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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 & Mrs	Mr
First Name	Chris	Aaron
Last Name	Martin	Smith
Job Title(where)		Chartered Town Planner
Organisation (where relevant)		Fowler Architecture & Planning Ltd
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.

Paragraph 47 of the Framework requires local planning authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs (FOAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

As a starting point, paragraph 157 of the Framework requires that Local Plans should be drawn up over an appropriate timescale preferably with a 15 year horizon, which relates to bullet point 3 of paragraph 47 that prefers a 15 year horizon for Local Plans in order to identify a supply of specific, developable sites or broad locations for growth. The SHMA evidence was produced in 2015 and only looks forward to 2033. This is the basis upon which the housing requirement is proposed in the Local Plan Review (LPR). A 15 year horizon on the basis of the existing SHMA would necessitate adoption in 2018 which is unrealistic.

Consequently, the LPR must be supported by an updated SHMA in accordance with paragraph 159 of the Framework to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period over a 15 year horizon, which must be to at least 2036.

Notwithstanding the above concerns, the 2015 SHMA concludes that the FOAN is 330 dwellings per annum at the North Dorset local authority level. The LPR thereafter proposes to increase the housing requirement to 366 dwelling per annum following the consultation on the Government's standard methodology. The Representor supports the increased housing need figure which is above the out-of-date existing requirement in the Core Strategy of 285 dwellings per annum. Care must be taken when preparing the LPR in order to adjust the housing requirement further upwards from 366 dwellings per annum to ensure that it takes account of past under-delivery within the first 5 years given the absence of a 5 year supply of housing land. The LPR must therefore seek to increase the housing requirement for the first 5 years of the LPR. In doing so the LPR should allocate a supply of specific deliverable sites, such as **SHLAA site reference 2-41-0408** on 'Land at Motcombe Road, Motcombe', that are of a sufficient scale to enable them to be brought forward quickly by utilising existing infrastructure, subject to mitigation.

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.

An alternative strategy should be considered that redefines the settlement hierarchy away from that adopted in the Core Strategy – that is largely based on maintaining the pre-existing strategy identified by the Local Plan adopted in 2003.

The continued reliance on the four main towns and a local needs approach in Stalbridge and the Larger Villages has been demonstrated to be ineffective as it has constrained growth against a lower housing requirement than is now proposed. Mindful that the LPR seeks to significantly increase the housing requirement alongside the need to address the shortfall within the next 5 years, a more flexible spatial strategy must be considered as a reasonable alternative. The LPR is unjustified by solely consider designating Stalbridge to allow some limited growth beyond just meeting local needs. The LPR provides no evidence to support the discounting of the role other Large Villages can play in delivering the objectives of the Framework and the PPG.

The LPR should support sustainable rural communities and consider rural housing policies to reflect the Framework at paragraphs 17, 28, 29, 34, 54 and 55 alongside the PPG at Reference ID: 50-001-20160519, the DEFRA Rural Productivity Plan and the Housing White Paper.

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.”

Framework paragraph 55

The LPR must be founded on a positive approach whereby the evidence should look beyond previous methodologies to categorise settlements in the hierarchy solely based upon accessibility to existing facilities and services in that settlement. This is regressive and ensures that the LPR does not plan for

sustainable rural communities in the manner expected in the Framework and PPG.

This recommendation is against the backdrop that PPG provides by confirming the relevant issues for local planning authorities when determining the roles which all rural settlements can play in delivering sustainable development. This PPG clarification alongside the Government's clear recommendation that a thriving community can be created by allowing housing to ensure viable use of local services and facilities, did not inform the methodology for the LPR.

"A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities." PPG

Reference ID: 50-001-20160519

Furthermore, more recently, the High Court sitting in the case Braintree District Council v Secretary of State for Communities and Local Government & Ors, Court of Appeal - Administrative Court, November 15, 2017, [2017] EWHC 2743 (Admin), [2017] WLR(D) 785 confirmed the meaning of paragraph 55 of the Framework insofar that it cannot be read as a policy against development without facilities and services since it expressly recognises that development in a small village may enhance and maintain services in a neighbouring village, as people travel to them.

It is clear that the LPR must be subject to a full review of the spatial strategy and disaggregation of the housing requirement to which identify the hierarchy and different categorisation of rural settlement. The settlement review must justify where identified and non-identified settlements are situated within the hierarchy. In line with the expectations of paragraph 55 of the Framework as clarified by the Courts, the review must consider the broader relationship settlements have with their hinterland whereby development elsewhere can enhance or maintain services in neighbouring settlements.

