

North Dorset Local Plan Part 1

Main Modifications Consultation Summary

October 2015

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Introduction

- 1.1 This statement is in response to the Inspector's Preliminary Findings dated the 9th June 2015. The Inspector's findings recommend 27 Main Modifications (MMs) to the North Dorset Local Plan Part 1 that would make it sound. These MMs were subject to consultation between the 24th July 2015 and 18th September 2015.
- 1.2 At the end of his preliminary Findings note the Inspector sets out that:

Following consultation¹ on the MMs the Council should send me a copy of the submissions received; a brief response to those submissions and a commentary on any implications of the MMs in terms of the Sustainability Appraisal and the Habitats Regulations Assessment, including in relation to the proposed extension to the area for growth to the south-east of Blandford St Mary and increased capacity proposed to the east of the former Creamery site, south of Elm Close, Sturminster Newton.

¹ *The Council is proposing a number of modifications which may have consequences for nearby residents, for example the 'extension' of the location for growth to the south east of Blandford St Mary and changes to the Elm Close location (Sturminster Newton). The Council should be satisfied that anyone who may be affected by the proposed land use changes is notified of the Modifications, whether or not they are on the existing respondents' data base.*

Local Plan Part 1 Main Modifications

(Including; additional changes, sustainability appraisal and habitats regulation assessment)

1.3 The first three sections in this document summarise the representations received in relation to consultation on the Main Modifications (MHD050), accompanying additional changes (MHD053), sustainability appraisal (MHD051) and habitats regulation assessment (MHD052) including the Council's brief response. As requested by the Planning Inspector the fourth section includes a brief commentary on any implications of the MMs for the Sustainability Appraisal and the Habitats Regulations Assessment.

- Section 1: Summary of representations received to the Schedule of Proposed Main Modifications (MHD050)
- Section 2: Summary of representations received to the Schedule of additional changes (MHD053)
- Section 3: Summary of representations received to the Sustainability appraisal (MHD051) and habitats regulation assessment (MHD052)
- Section 4: Commentary on Implications of the MMs in terms of the Sustainability Appraisal and the Habitats Regulations Assessment

Affordable Housing

1.4 In a note (Document ref: INS021) to the Council regarding affordable housing the Inspector allowed an additional 10 days for participants to submit further brief comments only on the proposed changes to the affordable housing threshold referred to in Policy 8. The consultation period ended on the 2nd October 2015. The section detailed below summarises the representations received and the Council response.

- Section 5: Summary of representations received to the Inspector's Post Hearing note (INS021) on Affordable Housing (Policy 8).

Section 1: Summary of representations received to the Schedule of Proposed Main Modifications
(MHD050)

North Dorset Local Plan Part 1 - Main Modifications Consultation Representations

Main Mod number 29 - Refers to a representation which covers all the main modifications

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
113	6152	Sue	Green	National Home Builders Federation		1	Note the extended Plan period from 2011-2031 ensuring a 15 year time horizon. Plan period should be aligned with a higher housing requirement based on an NPPF & NPPG compliant OAHN and spatial distribution strategy.	Support noted. Alignment of higher housing requirement with Plan period is not directly related to MM1.
748	6086	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	1	Support is given to the extended time period for the Local Plan through to 2031. This time period more closely aligns with the NPPF guidance under Plan Making and reflects the discussions at the Hearings and is in accordance with the Inspectors Preliminary findings.	Support noted.
769	6127	Tim	Hoskinson	Savills	Taylor Wimpey	1	Extension to the Plan period is supported subject to an early review.	Support noted.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
1601	6171	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	1	Support the extension to the Plan period from 2011-2031 to reflect NPPF.	Support noted.
2989	6106	Sarah	Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	1	Support the proposed extension to the Plan period as it provides a 15 year time horizon as preferred by paragraph 157 of the NPPF. However the extension of the Plan Period should be accompanied by a settlement strategy that will deliver the higher housing target. 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 in the plan.	Support for the extension to the Plan period is note. ‘The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy’ is set out in MHD007. The Council considers that if a specific need is identified at Stalbridge, the 18 larger Villages or in countryside locations the appropriate mechanism for the identification of potential sites and the review of settlement boundaries is through either LP2 or neighbourhood development plans. Furthermore, the approach advocated by the respondent to adopt a more flexible approach to development adjoining settlement boundaries is considered contrary to the approach set out in MHD007.
3055	6160	Roger	Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	1	Support the extension of the plan period to 2031, in accordance with paragraph 47 of the NPPF requirement to demonstrate a planning strategy for at least a 15-year plan period. However, this support is caveated by concerns in respect to the evidence base supporting the plan strategy and the Council’s selected housing policy.	Support noted. Concerns raised in respect of the Council's evidence base are not directly related to MM1.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3074	6147	Peter	Dutton	Gladman Developments		1	Support the decision to extend the Local Plan period by a further 5 years and a revised housing target of 5,700 homes from 2011 to 2031. This Modification ensures the Plan covers a 15-year time horizon post adoption. Support the need to identify an additional supply of 1,500 dwellings over the extended Plan period.	Support noted.
3156	6054	Shaun	Pettitt	Chapman Lily Planning Ltd	Mr Paul Bedford - Persimmon	1	Proposed extension of the Plan period from 2011-2031 is supported in accordance with para 157 of the NPPF which requires plans to be drawn up over an appropriate time scale, preferably a 15-year time horizon post adoption.	Support noted.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
113	6153	Sue	Green	National Home Builders Federation		2	<p>Proposal to commence a review of the Local Plan shortly after its adoption should be set out in Policy. Object to wording "shortly after" as this phrase is too vague and non-comital. An early review is only appropriate if the issue is not fundamental to the soundness of the Plan.</p> <p>NPPF Para 153 promotes a single Local Plan. It is understood that if the final new SHMA identifies an OAHN equal to or below the proposed housing requirement than the Part 1 of the Plan will be reviewed and the production of the Part 2 continues. If the SHMA identifies an OAHN significantly greater than previously calculated then the Local Plan Part 1 & 2 would be amalgamated. The effectiveness of the review is compromised as the relationship between the Local Plan Part 1 & Part 2 is uncertain.</p> <p>In respect of the Council merger, it is uncertain if the Councils planning team will be sufficiently resourced to cope with simultaneous timing of an early review of two separate Local Plans one of which is due for review no later than 2021.</p>	<p>The Council considers that the phrase 'shortly after' provides enough certainty that the Council will commence a review of the plan soon after it is formally adopted. The Council is of the view that it is most appropriate to set out its commitment to any early review in the supporting text. An early review of the Plan is required to ensure that the Plan remains appropriate for the District and to confirm that the Plan continues to encourage and secure the development and infrastructure that the District requires.</p> <p>The review will be informed by an updated evidence base drawing on the strategic work underway for the Housing Market Area and Functional Economic Area and will reflect the requirements relating to the duty to cooperate.</p> <p>The Council will ensure sufficient resources are made available for the production of the Plan.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
748	6087	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	2	Support the principle of an early review of the Local Plan to reflect the agreement that the housing figures used for the Plan are not up to date. However consider the use of the word 'shortly' is too vague and open ended. It offers no certainty to those seeking to use the Plan. The text indicates the review will be informed by an updated evidence base including Housing Market Area, functional economic area and Duty to cooperate. Recommend that updated information is supplied on the timescales for the updated evidence base and a commitment to start the review process within 6 months if evidence is available.	The Council considers that the phrase 'shortly after' provides enough certainty that the Council will commence a review of the plan soon after it is formally adopted.
749	6102	Sean	Lewis	Tetlow King Planning	South West HARP Planning Consortium	2	Support the Council's commitment to review the Plan following Adoption. Object to the wording 'shortly after' as it is not firm enough. It would be useful for the Council to specify an approximate period of time within which it will undertake the review and set out in an updated LDS.	The Council considers that the phrase 'shortly after' provides enough certainty that the Council will commence a review of the plan soon after it is formally adopted.
769	6128	Tim	Hoskinson	Savills	Taylor Wimpey	2	Extension to the Plan period is supported subject to an early review in order to ensure it is based on the findings of the SHMA for South East Dorset. An important component to this review will be to address the longer term growth needs of Sturminster Newton which is entirely reliant on Windfall/infill sites from 2021 and zero growth from 2026.	The Council acknowledge that an early review of the Plan is required to ensure that the Plan remains appropriate for the District and to confirm that the Plan continues to encourage and secure the development and infrastructure that the District requires. The review will be informed by an updated evidence base drawing on the strategic work underway for the Housing Market Area and Functional Economic Area and will reflect the requirements relating to the duty to cooperate.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
2989	6107	Sarah	Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	2	<p>Suggest commitment to early review is set out in policy rather than supporting text.</p> <p>The wording "commence a review shortly after its adoption" is too vague and non-comital. The Council should commit to a specified date.</p> <p>The proposed housing requirement does not reflect the objectively assessed need for housing as set out in MM3 and the distribution of housing to meet rural needs is not based on robust evidence as set out in MM5. These issues can't be addressed in an early review. NPPF paragraph 153 requires a single Local Plan however the Council have avoided taking important strategic decisions on housing need and provision. The form of the review seems as though it will depend on the extent of the OAN, if a similar figure or lower figure this will lead to a light touch review and LP2 would continue. If the increase is more significant than LP1 and LP2 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 reviewed. This approach is inconsistent with the NPPF and is an ineffective strategy. Concerned that a combined future authority will not have sufficient resources in place to carry out two reviews of the Local Plans and could result in a delay in housing needs not being met.</p>	<p>The Council considers that the phrase 'shortly after' provides enough certainty that the Council will commence a review of the plan soon after it is formally adopted. The Council is of the view that it is most appropriate to set out its commitment to any early review in the supporting text. The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A.</p> <p>'The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy' is set out in MHD007.</p> <p>The Council considers that if a specific need is identified at Stalbridge, the 18 larger Villages or in countryside locations the appropriate mechanism for the identification of potential sites and the review of settlement boundaries is through either LP2 or neighbourhood development plans.</p> <p>Furthermore, the approach advocated by the respondent to adopt a more flexible approach to development adjoining settlement boundaries is considered</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3055	6161	Roger	Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	2	<p>Substantive concerns have been raised in relation to the Council's Objectively Assessed Needs (OAN). The Council's position that these concerns can be overcome through an immediate plan review is not supported because the Plan is not sound in relation to housing target MM5 and development strategy for rural areas MM18.</p> <p>Concern is raised in respect to the timelines for the Local Plan review. Draft proposals are unlikely to be brought forward until 2017. This is a substantial period of time upon which to rely on an unsound interim strategy. Given delivery on site allocations is not to commence until 2019. 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.</p> <p>Acknowledge 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 concerns raised that the housing target does not reflect the NPPF. The adoption of the Local Plan would be immediately proceeded with appeals. The housing target, even if interim, reflects an appropriate assessment of housing need.</p>	<p>contrary to the approach set out in MHD007.</p> <p>The Council acknowledge that an early review of the Plan is required to ensure that the Plan remains appropriate for the District and to confirm that the Plan continues to encourage and secure the development and infrastructure that the District requires. The review will be informed by an updated evidence base drawing on the strategic work underway for the Housing Market Area and Functional Economic Area and will reflect the requirements relating to the duty to cooperate.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3074	6148	Peter	Dutton	Gladman Developments		2	Remain concerned that the Local Plan is continuing to progress a housing requirement that is not founded on robust evidence and may not be sufficiently aspirational. Recognise that it would be pragmatic for the authority to undertake an early review to consider the findings of the Eastern Dorset SHMA. Helping to align Plan preparation across the wider housing market area, suggest the proposed amendment to the introduction paragraph 1.9 would benefit from further commentary on a specific timescale in which the Local Plan will be undertaken.	An early review of the Plan is required to ensure that the Plan remains appropriate for the District and to confirm that the Plan continues to encourage and secure the development and infrastructure that the District requires. The review will be informed by an updated evidence base drawing on the strategic work underway for the Housing Market Area and Functional Economic Area and will reflect the requirements relating to the duty to cooperate.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3151	6047	Michael	Hopper	Milborne St Andrew Neighbourhood Plan Group		2	Concerned that an early review will or could negate any Neighbourhood Plan that has been drawn up and render the work in constructing the Plan superfluous. The Local Plan should make clear that any review will take account of the more local needs and issues identified through any Neighbourhood Plan. It may be necessary to make clear that the District wide policies do not over-ride certain Neighbourhood Plan policies. Suggested text supplied.	The Council acknowledge that an early review of the Plan is required to ensure that the Plan remains appropriate for the District and confirm that the Plan continues to encourage and secure the development and infrastructure that the District requires. Paragraph 184 of the National Planning Policy Framework (NPPF) states that neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. The North Dorset Local Plan Part 1 (LP1) sets out those strategic policies. Furthermore, paragraph 185 of the NPPF states that once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan, and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. These points are set out in paragraphs 1.14 - 1.22 of the LP1.
3156	6055	Shaun	Pettitt	Chapman Lily Planning Ltd	Mr Paul Bedford - Persimmon	2	Object to the phrase 'shortly after' as ambiguous and does not provide the required level of certainty on the timescale for the Council to undertake a review to take account for factors such as the updated SHMA. It is imperative that a clear timetable for the review of the Plan is set out. This would be consistent with the recent Inspectors Report in to the West Dorset, Weymouth and Portland joint Local Plan in which a review should be in place no later than 2021, if not earlier. In the context of the updated housing trajectory set out in Appendix E of the Plan that projects housing completions will fall below the annual requirement of 285 per annum in the year 2021. Suggested text supplied.	The Council considers that the phrase 'shortly after' provides enough certainty that the Council will commence a review of the plan soon after it is formally adopted.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
113	6154	Sue	Green	National Home Builders Federation		3	Retained settlement boundaries around Stalbridge and the larger villages are out of date. Without a review of settlement boundaries the Local Plan Part 1 will not be effective in meeting the OAHN.	Paragraph 3.55 of the supporting text confirms that settlement boundaries may be reviewed either through Part 2 of the Local Plan or a neighbourhood plan.
274	6098	B	MacGregor	Pimperne Parish Council		3	Broadly support recommendations to retain the settlement boundaries around the larger villages. Approach could restrict growth. Understand that Neighbourhood Plans can amend settlement boundaries and suggested that this should be added to paragraph 4. Section makes no reference to AONBs and/or conservation areas although the Parish Council are keen to protect.	Paragraph 3.55 of the supporting text confirms that settlement boundaries may be reviewed either through Part 2 of the Local Plan or a neighbourhood plan. Areas of Outstanding Natural Beauty (AONBs) are protected by National Policy and Policy 4 of LP1. Conservation Areas are covered by separate legislation.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
280	6073	M	Dando	Charlton Marshall Parish Council		3	The Parish Council consider Charlton Marshall should be excluded from the list of 18 larger villages. Charlton Marshall should be excluded because it has already built a large number of new houses under previous Plans and through infilling. The village does not have the community facilities and the District Council should look to re-evaluate the categorisation criteria. The village is not sustainable in terms of section 4.2. There is no local need and it is unlikely that the existing affordable houses at Old Orchard will go to local residents. There are no remaining areas to build. The only option would be to extend the settlement boundary to include SHLAA sites.	The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007. To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options. The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in the background paper SDS001 Sustainable Development Strategy Background Paper 2013.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
641	6117	James	Cleary	Pro Vision Planning and Design	Charborough Estate	3	It is noted that the original proposal that Stalbridge and the countryside should take 6% of new District wide housing growth and that this has been altered to 825 dwellings (14%). This provision is still considered too low in the context of a rural district with almost 50% of the population living outside the four main towns. Many of the services and facilities which make for sustainable development are outside the four towns. Consequently there is a substantiated imbalance with a failure to achieve positive planning for Stalbridge and the countryside. If thriving rural communities are to be maintained the balance should be further altered. It is suggested the figure of 825 should be increased to 1200 (21%) or a minimum of 1000 (17.5%). This change should be reflected in Figure 5.1 with either changes to other district wide figure or reductions in the proposed level of development in the four main towns. This approach still falls short of the percentage figure for the population outside the towns but seek to provide for a better balance.	The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007. To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options. The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in Document Ref: SDS001 Sustainable Development Strategy Background Paper 2013.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
748	6088	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	3	Support the revised approach and reinstatement of settlement boundaries for the larger villages. There is confusion in Policy 2 and the supporting text by continuing to refer to the countryside as including Stalbridge and the larger villages. There should be a clear distinction between settlements where development is directed and the more restrictive approach to the countryside. Concern raised that a large number of villages are still set to lose their settlement boundaries and become part of the countryside. The exercise to consider the larger villages appears to date back to 2007 and is therefore considerably out of date and needs updating.	<p>The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007.</p> <p>To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options.</p> <p>The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in the background paper SDS001 Sustainable Development Strategy Background Paper 2013. Additional changes to Policy 2 & 20 and their supporting text make clear that Stalbridge and the eighteen larger villages are distinct from the countryside in policy terms.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
2782	6060	David	Stephens	Battens Solicitors Ltd	Mr Julian Trim - Church Farm, West Stour	3	West Stour should be included in the list of larger villages. The village is vibrant and home to a number of businesses (list supplied) and has a number of facilities including public house, garage, filling station, shop, village hall, church and Dorset Show Ground. West Stour is easily accessible to Henstridge and Gibbs Marsh Trading Estate only three miles away and three and a half miles from Gillingham Train Station. Openreach BT have connected East and West Stour to fibre optic broadband. Comparison made against East Stour which has less services. Recognise East Stour is listed but believe the range of facilities and number of businesses present should be a key criteria in assessing sustainability. It is taken that as East Stour is included in the list there is no County Council objection in respect of the highways network.	The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007. To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options. The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in the background paper SDS001 Sustainable Development Strategy Background Paper 2013.
2783	6069	Gill	Smith	Dorset County Council		3	Dorset County Council supports the Main Modification MM3. The modification addresses our previous objection that the original strategy for limited growth in the villages would provide difficulties for the County Council in the provision of infrastructure which it is responsible in rural areas.	Support noted.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
2989	6108	Sarah	Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	3	<p>Support MM3 as far as it provides the opportunity for some of the rural needs to be addressed.</p> <p>Note that settlement boundaries were adopted in January 2003 and were drawn up to meet the development needs of villages until 2011. However these settlement boundaries have yet to be reviewed and are in effect out of date. It is noted that settlement boundaries will / maybe reviewed either through LP Part 2 or a neighbourhood plan. Concern raised in respect of proposed inconsistent approach. In order to provide opportunities for sustainable development in larger villages the settlement boundaries should be reviewed in Local Plan Part 1 given the uncertainties about the timing of any review. Policy 2 should be amended to enable appropriate developments on the edges of settlements which would avoid placing excessive pressure on underdeveloped land within existing settlement boundaries.</p> <p>The proposed rural figure of 825 new dwellings is based on the total figure of 5,700 dwellings which is not an objectively assessment of need as outlined in the response to MM5.</p>	<p>'The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy' is set out in MHD007.</p> <p>The Council considers that if a specific need is identified at Stalbridge, the 18 larger Villages or in countryside locations the appropriate mechanism for the identification of potential sites and the review of settlement boundaries is through either LP2 or neighbourhood development plans.</p> <p>Furthermore, the approach advocated by the respondent to adopt a more flexible approach to development adjoining settlement boundaries is considered contrary to the approach set out in MHD007. MM3 seeks to address concerns that insufficient development will take place in the countryside and ensure compliance with NPPF paragraph 28 to promote a strong rural economy. The Council commissioned JG Consulting (see Appendix in Document Ref MHD007) to undertake further work to understand housing need in Stalbridge, the larger villages, smaller villages and open rural areas, both in terms of the needs of existing populations and the need for in-migrants to locate to the countryside. This analysis shows that 41 dwellings per annum of the overall District need for 285 annual dwellings to 2031 is generated specifically from rural areas. Additional change 3/2/26 supersedes 3/2/4 in respect of paragraph 3.5.5 in the LP1. It replaces the word 'will' with 'may-be'.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3055	6162	Roger	Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	3	Support the identification of Stalbridge within the amended policy wording, however Stalbridge should be distinguished from the other 'large villages' as a more sustainable settlement. The council has failed to assess Stalbridge as a 'reasonable alternative' within the Sustainability Appraisal. 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. Further clarification on the role of settlements outside of the four main towns in meeting housing need over the plan period is required. The role of Stalbridge should be recognised and the settlement given an identified housing target.	<p>The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007.</p> <p>To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options.</p> <p>The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in the background paper SDS001 Sustainable Development Strategy Background Paper 2013. Stalbridge is not considered to have the same level of population and services as the other four identified towns and has instead been grouped with the District's other larger villages.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3073	6023	Suzanne	Keene	CPRE North Dorset Branch		3	Object to MM3 (Policy 2). Concern that too many houses are being built in unsustainable village locations. Insufficient land has been made available within settlement boundaries for infilling and inadequate facilities. Increase in motor traffic. Development would alter the character of the villages. Propose an alternative provision of 450 houses.	MM3 seeks to address concerns that insufficient development will take place in the countryside and ensure compliance with NPPF paragraph 28 to promote a strong rural economy. The Council commissioned JG Consulting (see Appendix in Document Ref MHD007) to undertake further work to understand housing need in Stalbridge, the larger villages, smaller villages and open rural areas, both in terms of the needs of existing populations and the need for in-migrants to locate to the countryside. This analysis shows that 41 dwellings per annum of the overall District need for 285 annual dwellings to 2031 is generated specifically from rural areas.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3074	6149	Peter	Dutton	Gladman	Developments	3	<p>Support the Council's decision to progress a more permissive approach to development in the district's rural settlements. Remain concerned for the LPAs revised strategy for Stalbridge and the villages lacks clarity and may continue to deliver insufficient housing in these locations. The Council should ensure each of the authority's settlements has the ability to deliver the sustainable development they can accommodate irrespective of the settlements size.</p> <p>Note the work undertaken to identify the specific housing needs of the district's rural areas there is a lack of consistency between the evidence and basis for setting the Council's overall housing target. Rural provision equates to just 9 dwellings in Stalbridge and the 18 larger villages through allocations and NDP and is lower than the 88 annual homes that would be provided to meet the rural area's needs. Housing sought in rural areas should be expressed as a minimum.</p>	<p>The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007.</p> <p>To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options.</p> <p>The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in the background paper SDS001 Sustainable Development Strategy Background Paper 2013.</p>

