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NORTH DORSET LOCAL PLAN REVIEW

Issues and Options Consultation

27 November 2017 to 22 January 2018

Response Form

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

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

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

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

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

Part A – Personal details

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

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

Personal Details*		Agent's Details (if applicable)*
Title		Mr
First Name		Stuart
Last Name		Williamson
Job Title(<i>where</i>)		Principal Planner
Organisation (<i>where relevant</i>)	Bryanston (RFE) Ltd	Amec Foster Wheeler
Address		████████████████████ ████████████████████
Postcode		██████
Tel. No.		
Email Address		████████████████████

Part B – Representations

Please answer as many questions or as few questions as you wish. There is a box at the end of the form where you can provide any comments that you may have.

Housing

1. Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset? If not, please set out what you consider to be an appropriate figure and provide reasons for this.

Yes

No

If you have answered 'No' please set out an alternative housing figure and provide reasoning to support your answer.

See attached response.

Employment

2. Do you consider that additional employment land should be allocated for development at Blandford as part of the Local Plan Review?

Yes

No

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

Yes

No

Spatial Strategy

4. Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?

Yes

No

5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.

Yes

No

If you have answered 'Yes' please set out your alternative spatial strategy and provide reasoning to support it.

See attached response.

Blandford (Forum and St Mary)

6. Do you agree with the conclusions regarding the areas of search identified at Blandford?

Yes

No

7. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

See attached response.

8. What are the additional infrastructure requirements that are likely to result from potential future development at Blandford?

Please set out what you see as the additional infrastructure requirements.

Gillingham

9. Do you agree with the conclusions regarding the areas of search identified at Gillingham?

Yes

No

10. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

11. What are the additional infrastructure requirements that are likely to result from potential future development at Gillingham?

Please set out what you see as the additional infrastructure requirements.

Shaftesbury

12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury?

Yes

No

13. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

14. What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?

Please set out what you see as the additional infrastructure requirements.

Sturminster Newton

15. Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton?

Yes

No

16. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

17. What are the additional infrastructure requirements that are likely to result from potential future development at Sturminster Newton?

Please set out what you see as the additional infrastructure requirements.

Stalbridge

18. Do you agree with the conclusions regarding the areas of search identified at Stalbridge?

Yes

No

19. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

20. What are the most important infrastructure requirements that are likely to result from potential future development at Stalbridge?

Please set out what you see as the additional infrastructure requirements.

The Villages

21. Do you agree with the Council's proposed approach in relation to future development at the eighteen larger villages within the District or do you think that the Council should consider an alternative approach?

Yes

No

If you have answered 'No' please set out your alternative approach and information/reasoning behind this.

Affordable Housing

22. Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?

Yes

No

23. Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?

Yes

No

24. Do you consider that the Council should continue with its existing policy approach, which allows for a small number of market homes on rural exception sites?

Yes

No

Self-Build and Custom-Build Housing

25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?

Yes

No

a. Allowing serviced plots to come forward under the current development plan policies.

Yes

No

b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing.

Yes

No

c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site.

Yes

No

d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties).

Yes

No

e. Identifying land in public ownership which would be sold only for self-build development.

Yes

No

f. The use of Local Development Orders to facilitate self-build development.

Yes

No

26. Are there any other approaches that could be used to meet the demand for self-build housing?

Yes

No

If you have answered 'Yes' please outline the other approaches which the Council could pursue.

Ensuring the Vitality and Viability of Town Centres

27. Do you consider that the existing hierarchy and network of centres, as set out in LPP1, should be amended to include Stalbridge as a 'local centre'?

Yes

No

Important Open or Wooded Areas (IOWAs)

28. Do you agree that those IOWAs, which are protected from development by other planning policies or legislation, should be deleted?

Yes

No

The A350 Corridor

29. Do you consider that the land which is identified and safeguarded for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass should continue to be identified and safeguarded for such purposes?

Yes

No

Comments

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

See attached response.

necessary

Continue on a separate sheet if

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

Yes

No

Signature: Stuart Williamson

Date: 22 January 2017

If submitting the form electronically, no signature is required.

