

GLADMAN DEVELOPMENTS LIMITED

REPRESENTATIONS ON THE NORTH DORSET LOCAL PLAN REVIEW

ISSUES AND OPTIONS CONSULTATION

JANUARY 2018



1. INTRODUCTION

These representations are made by Gladman Developments Limited (Gladman) in respect of the North Dorset Local Plan Review Issues and Options Consultation. Gladman specialises in the promotion of strategic land for residential development with associated community infrastructure. From this experience, Gladman understands the need for the planning system to ensure that local communities have access to both decent homes and local employment opportunities.

The National Planning Policy Framework (NPPF) has brought about fundamental changes to the planning process since its inception. One such change relates to the need to significantly boost the supply of housing and how this fundamental requirement of the Framework should be reflected in the plan making process. Gladman, which operates on a national basis, has considerable experience in contributing to the Local Plan preparation process since the NPPF came into effect.

What continues to be clear from this experience is that many local authorities are not fully addressing the requirements of the Framework when preparing their Local Plans, this has led to significant concerns being expressed by Inspectors on the soundness of their plans in their current form.

Gladman very much welcomes the Council's decision to undertake an early Review of the North Dorset Local Plan and is grateful for the opportunity to comment at this very early stage in the Review process. Gladman's responses to specific questions contained in the Issues and Options Consultation are set out below.

2. GLADMAN'S REPRESENTATIONS

Q1. 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?

Gladman agrees that the housing need figure of 366 dwellings per annum is a sensible starting point for planning housing growth in North Dorset. However, it must be borne in mind that this figure is based on the Government's currently proposed standard methodology for calculating the Objectively Assessed Need for Housing (OAHN) and this may be subject to change following the recent consultation and indeed is subject to substantive unresolved objections at this time. Also this figure does not take into account any additional housing provision that may be required to support economic growth. In this connection, it is pertinent to note that the 2015 Eastern Dorset SHMA report suggested an uplift in housing need of at least 105 dwellings per annum to reflect expected economic growth. In addition the recently published Western Dorset Economic Growth Strategy, which includes North Dorset, has ambitious economic growth plans, including 20,000 new homes and 13, 200 new full-time equivalent jobs for the period up to 2033. In terms of North Dorset, the Economic Growth Strategy identifies the Gillingham, Shaftesbury and Blandford Forum corridor as a focus for economic growth. It is important therefore, that the housing growth planned for in the Local Plan Review, positively supports these economic growth aspirations.

It is also important that the housing requirement in the Local Plan Review takes into account any unmet need from other authorities in the Strategic Housing Market Area. If the Government's standard methodology for calculating the OAHN is adopted, the OAHN for the Eastern Dorset HMA will be significantly higher than that set out in the Eastern Dorset SHMA. As a consequence of this, it is possible that the two major urban areas in the HMA, Bournemouth and Poole, will be unable to accommodate all of their OAHN within their authority areas and there may be a need for North Dorset to accommodate a share of that unmet need under the Duty to Cooperate.

Q4. 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?

Stalbridge is the fifth largest settlement in the District with a population of just over 2,500. It has a good range of shops, supermarket, primary school, Post Office, Library, recreation and employment opportunities. Further facilities are available in nearby towns such as Sherborne, Sturminster Newton and Blandford and a full range of strategic services is available in Yeovil some 12 miles to the west, all of which can be accessed by public transport from Stalbridge. The town benefits from being 6km south of the mainline rail station at Templecombe which provides regular services to London and the wider south west allowing commuters a real option to travel other than via the private motor car as part of a linked trip. Stalbridge therefore represents an eminently sustainable location for housing growth which, in turn, will support the longer term vitality and viability of existing services in the town. Stalbridge is also affected by relatively few environmental/heritage constraints to development unlike other towns in the District including the main settlements.

Q5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR?

The Local Plan Review offers the opportunity for the Council to undertake a fundamental review of its spatial strategy and settlement hierarchy. The Council should consider providing additional development, above that set out in the consultation document, to the town of Stalbridge, which should be made a main service centre, to assist with the delivery of housing early in the plan period. The Local Plan Review should ensure that there is a more flexible and positive approach to new housing in the rural areas of the District which addresses the difficulties affecting rural communities including a shortage of housing supply and unaffordability. Paragraph 55 of the NPPF stresses that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities” and the National Planning Practice Guidance makes it clear that all settlements can play a role in delivering sustainable development in rural areas and consequently blanket policies restricting housing in some settlements and preventing other settlements from expanding should be avoided.

Q12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury?

Gladman agrees with the Council’s conclusions that areas A, B and D have development potential.

Q18. Do you agree with the conclusions regarding the areas of search identified at Stalbridge?