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3123	6114	Genevieve	Collins	Alder King Planning Consultants		3	Support the retention of settlement boundaries around the larger villages but object to the blanket removal of settlement boundaries from the smaller or medium sized villages without sufficient evidence. Planning Law, NPPF and Practice guidance require Local Plans to be prepared with the objective of contributing to the achievement of sustainable development. The proposed countryside designation of all small and medium villages would likely act as an impediment to delivering new development and the redevelopment of existing brownfield sites. Reducing the flexibility and opportunity to contribute to the supply of sustainable housing or economic growth and could jeopardise the ability for the district to demonstrate a 5-year housing land supply. The ability to grow positively organically is critical for the enhancement and survival of small and medium villages in rural communities. It is also welcomed that a minimum of 825 dwellings will be provided in the countryside. Alternative policy text supplied.	The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007. To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options. The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in Document Ref: SDS001 Sustainable Development Strategy Background Paper 2013.
3145	6035	Adam	Bennett	Ken Parke Planning Consultants		3	Rural figure of 825 dwellings is insufficient to enable adequate sustainable growth in order to maintain a vitality of rural areas and support the rural economy.	Analysis by JG consulting (see Appendix in Document Ref: MHD007) shows that 41 dwellings per annum of the overall District need for 285 annual dwellings to 2031 is generated specifically from rural areas. Over the 20 year period of LP1, that equates to 826 of the 5,700 dwellings required in total between 2011 and 2031.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3159	6063	Janet	Montgomery	Brimble, Lea & Partners	Mr & Mrs Graham Hurd	3	The distribution of residential development through the identification of larger villages in areas where some growth can take place is supported in order to retain vitality and sustainability of these rural settlements. Support identification of Motcombe as a larger village. Map of land considered suitable for residential development on the edge of Motcombe is attached.	Support noted.
3176	6085	Tony	Brimble	Brimble, Lea & Partners	Mr Peter Cox	3	West Stour should be included as one of the larger villages assigning a level of growth. The village has the following important services; a village hall, pub and restaurant together with letting bedrooms , a church and a shop. Additionally there are many businesses within the village that support 33 people and 15 part time jobs. The village is adj to East Stour, Henstridge and Gibbs Marsh Trading estate. Additional housing growth is essential in order to retain businesses and facilities. The settlement boundary around West Stour should be maintained.	<p>The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007.</p> <p>To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options.</p> <p>The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in the background paper SDS001 Sustainable Development Strategy Background Paper 2013.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
113	6155	Sue	Green	National Home Builders Federation		4	Support the deletion of the reference to Renewable Energy.	Support noted.
769	6129	Tim	Hoskinson	Savills	Taylor Wimpey	4	The requirement for detailed energy statements is not justified as building standards are already addressed by other legislation. The modification to delete requirement is supported.	Support noted.
1601	6172	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4	Welcome deletion of the reference to any requirements for detail energy statements.	Support noted.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
113	6156	Sue	Green	National Home Builders Federation		5	<p>Housing requirement for 5,700 dwellings during the Plan period should be expressed as “at least” for consistency with other references.</p> <p>Remain concerned that such a low housing requirement is insufficient to accommodate employment growth, market signals, affordable housing need and potential unmet needs of the neighbouring authorities of Poole and Purbeck. Requirement of 285 dwellings per annum does not significantly boost housing supply as required in para 47 of the NPPF.</p> <p>While the proposed re-distribution in Table 5.1 is welcomed the question still remains whether or not the strategy will meet the housing needs of the rural population. The Council's AMR states that 45% of the District lives outside of the four main towns plus Stalbridge. The proposed strategy seeks to distribute only 14% of housing outside the main towns. The Council calculation of 826 dwellings in rural areas is calculated from unrealistic demographic projections based only on the natural increase of the existing population and zero migration. PAS guidance suggests that zero migration projects can be a useful context but considered as a potential future are unrealistic because the OAHN includes migration. The 826 dwellings is not representative of an OAHN in rural areas.</p>	<p>The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A.</p> <p>The Council's position is set out in MHD007A. In summary; MDH007 uses migration data for the lowest spatial area published i.e LA District: then apportioned out to the various parts of the District based on current population size. The approach is not to take either in-migration or out-migration as fixed and the other as a dependent variable instead net migration was estimated to be the product of a balancing out between the two. This reworking uses the official ONS/DCLG data i.e. the 2012-base population and household projections and the 2013 mid-year population estimates.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
522	6121	Gillian	Sanders	Wessex Water		5	<p>We are unlikely to revisit earlier appraisal work for foul capacity, however we will be seeking to work with developers and North Dorset Council to review requirements at pre-planning stages. We will be grateful if you can include Wessex Water in developing masterplans for these allocations. We will also be seeking to review new housing sites in rural areas to assess network and treatment capacity serving smaller communities.</p> <p>As a policy we wish to ensure that separate systems of drainage can be provided and surface water disposal can be made to land drainage systems with any flood risk measures approved by the Lead Local Flood Authority. Development in areas that suffer from groundwater induced sewer flooding will be subject to objection from the sewerage undertaker where a groundwater management strategy is not in place.</p>	Comment noted.
608	6126	Barbara	Carter	Shaftesbury Town Council		5	<p>MM5 previously read that Shaftesbury Housing Contribution was about 1140, now it reads that Shaftesbury Housing Contribution will be at least 1140. The Committee strongly object this amendment and request the wording revert to the original.</p>	The phrase 'at least' reflects the NPPF's aspiration to significantly boost housing land supply and its desire to not place a cap on new housing development.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
641	6118	James	Cleary	Pro Vision Planning and Design	Charborough Estate	5	It is noted that the original proposal that Stalbridge and the countryside should take 6% of new District wide housing growth and that this has been altered to 825 dwellings (14%). This provision is still considered too low in the context of a rural district with almost 50% of the population living outside the four main towns. Many of the services and facilities which make for sustainable development are outside the four towns. Consequently there is a substantiated imbalance with a failure to achieve positive planning for Stalbridge and the countryside. If a thriving rural communities are to be maintained the balance should be further altered. It is suggested the figure of 825 should be increased to 1200 (21%) or a minimum of 1000 (17.5%). This change should be reflected in Figure 5.1 with either changes to other district wide figure or reductions in the proposed level of development in the four main towns. This approach still falls short of the percentage figure for the population outside the towns but seek to provide for a better balance.	The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy is set out in MHD007. To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options. The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in the background paper SDS001 Sustainable Development Strategy Background Paper 2013.
748	6089	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	5	Support the revised approach and reinstatement of settlement boundaries for the larger villages. There is confusion in the Policy by continuing to refer to the countryside as including Stalbridge and the larger villages. There should be a clear distinction between settlements where development is directed and the more restrictive approach to the countryside. See also representation to MM3.	Additional changes to Policy 2 & 20 and their supporting text make clear that Stalbridge and the larger villages are distinct from the countryside in policy terms.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
749	6103	Sean	Lewis	Tetlow King Planning	South West HARP Planning Consortium	5	The Plan's overall commitment to deliver 5,700 new dwellings up to 2031 should be increased. The Plan's annual target of 285 dwellings is significantly below the evidence of need. The NPPF para 47 seeks to significantly boost housing supply. Concerned that the modification to the Plan seeks to reduce the overall provision of affordable housing despite extension to the Plan period. The SHMA outlines a net housing need requirement for 361 affordable dwellings but the Plan proposes the delivery of just 68 per annum. This will culminate in a severe shortage. North Dorset should align its overall housing trajectory with its objectively assessed need. The SHMA 2008 is considered out of date and the 2012 update was produced before the NPPF and PPG. Recent Court decisions have established that Local Plans should be based on objective assessment of full housing need that is fully compliant with the NPPF and up to date. The principle of private rented sector accommodation not meeting the definition of affordable housing has recently been confirmed by the Inspector examining the Cornwall Local Plan.	The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A
769	6130	Tim	Hoskinson	Savills	Taylor Wimpey	5	Support increase in housing provision to 285 dpa to reflect second homes. This should be considered a minimum requirement to reflect shortcomings in evidence. Support increased housing provision in Sturminster Newton which reflects the increased site capacity to land to East of the Creamery, Sturminster Newton. Support the reduction in affordable housing from 30% to 25% this should also be considered in CIL.	Support noted.

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1601	6173	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	5	Support clarification that Gillingham can support at least 2,200 units over the extended Plan period to 2031. The Gillingham SSA can contribute at least 1,800.	Support noted.
2961	6133	David	Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	5	Support the extension of the Plan period and phrase "at least". Note additional 5 dwellings to annualised target but do not consider this sufficient reflects concerns in relation to affordable housing raised at the Hearings. The Council have failed to correlate affordable housing need (387dpa) with total supply (285dpa). The proposed level of development proposed in the countryside including Stalbridge and the larger villages is not substantiated by appropriate evidence. No justification has been provided as to why the proposed level of housing at Shaftesbury has not been increased to reflect the extension of the Plan period to 2031. Shaftesbury is an important location for growth.	<p>The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A.</p> <p>Shaftesbury has taken a large amount of housing growth in recent years and planning permission (Planning Application Ref: 2/2015/1350/FUL) has recently (August, 2015) been approved, subject to a section 106 legal agreement being agreed, for a further 191 dwellings on land to the east of Shaftesbury. On this basis the Council consider it inappropriate to increase the housing number for Shaftesbury as part of MM5.</p>

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2989	6109	Sarah	Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	5	<p>The housing requirement within the Local Plan Part 1 has been increased for a number of reasons; firstly to correct for an allowance for unoccupied dwellings to include second homes and vacant dwellings and secondly to reflect the extended plan period. Neither of these adjustments reflect the issue raised at the hearings in March 2015 including the influence of restrictive planning policies on past trends, the need to consider employment growth, market signals and the fact that an annual rate of 285 dwellings per annum would represent a reduction on recent levels of house building which does not reflect paragraph 47 of the NPPF to "boost significantly the supply of new houses". The housing trajectory shows planned houses decreasing from 2018. The proposed rate of housing does not deliver sufficient supply of affordable housing and does not allow for the accommodation of any unmet needs from neighbouring districts such as Poole and Pubeck.</p> <p>The minimum 825 dwelling requirement in Stalbridge and the larger villages only provides for 14% of the district's total housing supply despite rural areas currently accommodating half the district population. Policy 6 therefore concentrates the majority of development in the four main towns without considering the needs of the rural areas. The figure 825 has been derived from analysis of population projections however the analysis is flawed as it assumes housing growth in North Dorset is driven by net in-migration and that this does not apply to rural areas. The assessment therefore a natural growth only scenario in rural areas with all net in-migration occurring in urban areas. However, census data approximately half of net in-migrants were in rural wards. The effect of artificially constraining rural</p>	<p>The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A. Analysis shows that 41 dwellings per annum of the overall District need for 285 annual dwellings to 2031 is generated specifically from rural areas. Over the 20 year period of the LP1, that equates to 826 of the 5,700 dwellings required in total between 2011 and 2031.</p> <p>The Plan's approach to housing figures has previously been set out in full in the Council's Hearing Statement (NDDC Issue 4A) to Issue 4 and it was also debated at the hearing sessions. The Council's position is set out in MHD007A.</p> <p>In summary; MDH007 uses migration data for the lowest spatial area published i.e LA District: then apportioned out to the various parts of the District based on current population size. The approach is not to take either in-migration or out-migration as fixed and the other as a dependent variable instead net migration was estimated to be the product of a balancing out between the two. This reworking uses the official</p>

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							<p>development such that no migration is allowed will not provide for rural needs, especially as local residents will often be priced out of the market by more affluent in-migrants.</p> <p>MM5 goes on to reduce the number of affordable homes required 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 homes per annum.</p>	<p>ONS/DCLG data i.e. the 2012-base population and household projections and the 2013 mid-year population estimates. The Council's position on affordable housing provision is set out in MHD009 & MHD010.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3055	6163	Roger	Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	5	<p>Support the modification to the housing target to include an allowance for second home ownership. 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 has reduced to 1,350 (67per annum) compared to the 1,480 (98per annum) previously projected over the plan period. 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). 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 a failure to deliver affordable housing in these locations over the next five years. 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. The Eastleigh Local Plan Examination clearly identified that any suggestion of a reliance on the PRS is entirely inappropriate. The Council's response to the implications of Satnam Millennium Ltd v Warrington Borough Council [2015], as detailed in MHD010, is inappropriate.</p> <p>An uplift to the housing requirement should be applied to meet a shortfall in affordable housing need. There are a number of sites within Stalbridge.</p> <p>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 requires an upward adjustment where</p>	<p>The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A. The Council's position on affordable housing provision is set out in MHD009 & MHD010.</p>

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worsening trends are identified.

The NPPF at paragraph 47 requires local planning authorities to “significantly boost the supply of housing”. 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. This shortfall in housing delivery has been combined with increased affordability pressures in the District.

The Council’s 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 include; 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.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3074	6150	Peter	Dutton	Gladman Developments		5	<p>Welcome the Council's decision to amend the overall spatial distribution of housing sought in the district through Local Plan Policy 6. This reflects the need to accommodate a revised housing target of 5,700 homes over the Plan period. Support the decision to increase the level of housing directed to Blandford Forum and Blandford St Mary to at least 1200 dwellings over the Plan period.</p> <p>Welcome the recognition that there is now the ability to expand the broad location of growth to the south east of Blandford St Mary, the St Mary's Hill site. Commensurate with a site area that would now include land to the north of Ward's Drove. We support the acknowledgment that this location could now support 450 dwellings reflecting the area's full potential.</p>	<p>Support for the Council's revised approach to Blandford is noted. In particular; the increased level of housing directed to Blandford "at least 1,200 dwellings" over the Plan period and the expansion of the broad location for growth to the south east of Blandford St Mary which has an expanded estimated capacity of 450 dwellings. It is also observed that the representation confirms that the land has no significant constraints, infrastructure, land ownership or viability issues that would preclude further development coming forward.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3085	6140	David	Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	5	Support the extension of the Plan period and phrase "at least". Note additional 5 dwellings to annualised target but do not consider this sufficient reflects concerns in relation to affordable housing raised at the Hearings. The Council have failed to correlate affordable housing need (387dpa) with total supply (285dpa). The proposed level of development proposed in the countryside including Stalbridge and the larger villages is not substantiated by appropriate evidence. No justification has been provided as to why the proposed level of housing at Shaftesbury has not been increased to reflect the extension of the Plan period to 2031. Shaftesbury is an important location for growth.	The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A. Shaftesbury has taken a large amount of housing growth in recent years and planning permission (Planning Application Ref: 2/2015/1350/FUL) has recently (August, 2015) been approved, subject to a section 106 legal agreement being agreed, for a further 191 dwellings on land to the east of Shaftesbury. On this basis the Council consider it inappropriate to increase the housing number for Shaftesbury as part of MM5.
3128	6002	Natalie	Wakefield			5	Support additional housing. Concerns rased about local school capacity. Support recognition of health provision.	Support noted.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3145	6036	Adam	Bennett	Ken Parke Planning Consultants		5	The proposed distribution of development does not make adequate provision to enable sustainable growth in the countryside and maintain the vitality of existing settlements. The Council's proposed housing figures do not take account of the latest available information. Such as recent figures from the ONS. Inevitably impact on the level of housing need in the emerging East Dorset HMA. Housing figures will need to be revised as part of an early review.	Analysis by JG consulting (see Appendix in Document Ref: MHD007) shows that 41 dwellings per annum of the overall District need for 285 annual dwellings to 2031 is generated specifically from rural areas. Over the 20 year period of the LP1, that equates to 826 of the 5,700 dwellings required in total between 2011 and 2031. The Plan's approach to housing figures has previously been set out in full in the Council's Hearing Statement (NDDC Issue 4A) to Issue 4 and it was also debated at the hearing sessions.