When completed please send form to planningpolicy@north-dorset.gov.uk



North Dorset Local Plan Issues and Options – January 2018

Response on behalf Bryanston (RFE) Ltd

These representations to the North Dorset Local Plan Issues and Options Consultation are submitted on behalf of Bryanston (RFE) Ltd.

Question 1 – Housing

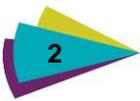
Yes, we agree that as a minimum the Council will need to plan for 366 dwellings per annum (as a minimum). Given however that the Council has failed to meet development targets during the LP1 plan period, there will need to be a fundamental change to housing delivery to increase supply. This could be achieved through the allocation of a range of sites, including medium sized sites of around 100 dwellings in sustainable locations (such as Blandford Forum) which provide a more responsive and deliverable supply and can boost housing numbers.

The evidence base produced in support of the Local Plan Part 1, demonstrates that there is a significant housing need which should be addressed through the Local Plan review. Although the current Local Plan was recently adopted, it includes a lower target (285 dwellings per annum) than evidence suggests is the actual need. The SHMA estimates that the need for the District is actually higher at 330 dwellings per annum. More recent evidence however suggests that there is significant upward pressure on housing need which the Local Plan Review will need to address beyond the OAN.

The Government's recent consultation on further measures set out in the housing white paper to boost housing supply in England suggests a standardised approach to calculating housing needs. The standard methodology for calculating housing needs '*Indicative assessment of housing need based on proposed formula, 2016 to 2026*' indicates that the projected need in North Dorset is significantly greater than is identified in the Local Plan Part 1 and East Dorset East Dorset SHMA (2015); it identifies an annual need of 366 dwellings per annum. This should be adopted as a minimum figure on which to base a Local Plan Review testing.

The housing number to be identified in the Local Plan is however only part of the requirement. The current Local Plan has not been successful in delivering new homes to meet the significant needs in the District. The Council has failed to deliver against the current lower Local Plan target suggesting that a fundamental change is required to boost housing delivery in line with the Government's emphasis to significantly boost the supply of new homes. The following evidence highlights that a more positive framework for the delivery of much needed homes should be considered to meet the significant needs in the District through the Local Plan Review:

- ▶ Although on face value it would appear from the Council's figures that there is sufficient supply to meet the current Local Plan target, the level of delivery of new homes in recent years remains considerably below target. Against a target 1,710 over the last 6-year period (2011/12 to 2016/17) only 1,286 dwellings were delivered. This is a shortfall of 424 dwellings. The Council has failed to meet the target in each of the last five years.



- ▶ The Council is also currently unable to identify a five-year supply of housing land. Latest information confirms that the Council can only currently identify a 3.4-year supply¹. Utilising the commonly preferred Sedgefield Method, the Council will need to make up this shortfall in the next five years. In addition, we agree that a 20% buffer will need to be applied to the five-year target as the Council has a persistent record of under delivery giving a requirement of 2,219 dwellings (444 dwellings per annum) against a target of 1,425 dwellings (285 dwellings per annum).
- ▶ The NPPF indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5-year supply of deliverable sites. Therefore, unless a favourable five-year supply position can be maintained, the Local Plan review would be immediately out of date once adopted and would be ineffective. To provide a more positive strategy which significantly boosts housing supply, the Plan will need to adopt a higher rate of growth and allocate additional sites to significantly boost supply and maintain a favourable five-year supply position.

These points emphasise the need for a step change in housing delivery and to allocate more deliverable sites in the Local Plan to boost delivery quickly and maintain a rolling land supply to better respond to housing needs. As a minimum therefore, we suggest that a figure of 366 dwellings should be used as a basis for testing. The Plan should allocate a mix of sites, including alternative medium sized options (of around 100 dwellings) in settlements such as Blandford Forum. This will provide flexibility in supply and thereby allow the Council to respond more quickly to fluctuations in delivery than the approach set out in the current Local Plan. The Council should prepare a housing trajectory which shows a positive position in significantly boosting housing supply in line with the emphasis of NPPF with more realistic assumptions on housing delivery. In addition, the housing distribution should take account of the higher requirement with a focus on sustainable locations such as Blandford Forum. This will ensure the Plan's soundness and compliance with NPPF, particularly the need to provide flexibility and significantly boost housing supply.

