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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	Stephen	
Last Name	Howard	
Job Title(where		
Organisation (where relevant)	CPRE North Dorset	
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 🖂

CPRE reluctantly accepted 280 houses pa and sees no reason to increase this already high figure. Housing supply is already exceeding availability of infrastructure and services in the towns. The higher figure will increase the housing shortfall in the short term and has already led to a 'presumption in favour of development'.

#### **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 🗆

I think some more local employment is required even though it may mean more land used for construction.. I am not sure why you think that small employment sites are a disadvantage. Obviously there are advantages in grouping employers together but small sites would encourage startups, especially when so many people are compelled to be self employed. They also could be family friendly.

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.

Stalbridge has not the infrastructure or services to support more than modest development.

# **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 🗆

Blandford is almost completely surrounded by the two AONBs, with the River Stour around the remaining sector. In the Sustainability Appraisal you judge many severely adverse effects even from a relatively limited amount of employment land (Para 4.2.2). in my opinion Blandford should be allocated less housing development. If there really is as much need as you calculate then more should be focused on Gillingham and Shaftesbury. In particular, Gillingham is served by the railway while Blandford is dependent on the A350 for major transport connections.

There is no discussion of the implications of the AONBs. These surround Blandford except to the south as Map 6.1 shows. Yet there is no discussion of the implications. Both the NPPF and LPP1 stress the importance of preserving landscapes and the AONBs have the highest level of legislative protection. They are mentioned as constraints but before they are taken forward possible mitigations, if they are possible, should be set out, to avoid a waste of time. The recent Supreme Court judgement https://www.supremecourt.uk/cases/uksc-2016-0188.html hinges on the requirement for planning committees to give reasons why a development can be permitted if it infringes AONB legislation. Clearly several of the proposed housing development sites would be highly detrimental to the AONBs.

If land close to the AONBs is developed for housing and employment a minimum requirement should be special provision for high quality design and layout such as the principles set out in the LPP1 Policy 24 and paragraphs 10.54-10.56. These are obviously seldom observed but in developments in the AONB it is important to set and enforce higher standards. Many **smal** developments around Blandford illustrate that this is not impossible.

When it comes to deciding the details of development please take into account that high density low rise developments can be very attractive and provide numbers of dwellings comparable to high rise. You only have to look at historic areas of Blandford, most of the historic centre and the area to the west of Salisbury Street, to see how attractive such high density areas can be.

Also I hope that proper connected street patterns can be ensured. The area between the Milldown and Salisbury Road is an example of a horrible incoherent tangle of dead ends and cul-de-sacs that results in no sense of place or location.

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.

More schools, surgeries etc

#### **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 🗌

Water supply. The rivers serving Gillingham are sensitive chalk streams and these are already triggering low level warnings, even before most of the existing development is completed.

Development should only proceed in accordance with neighbourhood plan.

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

Water supply. The considerable increase in demand cannot be met from the existing extraction arrangements.

#### **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 🗌

Greater weight should be given to the proximity of areas to the AONB. Land to the east of Wincombe Business Park is almost surrounded by the AONB and if this is developed then a wide margin should be left against the AONB. Areas A and B are also close to or contingent on the AONB. I examined these areas in connection with the current playing fields application and it is quite unsuitable for development because of its high quality landscape and many footpaths, which are well used recreational facilities for Shaftesbury.

All sites are only suitable for small infill development. Land south of A30 should not be used for more housing. Any new housing must be contingent on provision of amenities & services, schools, surgeries etc

Land safeguarded for the bypass should be released as unlikely to be provided in plan period: too expensive, damaging and poor value for money.

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

Better provision of playing fields, though not in Wiltshire land to the east as is currently proposed.

# 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.

Broadly agree development should be on plots A & B to NE of town

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.

Sustainability – Stalbridge lacks infrastructure, amenities & services to support large development as being proposed.

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

All public services require improvement but road infrastructure cannot easily be improved restricting amount of development desirable.

### 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 🛛

The number of houses proposed for the villages is too high and should not exceed 250 over the plan period.

Para. 11.5: I do not agree that development should be allowed outside the settlement boundary of villages. There are few if any villages that do not have the capacity for small developments within the settlement boundary. If this policy was followed it would be a prescription for sprawl out into the countryside.

I agree with concept of designating large villages appropriate for development and restricting development in other villages to small infill sites.

# 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 🛛

The Council should be cautious of self-build only allowing in special circumstances subject to strong aesthetic oversight.

# 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.

Failure to meet general sustainability criteria

I understand that you are subject to the government's insistence on using a single model for calculating housing demand (not the same as need, as many have pointed out). This model has been questioned by many. I hope that the Council will lobby the government to revise this, as it probably does not reflect the particular demographic of North Dorset population, where the larger proportion of older people will result in a lower formation of new households.

The results of the higher target for North Dorset will be very damaging to the environment and countryside. The proposals are for a quite massive growth in housing when tourism, depending on the attractiveness and tranquility of the countryside, is a major component in North Dorset's economy.

For this reason I consider that the proposed number of new houses would not meet the World Commission's definition of sustainable development, as quoted in Para 1.1 in the Sustanability Appraisal, as by building over so much of Dorset's incomparable asset, its beautiful countryside, it will both "compromise the ability of future generations to meet their own needs" and "enjoy a better quality of life without compromising the quality of life of future generations."

Allied to this is that developers are not building on sites for which permission has already been granted. Solving this is up to the government of course but it is unacceptable that developers, who stand to make enormous profits, should be able to do this. I hope the Council will lobby vigorously for government action on this.

### Failure to meet sustainability objectives (Sustainability Appraisal Fig. 2.1)

I agree with your Sustainability Assessment as summarized in your table in Para. 3.2.2, p. 16 of the Sustainability Appraisal.

It is clear that building over so many housing sites even to meet the lower targets will compromise most of these objectives. In particular, because of the large area of land taken and also the insistence of Highways for excessively large roads, together with the additional traffic generated, there will be:

- 1. Biodiversity loss and ecosystem degradation
- 2. Much productive land will be taken
- 3. Water quality will be compromised: especially because of the large amount of additional housing around Gillingham, necessitating water extraction from chalk streams from the Mere area
- 4. Air quality will suffer through traffic growth and because the government has refused to set requirements for energy generation in new developments
- 5. Hence climate change will be exacerbated not limited
- 6. The landscapes of the AONBs will be damaged especially by developments around Blandford and also to the east of Shaftesbury. Nothing in this plan will enhance valued landscapes.
- 7. The historic environment will be compromised unless clear standards for design and layout are set and enforced (see my response to Question 7, above)
- 8. This will be a challenge judging from experience of some around Shaftesbury

9. As we see already, the insistence on the primacy of private sector profits means that it will be difficult or impossible to provide housing that those who need it in Dorset's low wage rural economy can afford it

10. We hope.

necessary

Continue on a separate sheet if

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

No 🗆

Signature: Stephen Howard

If submitting the form electronically, no signature is required.

Date: <u>19 January 2018</u>

When completed please send form to <a href="mailto:planningpolicy@north-dorset.gov.uk">planningpolicy@north-dorset.gov.uk</a>