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3156	6056	Shaun	Pettitt	Chapman Lily Planning Ltd	Mr Paul Bedford - Persimmon	5	<p>Broadly support proposed modification set out in figure 5.1 and in Policy 6 in so much that they acknowledge the role of Blandford and Gillingham as the main focuses for new housing growth. Support the substitution of the term 'about' and 'at least' within Figure 5.1 and Policy 6 reflecting the emphasis of para 47 of the NPPF to 'boost significantly the supply of housing'. Concerned at the over-reliance on the delivery of the sole strategic allocation in the LP1, the Gillingham Southern Extension. As a consequence of the extended Plan period the Gillingham SSA is responsible for 30% of the Districts Housing supply. Concerns raised at the level of risk in light of critical infrastructure. There is a need to enhance the Secondary School. This in turn is listed as critical item of infrastructure in the IDP. Need for a clear strategy to address the required expansion of Gillingham High School. Councils proposed growth in Gillingham is therefore undeliverable. Suggested that land adjacent Gillingham High School at Windyridge and Woodwater Farms controlled by Persimmon Homes should be allocated in preference to the later stages of the southern Extension in order to provide the additional land required to enable the school to expand. The allocation would give greater certainty of delivery and unlock earlier phases of the SSA or in the case of a shortfall in supply. Finally Policy 6 sets out affordable housing development by town. The policy should instead reference the percentage of affordable housing to be sought else it could be interpreted that a shortfall on one site should be made up on another, this is unjustified and I believe not the intention.</p>	<p>Broad support for Policy 6 and Figure 5.1 noted including substituted phrases 'about' and 'at least'. The Plan acknowledges that the Gillingham SSA is a strategic allocation and will deliver a significant proportion of the District's growth. Allocation of Windyridge Farm and Woodwater Farms would place additional pressure on school places at Gillingham High School and primary schools in Gillingham. Dorset County Council is developing a strategy to accommodate future demand on school places and this will include revising the catchment area and provision of additional class rooms on site. However, the Education Authority is of the view that growth of the High School can be accommodated on the existing site, without the need for a new school. Although the Authority has been looking for additional playing field land to supplement that which is currently available adjacent to the school, specific projects are not sufficiently advanced. In conclusion the additional site proposed is not required. Policy 6 is clear with its intention to seek 25% affordable housing across Gillingham.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
113	6159	Sue	Green	National Home Builders Federation		6	It appears that the new housing trajectory set out in MM6 includes the delivery of sites beyond the retained settlement boundaries which supports the argument for an early settlement boundary review. The Council should be mindful that to maximize the housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land. The key to increased housing supply is the number of sales outlets. This can be best achieved by increasing the number of housing sites.	<p>Housing proposals relating to areas for growth identified in the LP1 beyond the settlement boundaries would in principle be supported by the Council. The Council also considers that sites relating to the areas for growth should be included in the five year supply, where proposals are sufficiently well advanced.</p> <p>This approach accords with national planning practice guidance Paragraph: 031 Reference ID: 3-031-20140306 which states "However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe."</p> <p>The LP1 has sought to identify broad directions of growth for new housing at the four main towns within the District. The LP2 provides an opportunity to allocate sites at Stalbridge and the eighteen larger villages to ensure a mix of options across the whole of the District. Additional allocations at the four main towns, Stalbridge and the larger villages can also be made through</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
								Neighbourhood Development Plans.
307	6027	Christopher	Wilkins	Sturminster Newton Town Council		6	Housing trajectory proposes more dwellings in Sturminster Newton within the first five years than can be provided for by adequate local education and health services. Propose redistribution of housing in years 2021-26 to be divided 25 units each year. Amedned policy text supplied.	The Council's housing trajectory for Sturminster Newton is based on the latest available information including from planning applications and discussions with potential developers of the sites. Given the need for the Council to maintain a 5-year housing land supply it does not wish to see a delay in the delivery of housing.
769	6131	Tim	Hoskinson	Savills	Taylor Wimpey	6	Support the housing trajectory set out in Appendix A of MHD008 which is considered a realistic assessment. The inclusion of a more detailed breakdown of the trajectory within the Local Plan or AMR would provide greater transparency and assist with monitoring and implementation. Note the inclusion of land east of the Creamery, Sturminster Newton in the first five years but would preference site within the settlement boundary and allocated on the proposal map.	<p>The Council's housing trajectory for Sturminster Newton has been based on the latest information from planning applications and discussions with potential developers of the sites. Given the need for the Council to maintain a 5-year housing land supply it does not wish to see a delay in the delivery of housing.</p> <p>Housing proposals relating to areas for growth identified in the LP1 beyond the settlement boundaries would in principle be supported by the Council. The Council also considers that sites relating to the areas for growth should be included in the five year supply, where proposals are sufficiently well advanced.</p> <p>The Council considers that the presentation style of the housing trajectory as presented provides sufficient detail to monitor the implementation of housing delivery.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
1601	6174	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	6	The Consortium concur that the housing trajectory projections contained within Figure E.1 for the Gillingham SSA are realistic assumptions. If anything the assumptions are conservative. Should there be multiple starting points with different housebuilders it is possible that completion rates are increased.	Support noted.
2961	6134	David	Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	6	In respect of the housing trajectory, consider the proposed level of delivery to be overly optimistic and not an accurate reflection of likely annual delivery rate, for example the proposed number of units in 2015/16 at Gillingham southern extension. Delivery will be constrained by the small number of developers and infrastructure constraints. This approach also contains a high level of risk with an over reliance on a single site. Propose continuing to support the Gillingham SSA but at a more realistic rate and allocating other more suitable sites to meet short term need. In Shaftesbury, land adjacent Wincombe Business Park is shown to provide 50dpa and again this level of delivery by a single developer is considered unrealistic.	The Council's housing trajectory is based on the latest available information including from planning application and discussions with the potential developers of sites.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
2989	6110	Sarah	Hamilton-Foy	Pegasus Planning Group	Messrs Drake	6	MM6 introduces a revised housing trajectory. It is assumed this includes potential extensions to the main towns. This additional modification ref: 3/2/4 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 5 year land supply is able to be demonstrated these site should be allocated now or the settlement boundaries reviewed such that these extensions would not be contrary to policy, rather than postponing this decision to a subsequent review. The proposed housing trajectory also demonstrates how a reducing number of housing completions are being planned for. Past delivery rates show an average 343 net dwellings were built per annum however the trajectory shows from 2021 a maximum of circa 285 will be built. The Local Plan does not therefore significantly boost supply as required by NPPF paragraph 47. The revised trajectory also demonstrates a reduction in the number of housing completions being planned.	<p>Housing proposals relating to areas for growth identified in the LP1 beyond the settlement boundaries would in principle be supported by the Council. The Council also considers that sites relating to the areas for growth should be included in the five year supply, where proposals are sufficiently well advanced.</p> <p>This approach accords with national planning practice guidance Paragraph: 031 Reference ID: 3-031-20140306 which states “However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.”</p> <p>The 2012 SHMA Update was produced in accordance with the most up to date guidance at the time of its production. It has been tested through the examination of local plans across the HMA and found to be a robust basis for establishing housing need. The North Dorset Local Plan is the last of the Local Plans in the HMA and should proceed to adoption to enable housing delivery to be</p>

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								boosted and to enable the coordinated production of the next round of local plans. This issue has been discussed in NDDC Issue Statement 1A.
3055	6164	Roger	Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	6	Reviewing the updated housing trajectory it is disappointing that the Council has not updated the trajectory with 2014/15 completions, which should be available now. 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, renders the five year requirement (from the March 2015 base date) questionable. 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.	The housing trajectory, as set out in MHD008, uses the latest completions data available at the time of publication (1 May 2015). 2014/15 completions data will be published in the 2015 AMR 2015. The 2014 AMR demonstrated a 5 year housing land supply with a 5% buffer applied.
3085	6141	David	Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	6	In respect of the housing trajectory, consider the proposed level of delivery to be overly optimistic and not an accurate reflection of likely annual delivery rate, for example the proposed number of units in 2015/16 at Gillingham southern extension. Delivery will be constrained by the small number of developers and infrastructure constraints. This approach also contains a high level of risk with an over reliance on a single site. Propose continuing to support the Gillingham SSA but at a more realistic rate and allocating other more suitable sites to meet short term need. In Shaftesbury, land adjacent Wincombe Business Park is shown to provide 50dpa and again this level of delivery by a single developer is considered unrealistic.	The Council's housing trajectory is based on the latest available information including from planning application and discussions with the potential developers of sites.

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3156	6057	Shaun	Pettitt	Chapman Lily Planning Ltd	Mr Paul Bedford - Persimmon	6	Figure E.1 is confusing due to the key, it is understood that the light blue columns represent the projected unit completions for the rest of the District i.e. the entire District with the exception of the Gillingham SSA and not the District Total as identified within the key. The reference to the light blue column in the key should read 'rest of the District'.	The Council accepts the representation made.
2783	6070	Gill	Smith	Dorset County Council		7	Dorset County Council supports Main Modification MM7 as it addresses the need for developer to work with the County Council and NHS Dorset to address the needs of people with social care or health issues. This was previously lacking in the Plan.	Support noted.
3156	6058	Shaun	Pettitt	Chapman Lily Planning Ltd	Mr Paul Bedford - Persimmon	7	Support the modification to supporting text of Policy 7 acknowledging the Council has previously confirmed that there is insufficient locally derived evidence to support the adoption of the nationally described standards for new housing, Further suggested reference to term 'sizes' is removed and text updated to read "that reflects the identified needs for houses with different numbers of bedrooms."	Support for main modification noted. Proposed text considered unnecessary as it broadly repeats the phrase "numbers of bedrooms". Evidence highlights that there are different needs for both market and affordable housing.

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113	6157	Sue	Green	National Home Builders Federation		8	<p>Aware the Affordable Housing Policy has been revised to reflect the Written Ministerial Statement dated 28 November 2014. However, if the Council propose any modifications to MM8 because of the recent High Court Judgement 31 July 2015 any such changes should be consulted upon as the HBF and other parties may wish to submit further comments.</p> <p>Previously the Council was seeking 40% affordable housing everywhere except Gillingham which correlated with figures set out in Policy 6. Under MM5 the Council has proposed modification to Policy 6 without consequential change to Policy 8. The Council should clarify its position.</p> <p>It is agreed that the reduced affordable housing provision from 30% to 25% on the Gillingham SSA in MM15 and MM18 reflects the Councils viability assessment of evidence. However this modification will reduce the overall amount of affordable housing delivered across the District resulting in a greater difference between affordable housing delivery and affordable housing need. This supports the argument for upward adjustment of OAHN as set out in the NPPG and High Court Judgement Satnam Millennium v Warrington Borough Council.</p>	<p>The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing.</p> <p>Given the Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan (Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017).</p> <p>The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out. The Council's position on affordable housing provision is set out in MHD009 & MHD010.</p>

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274	6099	B	MacGregor	Pimperne Parish Council		8	Understand the objective is to restrict the growth of larger developments (above 10 units) in AONBs. The majority of growth in Pimperne is anticipated to be small infill plots of 5 or under where there appears to be no requirement for Affordable Housing. This approach could price young people out of the area and threatens the overall plan to ensure 40% of homes are affordable.	<p>The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing. Although, it does note that the Court of Appeal has given the Government permission to appeal the High Court judgement. In the Council's opinion the Government's decision to proceed with a Court of Appeal challenge demonstrates its continued desire and intention to introduce a national threshold in respect of when affordable housing can be sought from new residential development.</p> <p>Based on research that that the Council has carried out, taking into account affordable housing completions in the District over the last five years, and the 5 year housing land supply data contained within the Council's AMR 2014 (Document Ref IMP006*) it is estimated that the latest iteration of Policy 8, outlined in MHD054, would deliver up to approximately 10 less affordable dwellings per year compared to the version of the policy outlined in the submitted plan (Document Ref: SUD017). However, the delivery of new residential development, including the number of affordable dwellings will obviously be dependent upon a number of factors including future market conditions.</p> <p>Given the Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment
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Council's Response

(Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017).

The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out. In advance of the review should a particular housing need be identified at Pimperne an Affordable Housing exception site could be pursued either through either the LP2 or a Neighbourhood Plan.

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749	6104	Sean	Lewis	Tetlow King Planning	South West HARP Planning Consortium	8	The High Court judgement in West Berkshire DC & Reading BC has meant that paragraphs 012-023 of the online Planning Praticce Guidance have been removed. This means that the 10 unit threshold in which developer contributions for affordable housing are required has been removed. The Council may want to reconsider its stance however it is understood that at the recent Planning Policy Panel the Council are seeking to retain this threshold which is of concern. Urge the Council to return to the former Policy 8 as was orginally published when the Plan was submitted for examination subject to appropriate viability testing. The above High Court judgement also revoked the Vacant Building Credit and we recommend that additional text in paragraph 5.110 be removed.	<p>The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing. Although, it does note that the Court of Appeal has given the Government permission to appeal the High Court judgement. In the Council's opinion the Government's decision to proceed with a Court of Appeal challenge demonstrates its continued desire and intention to introduce a national threshold in respect of when affordable housing can be sought from new residential development. Based on research that that the Council has carried out, taking into account affordable housing completions in the District over the last five years, and the 5 year housing land supply data contained within the Council's AMR 2014 (Document Ref IMP006*) it is estimated that the latest iteration of Policy 8, outlined in MHD054, would deliver up to approximately 10 less affordable dwellings per year compared to the version of the policy outlined in the submitted plan (Document Ref: SUD017). However, the delivery of new residential development, including the number of affordable dwellings will obviously be dependent upon a number of factors including future market conditions.</p> <p>Given the Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan</p>

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								<p>(Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017).</p> <p>The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out. In advance of the review should a particular housing need be identified an Affordable Housing exception site could be pursued either through either the LP2 or a Neighbourhood Plan.</p> <p>With regards to Vacant Building Credit the Council considers that as a result of the High Court judgement there is no longer any need for change 5/8/16 detailed in the Schedule of Additional Changes (Document Reference MHD053).</p>
1191	6167	Jonathan	Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	8	<p>Change references 5/8/22, 5/8/23 and 5/8/25. Clemdell Ltd considers the changes are unacceptable in principle. It is not clear whether this precludes an applicant using its own assessor. A local plan cannot prejudice an applicant's right of appeal. Disputes will arise because NDDC fail to recognise current use value of brownfield land and place barriers to sustainable development contrary to emerging government policy (see also comments on MHD009). If NDDC wish to use outside consultants for any element of a planning application that is its right at its own cost. In any event:</p> <p>(a) DV or joint assessor must be instructed jointly</p> <p>(b) that assessor makes any award of costs.</p>	<p>Change references 5/8/22, 5/8/23 and 5/8/25</p> <p>The Council agreed the scope of response to issues raised at the Hearing with the Inspector. The agreed scope, to which the Council has responded, sets out that the Council should widen the scope of Policy 8 to allow mutually agreed independent valuers to resolve viability disputes, rather than just the 'District Valuer'.</p>

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1601	6175	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	8	Welcome the additional reference to an “independent assessor” but object to on-going reference to District Valuer in assessment of viability assessment submitted in accompaniment with planning applications. Preference independent assessor only rather than either / or approach. Object to the phrase “mutually agreeable”, it should be for the applicant to confirm the appointment.	The Council agreed the scope of response to issues raised at the Hearing with the Inspector. The agreed scope, to which the Council has responded, sets out that the Council should widen the scope of Policy 8 to allow mutually agreed independent valuers to resolve viability disputes, rather than just the ‘District Valuer’.
2783	6071	Gill	Smith	Dorset County Council		8	Dorset County Council supports Main Modifcation MM* (both the text and Policy statement) in so far as it relates to the need to consider the provision of adapted or supported housing on relevant sites. This modification addresses the concerns of the County Council on an issue that was previously inadequately covered in the Plan.	Support noted.
2961	6135	David	Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	8	Government guidance in relation to affordable housing exemptions has been held in the High Court as unlawful. Reference to this guidance should be removed. This may have implications for other policies and need to be reassessed.	The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing. Given the Council’s priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan (Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017). The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3055	6165	Roger	Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	8	Support the amendment to include reference to other persons who could provide impartial judgement on viability appraisals.	Support noted.
3085	6142	David	Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	8	Government guidance in relation to affordable housing exemptions has been held in the High Court as unlawful. Reference to this guidance should be removed. This may have implications for other policies and need to be reassessed.	<p>The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing.</p> <p>Given the Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan (Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017).</p> <p>The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out.</p>

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2961	6136	David	Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	9	Government guidance in relation to affordable housing exemptions has been held in the High Court as unlawful. Reference to this guidance should be removed. This may have implications for other policies and need to be reassessed.	Representation does not relate directly to MM9. The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing. Given the Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan (Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017). The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3085	6143	David	Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	9	Government guidance in relation to affordable housing exemptions has been held in the High Court as unlawful. Reference to this guidance should be removed. This may have implications for other policies and need to be reassessed.	Representation does not relate directly to MM9. The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing. Given the Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan (Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017). The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out.
3156	6059	Shaun	Pettitt	Chapman Lily Planning Ltd	Mr Paul Bedford - Persimmon	9	In respect of the additional text that refers to the conversion of units from B8 to residential uses and the need to count these as part of the housing land supply, it should be noted that these provisions through the GDPO are time limited until 15 April 2018. Given the time limit and the numerous practical challenges of achieving a successful conversion it could be anticipated such schemes will only make a negligible contribution towards housing land supply. To this end it should be made clear in the supporting text that such conversions will be counted as part of the housing supply only where applications for prior approval have been granted and there is strong evidence that schemes will come forward.	Housing supply concerns are noted. Supporting text simply seeks to recognise a potential additional source of housing provision.

