

NORTH DORSET LOCAL PLAN EXAMINATION

ISSUE 1 : DUTY TO CO-OPERATE, LEGAL REQUIREMENTS AND THE COUNCIL'S BROAD STRATEGY (POLICIES 1 AND 2)

Inspector's Key Issues and Questions in bold text.

1.1 Has co-operation between North Dorset District Council and other nearby local planning authorities been a continuous process of engagement from initial thinking? What evidence is there of effective co-operation (NPPF paragraph 181) and of joint working on areas of common interest being diligently undertaken for the mutual benefit of neighbouring authorities (NPPF paragraph 178)? Is there a long-term commitment to co-operation?

The Council's Duty to Co-operate Statement dated November 2014 (SUD019) provides an up-date on the progress of neighbouring Core Strategies / Local Plans since the last consultation in January 2014 which has resolved some of the previous uncertainties. The report also includes in its Appendices reference to Memorandums of Understanding and Statements of Common Ground with its neighbouring authorities of South Somerset, West Dorset, Purbeck, East Dorset and Wiltshire. However these documents are unsigned. The Council should confirm the status of these documents and whether or not these documents are now formally signed off by elected members of each Council.

1.2 Have any cross-boundary strategic priorities or issues been identified? If so are they clearly reflected in LP1 (NPPF paragraph 179)?

In the Council's Response to the Inspector's Question 3 (INS008) the Council states that the SHMA Review known as the Eastern Dorset SHMA indicates that "*consideration of economic growth projections suggest HMA housing provision may need to exceed HMA-wide demographic projections to support economic growth*" (Paragraph 2.16).

Similarly the Council has previously acknowledged that the District sits at the junction of more than one Strategic Housing Market Area. The up-dated SHMA report for the Bournemouth & Poole HMA identified that the northern part of North Dorset District including the towns of Gillingham, Shaftesbury, Sturminster Newton and Stalbridge look towards Yeovil and Salisbury whilst the southern part of the District including Blandford lies within the periphery of the Bournemouth & Poole HMA. Please also refer to answer to Question 4.3.

From the Council's Duty to Co-operate Statement dated November 2014 (SUD019) it is not clear how these two important strategic issues of overlapping HMAs and an increase in the OAHN are dealt with?

1.3 Has LP1 been prepared in accordance with the Council's Statement of Community Involvement?

No specific comment.

1.4 Is LP1 based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the strategic site selection process been objective and based on appropriate criteria? Is there clear evidence demonstrating how and why the preferred strategy was selected?

No specific comment.

1.5 Is the Council's core spatial strategy (policy 2) justified and compatible with the principles referred to in paragraphs 17 and 55 of the NPPF? Will the policies and proposals in LP1 contribute to the sustainable growth of the District?

Policy 2 – Core Spatial Strategy proposes to focus growth on four main towns of Blandford, Gillingham, Shaftesbury and Sturminster Newton with the remainder of the District subject to countryside policies which restrict development to essential rural needs only.

One of the Core Planning Principles of Paragraph 17 of the NPPF is to *“take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”*. This principle is re-emphasised in Paragraph 55 of the NPPF which states *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*.

The Council's latest Annual Monitoring Report (AMR) 2014 (IMP006) states that 45% of the population of the District live outside of the five major settlements (four main towns plus Stalbridge) where only circa 6% (230 dwellings as a minimum) of future residential development is proposed under Policy 6 – Housing Distribution. As North Dorset is described as a rural District there is a concern that this proposed distribution will not be sufficient to meet housing needs outside the four main towns.

Appendix 2 of AMR 2014 identifies 274 existing planning consents in the rural area outside of four main towns of which all are included in the Council's five year housing land supply (YHLS) and therefore are expected to be delivered by 2019. As a consequence after 2019 there may be no further development in the rural areas. Such a severe restriction is not compatible with the principles of Paragraphs 17 and 55 of the NPPF and is likely to inhibit sustainable growth across the District.

Therefore if objectively assessed housing needs (OAHN) and the housing requirement for the District is more than 280 dwellings per annum as HBF and other parties contend (please refer to answers to Questions in Issue 4 Hearing Statement) a proportion of the increased housing provision should be distributed outside the four main towns in the rural areas where 45% of the

existing population live (NB. the percentage is even greater when the population of Stalbridge is accounted for in the rural area).

1.6 Paragraph 1.8 of the Sustainability Appraisal (SUD003a) refers to ‘five market towns which act as hubs serving their rural hinterland’. Is Stalbridge the ‘fifth’ market town? The town is referred to as an individual settlement throughout LP1 (rather than included generically as a village). Is this an indication that it displays different characteristics to other small settlements in the District and as such are the policies being applied to it justified?

No specific comment.

1.7 Restrictive countryside policies will apply to settlements where settlement boundaries are proposed to be removed. Bearing in mind that only 230 dwellings (as a minimum) are proposed outside the 4 main towns, will housing need (including for affordable housing) and LP1 objectives 4 and 5 (page 23) in these locations be met? What is the justification for only proposing about 230 dwellings (6% of total provision) in smaller settlements? Why has the Council placed little weight on the 2010 SHLAA (MHN007) which identified 19 smaller settlements (page 47) suitable for some market and affordable housing? Are there any significant opportunities for sustainable residential or economic development in these settlements? (see also question 6.1)

Please refer to answer to Question 1.5.