Questions 4 and 5 – Spatial Strategy

Bryanston (RFE) Ltd, generally supports the approach to spatial planning within Policy 2 of the existing Local Plan Part 1 with the majority of growth being delivered in the four main towns to provide a sustainable growth strategy. In particular, they support the recognition of Blandford Forum as a location for housing growth to support its role as the only major service centre in the southern part of the District. The current Spatial Strategy has recently undergone scrutiny through the Local Plan examination where it was considered the most appropriate strategy and it is highlighted in the SA for the Local Plan Review as being the most sustainable option. Overall, we do not consider that the settlement hierarchy contained in LP1 should be amended to include Stalbridge and we do not consider any other strategy should be considered.

It is considered that the further revisions to the Spatial Strategy should be avoided which would diminish the role and function of Blandford Forum as a main town. Guidance provided in NPPF seeks to ensure that sustainable development is delivered through a number of steps including managing patterns of growth to ensure development takes place in locations which are or can be made sustainable (paragraph 17) and facilitate the use of sustainable modes of transport. Growth in Blandford Forum will make a significant contribution to a sustainable development strategy. Expanding the settlement hierarchy to introduce further growth at Stalbridge is unlikely to result in sustainable patterns of development in the same way a strategy focused on sustainable locations such as Blandford Forum. Furthermore, it will lead to a concentration of growth in the northern part of the district which will not address housing needs in the southern part of the district.

Given that the level of service provision, public transport and road connections at Stalbridge are not as extensive as at the four main settlements, particularly Blandford Forum, it does not perform as well in sustainability terms. Option 2 included in Appendix A of the SA (including Stalbridge into the settlement hierarchy as a main town) will therefore lead to a dispersion of development to less sustainable locations. This should be reflected in the scoring for 'Climate Change' and it should not score as positively in the Sustainability

¹ North Dorset District Council Annual Monitoring Report 2017



Assessment as option 1 focused on the main four towns which have a greater level of service provision and public transport connections.

Question 6 – Areas of Search Blandford

Area F – Land at West of Blandford St Mary

Bryanston (RFE) Ltd considers that area of search F 'land at West Blandford St Mary' provides a sustainable location to assist in meeting future development needs and should be tested through further stages of the Local Plan. It presents a logical and sustainable location for new housing provision and meets the tests of soundness set out in NPPF. Further testing through the Local Plan preparation will demonstrate the suitability of this location and help to define future development sites, including at Lower Bryanston Farm. There are low lying areas between New Road and Fairmile Road which can be developed without harm to the landscape and AONB. Furthermore, given the area of land in the ownership of Bryanston (RFE) Ltd within this locality, there is a unique opportunity to offer appropriate areas of land to mitigate any ecological impacts (including for Greater Horseshoe Bats) through an approach agreed in principle with Natural England.

Amec Foster Wheeler has prepared an evidence base of technical reports to demonstrate the suitability of land at Lower Bryanston Farm through the preparation of an outline planning application recently submitted to North Dorset District Council (2/2017/1919/OUT). This is in addition to evidence base work prepared through the Local Plan Part 1 preparation to demonstrate the suitability of the site in line with guidance in the NPPF. This included transport, landscape, biodiversity and drainage/flood risk assessments. They have previously been shared with the Council and demonstrate the suitability of this location, which can deliver suitable development, in addition to development at Lower Bryanston Farm.

The sustainable development merits of the location are outlined below:

- ▶ **Sustainability and Access:** With close proximity to the town centre and nearby amenities, the location provides one of the most sustainable housing options which will encourage transport modes other than private car. The land is well integrated with existing communities and is also in close proximity to the shops and amenities in Blandford St Mary and is within walking distance of Blandford town centre. This is a highly sustainable location where multi-modal access to the town centre, schools, health, retail and employment opportunities is achievable. It is also within acceptable walking distances of bus stops served by frequent services to Poole, Weymouth, Dorchester and Salisbury. Such locations offer the best opportunity to reduce the need for people to make journeys by car and will help promote sustainable travel patterns amongst future residents thereby minimising the impact on the local highway network.