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3073	6024	Suzanne	Keene	CPRE North Dorset Branch		10	Object to MM10 and proposal to raise requirement for drainage solutions from a threshold of 2 to 10 dwellings within Policy 13. A large proportion of developments on schemes are below the proposed threshold. NPPF requires development to be safe without increasing flood risk and where possible reduce overall risk. Proposed alternative wording supplied.	In a Written Ministerial Statement dated 18 December 2014 the Government stated that SUDS should be incorporated in all new development of ten dwellings or more.
3151	6048	Michael	Hopper	Milborne St Andrew Neighbourhood Plan Group		10	Modification does not take account of local circumstances that justify deviating from the national guidance on this issue. In parts of North Dorset which are particularly susceptible to flooding any development is considered likely to exacerbate flood risk in times of high rainfall and groundwater levels. Milborne St Andrew is such an area. As the catchment extends beyond the the Neighbourhood Plan areas this is an issue best tackled through the local plan. Retain SUDs threshold at 2 (or even reduce to 1 unit) in those locations currently recorded frequent flood events. Policy text supplied. Suggest it maybve helpful to identify these areas through Local Plan Part 2 or through the review.	In a Written Ministerial Statement dated 18 December 2014 the Government stated that SUDS should be incorporated in all new development of ten dwellings or more.
1601	6176	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	11	Concern requirement for public art provision for all large scale development proposals lacks flexibility and is overly prescriptive. The policy should encourage art where appropriate and necessary to make the development acceptable in planning terms. The clarification on what constitutes large scale development does not address this concern.	The Council agreed the scope of response to issues raised at the Hearing with the Inspector. The agreed scope, to which the Council has responded, sets out that the Council should amend wording to clarify that the provision of public art would only be sought on large scale schemes.

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1601	6177	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	12	Main Modification implies that existing medical practices are already under pressure in Gillingham. Evidence from Gillingham Medical Practice identifies that there is considered to be some capacity. Evidence from Dr Yule confirmed that there is no funding available for the delivery of new facilities. The delivery of a new facility by developers creates a series of operational and cost challenges such as staffing that can be a huge burden on existing practices. Such that the delivery of new facilities should be carefully considered. Any requirement for additional medical provision within the SSA must be subject to further detailed consideration of actual operational requirements. The wording in Para 7.93 & Policy 21 (z) should be amended. It is incorrect for text to note that a health facility including a doctor's surgery, dentists and pharmacy will be provided in the local centre. The evidence base has yet to be determined. Such facilities should be determined through the Masterplan Framework and outline applications.	The Council agreed the scope of response to issues raised at the Hearing with the Inspector. The agreed scope, to which the Council has responded, sets out that the Council should provide greater commitment to resolving issues surrounding health service provision.
274	6100	B	MacGregor	Pimperne Parish Council		13	The final sentence of the proposed new para 7.135 seems to provide an opportunity for the planning process to undermine the purpose of the IOWAs if sufficiently robust arguments can be put forward. In Pimperne the Parish Council wish to ensure the old school field remains an amenity (village green) and will be looking to designate this area.	Comment noted.
307	6030	Christopher	Wilkins	Sturminster Newton Town Council		13	The policy is inconsistent in providing varying degrees of protection of IOWAs at different times. Amended wording supplied.	The Council considers that the proposed modification provides sufficient protection for IOWA's within the District.

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661	6105	Michel	Nublat			13	The IOWA designation is out of date, consequently its inclusion in the Local Plan Part 1 is unjustified and thus this section is unsound. The methodology of the SHLAA was thorough, it was endorsed by local authority representatives and by a panel with expertise and experience that represented a cross section of stakeholders. Consequently the assessment and lists of included and excluded sites need to be taken as valid and used as a working document. The Local Plan 2003 Inspector's recommendations requested a review of IOWA designations. This was in fact done through the SHLAA. I question and dispute the modifications call for yet another review of designated IOWAs, this would ignore the solution in place, the SHLAA assessment and the lists of included and excluded sites. Only those sites that have yet to be brought forward by their owners and yet to be assessed, should be subject to assessment using the same SHLAA matrix and criteria.	The Council's position on IOWA designations is set out in its Hearing Statement (Document Ref: NDDC Issue 2A) on Issue 2. In summary; IOWAs will continue to be used for development management purposes by virtue of 'saved' policy 1.9. The retention of this policy will also enable the designated areas to be reviewed through the Local Plan Part 2 (LP2) and / or neighbourhood plans. Where settlement boundaries are removed, it will no longer be necessary to retain IOWAs as any green space would be subject to countryside policies. Where settlement boundaries are retained the existing IOWA designations could provide the starting point for the consideration of introducing Local Green Space designations.
748	6090	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	13	Support is given to the revised text at 7.135 which clarifies the role of and approach towards IOWAs pending their review through the Local Plan Part 2 or Neighbourhood Plan.	Support noted.

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1601	6178	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	13	The size of an allotment plot (250 sqm) is generally considered too large for most allotment holders, and a half size plot of 125sqm is considered a more manageable size, indeed a quarter plots are also popular. Whilst the acknowledgment that plot sizes could be smaller than 250sqm this does not go far enough as it is a discretionary decision left to a relevant parish or town council. Propose further clarity on this matter and to allow smaller plot sizes.	The Council agreed the scope of response to issues raised at the Hearing with the Inspector. The agreed scope, to which the Council has responded, sets out that the Council should re-consider the level of provision sought in relation to allotments. It is considered that the main modification addresses the concerns of the respondent that smaller plot sizes would be permitted if local requirements are indicated as such through the Parish and Town Councils. However, to give the opportunity for further clarification on such a detailed matter the Council proposes additional text.
3123	6115	Genevieve	Collins	Alder King Planning Consultants		13	The Policy relating to Important Open and Wooded Areas (IOWA) of the 2003 Local Plan should not be saved because it is not in conformity with the NPPF para 73 and 77 and Planning practice Guidance for Local Green Space paragraph 005-002, specifically para 013. Paragraph 73 of the NPPF requires policies for the protection of open space to be based on robust and up-to-date assessments for the needs of open space, sports and recreation facilities and opportunities for provision. There is no such assessment. Paragraph 77 of the NPPF and planning practice guidance confirm that Local Green Space designations are inappropriate for most green areas or open space and designations should be used where it holds particular local significance. A review should take place as part of LP2 and the policy should not be applicable until this time. Alternative text supplied.	The Council's position on IOWA designations is set out in its Hearing Statement (Document Ref: NDDC Issue 2A) on Issue 2. In summary; IOWAs will continue to be used for development management purposes by virtue of 'saved' policy 1.9. The retention of this policy will also enable the designated areas to be reviewed through the Local Plan Part 2 (LP2) and / or neighbourhood plans. Where settlement boundaries are removed, it will no longer be necessary to retain IOWAs as any green space would be subject to countryside policies. Where settlement boundaries are retained the existing IOWA designations could provide the starting point for the consideration of introducing Local Green Space designations.

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274	6101	B	MacGregor	Pimperne Parish Council		14	In respect of Policy 16. The use of greenfield sites beyond the by-pass will have an adverse impact on the landscape of Blandford and the Parish of Pimperne. There are also potential issues with highways water extraction and flooding, lack of infrastructure and negative impact on the town centre regeneration. The area is surrounded by AONB and therefore development is likely to impact on the AONB and Dark Skies accreditation. The pre-submission Local Plan was assessed as having a positive impact on the environment as far as Blandford development was concerned. The modification has now removed this positive assessment in the SEA. In respect of surgeries and health care the wording is too vague and does not adequately address the need to meet growing needs in Blandford where resources are stretched.	<p>The Schedule of Changes Arising from the Hearing Sessions (Document Ref: MHD018) includes change reference 8/16/8 which reflects points raised by the Planning Inspector during the hearing sessions about the relationship between LP1 and the Neighbourhood Plan being prepared by Blandford+. This change highlights that policies in the Neighbourhood Plan will supplement the strategic policies contained within the LP. The District Council acknowledges that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. The District Council would, however, reiterate the need for a Neighbourhood plan to meet the 'basic conditions' relating to neighbourhood planning.</p> <p>The wording regarding medical provision in Blandford reflects discussions with Whitecliff Group Practice. The Council will continue to engage with relevant stakeholders regarding the issue of medical</p>

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278	6041	Linda	Scott-Giles	Blandford Forum Town Council		14	<p>Representation Update (September 2015) The group's previous representation dated July 2015 still stands. To update the Inspector, further progress has been made through consultation with landowners and with Dorset County Council on the provision of a primary school. Potential to relocate recycling centre and to establish a further education facility. Landowners are undertaking additional work on land inside/outside the AONB and of its flood risk, biodiversity and traffic impacts. Planned social infrastructure to the North East is not related to proposed residential development in the South and will result in increased traffic movements. Group has undertaken and updated its own SA/SEA comparison assessment of the two alternative growth strategies (Appendix B). Assessment demonstrates the alternative strategy outperforms the proposed strategy noting the District Council has allowed landscape impact to dominate their assessment. The group seek an opportunity to undertake landscape assessment work to demonstrate how impacts on the landscape can be mitigated.</p> <p>Previous Representation (July 2015) The District Council has not responded to the matters Blandford+ raised on the Blandford strategy in the NDLP1 at the hearings within the relevant explanatory notes (notably docs MHD006 and/or MHD011). Support in principle the extension to the Plan period to 2031 (MHD006). Object to the increase in the size of site on the edge of Blandford St Mary to 450 homes (MHD008). Concern that no re-assessment in the SA/SEA of the reasonable alternatives has been undertaken. A housing scheme of 450 homes in this location will neither be able to afford to make provision for a new primary school and GP</p>	<p>Progress on the production of the Blandford+ Neighbourhood Plan is acknowledged. The comments by Ms Loch of Blandford+ are also noted. However, the points raised have already been covered in evidence and previous discussions. Please see the Council's Hearing Statement (Document Ref NDDC Issue 7A) and changes 8/16/17 and 8/16/18 in the Council's Schedule of Additional Changes (Document Ref: MHD053). Furthermore in terms of the SA / SEA comparison assessment please see the Council's comments in response to comments on MHD051.</p>

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surgery nor would those facilities be able to serve the town even if they were viable. The land budget cannot accommodate the 2Ha – 3Ha required for those purposes without extending further into the countryside to the south. There is already a primary school in the village (which cannot be extended) and similarly the existing GP surgeries are in the town centre, which is reasonably accessible for the town population, but their expansion will not be easy. The main demand for such services lies in its northern and eastern areas. The Steering Group are persuaded through 'careful assessment' of the advantages of using land to the north or east of the town to make provision for a new primary school and GP surgery as part of a sustainable urban extension. Acknowledge the Schedule of Changes Arising from the Hearing Sessions (MHD018) acknowledges this issue in its ref 7/14/14 & 8/16/9. The Steering Group is mindful of the proposed change (ref 8/16/8 in the Schedule) to para 8.13 of the supporting text to Policy 16, which appears to enable the Neighbourhood Plan to make provision for "additional greenfield sites beyond the by-pass". Assume this change enables the Neighbourhood Plan to allocate a series of sites to the north and east of the town for sustainable development. The Steering Group expect the District Council to justify changes through a review of the Sustainability Appraisal.

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1191	6168	Jonathan	Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	14	<p>Para 8.85 of the revised Sustainability Appraisal (MHD051) includes the conclusion: “The provision of greenfield sites beyond the bypass may result in the town centre regeneration being less viable. Typically the more difficult to develop regeneration sites in town centres are less likely to be developed than greenfield sites. The difficulties of developing these sites, along with the potential for reduced house sales prices from new developments, will have an impact on their viability and therefore make the regeneration less likely. “</p> <p>The Local Plan changes and Modifications contain no proposals to mitigate this impact which will affect not only the viability but also the vitality of Blandford Forum Town Centre. The PBAVR does not recognise the pressure. The identified effect on the Housing Mix Policies following upon this element of the SA should be considered as part of the Local Plan Examination and not left to the CIL Examination. Change reference 8/16/10</p> <p>A consequential minor amendment is to Item 12 on that plan should be reworded “Regeneration to the south of Market Place and East Street” with an illustrative location shown similar to that in Figure 2.8.1 in the March 2010 iteration of LP1. Wording of this paragraph should be clarified to: “such as the extension or redevelopment of existing, and additional, retail units south of Market Place and East Street”. This is to provide for the potential closure of Morrisons and to guide e.g. the development of vacant land such as the DCC site. Further: (a) for consistency with the land around the recognised constraints on the land around the existing Morrisons, the same existing constraints around the Co-op should be recognised in paragraph 8.37 of SUD017a by adding at the end of 8.37: “any</p>	<p>The fact that greenfield sites can come forward does not prevent development coming forward on brownfield sites. Proposals will be considered on their individual merits and viability matters associated with developing a site could be considered as part of a planning application. The Council considers that the proposed changes recommended by the respondent are unnecessary. The Council’s proposed change to Policy 16 (8/16/10) makes it clear that all town centre regeneration projects in Blandford will be encouraged. In addition it sets out that on appropriate sites all development and redevelopment schemes which support town centre regeneration would be viewed positively within the recognised constraints of heritage and flooding considerations. Any future development proposals relating to sites in Blandford town centre would also be subject to character, local context and viability considerations.</p>

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							scheme here would also have to have regard to the potential impact on the historic character and visual context of the town” (b) to recognise the sequential tests in NPPF paragraph 24 that apply to the Co-op land, after (a) should be added: “and on the viability of the town centre” and paragraph 8.38 of SUD017a should reflect the final wording of this change.	
2784	6124	John	Stobart	Natural England		14	Support change to Policy 16 Blandford Forum. Natural England endorses the revised findings of the comprehensive Habitats Regulation Assessment completed by Footprint Ecology. Natural England has no further comments on the revised Sustainability Appraisal.	Support noted.
2944	6025	Bruce	Willatt			14	Object to development at Blandford St Mary. Concern that development would be visible from a wide area causing a destruction of the landscape and light pollution. Previous development at Blandford St Mary has not been mitigated, road improvements and no village centre. Difficult accessing Doctors surgery, chemists and parking. Coalescence with Lower Blandford St Mary. Traffic issues along church lane and A350. Lose of flora and fauna along Wards Drove and amenity value. Difficult for new residents to access the town centre.	Blandford St Mary is a broad location for growth. Site specific design and transport issues will be considered through site allocation process within the Local Plan Part 2 or any Planning Application. Policy 16 enables a new doctors surgery, expansion or relocation of existing surgery.

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3051	6040	Linda	Scott-Giles	Blandford+		14	<p>Representation Update (September 2015) The group's previous representation dated July 2015 still stands. To update the Inspector, further progress has been made through consultation with landowners and with Dorset County Council on the provision of a primary school. Potential to relocate recycling centre and to establish a further education facility. Landowners are undertaking additional work on land inside/outside the AONB and of its flood risk, biodiversity and traffic impacts. Planned social infrastructure to the North East is not related to proposed residential development in the South and will result in increased traffic movements. Group has undertaken and updated its own SA/SEA comparison assessment of the two alternative growth strategies (Appendix B). Assessment demonstrates the alternative strategy outperforms the proposed strategy noting the District Council has allowed landscape impact to dominate their assessment. The group seek an opportunity to undertake landscape assessment work to demonstrate how impacts on the landscape can be mitigated.</p> <p>Previous Representation (July 2015) The District Council has not responded to the matters Blandford+ raised on the Blandford strategy in the NDLP1 at the hearings within the relevant explanatory notes (notably docs MHD006 and/or MHD011). Support in principle the extension to the Plan period to 2031 (MHD006). Object to the increase in the size of site on the edge of Blandford St Mary to 450 homes (MHD008). Concern that no re-assessment in the SA/SEA of the reasonable alternatives has been undertaken. A housing scheme of 450 homes in this location will neither be able to afford to make provision for a new primary school and GP</p>	<p>Progress on the production of the Blandford+ Neighbourhood Plan is acknowledged. The comments by Ms Loch of Blandford+ are also noted. However, the points raised have already been covered in evidence and previous discussions. Please see the Council's Hearing Statement (Document Ref NDDC Issue 7A) and changes 8/16/17 and 8/16/18 in the Council's Schedule of Additional Changes (Document Ref: MHD053). Furthermore in terms of the SA / SEA comparison assessment please see the Council's comments in response to comments on MHD051.</p>

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							<p>surgery nor would those facilities be able to serve the town even if they were viable. The land budget cannot accommodate the 2Ha – 3Ha required for those purposes without extending further into the countryside to the south. There is already a primary school in the village (which cannot be extended) and similarly the existing GP surgeries are in the town centre, which is reasonably accessible for the town population, but their expansion will not be easy. The main demand for such services lies in its northern and eastern areas. The Steering Group are persuaded through 'careful assessment' of the advantages of using land to the north or east of the town to make provision for a new primary school and GP surgery as part of a sustainable urban extension. Acknowledge the Schedule of Changes Arising from the Hearing Sessions (MHD018) acknowledges this issue in its ref 7/14/14 & 8/16/9. The Steering Group is mindful of the proposed change (ref 8/16/8 in the Schedule) to para 8.13 of the supporting text to Policy 16, which appears to enable the Neighbourhood Plan to make provision for "additional greenfield sites beyond the by-pass". Assume this change enables the Neighbourhood Plan to allocate a series of sites to the north and east of the town for sustainable development.</p> <p>The Steering Group expect the District Council to justify changes through a review of the Sustainability Appraisal.</p>	
3074	6151	Peter	Dutton	Gladman Developments		14	<p>Policy 16 should be amended to make clear that at least 450 dwellings are to be provided on land to the south east of Blandford St Mary, the St Mary's Hill site. Commensurate with a revised boundary that extends to Ward's Drove. This amendment would provide further clarity for both applicants and decision makers on the direction and location of development within the town.</p>	<p>The Council's approach has been to identify broad locations for growth and not to attribute specific site capacities in advance of site allocations in the LP2. However, site capacities have been estimated on the basis of known SHLAA sites for the purpose of the Council's housing trajectory.</p>

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3090	6096	S	Way			14	Object to proposed development at Lower Blandford St Mary. Concerns raised relate to visual impact of development on the surrounds, listed buildings and heritage assets in the area. Have all options been considere including land within the by-pas at Black Lane, Fairmile and south of Pimperne. Has an SEA been considered. Increased traffic along the A350 / A354 and increased potential for accidents. Insufficient jobs, schools and doctors surgeries. Land was previously agreed on that it would not be developed.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3135	6014	David	Lindsell			14	Object to proposed extension at Blandford St Mary. Too much traffic, access to Doctors and Dentists surgeries and parking.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3136	6015	Phil	Lindsell			14	Object to growth at Blandford St Mary. Too much traffic and difficult to secure NHS appointments. Preference is growth of the town to the north and west.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3137	6016	Jill	Lindsell			14	Object to proposed growth at Blandford St Mary. Too much traffic, car parking and difficult to access to doctors surgery's. Preference growth of the town to the north and west. Dangerous to cross A354. The separate identity of Lower Blandford St Mary will be lost.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3138	6017	Nicola	Lindsell			14	Object to growth at Blandford St Mary. Pressure on infrastructure, parking, schools, doctors and dentists surgeries. Increase in traffic. The coalescence of Lower Blandford St Mary. Object to development outside the ring road. Dangerous crossing the A354. Preference for growth to the north and west.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3139	6018	Chris	Lindsell			14	Object to proposed extension to Blandford St Mary. Too much traffic. Dangerous to cross the ring road. Difficult to access parking, Doctors and Dentists surgeries.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3140	6019	Joanna	Mains			14	Object to growth at Blandford St Mary. Concern raised in respect of the impact of nearby listed buildings (The Manor House). Object to development outside the bypass. Difficult to access Doctors surgeries. Preference for growth to the North and West. Dangerous to cross the A354.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3141	6020	C N	Lindsell			14	Object to development at Blandford St Mary. Difficult to access existing infrastructure including schools, doctors surgeries. Too much traffic, pollution and waste disposal. Impact on three listed houses. Dangerous to cross the A354. Preference for development north and west of the town. Don't build beyond the bypass.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters, including access, highway safety and landscaping, will be considered either/or as part of the LP2 or a planning application.

