modification?

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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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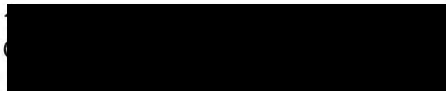
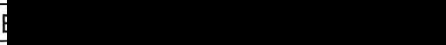
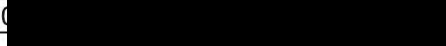
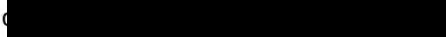
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Last Name		Weaver	
Job Title (where relevant)		Director	
Organisation (where relevant)	Lightwood Strategic Ltd	Pegasus Planning Group Ltd	
Address			
Postcode			
Tel. No.			
Email Address			

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)

MM8

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 main 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?

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Part B – Representation

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

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 main modification?

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It is not justified

It is not effective

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FT/BRS.5093

15 September 2015

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

Via Email Only: planningpolicy@northdorset.gov.uk

Dear Sir / Madam

North Dorset District Local Plan Part 1 – Main Modifications
Responses by Pegasus Planning Group on behalf of Lightwood Strategic Ltd
(Participant ID: 3055)

Pegasus Planning Group, on behalf of Lightwood Strategic, submitted representations to earlier versions of the Local Plan, attended the Examination in Public (EiP) and most recently submitted representations to the 'additional mid-hearing written material' (May 2015).

The comments below respond to the Main Modifications as proposed, and as such, shouldn't be read as having resolved other objections raised by ourselves to parts of the Local Plan not covered by these proposed modifications.

MM1

We support the extension of the plan period to 2031, in accordance with paragraph 47 of the National Planning Policy Framework's (NPPF) requirement to demonstrate a planning strategy for at least a fifteen year plan period. However, this support is caveated by our concerns in respect to the evidence base supporting the plan strategy and the Council's selected housing policy; these concerns are detailed below.

MM2

Substantive concerns have been raised in respect to the North Dorset Local Plan both in earlier representations to the emerging document, and at the Examination in Public (EiP); most prevalently in relation to the Council's Objectively Assessed Needs (OAN) studies, the chosen housing requirement and the chosen Spatial Strategy.

The position of the Council, that these substantive concerns can be overcome through an immediate plan review are not supported; as detailed in our representation to the Mid Hearing Written Material Consultation (May 2015).

The NPPF requires that Local Plans are sound, as per paragraph 182, at the time of Examination. It is recognised that a Local Plan can be found sound conditional on the

basis of an early review (008, 12-06-03-2014, PPG). However this is posited on the basis that the 'interim' approach is sound on the basis of the current evidence before the Examination. For those reasons set out below in relation to the chosen housing target (MM5) and development strategy for rural areas (MM18); this is not the case.

Additionally, concern is raised in respect to the timelines for the Local Plan review. Discussions with neighbouring authorities who are also participating in the joint Strategic Housing Market Assessment (SHMA) indicate that the final assessments have been completed, and whilst currently subject to minor tweaks, are likely to be published within September 2015. However, Duty to Cooperate discussions are currently indicating that draft proposals will not be brought forward until 2017, with Examination and adoption of Plans occurring in 2018. See 'News Update' on Poole District Council's Core Strategy Review Page (<http://www.poole.gov.uk/planning-and-buildings/planning/ldp/core-strategy-review/> viewed 15 September 2015).

This is a substantial period of time upon which to rely on an unsound interim strategy; as detailed below in our response to MM5.

Emphasis is placed on this when considering the capacity of the Council to undertake a Local Plan Review, and to bring forward a Part 2 Local Plan. Whilst the Council may intend to bring forward these jointly, as detailed in Appendix A MHD008, to meet housing need over the next five years, delivery on allocations (outside of settlement boundaries) in Stalbridge and Villages, is required to commence in 2019. As such, the proposed housing strategy doesn't provide an appropriate supply of housing land and within the 5 year period, the Council will be required to permit housing sites contrary to the adopted development plan to maintain housing land supply.

Beyond this, reference has been made at the Local Plan EIP to the letter issued by Brandon Lewis MP on the 19th December 2014. This sets out that the publication of updated housing needs evidence should not be used as the OAN where a "timely" review of a Local Plan is carried out. Given the updated publication of timelines for the Local Plan review, and the fact that the Council's chosen housing target fails to reflect the NPPF, see comments below, it is clear that the Council would be unable to rely on this letter as an interim policy.