If alternative sites were considered in the Local Plan review outside of the town centre and the by-pass, this would counter the guidance in the NPPF. Being located further away from local community facilities and services would do little to discourage car dependency and would result in higher trips in the town centre, as many residents would have little option but to drive to local jobs, community facilities and services. This would place a greater burden on the local road network and run counter to local concerns about the traffic impact of future residential development.

- ▶ **Landscape and Amenity:** Although located within the AONB, the topography of the land ensures that future housing around the current application area at Lower Bryanston Farm could occupy a discreet location within the local landscape. Technical work undertaken by Amec Foster Wheeler and the District Council through the Local Plan Part 1 preparation, demonstrates that development at Blandford St Mary, including on land adjacent to Lower Bryanston Farm can be assimilated into the local landscape without harming the AONB. Land at Blandford St Mary is located to the south of the River Stour, separated from Blandford Forum by Blandford Bridge and The Cliff. The land is located on the western edge of the settlement, in a localised hollow formed by rising land to the north, west and south west. The topography and mature woodland of The Cliff combined with the undulating topography and blocks of plantation woodland to the south south-west and west of this site restricts the visibility of this area from much of the Dorset AONB.

Low lying areas of land between New Road and Fairmile Road can be developed without harm to the landscape and AONB.

In addition, a high-quality landscaping scheme on land to the west of Lower Bryanston Farm, within the ownership of Bryanston (RFE) Ltd, is proposed as part of the ecological mitigation for the current outline planning application at Lower Bryanston Farm. This will include hedgerow planting and woodland belts, which would help to further assimilate future development into the local landscape.

- ▶ Ecology: There are no ecological reasons to preclude further development in this area. Bryanston (RFE) Ltd recognises that, unless adequately mitigated, there is the potential for development proposals on greenfield sites such as that at West Blandford St Mary to affect biodiversity, including on the nationally important population of greater horseshoe bats that roosts in the Bryanston Site of Special Scientific Interest (SSSI). In view of these sensitivities, Amec Foster Wheeler has been in discussion with Natural England for many years regarding mitigation strategies.

The principle of a landscape improvement strategy has been agreed for the outline planning application which will provide significant local benefits enhancing bat habitats across the extensive Bryanston Estate. The agreed mitigation strategy includes compensatory habitat capable of providing an equivalent foraging resource at appropriate locations on Bryanston (RFE) Ltd's wider estate within the bats' roost sustenance zone. This provides a significant opportunity to improve local bat habitats in perpetuity across a much wider area of land than that proposed for development. This approach can also mitigate for further development opportunities at West Blandford St Mary and is a unique opportunity given the wider ownership in this location.

- ▶ Flood Risk: The site is entirely in Flood Zone 1 (lowest probability of flooding) and therefore the site should be sequentially preferred to other development options at greater risk of flooding.

Overall, we agree with the conclusions of the assessment that the area can accept additional growth and deliver homes in a sustainable manner. Land beyond the current outline planning application around Lower Bryanston Farm area should therefore be taken forward for testing in the preparation of the Local Plan.

Area of Search H – Crown Meadows

The Council's assessment makes the assertion that the characteristics of the area are the same across the whole area which is clearly not the case. It is considered that the negatives for the wider area have been over stated and that smaller deliverable options exist nearer the urban edge. This was agreed by the Council in the LP1 preparation who recognised opportunities of around 100 houses exist nearer to the urban edge. Whilst the southern part of the area of search are defined by the river meadow and large areas of flood risk, the northern part is urban fringe, and outside of flood risk areas. Bryanston (RFE) Ltd considers that areas located within the northern part of the parcel, including at Deer Park Farm, are highly developable and should not be overlooked given the need to allocate smaller sites to boost supply (see response to question 1). Subsequently the land submitted at West Blandford by Bryanston (RFE) Ltd through the call for sites should be taken forward for consideration. It offers a part Brownfield opportunity with the ability to provide visual improvements through the removal of dilapidated buildings.