The methodology should provide a robust and credible basis to understand the critical issues facing the area. The LPR must further understand the needs and function of the rural communities; which account for a very considerable component of the plan area and overall population. Key to this will be understanding local housing needs and quantifying how much development is needed locally to face the particular issues of that community. Addressing this need can be a matter for the LPR by apportioning a broad minimum quantum of development to specific or groups of rural settlements. The needs can then be planned for with allocations identified by the LPR, or the LPR can provide the stimulus to encourage neighbourhood development plans / orders to be proactive tools to deliver needs.

When reviewing Policy CP1 the WLPR must consider whether the current hierarchy remains appropriate. It must also assess whether the scale of development envisaged remains best defined by the terminologies used in the CS having regard to the actual level of development needed to achieve the objectives of paragraph 55 and the PPG. It is therefore appropriate and proportionate for the LPR evidence to define the settlement strategy and hierarchy to give full consideration of the following matters:

- Assessing evidence of local housing need;
- An understanding of the level of development required to support a thriving rural community by ensuring local services and facilities remain, or become viable;
- Assessing the availability of land (within the SHLAA);
- Assessing the implications of delivery in locations where the Framework indicates development should be restricted;
- Assessing the dual role many settlements provide in delivering services to other nearby

settlements, and the benefits of development in one village supporting services in a village nearby; and

- Recognising the value of the plan delivering a greater percentage of the overall FOAN within the rural communities.

The Large Village of Motcombe can play an important role in delivery sustainable development in rural area. There is no reasonable basis to restrict housing development in this sustainable development by reference to local needs as such an approach is unsupported by robust evidence. Motcombe is a sizeable settlement with a good range of local services and facilities that support the existing community, as well as the wider hinterland, that would be maintained by appropriate growth to meet the District-wide needs for housing alongside providing local needs affordable homes. The maintenance of a thriving range of schools, local shops, cultural venues, public houses and places of worship at Motcombe has been possible through the managed growth of the village. There remains land available within the SHLAA, see response to Question 21 that provides appropriate opportunities for further growth in locations where the Framework does not advise development should be restricted.

The Representors therefore seek the LPR be subject to:

- Justification with a full assessment of the need to support sustainable rural communities reflected in new policies to support sustainable rural communities;
- A reassessment of the appropriate level of development and the role settlement hierarchy that recognises the role that current Large Villages, such as Motcombe, can play in meeting both the District-wide and local housing needs through the allocation of land for residential development at the most sustainable rural communities - i.e. other settlements that are currently identified as Large Villages have the capacity to accommodate potential growth. In such cases, more sustainable Large Villages should become Local Service Centres in recognition of their role in maintaining or enhancing the vitality of rural communities. Alternatively the 'Large Villages' be disaggregated into 'Large' and 'Small' villages whereby allocations can be proposed to the higher order rural settlements;
- Allocating deliverable housing schemes at the Local Service Centres / most sustainable Large Villages that can play an important role in delivering housing in the short-term and contributing towards the housing requirement.

~~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.

- ~~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.

As outlined in the response to Question 5 the LPR must consider the reasonable alternative of a newly defined spatial strategy for the rural areas. It is unjustified to not propose to change the existing spatial strategy approach for the 18 Large Villages.

The approach to maintain the status quo of Large Villages continuing to meet local (rather than strategic) needs fails to accord with the Framework, specifically paragraphs 17, 28, 29, 34, 54 55 and the PPG at Reference ID: 50-001-20160519.

The proposed maintenance of the status quo is a blanket approach restricting housing developments at Large Villages that prevents them from expanding. The Large Villages can clearly play an important role in meeting District-wide needs for housing and that an approach to focus development in these settlements “through rural exception affordable housing schemes” is unjustified.

The reasonable alternative is for the LPR to redefine the spatial strategy in the rural areas, including the disaggregation of the 18 Large Villages into ‘Large’ and ‘Small’ villages, or alternatively the higher order Large Villages become ‘Local Service Centres’. By following either approach the largest and most sustainable of the current 18 Large Villages must be considered suitable for housing allocations. Such allocations will play a role in meeting the overall District-wide needs, but these will also deliver the affordable housing that is needed with homes for people with a local connection.

The capacity and ability of the Large Villages to accommodate growth has been demonstrated by the Shillingstone Neighbourhood Plan. Other neighbourhood plans being developed are also considering the desirability of allocating land for housing. As residential allocation opportunities do exist at the Large Villages, there is no reason why the LPR cannot consider them now as they can comprise an important component to ensure surety of housing supply. The PPG makes clear that it is the role of a Local Plan to assess housing need and allocate sites for rural areas, there is no reasonable basis to defer this to neighbourhood planning particularly as the proposed housing requirement is a challenging figure for the District, where there is a chronic under-supply of deliverable housing land. Furthermore, the maintenance of the current status quo, despite the proposed redefinition of Stalbridge has been demonstrated to be ineffective.