1.8 Planning Practice Guidance (PPG) on Rural Housing (paragraph 001) advises that rural housing is essential to ensure viable use of local facilities and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. What is the robust evidence for the Council’s approach? Is there a risk that the Council’s approach, which includes the removal of all settlement boundaries (except for the four main towns), will lead to uncertainty and act as an impediment to sustainable development in these locations?

Please refer to answer to Question 1.5.

1.9 Local Planning Authorities should boost significantly the supply of housing, including through the promotion of sustainable development in rural areas (NPPF paragraph 55). Does the Council’s option of ‘opting in’ to the Local Plan Part 2, or the reliance on the adoption of Neighbourhood Plans (pages 36 and 37) provide the appropriate framework for ensuring that local needs for housing and employment in rural areas will be met?

The Council’s option of “opting in” to the Local Part 2 or adopting a Neighbourhood Plan will not ensure that local needs for housing in rural areas will be met. Please refer to answer to Question 1.5.

1.10 What is the justification for the removal of the settlement boundaries now (with the exception of the four main towns)? What options were considered by the Council? Policy 9 refers to affordable housing schemes ‘adjoining the built-up area’ of Stalbridge and the villages. How would a decision maker know how to react to such a scheme when the built-up area is not defined? If the Council’s approach is not sound (i.e. justified), what is the appropriate way forward?

Policy 2 removes the existing settlement boundaries for all settlements other than the four main towns of Blandford, Gillingham (excepting the strategic site allocation under Policy 21), Shaftesbury and Sturminster Newton. The settlement boundaries around the four main towns are retained until changed by the Local Plan Part 2 Site Allocations document or an appropriate Neighbourhood Plan. The AMR 2014 confirms that work on the Part 2 document will not commence until after the adoption of the Local Plan Part 1 and adoption of the Part 2 is not expected until June 2017. The AMR 2014 also confirms that to date there are only nine Neighbourhood Plan Designated Areas across the District. There is no justification for the retention of the existing settlement boundaries around the four main towns which are out of date and restrictive to the Council’s ability to “*boost significantly the supply of housing*” in accordance with Paragraph 47 of the NPPF.

1.11 Is the relationship between LP1 and any future Neighbourhood Plans (as outlined in Chapter 1) sufficiently clear? Do the strategic policies of LP1 provide sufficient and appropriate ‘hooks’ on which to ‘hang’ neighbourhood plans?

Please refer to answer to Question 1.5.

1.12 What is the justification for progressing with a plan that once adopted would only have a lifespan of about 11 years? Paragraphs 2.45 and 2.46 refer to the vision for 15 years time, so why is the plan period not 15 years from submission or likely adoption (as referred to in paragraph 157 of the NPPF)?

North Dorset District Council provides no reasoned justification for its shortened plan period. Therefore the Council should consider extending the proposed plan period to at least 2030 (assuming adoption of the Plan in 2015) and increase its housing requirement on a pro-rata basis.

1.13 The Planning Practice Guidance (paragraph 012 under Local Plans) confirms that while additional local plans can be produced, for example a separate site allocations document, there should be a clear justification for doing so. What is the clear justification in this case?

The NPPF envisages that “*each Local Planning Authority should produce a Local Plan for its area*” (Paragraph 153). The NPPG confirms this approach stating “*the NPPF makes clear that the Government’s preferred approach is for each local planning authority to prepare a single Local Plan for its area*”. Although other Development Plan Documents (DPD) may be produced such

DPDs must be justified. The Council has not provided any justification for the proposed Local Plan Part 2 Site Allocations document.

Paragraph 47 of the NPPF requires that *“to boost significantly the supply of housing, LPAs should ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing ... identifying key sites which are critical to the delivery of the housing strategy over the plan period”*. Paragraph 157 of the NPPF requires that *“critically Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate”*. By not allocating sites other than the Gillingham SUE the Local Plan is not positively prepared nor effective.

There is no reason for not changing the settlement boundaries of the four main towns and allocating sites in the Local Plan Part 1 especially given that in Appendix 2 of the AMR 2014 the Council includes within in its 5 YHLS 804 dwellings (circa over 3 years supply) on SHLAA sites in the four main towns on which successful delivery of the Local Plan is dependant.

1.14 Although not necessarily a matter of soundness, LP1 is over 400 pages long. Planning Practice Guidance (paragraph 010 under Local Plans) advises that ‘local plans should be as focused, concise and accessible as possible’. Are there any opportunities which the Council could take to streamline the document?

The document should be more concise. The policies and supporting text are unnecessarily wordy with much repetition of the NPPF and between different sections of the Plan. If there is also a Local Plan Part 2 as proposed by the Council the amount of documentation will become even more unwieldy and cumbersome for all parties to deal with. Part 1 and Part 2 of the Local Plan should be amalgamated into one shorter document.

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