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3148	6043	K	Gleed			14	Object to proposed development at Lower Blandford St Mary. Traffic concerns regarding A350.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3149	6044	Ivy	Gleed			14	Object to proposed development at Lower Blandford St Mary. Concerned at safely crossing the A354 & A35 due to increased traffic. Increase waiting times at Doctors and Dentists. Extra parking spaces required even with blue badge. Capacity in schools for extra children. Have sites to the west and north within the by-pass been considered.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3150	6045	Paul	Bedford	Persimmon Homes South Coast		14	Object to the requirement to not commence development at Dorchester Hill until a mitigation package has been agreed and implemented to the satisfaction of Natural England. In practice mitigation measures happen at the same time as development. Persimmon have agreed a mitigation strategy with Natural England but consider it unreasonable to wait 20 years to implement the permission for much needed housing. Any mitigation package will be specified and obligations enforced via a section 106 or similar, this would usually include a timetable for implementation to be agreed by the LPA. There is no reason to refer to mitigation having been implemented in the Policy.	The Council's position is set out in MHD012. In summary, any mitigation package should be agreed by Natural England and should be given sufficient time for the measures to be established. The implementation of the mitigation measures should be monitored by the landowners to ensure their effectiveness. Development should only take place once it can be demonstrated that the mitigation measures are established to Natural England's satisfaction. For example it will be essential that hedgerows have been given time to mature and that cockchafer beetle populations are at a reasonable and stable level.
3152	6050	Susan	Billington			14	Object to the proposed development at Lower Blandford St Mary. Concerns raised over school and doctors capacity. Traffic issues associated with the A350/A354 , noise and safety concerns.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3154	6052	Candice	Willatt			14	Object to proposed development at Lower Blandford St Mary. Concern at excessive amount of building on open countryside. Lower Blandford St Mary will be absorbed into Blandford Forum. Concern houses will not be occupied by local families. There is insufficient employment opportunities in Blandford. Increased risk of flooding to lower Blandford St Mary, water puddles along the A350 and surface water flows along Wards Drove. Increased traffic along the A350 and safety concerns for residents crossing the road to services.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3157	6061	J A A	Mains			14	Object to proposed development at Lower Blandford St Mary. Impact on listed buildings at Lower Blandford St Mary. Safety concerns raised for residents crossing A350/A354. Infrastructure concerns in particular schools, NHS Doctors and Dentists, Police and fire services, impact on parking and increased pollution. Preference for development within the ring road.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3158	6062	Colin & Jacky	Duffield			14	Object to development proposal at Lower Blandford St Mary. Seek a comprehensive design / layout. Rear gardens should be adjacent Wards Drove. A proportion should be affordable. A subway or pedestrian footbridge must be provide under/over A354. A vehicular access from the roundabout on the A354 not A350. No vehicular access from Wards Drove / A350 a dangerous junction. Seek reduced speed limits. Adequate infrastructure should be in place for schools, doctors, NHS services, dentists, additional traffic, car parking and pollution. Improve Georgian town centre including resurfacing.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3160	6064	Allen	Shepherd			14	Object to proposed development at Lower Blandford St Mary. Proposal defeats the objective of a by-pass to take traffic away from the town centre and increase pedestrian safety. Plan should consider alternative sites such as areas adjacent to Bryanston village which maintains the integrity of the by-pass.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3162	6066	D	Snook			14	Object to proposed development at Lower Blandford St Mary. Other others around Blandford are more suitable such as Fairmile, land off Black Lane and land South of Pimperne. Query SEA evidence. The A350 / A354 are very busy arterial roads and new development would contribute to this traffic. Safety concerns for cyclists and pedestrians in the area. Visual impact of new development including urbanisation of rural scene. Impact on listed buildings and heritage assets. Insufficient infrastructure, capacity of doctor's surgeries and local primary schools. Object to development outside the by-pass.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3163	6067		Green			14	Object to development at Lower Blandford St Mary. Concerns raised in respect of capacity of infrastructure of increased traffic, pollution, schools, doctors and dentists surgeries. Denigrate the countryside and loss of agricultural land. Other suitable sites proposed to the north and west of Blandford Forum within the by-pass.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3164	6068	Alexandra	Willatt			14	Object to proposed development at Lower Blandford St Mary. Concern at excessive amount of building on open countryside. Lower Blandford St Mary will be absorbed into Blandford Forum. Concern houses will not be occupied by local families. There is insufficient employment opportunities in Blandford. Increased risk of flooding to lower Blandford St Mary, water puddles along the A350 and surface water flows along Wards Drove. Increased traffic along the A350 and safety concerns for residents crossing the road to services.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3165	6074	A L	Snook			14	Object to proposed development at Lower Blandford St Mary. Impact on nearby listed buildings. Local roads including the A350 and A354 are at capacity and additional traffic could cause hazards to road users and pedestrians. Concerns for infrastructure capacity including schools, doctors & dentists, public transport and roads. Has an SEA been undertaken? Preference for development at Black Lane. Object to development beyond the by-pass. Retain settlement identity.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3166	6075	Ann	Dewar			14	Object to proposed development at Lower Blandford St Mary. Concerns in respect of infrastructure capacity; doctors surgeries, schools and traffic along the A350. Church lane is used as a rat run and is less safe for Children. Loss of settlement identity of Lower Blandford St Mary. Preference for sites within the by-pass.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3168	6077	June	Lane			14	Object to proposed development at Lower Blandford St Mary. Concerned that Lower Blandford St Mary will lose its separate identity. Road safety concerns for residents crossing the by-pass. Loss of agricultural land.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3169	6078	M A	Phipps			14	Object to proposed development at Lower Blandford St Mary. Further development will increase traffic congestion and pollution.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3170	6079	M W	Lane			14	Object to proposed development at Lower Blandford St Mary. There is land available within the ring road. Loss of agricultural land.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3171	6080	J E	Phipps			14	Object to proposed development at Lower Blandford St Mary. Concern for pedestrian safety crossing the ring road. Preference for housing development within the ring road.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3172	6081	A C	Wrench			14	Object to proposed development at Lower Blandford St Mary. Concerns raised in respect of the level of traffic, infrastructure including hospital, parking, doctors' surgery and schools. Safety concerns for residents crossing A350 / A354. Other more suitable sites within the by-pass.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

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3173	6082	C	Wrench			14	Object to proposed development at Lower Blandford St Mary. Concerns raised in respect of traffic along the A350 / A354 and pedestrian safety crossing the ring road. Church road will be subsumed by the development. Infrastructure issues in respect of town centre parking and NHS services. There are more suitable sites to the north and west of Blandford within the by-pass.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3174	6083	Brian	Wrench			14	Object to proposed development at Lower Blandford St Mary. Other sites are available within the by-pass to the north and west from Salisbury Road and Shaftesbury Road roundabouts. Concerns related to increased traffic on the A350. Infrastructure capacity issues including doctor's surgeries and parking. Traffic congestion within the town continues to worsen since town centre developments and pedestrianisation.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3175	6084	Lorna	Wrench			14	Object to proposed development at Lower Blandford St Mary. Concerns relate to the speed and volume of traffic on the A350 including pedestrian safety, Blandford Town Centre and access for emergency vehicles, detrimental impact on local services including GP surgery and community hospital and impact on the village of Lower Blandford St Mary such as increased noise and loss of privacy.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3177	6094	Ian	Mackay			14	Object to proposed development at Lower Blandford St Mary. Concerns raised in respect to the lack of a school, impact on Police services, infrastructure capacity, the need for a masterplan for the area, traffic issues of the A350, doctors surgeries, inadequate consultation of the Bryanston Hills estate, the old railway line should be listed, development to be located within the ring road and Blandford Camp offering a viable option for future housing.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3178	6095	Angela	Mackay			14	Object to proposed development at Lower Blandford St Mary. Concerns raised in respect of the present infrastructure, traffic congestion along the A350, more road noise and pollution, need for a new school, impact on heritage assets including listed buildings, conservation area and old railway line, inadequate consultation of residents at Bryanston Hill, the availability of other sites such as Blandford Camp and sites within the by-pass and possibility of archaeological finds.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.
3180	6122	Avril	Baker			14	Object to the neighbourhood plan including additional greenfield sites beyond the bypass for development. If greenfield sites were built beyond it this would mean a free for all to build anywhere. Houses should be designed in keeping with the surrounding area. Agree that there is a need for more houses, preference for development of empty flats above shops and industrial sites. Infrastructure is overloaded.	The Localism Act 2011 gives local communities the power to produce a Neighbourhood Development Plan. In order for a neighbourhood plan to become part of the statutory development plan for an area it must meet the 'basic conditions' requirements relating to neighbourhood planning.
3181	6125	Annabel	Mains			14	Object to proposed development at Lower Blandford St Mary. Pressure on schools, NHS, doctors and dentists. Impact on heritage including grade 1 listed building. Preference for other sites to the north of the town. Pedestrian safety concerns from increased traffic.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the 'extension' of the location for growth to the south-east of Blandford St Mary. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future development will be considered as part of the LP2 and /or a planning application.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
405	6008	Steve	Hellier	Highways England		15	Growth in Gillingham beyond 2026 to 2031 will increase planned housing and employment provision in the town. Recent trip generation and gravity modelling shows that the number of two way peak time trips onto the A303 exceeds assessment threshold. Policy 17 should now include an explicit reference to the need to assess the impact on the safety and capacity of the A303 and provide mitigation to off set any potential severe impacts. Road Investment Strategy 2015-2020 includes the duelling of the A303 however improvements to existing duelling would not be considered. Wording change to Policy 17 supplied.	The increase in planned residential development due to the extension of the Plan period is not considered significant enough by the Assessing the Growth Potential at Gillingham (Atkins) report to require improvements to the Strategic Road Network (SRN). The 'assessment threshold' referred to by the respondent used to appear in the Guidance Transport Assessment (GTA) which has been withdrawn and superseded by the NPPF, Circ 02/2013 and the Highways England guide to working on planning matters which removes the previous arbitrary threshold and places the emphasis on 'significance'. The respondent (the statutory consultee) considers the number of vehicle movements onto the SRN from the SSA at Gillingham to be significant. The transport consultants producing the Transport Assessment for the SSA consider the number of vehicle movements will not result in a material or adverse impact on the safety or operation of strategic highway network. The proposed additional text by the respondent is considered benign as any negative outcomes from a Traffic Impact Assessment would need to be mitigated in order for the planned development to be considered acceptable.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
1601	6179	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	15	Support the reduction in affordable housing within the SSA from 30% to 25% given the acknowledged viability issues in relation to delivery of the SSA as confirmed by the Peter Brett Associates work in support of CIL. CIL should take account of affordable housing and recent budget changes regarding the need for a flexible tenure mix.	The Council's position on affordable housing provision is set out in MHD009 & MHD010.
2961	6137	David	Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	15	Support proposed amendment to the level of affordable housing that will be sought from developments at Gillingham. Proposed modifications to Policy 17 are insufficient in relation to proposed growth at Gillingham. Concerns raised at the over reliance on a single strategic site at Gillingham will deliver housing at the rate required. Propose continuing to support the Gillingham SSA but at a more realistic rate and allocating other more suitable sites to meet short term need. One suitable site at Land South of Le Neubourge Way is available, sustainable and deliverable.	The Council notes the support regarding the level of affordable housing that will be supported from developments at Gillingham. The Council's Housing Trajectory is based on the latest information available including in terms of planning applications and discussions with site developers. The Council's approach to growth at Gillingham is set out in Issue Statement 8.
2989	6111	Sarah	Hamilton-Foy	Pegasus Planning Group	Messrs Drake	15	MM15 reduces the proportion of affordable housing sought across Gillingham and therefore North Dorset. This in turn will result in a greater discrepancy between the objectively assessed need for affordable housing and the numbers that will be delivered. In accordance with PPG (2a-029) this further supports the requirement to increase overall housing requirement to facilitate delivery of additional affordable homes. Without such an uplift the Local Plan will be ineffective in meeting affordable needs.	The Council's position on affordable housing provision is set out in MHD009 & MHD010.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3085	6144	David	Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	15	Support proposed amendment to the level of affordable housing that will be sought from developments at Gillingham. Proposed modifications to Policy 17 are insufficient in relation to proposed growth at Gillingham. Concerns raised at the over reliance on a single strategic site at Gillingham will deliver housing at the rate required. Propose continuing to support the Gillingham SSA but at a more realistic rate and allocating other more suitable sites to meet short term need. One suitable site at Land South of Le Neubourge Way is available, sustainable and deliverable.	The Council notes the support regarding the level of affordable housing that will be supported from developments at Gillingham. The Council's Housing Trajectory is based on the latest information available including in terms of planning applications and discussions with site developers. The Council's approach to growth at Gillingham is set out in Issue Statement 8.
2961	6138	David	Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	16	Proposed modification to Policy 18 and support text have failed to address concerns raised in relation to broad locations for growth and consideration given to the AONB. Policy and supporting text does not acknowledge land to the west of the A350 opposite Wincombe Business Park is largely within the Cranborne Chase AONB. The Council has not provided evidence of exceptional circumstances for this site to be brought forward in an AONB and other sites outside of the AONB are not available. One such suitable alternative is land at Higher Blandford Road, Shaftesbury. It is understood that this site was not considered suitable because it was not included in the SHLAA at the time of the landscape impact assessment. Land at Higher Blandford Road has been assessed more recently in the SHLAA as suitable and available.	Representation does not relate directly to MM16. The Council's position on landscape matters relating to land at Higher Blandford Road, Shaftesbury is set out in MHD016. In conclusion the site is considered to be too sensitive from a landscape and visual perspective for mitigation to be effective. Residential development would need to be of a low density and small scale to retain the character of the surrounding area. Even with this design mitigation in place, the open countryside character and open views towards the AONB would be damaged.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3066	6097	James	Iles	Terence O'Rourke Limited	Mr Matthew Richardson	16	Note that there are no significant changes to the strategy for Shaftesbury. Gleeson Strategic Land continues to support Policy 18 and have submitted an application for the development of land west of the A350 opposite Wincombe Business Park (Land at Littledown) to demonstrate deliverability. Also support the minor modification that the housing target for Shaftesbury is at least 1,140 homes in the period 2011-2031.	Support noted.
3085	6145	David	Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	16	Proposed modification to Policy 18 and support text have failed to address concerns raised in relation to broad locations for growth and consideration given to the AONB. Policy and supporting text does not acknowledge land to the west of the A350 opposite Wincombe Business Park is largely within the Cranborne Chase AONB. The Council has not provided evidence of exceptional circumstances for this site to be brought forward in an AONB and other sites outside of the AONB are not available. One such suitable alternative is land at Higher Blandford Road, Shaftesbury. It is understood that this site was not considered suitable because it was not included in the SHLAA at the time of the landscape impact assessment. Land at Higher Blandford Road has been assessed more recently in the SHLAA as suitable and available.	Representation does not relate directly to MM16. The Council's position on landscape matters relating to land at Higher Blandford Road, Shaftesbury is set out in MHD016. In conclusion the site is considered to be too sensitive from a landscape and visual perspective for mitigation to be effective. Residential development would need to be of a low density and small scale to retain the character of the surrounding area. Even with this design mitigation in place, the open countryside character and open views towards the AONB would be damaged.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
307	6031	Christopher	Wilkins	Sturminster Newton Town Council		17	Policy is unclear and inconsistent in its treatment of the settlement boundary. Consultation with local residents about the effects of the policy on the settlement boundary and future development in the vicinity has been insufficient and inadequate. Concern policy would intensify development leading to traffic problems, noise and pollution from use of roads, general loss of amenity, strain on local schools, health and other infrastructure.	Policy 19 clearly refers to the saved settlement boundary for Sturminster Newton. This boundary will be reviewed either through the LP2 or a Neighbourhood Development Plan. The Council wrote to local residents who live in proximity of the site to highlight the consultation on the MMs.
748	6091	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	17	Support amended wording to Policy 19 to refer to development and redevelopment within the settlement boundary as opposed to the existing built up area. Policy no longer artificially constrains the opportunities for the future direction of development. For consistency it is also noted that a similar approach is promoted for the four main towns.	Support noted.
769	6132	Tim	Hoskinson	Savills	Taylor Wimpey	17	The proposed modification does not achieve the objective set out in paragraphs 3.15 – 3.20 of MHD006 of increasing the development capacity of land to the east of the Creamery to 45 dwellings. The proposed modification creates greater uncertainty by stating allotments will be provided to the east of the former creamery where the intention to provide this site for development. Taylor Wimpey control additional land at Elm Close Farm which is located to the east of Elm Close and south of Bull Ground Lane which could be made available for allotments. Alternative text supplied.	The intention of the use of the phrase “east of the former creamery site” was to reflect the name already given to the general direction for growth but the Council acknowledges that a more precise description regarding the proposed location of the allotments would provide greater clarity.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3129	6003	D	Fowles			17	In respect of Land to the East of the Creamery, concerns raised; Possible loss of 5 rights of way, traffic management arrangements, construction management. Percentage of affordable housing, section 106 requirements, traffic management plan, car parking provision, footpath route safeguarding and maintenance. In respect of allotments, vermin control, parking for allotments, traffic management. In respect of infrastructure sewage capacity, rainwater infrastructure and maintenance. Concern about escaping gas and construction.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.
3129	6010	D	Fowles			17	Concerns with development at land East of the Cremery, Sturminster Newton in respect of additional vehicle movements. Highlight traffic safety concerns at Rixon Hill Road. Cars are parked along Rixon Hill Road & Elm Close causing additional traffic hazards, combined with local bus top.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.