Amec Foster Wheeler promoted land at West Blandford throughout the preparation of the North Dorset Local Plan and undertook all supporting technical work including on transport, landscape, ecology, heritage, flood risk and so on.

Land at West Blandford was identified throughout various stages of the North Dorset Local Plan preparation to deliver housing development. It was consistently identified in the Council's evidence base as the most sustainable location to provide additional housing in Blandford. It was initially identified in the early stages of the Plan as being suitable for a development of 200 homes but was subsequently reduced to 150. Following concerns raised by English Heritage on the Pre-submission Plan (November 2013) however, the Council deleted the site.

Although the site was not carried through to the adopted Local Plan Part 1, the Council's own evidence base in preparing the North Dorset Local Plan identified that development could be accommodated on the site if it were limited to the more 'urban fringe' northern part of the site².

The area submitted for the Council's consideration through the recent call for sites, is smaller than that considered in the Local Plan Part 1 process and addresses the Council's previous concerns and is more closely aligned to its evidence base. Such smaller sites will be needed to boost supply. The Council's evidence base demonstrates that development can be accommodated in this location and also highlights advantages over other competing sites:

- ▶ Sustainability and access: being within close proximity to the town centre and directly adjacent to the town's secondary school and a primary school, the site offers the best opportunity to deliver sustainable development. The site is acknowledged as being the most sustainable option available to the Council (North and North East Dorset Transport Study, March 2010 and SAs). Amec Foster Wheeler has held numerous discussions with Dorset County Highways. They are supportive of development at this site and recognise the benefits of locating new homes adjacent to the town centre as part of a sustainable development strategy to minimise traffic impacts on the town centre.
- ▶ Landscape: Previous landscape testing demonstrated how little impact any development in this location would have on important views from Blandford Bridge and would maintain the views along the river from the bridge. Further opportunities exist to restore the former parkland setting through planting on Crown Meadows. Development would effectively 'finish off' development on the western side of the town and can be integrated into the existing settlement pattern without harming the quality and character of the area or the openness of the river corridor.
- ▶ Heritage: The site is located within a Conservation Area but it was consistently identified in the Council's evidence base as the most sustainable location to provide additional housing in Blandford. Although the site was not carried through to the adopted Local Plan Part 1, the Council's own evidence base in preparing the North Dorset Local Plan identified that development could be accommodated on the site if it were limited to the more 'urban fringe' northern part of the site. The Council's Planning Policy manager gave oral evidence at the Local Plan Examination in Public acknowledging that a smaller scheme to that considered in the Local Plan Part 1 process would address their concerns on heritage grounds.

A smaller scale of development at West Blandford than previously considered would infill a section of the already damaged settlement edge and would effectively 'finish off' the settlement edge on the western side of the town (located between Blandford School, and the recently developed all weather pitch to the north and 60s/70s development at Parklands to the south and White Cliff Mill Street to the east). It would also utilise the brownfield land at Deer Park Farm, including the removal of dilapidated farm buildings, and would avoid impacts on heritage assets previously identified.

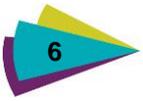
- ▶ Flood Risk: The site is not at risk of flooding and the area proposed for development is entirely located in Flood Zone 1 (lowest probability of flooding).

We do not agree with the conclusions of the assessment and consider that there are locations near the urban edge which can accept additional growth and deliver homes in a sustainable manner.

As noted above, there are no overriding constraints to prevent development on this site. The smaller suggested site area submitted in response the call for sites compared to that considered in the Local Plan Part 1 process can address the Council's previous heritage concerns and could assist the Council in meeting development needs in a highly sustainable manner.

The site is considered to be suitable for development and the landowner is willing to bring the site forward to help meet development needs. It must be stressed that whilst the revised area is considered to be technically justified, the boundaries are not fixed at this stage. Bryanston (RFE) Ltd is open minded to development and has brought a fresh approach to previous proposals for this site. Bryanston (RFE) Ltd and Amec Foster

² North Dorset District Council (November 2013) Market Towns Site Selection Background Paper – paragraph 5.20.



Wheeler would welcome further discussions with the Council to explore the appropriate nature and scale of development on this site and how it could assist in meeting development needs in the District.