As such, the adoption of the Local Plan would be immediately proceeded with s78 appeals which applied an alternative OAN. Clearly this adds to the impetus to ensure that the housing target, even if interim, reflects an appropriate assessment of housing need.

MM3

We support the identification of Stalbridge within the amended policy wording, however as raised in previous representations, the failure to distinguish Stalbridge as a more sustainable settlement than all of the other 'large villages' amounts to a failure to consider the most appropriate spatial strategy for North Dorset over the plan period.

As identified in our earlier representations and within the Council's own evidence base at INS010a/b/c, Stalbridge represents a significantly more sustainable location for development over the plan period than the other settlements identified in this policy.

The failure to recognise this within the evidence base, has resulted in the council failing to assess Stalbridge as a 'reasonable alternative' within the Sustainability Appraisal submitted in support of the Council's spatial strategy. As noted in our Hearing Statement, this compromises the plan and questions the soundness of the spatial strategy.

The amendments merely require the delivery of 825 units in the 'Countryside' alongside a statement that Stalbridge and other large villages will be a 'focus' for growth. This lack of detail fails to provide an appropriately justified or detailed strategy for delivery outside of the four main towns; with this questioning the effectiveness of the strategy, as per paragraph 182 of the NPPF.

In line with our comments in our Hearing Statements, and as detailed at the Examination, further clarification on the role of settlements outside of the four main towns in meeting housing need over the plan period is required.

With particular reference to Stalbridge, its position as the most sustainable location outside of the Council's four main towns, renders the identification of a specific housing requirement, as per the only other towns in the District, the most suitable strategy for delivering housing over the plan period.

MM5

We support the modification to the housing target to include an allowance for second home ownership; recognising that this was discussed in some depth at the EIP.

However, this doesn't resolve our previously raised substantive concerns with the Council's assessment of need.

- Affordable Housing Need

The affordable housing need in the District is substantial at 387 dwellings per annum. It is noted that as a result of viability constraints, affordable housing delivery in the main towns (which will account for 86% of total housing growth over the plan period – Figure 5.1) has reduced to 1,350 (67per annum) compared to the 1,480 (98per annum) previously projected over the plan period (see paragraph 5.17 of track changed Local Plan).

The Council's response to Question 8 (INS020) indicates that they are content to continuing applying the 10-unit threshold for affordable housing, or 6-9 units threshold via commuted sums in the AONB (40% District area). Reviewing the Council's housing trajectory (MHD008), the decision to rely on small infill opportunities outside of the four main towns until the Local Plan Review, or Part 2 Local Plan, results in an absolute failure to deliver affordable housing in these locations over the next five years.

Evidently, draft Policy 9 (Rural Exception Sites) will not provide a sufficient quantum of housing to meet need.

The continued suggestion (as at 5.1 of MHD009) that there is a role for the private rented sector (PRS) in meeting affordable housing need is concerning. As referenced in our Hearing Statement (Issue 4), the Eastleigh Local Plan Examination clearly identified that any suggestion of a reliance on the PRS is entirely inappropriate.

As outlined in our response to the Mid-Hearing Written Material, the Council's response to the implications of Satnam Millennium Ltd v Warrington Borough Council [2015], as detailed in MHD010, is inappropriate.

It is clear that despite the evident requirement in the NPPF and PPG, as documented by the Satnam Judgement and the findings of the Eastleigh Local Plan Inspector, that an uplift to the housing requirement should be applied to meet a shortfall in affordable housing need, the Council have failed to grasp both the severity of this shortcoming, and failed to provide a sound justification for not considering such an uplift. This goes to the heart of the Local Plan.

As detailed in our earlier representations, there are a number of sites within Stalbridge and reviewing evidence from other participants at the EiP in other sustainable locations within North Dorset, that would provide suitable opportunities for housing development to meet this affordable housing need, without compromising the other objectives of the Local Plan.

- Market Signals

As detailed in our Hearing Statement (Issue 4), there are clear affordability issues within North Dorset, with the lower quartile earnings to lower quartile house prices, significantly above the national trend, and now rising above the Dorset County average in recent years.

The PPG at paragraph 020 (ID: 2a, 06-03-2014) clearly requires an upward adjustment where worsening trends are identified.