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3130	6004	David	Wingate			17	In respect of land to east of the former creamery, concerned about increased traffic on narrow residential road, safety, noise and parking. Point of access. Construction issues. Allotment parking provision.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.
3132	6007	Pauline	Hacipasaoglu			17	Object to direction of growth at land at East of the Creamery, Sturminster Newton. Loss of wildlife and footpaths to Trailway. Higher density development, drainage issues and transport congestion. Concern allotments in adj field will allow for further growth.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.

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3133	6009	Rita	Taylor			17	Concern development at Land East of the Creamery will increase traffic movements in the close. Concern that local infrastructure; schools, health, social care and policing have insufficient capacity. Proximity to sewerage system is a concern.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.
3142	6022	Alan	Tootell			17	Object to development at land east of the creamery, Sturminster Newton. Elm Close road is constructed to the specification of a cul-de-sac and not an access road. Concern at disruption caused by construction and lack of parking.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.

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3143	6026	J M	France			17	Object to development at land east of the Creamery, Sturminster Newton. Concerns in respect of additional traffic and noise along Elm Close, a narrow road. Can access be achieved via Friars Moor. Concern at levels of proposed parking provision.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.
3144	6034	Iris	Coombs			17	Object to development at Land East of the Creamery, Sturminster Newton as the access road is narrow, noise dust from lorry's and increase in traffic. Concern access to Tailway will be blocked off.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.

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3146	6039	Julie	Beale			17	Object to development at Land East of the Creamery, Sturminster Newton due to increased traffic, lack of capacity at local primary school, lack of job opportunities and road safety along Friars Moor Road and junction.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.
3147	6042	D	Dryden			17	Object to development at Land east of the Creamery, Sturminster Newton. Concern raised in respect of construction traffic and additional cars using Elm Close. No jobs in Sturminster Newton, poor access to the town and no infrastructure for more development.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.

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3153	6051	R T	Rolf			17	Object to proposed development at Land to the East of the Creamery, Sturminster Newton. Concerns raised in respect of increased traffic and noise along Elm Close.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.
3155	6053	Nigel & Eileen	Baverstock			17	Object to the proposed development at Land to the East of the Creamery, Sturminster Newton. Concerns raised relate to infrastructure implications i.e. healthcare, schools and other local amenities. Access, if Elm Close is the only access point, the implications for emergency situations due to on-street parking. Allotments in close proximity to residential dwellings and potential for rat infestation. Concerns also relate to traffic, noise and parking problems.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.

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3161	6065	Rebekah	Goddard			17	Object to proposed development at land to the east of the Creamery, Sturminster Newton. Concerned about noise from new neighbours, more social housing in the area and the issues associated, possibility of road widening for additional vehicles and parking issues. Concern at the height of properties, loss of light countryside views.	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.
3167	6076	B	Mead			17	Object to proposed development at Land to the East of the Creamery, Sturminster Newton. Concerns raised in respect of increased traffic along either Elm Close or Friars Moor as both roads are narrow and junction capacity due to parking along Station Road. There would be problems for emergency and construction vehicles. Other issues include cars parked for access to the Trail way. Loss of privacy of Elm Close properties due to overlooking from possible new houses. Concerns related to noise. In respect of the location of the proposed allotments, concerns raised in relation to rats and whether the allotments will be used by local residents? Re-direction of footpath. Traffic associated with the allotments. Loss of wildlife. Concerns for infrastructure capacity including; roads, schools, doctor's surgery. Are other areas in Sturminster Newton more suitable?	The Council observes the number and wide range of concerns that have been raised by local residents in respect of the changes relating to the location for growth south of Elm Close. However, in the Council's opinion there are no fundamental constraints that would prevent development coming forward in this location for growth. Detailed matters regarding potential future developments will be considered as part of the LP2 and / or a planning application.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
641	6119	James	Cleary	Pro Vision Planning and Design	Charborough Estate	18	The Charborough Estate is a mainly arable country estate that extends over three District administrative areas. The estate has a number of redundant or semi-redundant farm complexes around Winterborne Kingston. The estate is looking to modernise and diversify its assets. There is likely to be a shift in operations increasing the need to consider either re-development or diversification related to these farmsteads. Winterborne Kingston is thriving rural community with reasonable levels of employment opportunities. The redundant farm buildings are well suited for residential development. At the Hearings the Council argued that this issue could be picked up by either through a NDP or LP Part 2, it was noted that the Inspector clearly indicated that he disagreed with the Council proposal. The matter seems to have been missed as a Main Modification. Alternative policy text supplied.	Change Ref 10/29/18 in the Schedule of Additional Changes (Document Ref: MHD053) considers the issue of accommodating growth in and around Stalbridge and the 18 larger villages. Change Ref 10/29/18 states: "10(f) proposals for the re-use of buildings in the countryside may be identified through the preparation of Local Plan Part 2 or by Local Communities in their Neighbourhood Plans."
748	6092	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	18	There is confusion in policies and supporting text because Policy 20 and supporting text 8.173 defines the countryside as land outside the four main towns, Stalbridge and the larger villages, where earlier policies (Policy 2 & 6) include Stalbridge and the larger villages within the countryside for the purposes of housing numbers. The term countryside should only be applied to the parts of the district where restrictive policies are properly to be applied. See also representation to MM3 & MM5. Policy 20 is also considered overly restrictive given it applied to many of the Districts smaller villages.	The three policies referred to serve different purposes hence their differences. Policy 2 outlines the spatial strategy for the District. Stalbridge and the larger villages are distinct from the countryside. Policy 6 sets out the proposed housing distribution for the District. The figure relating to the countryside includes Stalbridge and the larger villages. Finally Policy 20 which only applies to the countryside explicitly excludes Stalbridge and the larger villages.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
2989	6112	Sarah	Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	18	MM18 excludes Stalbridge and the 18 larger villages from the countryside and identifies these villages as the focus for growth outside of the towns. This approach is supported. However as the Local Plan Part 1 does not undertake a settlement boundary review but relies on the out of date settlement boundaries of the previous Plan the effect is twofold. Firstly there is insufficient capacity to meet the identified rural needs and secondly the out of date settlement boundaries will serve to promote infill development on existing open spaces which may erode the rural character of settlements. The Local Plan Part 1 restricts development in the countryside other than exception circumstances and MM18 has adjusted how the countryside is defined. Policy 20 prevents development adjacent to the main towns and larger villages regardless of the sustainability credentials of any particular development proposal. This does not follow the presumption in favour of sustainable development. The settlement boundaries need to be reviewed or a policy adopted which facilitates sustainable development on the edge of settlements.	'The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy' is set out in MHD007. The Council considers that if a specific need is identified at Stalbridge, the 18 larger Villages or in countryside locations the appropriate mechanism for the identification of potential sites and the review of settlement boundaries is through either LP2 or neighbourhood development plans. Furthermore, the approach advocated by the respondent to adopt a more flexible approach to development adjoining settlement boundaries is considered contrary to the approach set out in MHD007.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3055	6166	Roger	Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	18	<p>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.</p> <p>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. Propose an amendment to recognise the role of Stalbridge in meeting housing need.</p> <p>A 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. Alternative text supplied. 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.</p>	<p>‘The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy’ is set out in MHD007.</p> <p>To answer the Inspector’s concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options.</p> <p>The Option 3a is described in the Core Submission Document COD008 ‘Moving Forward with the Spatial Strategy’, March 2012. Further detail is also contained in Document Ref: SDS001 Sustainable Development Strategy Background Paper 2013.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3123	6116	Genevieve	Collins	Alder King Planning Consultants		18	<p>Support the retention of settlement boundaries around the larger villages but should widen Policy 20 to include the retention of settlement boundaries of small and medium sized villages in the interests of fostering sustainable development. Approach does not conform to NPPF paras 14, 17 & 28 unless there is clear evidence to justify designation of countryside across these existing established settlement boundaries. Planning Law, NPPF and Practice guidance require Local Plans to be prepared with the objective of contributing to the achievement of sustainable development. The proposed countryside designation of all small and medium villages would likely act as an impediment to delivering new development and the redevelopment of existing brownfield sites. This approach is contrary to the core principles of the NPPF which requires planning to proactively drive and support suitable economic development to deliver homes, businesses and industrial units, infrastructure and thriving local place the countryside needs. The designation of small and medium villages as entirely countryside does not support sustainable growth of rural business, does not promote development of agricultural and other land based businesses and does not support the development of local service and community facilities. Alternative text supplied.</p> <p>It is difficult to understand how Neighbourhood Plans can come forwards including settlement boundaries in small and medium sized villages if the established settlement boundaries are removed and such villages designated as countryside. Under the overarching strategic vision. Policy approach to NDP should be clarified or removed and provision included under the LP Part2.</p>	<p>Paragraph 3.55 of the supporting text confirms that settlement boundaries may be reviewed either through the LP2 or a neighbourhood plan. 'The Council's Approach to Development in the Countryside to Promote a Strong Rural Economy' is set out in MHD007.</p> <p>To answer the Inspector's concerns about meeting housing need in rural areas, the Council is proposing an approach which had previously been considered by members but not taken forward to the submission Plan. This option –at the time termed Option 3a – was considered following the 2011 consultation with Towns and Parishes and was seen to mitigate some of the deficiencies around the uncertainty of delivery and resource implications for implementing desired growth, which were associated with other options.</p> <p>The Option 3a is described in the Core Submission Document COD008 'Moving Forward with the Spatial Strategy', March 2012. Further detail is also contained in Document Ref: SDS001 Sustainable Development Strategy Background Paper 2013</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3145	6037	Adam	Bennett	Ken Parke Planning Consultants		18	Paragraph 8.190 supports the allocation of development outside of the settlement boundaries through a Neighbourhood Plan in order to achieve sustainable growth. This aspiration is not contained in Policy 20. Additional text to policy 20 supplied.	Neighbourhood Development Plans should be prepared in general conformity with the strategic policies of the Local Plan.
1601	6180	Will	Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	19	Welcome an amendment to the indication of the local centre with the removal of the site specific boundary and replacement with star notation. Approach does not however provide flexibility to include land adjacent the Garden Centre site, necessitating and extension to the boundary of the SSA. Flexibility to be caveated with a sequential style approach in the instance the only deliverable location is outside the SSA boundary. Such a conflict could ultimately prejudice the successful implementation of the local centre which is an important component. The likely phasing and s106 requirements for the delivery of the local centre and absence of land ownership amongst the consortium of the Council's favoured location for it. Significant issues with the preferred location for the local centre and for this reason we believe the garden centre site must be located with clarification of the sequential approach. The consortium welcomes clarification that the masterplan is a material consideration as opposed to part of the Development Plan in the determination of subsequent planning applications within the SSA.	The Council agreed the scope of response to issues raised at the Hearing with the Inspector. The agreed scope, to which the Council has responded, sets out that the Council should produce a note setting out the evolution and changes of the local centre within the SSA including issues of garden centre land availability within the settlement boundary. MHD014 sets out consideration of all the issues requested and, as no circumstances surrounding the details within the note have changed, MHD014 remains the Council's position. Sufficient flexibility is provided within the policy to bring forward land available to accommodate the local centre within the SSA boundary across a broadly identified location where opportunity lies to incorporate vital place-making principles. It is not considered necessary for delivery or desirable in place-making terms to extend the settlement boundary to incorporate a sub-optimal location for the local centre.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
2671	6046	Keith	Howell			19	The Shaftesbury Road Corridor (local centre) is unexplained other than a star on the map. Traffic flow at peak and now often non-peak times renders this road at a standstill. Proposed Southern Extension to Gillingham will add traffic from 2,200 houses onto this road without any proposals to add additional roads to avoid gridlock. No development should be considered without CIL on the developers to provide a ring road to take traffic from the current Sydmonds roundabout on the Shaftesbury Road to take traffic via Madjeston around to connect to Peacemarsh.	<p>The explanation for the star notation at the Shaftesbury Road corridor is set out in the Reason For Modification under MM19. The text set out in paras 9.76-9.78 of Policy 21 explains the approach to the Shaftesbury Road Corridor and the local centre.</p> <p>The proposed SSA plans for 1,800 dwellings and forms a significant part of the 2,200 dwellings for Gillingham. Policy 21 requires a sustainable transport plan providing details relating to both on- and off-site proposals for all highway provision and improvements together with other transportation measures including the provision of pedestrian and cycleway networks and bus routes to be provided as part of the Master Plan Framework. Policy 21 also requires specific highways and transport measures, including the provision of a principal street linking Shaftesbury Road (B3081) and New Road (B3092).</p> <p>No by-pass for Gillingham is planned, and it is not identified as a mitigation measure required to address significant growth at Gillingham in the Assessing the Growth Potential of Gillingham report.</p>

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
2961	6139	David	Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	19	Object to proposed new paragraph after 9.92 as this approach is not considered sufficiently robust to ensure the level of housing at the SSA will be successfully delivered and reiterates the need to identify additional sites for development at Gillingham.	Additional text at the end of new paragraph after 9.92 outlines an alternative mechanism available to the Council in which remedial action could be set out should the southern extension fail to deliver housing, employment and infrastructure at the anticipated rate. The text does not support the need to identify additional sites for development at Gillingham.
2989	6113	Sarah	Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	19	MM19 reduces the proportion of affordable housing sought across Gillingham and therefore North Dorset. This in turn will result in a greater discrepancy between the objectively assessed need for affordable housing and the numbers that will be delivered. In accordance with PPG (2a-029) this further supports the requirement to increase overall housing requirement to facilitate delivery of additional affordable homes. Without such an uplift the Local Plan will be ineffective in meeting affordable needs.	The Council's position on affordable housing provision is set out in MHD009 & MHD010.
3085	6146	David	Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	19	Object to proposed new paragraph after 9.92 as this approach is not considered sufficiently robust to ensure the level of housing at the SSA will be successfully delivered and reiterates the need to identify additional sites for development at Gillingham.	Additional text at the end of new paragraph after 9.92 outlines an alternative mechanism available to the Council in which remedial action could be set out should the southern extension fail to deliver housing, employment and infrastructure at the anticipated rate. The text does not support the need to identify additional sites for development at Gillingham.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
307	6032	Christopher	Wilkins	Sturminster Newton Town Council		20	Policy lacks clarity in the proper applicability of design principles. Delete MM text in preference to original wording.	Proposed MM seeks to identify circumstances when it would not be appropriate to apply design principles, aspects of form and/or standards (for example bin storage and laundry drying in town centre developments).
1191	6169	Jonathan	Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	20	Change reference 10/24/12 For clarity this should be amended: "... the design principles (set out in Figures 10.1, 10.2 and 10.3 of this policy)"	A similar change has already been made.
307	6033	Christopher	Wilkins	Sturminster Newton Town Council		21	Policy lacks clarity about its applicability. Amended text supplied.	MM seeks to provide consistency between Policy 25 and supporting text. Town centre development is not considered exceptional.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
748	6093	Lynne	Evans	Southern Planning Practice	Hall & Woodhouse Ltd	22	The final paragraph does not add to the policy but serves to complicate the tests the Council will apply. The test for commercial viability is already set out in the second paragraph. Unclear how the importance of the facility to the local community is to be tested. The supporting text already sets out detailed parameters for such marketing exercises. Assesses of community value legislation does not require that such assets cannot be disposed off once certain procedures have been followed. Suggest final para is deleted and certainly the phrase 'the retention of'.	Proposed policy wording to Policy 27 (Please see document ref MHD018, change ref 10/27/1) seeks to respond to objections that have been raised during the examination including the fact that the terms 'viability' and the 'importance to the community' had been missed.
641	6120	James	Cleary	Pro Vision Planning and Design	Charborough Estate	23	Policy 29 on the re-use of existing buildings in the countryside should be altered to allow re-use for occupational or non-occupational residential use in accordance with the suggested revised approach to Policy 20.	Please see change ref 10/29/14 in the Schedule of Additional Changes (Document Ref: MHD053). This allows for the re-use of existing buildings for occupational or non-occupational residential purposes in certain circumstances.
3145	6038	Adam	Bennett	Ken Parke Planning Consultants		24	Policy 30 should make clear that the redevelopment of existing employment sites in the countryside where under-used or unviable for the purposes of housing development will be supported in line with the national starter homes exceptions policy as set out in the Ministerial Statement of 2 March 2015.	The Government has not yet provided all the details for the identification of suitable Starter Homes Exception sites.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
3151	6049	Michael	Hopper	Milborne St Andrew Neighbourhood Plan Group		24	Insertion of the word 'sustainable' within Policy 30 is not a clear indication of how a decision maker should react to a development proposal as it is not readily measurable. Does it mean the business promotes social, economic and environmental benefits or is accessible by public transport. Either delete the modification or introduce a test that is appropriate in a rural context.	At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both-plan making and decision-taking. The NPPF paragraph 7 is clear that there are three dimensions to sustainable development; economic, social and environmental. Paragraph 8 further states that these roles should not be undertaken in isolation, because they are mutually dependent. The MMs reflect these principles of sustainable development.
113	6158	Sue	Green	National Home Builders Federation		27	The Council should clarify if the car parking standards referred to as set out in Appendix C, are minimum or maximum standards? Proposed change should be checked for compliance with national policy set out in the Written Ministerial Statement dated 25 March 2014. The government abolished maximum parking standards in 2011.	The Council will use guidance published by Dorset County Council as the basis for parking provision. These requirements are set out in Appendix C of the Plan. The requirements do not set minimum or maximum standards. Developers will be expected to make provision for parking in accordance with this guidance unless there are specific site constraints or other local factors necessitating increased or reduced provision.
1191	6170	Jonathan	Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	27	For consistency and clarity this change should also be added as a new paragraph 10.44A	The Council acknowledges the changes recommended by the respondent to add consistency between the policies and supporting text in the plan.
220	6072	Gary	Parsons	Sport England		29	Sport England has reviewed the Main Modifications and has no comment to make.	Noted.