Maintaining of the current local needs restriction approach at all of the 18 Large Villages cannot deliver the affordable housing that is needed in the rural communities. The changes in Government policy to exempt small-scale developments means that the scale of sites coming forward under the current policy to restrict development to settlement boundaries will fall below the thresholds. As a result, a greater choice of deliverable sites are required to be allocated at the most sustainable villages that will enable affordable housing as a component of those schemes.

The village of Motcombe is a highly sustainable village in the present settlement hierarchy. The accessibility of a variety of local services and facilities including the primary school, post office, stores, village hall, church, public open space, as well as the access to employment in the community and nearby means that the settlement performs very well against other 18 large villages. Motcombe should be redesignated as one of the highest order of rural settlements in recognition that it can play a greater role in delivering sustainable growth in the rural areas.

The Representors wishes to re-affirm the availability of the following SHLAA sites at Motcombe that are under their sole control:

- **SHLAA reference 2-41-0408** ‘Part Field Adjacent Motcombe Road’ extends to approximately 1.84 hectares with the SHLAA identifying the site offers the potential for up to 45 homes.

The greenfield site has been submitted to the North Dorset District Council SHLAA by the landowner. The SHLAA does not identify any significant barriers or environmental designation constraints to the development of the site in concluding that it is suitable and available for development. While the site is outside of the Settlement Boundary this out-of-date policy constraint must not weigh against the consideration of the site as deliverable or developable as part of the SHLAA.

The SHLAA highlighted that the site has 'longer term potential' in an area that is characterised by ribbon type development. The landowner considers the site is deliverable and offers immediate potential to deliver homes in the next 5-years. The site has a wide frontage onto Motcombe Road and can be easily served from the public highway. Development of the site would reflect the character of the existing ribbon development that exists along Motcombe Road and through the village.

Given the rural character of the surroundings the appropriateness of the development quantum will need to be fully understood by contextual and technical analysis to understand whether 45 units suggested by the SHLAA is appropriate, however the site can accommodate a range of homes between 10 and 45 units depending on configuration. A Visioning Document can be submitted to the Council to aid the further consideration of the site constraints and opportunities as a housing allocation. The site is of a sufficient scale that it can deliver a wide choice of high quality homes including open market and affordable housing, as well as self-build plots for people wishing to build their own home.

Site 2-41-0408 is a natural gap in an otherwise built-up frontage with good access available to the public highway. There do not appear to be any significant technical barriers to prevent this land being brought forward for development in the short-term. For these reasons the site represents a logical location for housing growth that can help to deliver both District-wide and local needs for housing, including a proportion of affordable housing for local people.

The availability and deliverability of Site 2-41-0408 demonstrates that the reasonable alternative promoted by the Representors to increase the amount of development at sustainable rural villages, such as Motcombe would be a justified approach. The site is capable of accommodating a component of the overall District-wide need for housing, alongside affordable housing for local people, as a housing allocation in the RLP.

- **SHLAA reference 2-41-0409** 'Fields Adjacent Frog Lane, Motcombe' extends to approximately 19.24 hectares with the SHLAA identifying the site offers the potential for up to 550 homes.

The greenfield site has been submitted to the North Dorset District Council SHLAA by the landowner. The SHLAA does not identify any significant barriers or environmental designation constraints to the development of the site in concluding that it is suitable and available for development. Proper masterplanning of the site would define the developable area to ensure flood risk, drainage, heritage, tree, easement and landscape constraints are all addressed. Ultimately, the quantum of development and developable area may reduce from the figures quoted in the SHLAA, however this would remain a sizeable development opportunity that could come forward in whole or in part to meet District-wide development needs.

A visionary development of this site could offer significant additional advantages to the village including a relocation of the Primary School away from the main road and the establishment of a GP surgery. This would enhance the vitality of the community and ensure facilities would be more centrally sited in the village with sufficient space for ancillary land and facilities, including an extension to the public open space at the Memorial Hall to create a hub for the community.

A Vision Statement can be provided to the LPA to assist consideration of this site, in whole or in part, as a potential location to accommodate growth.

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.

The allocation of sites for residential development could offer the potential to provide a percentage of the homes as self-build units. This should be based on evidence on a case-by-case basis to make serviced plots available for that purpose for a time-limited period. The responses to Questions 1, 5 and 21 highlight the advantages arising from the LPR taking a more proactive approach to delivering growth including the allocation of a range of sites, with a greater focus at the most sustainable rural villages.

SHLAA site reference 2-41-0408 'Part Field Adjacent Motcombe Road' should be allocated for development as this is deliverable in the next 5 years and offers potential to deliver a wide choice of high quality homes, including self-build plots, should a need exist for this typology of homes.

~~**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.

A large, empty rectangular box with a thin black border, intended for users to enter their comments. The box is currently blank.

Continue on a separate sheet if necessary

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

Yes

No

Signature: _____

Date: 22 January 2018

If submitting the form electronically, no signature is required.

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