- Boosting Supply

The NPPF at paragraph 47 requires local planning authorities to "*significantly boost the supply of housing*". As set out in our Hearing Statement to Issue 4, it is clear that the Council's chosen housing target, at 285 dwellings per annum, would fail to meet this NPPF requirement; housing completions have exceeded 285 dwellings in 13 of the 20 years since 1994.

Whilst it is noted that recent completions (2007-2011, and 2012-2014) have fallen below the 285 dwelling, this is a result of the recession. As noted above, this shortfall in housing delivery has been combined with increased affordability pressures in the District.

- Summary

In line with our comments raised previously, it is clear that the Council's chosen housing target does not represent a positively prepared strategy to meet existing housing needs as required by the NPPF.

Irrespective of whether the Local Plan is adopted as 'interim' with an early review, the NPPF requires that the Local Plan is 'sound' (paragraph 182) based upon the available evidence. Notwithstanding the emerging SHMA, the existing evidence before the Council raises significant concerns in respect to the chosen housing target.

The implications of allowing an inappropriate interim housing target are substantial and well versed; increased affordability pressures, increased over-crowding, loss of younger families who are priced out of the area, increasing ageing population, loss of purchase parity in the local markets, decreased footfall and demand for local services etc.

MM6

Reviewing the updated housing trajectory, as detailed in MHD008, it is disappointing that the Council have not chosen to update the trajectory with 2014/15 completions, which should be available now.

Concerns have been highlighted above, that the decision to delay selection of housing sites outside of the four main towns to either the Part 2 Local Plan, or the Local Plan Review, render the five year requirement (from the March 2015 base date) questionable.

It is also noted that it is unclear whether a discount allowance has been applied to the committed schemes assumed within the Council's trajectory. This is standard national practice.

MM8

We support the amendment to include reference to other persons who could provide impartial judgement on viability appraisals.

MM18

As detailed above, we have substantial concerns in respect to the delivery strategy for housing outside of the four main towns. Aside from a reference that of the 825 units identified, Stalbridge and the large villages should provide a "focus" for growth, there is no further strategy for meeting this need.

The decision to reinstate settlement boundaries for Stalbridge is supported, however the imposition of the boundaries from the 2003 Local Plan is not. They would be immediately out of date for the purposes of paragraph 215 of the NPPF, having been drawn up on the basis of housing need up to 2011.

Our comments above to MM2 raise a concern in respect to the timelines for reviewing these out of date boundaries. Part 2 of the Local Plan will not come forward for some time, and given the implications of the emerging SHMA, it seems unrealistic to expect the Council to have capacity to undertake the Local Plan Review alongside the drafting of Part 2 of the Local Plan. This would also be abortive work, should the Local Plan

Review indicate a significantly higher housing requirement in North Dorset than that forming the basis of Part 2.

Reliance on Neighbourhood Plans is not appropriate, with delivery of Neighbourhood Plans unlikely to occur in a comprehensive or timely fashion; failing to represent a positive form of planning.

In our Hearing Statement (Issue 1) we set out a proposed amendment to the Council's housing policy, to recognise the role of Stalbridge in meeting housing need. We still retain our position that this amendment would ensure the effective delivery of housing, to meet the 825 target, within the most sustainable settlement. This amendment gains increasing importance when considering the potential that the Council's housing target could be found unsound; resulting in an increased requirement to deliver housing in this location.

However, in light of the updated timelines put forward to review settlement boundaries and update housing need, it is felt that some reference to an interim housing policy should be inserted into the Local Plan to support sustainable development outside of the four main towns during this interim period.

Suggested text:

Prior to the amendment of settlement boundaries within Stalbridge and the eighteen larger villages, as part of Part 2 of the Local Plan or via an adopted Neighbourhood Plan, proposals for housing development outside of settlement boundaries will be supported where:

- *The proposals represent an appropriate scale of development for the settlement, having regard to its characteristics and function, and its role in the settlement hierarchy;*
- *The proposals appropriately demonstrate through a proportionate assessment, that the site represents a suitable, developable and deliverable site compared to other sites within the settlement;*
- *The proposals conforms with other policies as contained within this Plan.*

The inclusion of an interim policy would ensure that the Council had an effective mechanism to deliver the required housing within these settlements in a proactive manner. This would ensure that should further delays in the Part 2 Local Plan, or Local Plan Review, occur, the Council will not be immediately subject to applications under paragraph 49 of the NPPF.

Yours faithfully


Daniel Weaver
Director