Rep ID	Rep No	First Name	Last Name	Organisation	Representing	Main Mod	Main Modification comment	Council's Response
287	6005	Sylvia	Dobie	Gillingham Town Council		29	Support all MMs	Support noted.
304	6021	Tracey	Watson	Stalbridge Town Council		29	Stalbridge Town Council have resolved not to prepare a Neighbourhood Development Plan. Consider propsoed MMs are sound.	Comment noted.
404	6123	Michael	Holm	Environment Agency		29	No objection.	Noted.
407	6012	Anna	Lee	Purbeck District Council		29	No areas of concern.	Support noted.
2922	6013	Belinda	Ridout			29	Support all MMs	Support noted.
3127	6001	David	Walsh			29	Support all MMs.	Support Noted

Section 2: Summary of representations received to the Schedule of additional changes (MHD053)

1.5 3 valid representations were received.

PCL Planning on behalf of Land Value Alliances (2961) and Sherborne School and Cancer Research UK (3085)

Change Reference	Representation	NDDC Response
1/INT/3	The proposed new paragraph does not help to clarify the relationship between LP1 and LP2. There is embedded conflict in the Council's approach to identifying 'broad locations for growth' within LP1 and their aim to provide flexibility in the allocation of sites in LP2.	The Council's approach seeks to provide 'some' flexibility in terms of the size and specific boundaries of the housing sites that are to be allocated at the four main towns within the District. The Council considers that there is no inherent conflict between identifying broad locations for growth the in the LP1 and then identifying sites within LP2.

3/2/4, 3/2/7 and 3/2/29	<p>The proposed amendments state that proposals for housing and employment growth set out in policies relating to the main towns will be used alongside the settlement boundaries for development management purposes. However the text is vague and would not provide sufficient certainty for applicants and the local community in bringing sites forward through planning applications (in advance of their allocation in LP2).</p> <p>As set out in our earlier representations, we have significant concerns in the Council's identification of broad locations for growth, which did not involve a full assessment of the potential of land around the edge of settlements to accommodate development. As such, it is considered that the Council should look to formally amend settlement boundaries at the main towns in order to bring forward development and this should involve a full review of potential additional sites.</p>	<p>The Council is of the opinion that the LP1 provides enough certainty that housing or employment proposals relating to areas for growth identified in the LP1 beyond the settlement boundaries would, in principle, be supported by the Council in advance of the LP2 being adopted. There are no policy constraints which seek to delay prevent sites coming forward for development in advance of the LP2 being adopted.</p> <p>Paragraph 3.55 of the supporting text to the LP1 confirms that settlement boundaries may be reviewed either through the LP2 or a neighbourhood plan.</p>
4/4/12	We support the amendments, to reflect guidance in relation to AONBs set out in the Framework.	Support noted.
4/4/41	We do not support the proposed wording in Policy 4 that <i>"proposals which would harm the natural beauty in AONBs will not be permitted unless it is clearly in the public interest to do so"</i> . This is not consistent with the Framework which is clear that great weight should be given to conserving landscape and scenic	The Council is of the view that the proposed wording is consistent with the thrust of paragraphs 115 and 116 of the National Planning Policy Framework (NPPF).

	beauty in the AONB, irrespective of whether paragraph 116 is applicable (i.e. it is not 'major development').	
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Jonathan Kamm Consultancy on behalf of Clemdell Ltd (1191)

Change Reference	Representation	NDDC Response
5/6/3	<p>This Change to deliver about 1,480 additional affordable homes in the four main towns by 2026 is stated to be: <i>"To clarify policy position and ensure consistency in the plan"</i>. Conflicts with change 5/6/19, 5/6/30 and CON/6/8.</p> <p>In particular the numbers do not have a consistent alignment with the % affordable housing to be sought from market housing in Change 5/6/36. The Council should clarify its policy and this inconsistency by reference to the comment on Change 5/6/36 below so that there can be discussion upon an appropriate balance between the provision of Affordable Housing and CIL.</p>	<p>The Council acknowledge that a small number of 'change references' have been superseded by subsequent changes made during the Examination process for example to reflect issues raised at the Hearings. The Council will ensure the final additional changes are consistent.</p> <p>The consistency issue highlighted between Paragraph 5.16 (5/6/36) and Policy 6 (5/6/30) reflects the alternative purposes and therefore methodologies for which the calculations have been made. Change 5/6/36 sets out the percentage of affordable housing that will be sought from new development in the four towns and the countryside. Change 5/6/30 sets out the number of affordable dwellings that will be sought over the plan period in the four main towns. In addition to being based on the affordable housing percentage requirements set out in Policy 8 this figure takes into account the number of affordable dwellings that will be provided through developments that have been granted planning permission.</p>
5/6/36 and 5/8/11	Change 5/6/36 consists of altering the percentages of Affordable Housing in the four main towns. It is stated to be because of the "Councils written	The figures relating to the percentage of affordable housing to be sought from new development have been revised as part of the Main Modifications (MMs) to the LP1 to reflect the evidence in the North

<p>response to Inspectors Question 2”. That Question 2 (INS003) is <i>“on Support for Small-Scale Developers, Custom and Self-Builders”</i> and the Council’s reply (INS007) responds to that point without reference to Policy 6. The Council should clarify the reason for Change 5/6/36. By reading the terms of Change 5/8/11, Change 5/6/36 appears, in fact, to be an acceptance of the recommendations of the PBA North Dorset Whole Plan Viability and CIL Study (“PBAVR”) (INF016). For the purposes of setting CIL the PBAVR has concluded that its proposed CIL rates are not viable unless Affordable Housing is reduced. The Change accepts two tendentious propositions which require examination:</p> <ul style="list-style-type: none"> (i) that residual land values are lower in Gillingham and Sturminster; and (ii) that the PBAVR should determine Affordable Housing policy. <p>In short the change, evidenced in MHD053, of side lining the SMHA and accepting the PBAVR indicates that: the delivery of flats during the Plan period is at best problematic. The PBAVR identifies this as 20% of market housing. But given that Change 5/7/2 strengthens the LPA’s commitment to <i>“support the delivery of about 40% of market housing in North Dorset as one or two bedroom properties”</i> flats could be about 40% of market housing.</p>	<p>Dorset Whole Plan Viability and CIL Study (Document Ref xxx) produced by Peter Brett Associates (PBA) on behalf of the Council. The figures are being tested through the Local Plan Examination.</p> <p>Any subsequent Community Infrastructure Levy (CIL) Charging Schedule that is submitted for Examination will need to take into account the affordable housing requirements detailed in the LP1. Once adopted the CIL charge applicable to a proposal will not be negotiable. Therefore, any discussions regarding the viability of a proposed development would focus on any possible obligations (e.g. affordable housing provision) associated with a proposed development.</p> <p>Whilst the Council notes the concern expressed regarding the delivery of flats over the plan period it is of the view that the evidence contained within the Viability and CIL Study does not support such concerns.</p>
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	<p>(ii) NDDC accepts that an appropriate balance is to reduce Affordable Housing and maintain CIL. PBA adopt the Harman methodology. As the PBAVR states (at para 7.8.2) <i>“The exact level to charge is ultimately the Council’s decision and should be aligned to wider ambitions....”</i> and (at para 8.2.3) <i>“The Council will need to carefully consider the requirements set out in their Infrastructure Delivery Plan and the Strategic Housing Market Assessment to arrive at an appropriate balance.”</i> That step appears not to have been taken. The Harman Report (page 40) records that: <i>“in the context of the Local Plan as a whole... As already discussed, this is an iterative process. If an initial viability assessment determines that, for example, the plan’s housing requirements are not deliverable, factors such as plan policies or the geographical distribution of housing land will need to be reconsidered and balanced until the plan is judged deliverable within the principles of sustainable development.”</i> The debate on the iterative rebalancing of the plan’s housing mix etc which NDDC has accepted in its Preliminary Draft Charging Schedule is properly one for the Local Plan Examination and not for the CIL Examination.</p>	
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5/7/9 and 5/7/22	Both changes delete “ <i>including on residential gardens</i> ” from “infilling”. The wording remains in para 5.1 for “Meeting Housing Need”. The Council should clarify the Policy Panel’s reasoning in deleting residential gardens from infilling. Change 5/7/22 states the deletion is for “clarification”. Garden infilling is still included in the meeting of housing need and the typologies in the PBAVR used to evidence whole plan viability for CIL.	The Council’s definition of infilling as set out in Appendix D of the LP1 is clear that ‘infilling’ means “residential development within settlement boundaries”. The remaining text outlined in the definition is to highlight examples only. The Council’s approach does not seek to preclude infill development taking place on residential gardens.
5/7/1, 5/7/2 and 5/7/2A	These three Changes each add the words “ <i>or viability considerations</i> ”, stated to be: “ <i>To clarify policy position</i> ”. On the contrary this introduces an element of policy confusion. Given that (at the very least) the delivery of smaller units such as flats is evidenced as problematic in its CIL documentation (as. detailed in the attached CIL submission) the LPA should identify how it reconciles these Changes with: (i) its commitment to “ <i>seek a mix of housing across the District, in terms of bedroom numbers, that reflects the identified needs for different sizes, both in relation to market and affordable homes.</i> ” (Change 5/7/3) (ii) its reinforced commitment to support the delivery of about 40% of market housing in North Dorset as one or two bedroom properties (Change 5/7/5):	These changes take into account the fact that viability issues associated with any particular site may have an impact on the mix of housing proposed. The Council considers that the proposed changes are pragmatic and show the Council’s willingness to negotiate the specific mix of housing to be delivered on a site to ensure proposed developments are deliverable. As previously set out whilst the Council notes the concern expressed regarding the delivery of flats it is of the view that the evidence contained within the Viability and CIL Study does not support such concerns.
6/12/2 and	Change 6/12/2 includes a statement that the	The Council acknowledges that there could be viability issues

MHD051 – 8.85	<p><i>“Council recognises that residential development can play an important role in ensuring the vitality of centres”</i> Para 8.85 of the revised Sustainability Appraisal (MHD051) includes this conclusion <i>“The provision of greenfield sites beyond the bypass may result in the town centre regeneration being less viable. Typically the more difficult to develop regeneration sites in town centres are less likely to be developed than greenfield sites. The difficulties of developing these sites, along with the potential for reduced house sales prices from new developments, will have an impact on their viability and therefore make the regeneration less likely”</i>.</p> <p>The LP1 Changes and Modifications contain no proposals to mitigate this impact which will affect not only the viability but also the vitality of Blandford Forum Town Centre. The PBAVR does not recognise this pressure. The identified effect on the Housing Mix policies following upon this element of the Sustainability Appraisal should be considered as part of the current Local Plan Examination and not left to the CIL Examination. LP1 must incorporate mitigation measures “to ensure consistency with national policy and guidance” and Change 6/12/2 and these should be carried through to the CIL Schedule</p>	<p>associated with developing some sites within the District including sites located within Blandford Forum Town Centre. However, it considers that the proposed changes it has made to the plan, including the three changes (5/7/1, 5/7/2 and 5/7/2A) considered above demonstrate the Council’s willingness to negotiate on viability matters in certain circumstances.</p>
4/5/3 and 4/5/4	<p>This Change is stated to be: <i>“To reflect the importance of the setting of heritage assets in line</i></p>	<p>Additional change 4/5/3 cross references the full definition of ‘Setting of heritage asset’ within appendix 2 of the NPPF. Additional text is</p>

	<p><i>with the PPG</i>". The footnote it refers to (as Change 4/5/4) is to the NPPF.</p> <p>Change 4/5/3 should therefore be rewritten to reflect the definition given in the NPPF.</p> <p>The proposed Change in MHD0053 does not conform with the NPPF as the Change omits the key element in the NPPF that recognises as to setting that "<i>Its extent is not fixed and may change as the asset and its surroundings evolve.</i>" <i>Alternative text supplied.</i></p>	unnecessary.
4/5/5 and 4/5/6	<p>This Change is stated to be: "<i>To ensure consistency with national policy and guidance</i>". Change 4/5/6 then gives two PPG references neither of which reference "<i>significant harm</i>". Prima facie this change does not accord with Practice Guidance.</p> <p>Indeed the Change seeks to confuse by conflating an unsupported "<i>significant</i>" harm with the harm referred to in the PPG reference 18a-017-20140306 which is headed "How to assess if there is substantial harm?" and which includes the advice that "<i>In general terms, substantial harm is a high test, so it may not arise in many cases.</i>"</p> <p>Neither of the paragraphs referred to in Change 4/5/6 considers "<i>significant</i>" harm. PPG 18a-018-20140306 considers harm in relation to the demolition of unlisted buildings in Conservation Areas, Either appropriate PPG references should be found or this Change must be deleted</p>	Agree with point raised. Replace the phrase "Significant harm" with "substantial harm" to ensure consistency with the PPG.

4/3/9	<p>This Change requires in part that: <i>“Flood Risk Assessments must demonstrate that development itself is not at risk from flooding”</i>.</p> <p>This should be deleted. It is inconsistent with the remainder of the Change and contrary to the NPPF Technical Guidance. Every development is at risk of flooding and within a Flood Zone. The Technical Guidance states that: <i>“The overall aim should be to steer new development to Flood Zone 1”</i> (para 5). Flood Zone 1 is defined as “Low Probability” i.e. it may flood – thus the best that a Flood Risk Assessment (“FRA”) can ever demonstrate is that it has “low probability”.</p>	Wording of additional change 4/3/9 reflects advice received from the Environment Agency (Document Ref SUD011, ID404).
7/13/10 and 4/3/9	<p>This Change states: <i>“Site specific Flood Risk Assessment taking into account all sources of flood risk including surface water management, and the impact of climate change, will be required to accompany planning applications”</i> That is contrary to NPPF footnote 20 and PPG ID: 7-030-20140306</p> <p>Change 7/13/10 is also contradicted by part of Change 4/3/9. This does not comply entirely with the NPPF Footnote but at least it limits the need for an FRA.</p> <p>This part of Change 4/3/9 should be deleted and replaced by a reference to, or verbatim wording of, NPPF Footnote 20. Change 7/13/10 should be deleted and FRA’s limited to development that meets</p>	Wording of additional changes 7/13/10 and 4/3/9 reflects advice received from the Environment Agency (Document Ref SUD011, ID404).

	the NPPF requirements for an FRA.	
10/26/1 and 10/26/2	This Change requires development to demonstrate <i>“that sites are not located in flood risk areas.”</i> That is perverse and should be deleted. Every site is in a Flood Risk Area and the NPPF Technical Guidance identifies the appropriate area for different types of development. Sites may be located in Flood Zone 1 and acceptable in terms of NPPF etc. But that is still a flood risk area and would fall foul of this ill thought out Change, which should be amended to align with NPPF.	Wording of additional changes 10/26/1 and 10/26/2 reflects advice received from the Environment Agency (Document Ref SUD011, ID404).
1/INT/28	It is not made clear how the deletion of the final sentence in this paragraph assists clarification. It should be re-instated.	The text duplicated the “basic conditions” relating to neighbourhood planning which are already outlined in paragraph 1.15 of the LP1.
3/2/16	The justification for this change is stated to be: <i>“To reflect relevant legislation and guidance”</i> . LP1 should add a footnote to identify that legislation and guidance, and specifically the need for <i>“general conformity”</i> between local and neighbourhood plans.	It is considered impractical to cross-reference every change to legislation and guidance.
3/2/20 and 3/2/21	The deletions in these changes are stated to be <i>“To remove duplication”</i> . But the double deletion effectively totally removes the substantive and important matter from the plan. One of these deletions should be re-instated.	The text duplicated the “basic conditions” relating to neighbourhood planning which are already outlined in paragraph 1.15 of the LP1.
4/4/47	This change to identify the importance of restricting development by reference to <i>“the setting of an AONB”</i> is supported and should be applied to the	The impact of proposals contained within the LP1 on the setting of AONBs has been considered throughout the plan making process including within the Sustainability Appraisal work that the Council has

	<p>Sustainability Appraisal (MHD051) when considering broad locations for development in LP1 (currently not the case); to Scoping Opinions etc for those broad locations proceeding through the planning process; and to Neighbourhood Plan allocations.</p>	<p>carried out (Document Refs: SUD003, SUD005, SUD008 and MHD051). This is demonstrated by SA Objective 9 which reads ‘Recognise the importance of the district’s distinct rural landscapes beyond just the aesthetic value’.</p> <p>Furthermore, the Council has carried out a detailed analysis of potential development sites on the edge of Blandford and Shaftesbury including in respect of the impact that development could have on AONBs. The analysis that the Council has carried out is titled ‘The weight afforded to the Area of Outstanding Natural Beauty in relation to sites in Blandford and Shaftesbury’ (Document Ref: MHD011).</p>
4/4/23	<p>This Change, to include the grade of agricultural land will therefore be taken into account in the decision making process, is supported and should be applied to the Sustainability Appraisal (MHD051) when considering broad locations for development in LP1 (currently not the case); to Scoping Opinions etc for those broad locations proceeding through the planning process; and to Neighbourhood Plan allocations.</p>	<p>The impact of proposals contained within the LP1 on agricultural land has been considered throughout the plan making process including within the Sustainability Appraisal work that the Council has carried out (Document Refs: SUD003, SUD005, SUD008 and MHD051). This is demonstrated by SA Objective 11 which reads ‘Reduce pressure on the district’s natural resources, reducing waste and promoting the wise use, reuse and recycling of land and resources’.</p>
5/7/2, 5/7/8 and 5/8/28	<p>Change 5/8/28 confirms “<i>Adapted or supported housing should be considered as part of the affordable housing mix</i>” whilst change 5/7/8 states: “<i>For sites of 10 or more dwellings this mix should be determined through early engagement with Registered Social Landlords, Dorset County Council and NHS Dorset health and social care services.</i>”</p>	<p>The Council considers that there is no inconsistency issue between Policy 7 (change 5/7/8) and Policy 8 (Change 5/8/13). It is the Council’s opinion that the proposed thresholds in terms of affordable housing should not impact on its ability to negotiate an appropriate housing mix in respect of any future residential development within the District</p>

	<p>To be consistent with changes setting the Affordable Housing threshold at 11 or more (e.g. Change 5/8/13) considerations of the housing mix should only apply to sites of 11 or more dwellings. This also applies to Change 5/7/2.</p>	
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Section 3: Summary of representations received to the Sustainability appraisal (MHD051) and habitats regulation assessment (MHD052)

1.6 2 valid representations were received.

Natural England (2784)

Representation	NDDC Response
Natural England endorses the revised findings of the comprehensive Habitats Regulation Assessment completed by Footprint Ecology. Natural England also has no further comment on the revision to the Sustainability Appraisal.	Support noted.

Blandford+ (3051) and Blandford Forum Town Council (278)

Representation	NDDC Response
<p><u>Representation Update (September 2015)</u></p> <p>The Neighbourhood Planning Group (NPG) has undertaken and updated its own SA/SEA comparison assessment of the two alternative growth strategies (Appendix B) for Blandford.</p> <p>The assessment demonstrates that the NPG's alternative growth strategy outperforms North Dorset District Council's proposed strategy. The assessment also notes that the District Council has allowed landscape impact matters to dominate its assessment. The NPG seek an opportunity to undertake landscape assessment work to</p>	<p>The proposed development strategy for Blandford has been subject to Sustainability Appraisal (Document Refs: SUD003, SUD005, SUD008) as the LP1 has been progressed.</p> <p>As a result of issues raised at the hearings and subsequent changes to the plan the SA has been updated to reflect MM14 which concerns Policy 16 and supporting text Blandford (Document Ref: MHD051).</p> <p>The Council is not aware of any new submitted evidence that would alter the conclusions of the Sustainability Appraisal. Consequently, it is satisfied that the proposed area of housing growth to the south-east of Blandford St Mary is a deliverable strategy.</p>

<p>demonstrate how impacts on the landscape can be mitigated.</p>	
<p><u>Previous Representation (July 2015) (MHD038)</u> The District Council has not responded to the matters Blandford+ raised on the Blandford strategy in the NDLP1 at the hearings within the relevant explanatory notes (notably docs MHD006 and/or MHD011). Concern that no re-assessment in the SA/SEA of the reasonable alternatives has been undertaken. The Steering Group expect the District Council to justify changes through a review of the Sustainability Appraisal.</p>	<p>The comments by Ms Loch of Blandford+ are noted but they do not raise any new points. The Council has previously provided a response to the points raised (please see document ref: NDDC response to MHD038).</p>

Section 4: Commentary on Implications of the MMs in terms of the Sustainability Appraisal and the Habitats Regulations Assessment

- 1.7 The Local Plan Part 1 has been subject to a Sustainability Appraisal at various different stages as it has been progressed. Both the Pre-submission Document (Document Ref: SUD001) and the Focused Changes Pre-submission Document (SUD007) were subject to a SA Report (Document Refs: SUD003 and SUD008 respectively). In addition to the SAs a Habitats Regulations Assessment (HRA) (Document Ref: SUD005) of the Pre-submission Document was carried out.
- 1.8 The Council also produced a document titled Implications of the Habitats Regulations Assessment of the North Dorset Local Plan 2011-2026 Part 1 (Document Ref: ECC005). This document sets out the extent of the European protected sites within or in close proximity of North Dorset. It then goes on to examine the implications of the HRA produced to support the Pre-submission Document.
- 1.9 The Post Submission Changes to the Local Plan, including the MMs, have been subject to a SA which incorporates a Strategic Environmental Assessment (SEA) (Document Ref: MHD051). The implications of the MMs when taken as a whole are not considered to be significant when assessed against the SA Framework. In most instances, the results of the assessment have not significantly changed from the results of the SA undertaken on the Pre-submission version of the plan. The appraisal of the MMs has concluded that, subject to monitoring of the plan's implementation and the subsequent review of the plan, the MMs should be accepted as proposed.
- 1.10 With regards to MM14 and the revised approach to proposals at Blandford, including the area for housing growth to the south-east of Blandford St Mary, paragraph B.83 of MHD051 outlines that although the revised approach does not alter the strategy overly much, there are a number of changes that have SA implications. It is concluded that although the proposed MM is likely to tackle a number of issues raised at the hearings, there are sustainability concerns that should be built into any development proposals for sites beyond the bypass. These concerns are addressed in part by the recommendations included in the Local Plan Part 1 Focused Changes Supplement to the Final SA Report (Document Ref: SUD008). The recommendations are therefore:
- that landscape mitigation should be included particularly for sites adjacent to or within the AONB around the town;

- that severance issues associated with the bypass are effectively remedied to enable ease of access to the town centre by means other than the private car;
- that heritage impacts are given full consideration especially in relation to the listed buildings at Lower Blandford St Mary; the town centre regeneration gives full consideration to the heritage assets in the town centre; and
- that adequate provision is made for social and green infrastructure within any proposals.

- 1.11 In terms of MM17 and the revised approach at Sturminster Newton relating to land south of Elm Close paragraph B.96 of MHD051 sets out that the implications of allowing for the proposed location of the allotments to be moved and a limited number of additional dwellings to be built are likely to be minimal with only a slight impact on the views into the town when approaching along the Trailway. For this reason, there are no significant SA implications associated with this change.
- 1.12 In addition to the SA, the MMs to the plan have been considered as part of an update to the HRA (Document Ref: MHD052) of the Pre-Submission Document. A screening of all the MMs identifies the potential for additional impacts. However, further analysis of previous recommendations made in earlier HRA work, changes already made to the plan to incorporate earlier recommendations and measures being put in place to implement avoidance, mitigation and monitoring, along with continued close working with neighbouring authorities, allows the assessment to conclude that the Local plan, with the modifications added, would not lead adverse effects on the integrity of any European site.
- 1.13 With regard to MM14 concerning Blandford, the update to the HRA details that the MM has no direct link to European sites but consideration of issues relating to bats will be necessary. Paragraph 6.10, in Section 2 of the update to the HRA, refers to a maternity colony of greater horseshoe bats at Bryanston near to Blandford.
- 1.14 It goes on to detail, whilst there isn't any clear evidence of the association with a SAC for this colony, greater horseshoe bats are listed on annex II of the Habitats Directive as a feature for which SACs are designated, and do form a SAC feature at sites in the wider area. Therefore, it is detailed that protection and appropriate management of foraging habitat for greater horseshoe bats should be a key consideration in the allocation of greenfield sites at Blandford as preparation of Part 2 of the plan is initiated.
- 1.15 In respect of MM17, and the changes relating to the proposals for land to the south of Elm Close, Sturminster Newton it is detailed that the changes will not result in any likely significant effects.

- 1.16 On the basis of the above the Council considers that the MMs do not have any significant negative implications in respect of the SA or the HRA. Natural England (Rep ID: 2784) in its response to the consultation on the MMs states that it has no further comments on the revision to the SA and that it endorses the revised findings of the comprehensive Habitats Regulations Assessment completed by Footprint Ecology.

Section 5: Summary of representations received to the Inspector's Post Hearing note (INS021) Affordable Housing Policy 8

1.17 4 valid representations were received.

Jonathan Kamm Consultancy on behalf of Clemdell Ltd (1191)

Representation	NDDC Response
Substantive changes are incorporated as Additional Changes and not as Main Modifications. For example the change in affordable housing threshold (change reference 5/8/17)	<p><u>Affordable Housing threshold</u></p> <p>The Council consulted on a 'Schedule of additional changes (Document Ref: MHD053)' and the latest iteration of a 'Track changes version of the Local Plan (Document Ref: MHD054)' as part of the consultation on Main Modifications. Both of these documents detail the change in the affordable housing threshold from three to eleven dwellings in respect of Policy 8. In addition, given that the Council proposed this change in the threshold at an early stage of the Examination process, and prior to the Hearings taking place, the Council is of the view that interested parties who may wish to make comments as part of the consultation held between the 24 July to 18 September 2015 would be aware of the change that has taken place.</p>
The PBA 'North Dorset Whole Plan Viability & CIL Study' (INF016) was not made available until July 2015 after the Hearings had taken place and therefore there has not been any relevant opportunity to discuss affordable housing thresholds including cumulative impacts on development.	<p>The PBA 'North Dorset Whole Plan Viability & CIL Study' (INF016) was published in February 2015 in advance of the Hearings held between, 10 – 19 March 2015. <i>Statement made at para 1.88 in 'Hearing Statement – Issue 4' was correct at the time of publication but was superseded on the publication of the PBA report.</i></p> <p><u>Affordable Housing threshold</u></p> <p>In November 2014 the Government made changes to the PPG stating that contributions (including contributions towards the provision of affordable housing) should not be sought from developments of 10 dwellings or less and which have a maximum combined gross floor space of no more than 1,000 square</p>

	<p>metres. This change was the subject of Inspector's Question 2 (INS003). The Council's response to Inspector's Question 2 (INS007) outlined the Council's proposed approach.</p> <p>Proposed changes to Policy 8 were published on the 5 March 2015 in advance of the Hearings in a Schedule of Further Proposed Changes for the Hearings (NDDC Hearing Change 1) and in track changes format (NDDC Issues Statement 4B).</p> <p>During the Hearings there were opportunities for discussions around the revised approach to affordable housing thresholds and any cumulative viability impacts. For example Issue 4 item 4.12 'The affordable Housing threshold and the financial viability of housing schemes'.</p>
<p>As a consequence of the West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] EWHC 2222 (Admin) decision the Local Plan Affordable Housing threshold should be revised back to the submission version and the PBA 'North Dorset Whole Plan Viability & CIL Study' (INF016) updated.</p>	<p><u>Affordable Housing threshold</u></p> <p>On the 31 July 2015 the High Court issued judgement on a joint application by West Berkshire District Council and Reading Borough Council primarily regarding the Secretary of State's Written Ministerial Statement of 28 November 2014. The judgement confirms that the Statement must not be treated as a material consideration in development plan procedures and decisions.</p> <p>This judgement was subject to Inspector's Question 8 (INS019). The Council's response to Inspector's Question 8 (INS020) outlined the Council's proposed approach. The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing.</p> <p>Given the Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan (Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017).</p> <p>The issue of affordable housing thresholds can be considered in the early review</p>

	<p>of the plan which the Council will carry out.</p> <p>Given the Council's decision to retain the 11 or more threshold as outlined in additional change 5/8/17 there is no need to revise the 'North Dorset Whole Plan Viability & CIL Study' or open up the Hearing sessions.</p>
<p>An affordable housing threshold set at 11 units (change reference 5/8/17) would be unable to deliver the combined proposed level of Affordable Housing and Infrastructure (via CIL) in the Districts main towns.</p>	<p>The PBA 'North Dorset Whole Plan Viability & CIL Study' (INF016) has been prepared on the basis of a threshold of 11 dwellings or more (reflecting Government guidance at the time of publication).</p> <p>The study shows that most of the residential development scenarios relevant to the planned trajectory are currently viable without any policy costs added. However, once affordable housing and infrastructure policy costs are included, the viability of schemes varies further depending on the scale of policy obligation. The study recognises that where development is marginal, some policy trade-off will be required between affordable housing and infrastructure. The study advises that the Council will need to carefully consider the requirements set out in their Infrastructure Delivery Plan and the Strategic Housing Market Assessment to arrive at an appropriate balance.</p> <p>The viability appraisal findings demonstrate that policy trade-off decisions are required between the need to deliver infrastructure to support the delivery of growth and meeting the affordable housing need, if the overall delivery of the Local Plan is to remain viable. These decisions will be informed in part by the requirement to meet housing need, infrastructure need and political priorities. Recommended Policy amendments have been incorporated into the Local Plan. The North Dorset Preliminary Draft Charging Schedule was subject to a separate consultation between the 24 July to 18 September 2015.</p>
<p>Changes to the affordable housing threshold (change reference 5/8/17) have been subject to a lower level of public consultation.</p>	<p>The change in affordable housing threshold to eleven or more (change reference 5/8/17) occurred as a consequence of a Ministerial Statement and corresponding changes in PPG in November 2015 and was implemented in advance of the</p>

	<p>Hearings on 5 March 2015 through a Schedule of Further Proposed Changes for the Hearings (NDDC Hearing Change 1) and in track changes format (NDDC Issues Statement 4B).</p> <p>This change was subsequently consulted upon within ‘Schedule of additional changes (Document Ref: MHD053)’ and the latest iteration of a ‘Track changes version of the Local Plan (Document Ref: MHD054)’ for a period of eight weeks between the 24 July – 18 September 2015.</p> <p>Given the High Court judgement on 31 July 2015 and the Council’s response to Inspectors Question 8 (INS020) the Planning Inspector again wrote to the Council, Inspectors Question 9 (INS021) stating that he was aware that the change to ‘eleven’ occurred before the hearing sessions commenced and that interested parties have therefore had the opportunity to comment at all recent stages.</p> <p>The aforementioned change to the threshold, however, is not included within the Schedule of Main Modifications but is referred to in the ‘Schedule of Additional Changes’ (Ref: MHD053) which has also been subject to public consultation.</p> <p>In order that the Planning Inspector can be satisfied that no-one has been disadvantaged by the Council’s approach the Inspector proposed to allow 10 days for participants to submit further brief comments only on the proposed changes to the threshold referred to in policy 8.</p> <p>This additional consultation closed on the 2 October 2015.</p>
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Cranborne Chase and West Wiltshire Downs AONB (616)

Representation	NDDC Response
The AONB Management Plan is a material consideration, and encourages, where consistent with the primary purposes of AONB designation, the provision of more	<p><u>Affordable Housing threshold</u></p> <p>In November 2014 the Government made changes to the PPG stating that contributions (including contributions towards the provision of affordable</p>

<p>affordable housing in and around the AONB in Policy VRC4.</p> <p>The AONB Partnership is aware that developments in the villages of the AONB are likely to be small and that shortages of affordable housing are found in these villages. Therefore, the AONB is of the view that to provide affordable houses for those that live and work in the AONB it would be more appropriate to refer to 3 dwellings as the threshold in Policy 8</p>	<p>housing) should not be sought from developments of 10 dwellings or less and which have a maximum combined gross floor space of no more than 1,000 square metres. It further stated that in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty.</p> <p>The Council recognises that designated rural areas such as the Dorset AONB and Cranborne Chase and West Wiltshire Downs AONB are landscapes of outstanding value and should be managed in a way that preserves their natural beauty. Furthermore, the Council acknowledges the need to have regard to the objectives of their AONB Management Plans. In this regard there is both a presumption against major development within the AONB unless it can be clearly demonstrated that it is in the public interest to go ahead and there is also a requirement to seek to foster economic and social well-being of local communities.</p> <p>In seeking to balance these demands the Council sought to introduce a lower affordable housing threshold in rural areas (Change reference 5/8/17 & 5/8/24) “On schemes of six to ten in Areas of Outstanding Natural Beauty, including housing on mixed-use sites, financial contributions to the provision of affordable housing will be sought”.</p> <p>On 31 July 2015 the High Court issued judgement on a joint application by West Berkshire District Council and Reading Borough Council primarily regarding the Secretary of State’s Written Ministerial Statement of 28 November 2014. The judgement confirmed that the Statement must not be treated as a material consideration in development plan procedures and decisions.</p> <p>The Council has considered the implications of the High Court judgement upon its Local Plan Part 1 and in particular Policy 8: Affordable Housing. Given the</p>
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	<p>Council's priority is to adopt its Local Plan Part 1 as soon as possible it wishes to progress the plan on the basis of the iteration of Policy 8 set out in the latest tracked changes version of the plan (Document Ref: MHD054) rather than reverting back to the version of Policy 8 outlined in the submission plan (Document Ref: SUD017).</p> <p>The issue of affordable housing thresholds can be considered in the early review of the plan which the Council will carry out.</p>
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Southern Planning Practice Ltd on behalf of Hall and Woodhouse (748)

Representation	NDDC Response
<p>Hall & Woodhouse Ltd support the Council's position in respect of affordable housing and the thresholds to be applied as set out under Policy 8 in the latest tracked changes version of the Plan (Document Ref: MHD054) , for the very reasons set out at Paragraph 5.81 of that document.</p> <p>Objections had been raised to the lower thresholds set out in the earlier Submission version of the Plan (Document Ref: SUD017) but the thresholds now proposed overcome those objections. We understand that a future review of the Plan may reconsider the appropriate thresholds to be applied.</p>	<p>Support for the Council's position is noted.</p>

National Home Builders Federation (113)

Representation	NDDC Response
Previous representation dated 18 September 2015 noted Modifications under MM5 did not have corresponding changes under Policy 8. This was incorrect because 5/8/17 in the additional changes schedule sets out modifications to Policy 8.	Comment is acknowledged.
However there remains some inconsistency between figures quoted under MM5, additional change 5/6/19 and the tracked changes document (MHD053).	Additional change 5/6/19 updated Policy 6 to reflect issue raised at hearings. Policy 6 has however been further updated by additional change 5/6/30 to reflect the note on extending the plan period (MHD006) and to mirror the track changes (MHD054).
Policy 8 as proposed is now in accordance with the Council's own viability evidence. It is also agreed that the Council's response in the letter dated 10th August 2015 (INS020) is appropriate and pragmatic especially given that the Government has been grant the right to appeal against the High Court judgement. This is also the same approach set out in the Herefordshire Core Strategy Core Strategy Inspector's Final Report published on 29th September 2015.	Support for the Council's position is noted. The Council also notes the approach taken by the Inspector in respect of Herefordshire's Core Strategy.
The wording in paragraph 5.79 should be re-worded to remove reference to the NPPG perhaps instead referring to the Written Ministerial Statement dated 28th November 2014 which has not been withdrawn.	Comment is acknowledged. Agree that paragraph 5.79 would benefit from re-wording.