Gladman agree with the Council’s conclusions that areas A, B, C and D have development potential. However, part of Area B is currently the subject of a live planning application (2/2017/0741/OUT) and consultation responses have now been received. As such, it can be confirmed that there is no unacceptable impact on biodiversity, indeed the proposal will lead to a net gain in this area, and the impact on the landscape is minimal and certainly nowhere near at a level so as to preclude development of this land. As set out in the consultation responses received from Dorset County Council, the impact in terms of highway safety/junction capacity etc. is entirely acceptable. Area B represents the most sensible location for housing growth in Stalbridge.

Q21. 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?

As indicated in the response to Q5 above, Gladman considers that the Local Plan Review should support the provision of housing growth in key villages which offer a wide range of community facilities and services. Gladman generally supports an approach to the distribution of housing which reflects the needs and characteristics of individual settlements. However in considering the distribution of housing growth it is important to note that a fundamental objective of NPPF is to secure a thriving rural economy “by taking a positive approach to sustainable new development”¹ The NPPF seeks to significantly boost the supply of new housing and in rural areas “housing should be located where it will enhance or maintain the vitality of rural

¹ NPPF para 28

communities”² and market housing may be allowed where it “would facilitate the provision of significant affordable housing to meet local needs”.³

There are several benefits of providing new housing in rural areas. These benefits are:

- New housing can help sustain rural communities and businesses. Planning Practice Guidance states that “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”⁴;
- The provision of family housing in rural areas would help redress the current age structure imbalance towards those aged over 65;
- The amount of affordable housing in rural areas can be significantly increased by allowing new and larger sites to be developed; and
- Locating housing development in settlements with good public transport links can assist in encouraging sustainable travel choices and can assist in maintaining the viability of those transport links.

Gladman submits that it is inappropriate to use settlement boundaries as a mechanism to restrict otherwise sustainable development from coming forward. The NPPF is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable and sustainable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by NPPF. Planning Practice Guidance⁵ also advises that “*all settlements can play a role in delivering sustainable development in rural areas – and so 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*”.

There is nothing in NPPF which states that development in the open countryside should be restricted in the extensive manner which the adopted Local Plan suggests. Instead, Gladman suggests that the Local Plan Review should take a more permissive stance. In reality, in its current form, the policy approach creates a ‘presumption against development’ in all areas beyond the settlement boundaries. Gladman recommends that the policy approach needs to be significantly revised to provide a more permissive approach to development in the open countryside. Greenfield sites on the edge of settlements, but lying outside of the currently built up area may offer opportunities for sustainable development which could help meet the housing needs of North Dorset and help achieve NPPF’s objective to ‘*significantly boost the supply of housing*’ and would accord with the presumption in favour of sustainable development.

Greenfield sites on the edge of settlements, but lying outside of the currently built up area may offer opportunities for sustainable development which could help meet the housing needs of North Dorset and help achieve NPPF’s objective to ‘*significantly boost the supply of housing*’ and would accord with the presumption in favour of sustainable development.

Gladman would commend to the Council the policy approach taken by Harborough District Council in its Submission Local Plan published in September 2017. Policy GD2 of that Plan concerns Settlement Development and states that:

1. *In addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicester Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where:*

² *ibid* para 55

³ *ibid* para 54

⁴ PPG Rural Housing 50-001-20140306

⁵ PPG Rural Housing Ref 50-001-20140306

- a) *In the case of housing, it does not, cumulatively with other proposals, significantly exceed the target for the delivery of new homes in the Rural Centres and Selected Rural Villages specified in Policy H1 Provision of new housing;*
 - b) *It reflects the size of the settlement concerned and the level of service provision within that settlement;*
 - c) *It is physically and visually connected to and respects the form and character of the existing settlement;*
 - d) *It retains as far as possible existing natural boundaries within and around the site and the settlement;*
 - e) *It does not harmfully diminish the physical and/or visual separation of neighbouring settlements.*
2. *Development involving the appropriate and efficient re-development of previously developed land which is not of high environmental value and re-use of buildings will be permitted where such re-use achieves the objectives of sustainable development.*

Such an approach, which allows identified settlements to grow in order to maintain rural vitality but ensures that rural communities maintain their identity and distinctiveness, would be fully in line with the NPPF objectives for rural housing and an appropriate approach for the North Dorset Local Plan review to adopt.

Q22. 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?

Gladman agrees that the reference to a maximum figure of dwellings in Policy 9 of LPP1 should be removed.

Q24. 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?

Gladman considers that the Council should continue with its existing policy approach which allows for the provision of market housing on rural exceptions sites. In many cases affordable housing can only be viable on such sites if cross subsidised by market housing.

Q25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?

- a. **Allowing serviced plots to come forward under the current development plan policies.**
- 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**
- 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.**
- d. **Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties).**
- e. **Identifying land in public ownership which would be sold only for self-build development.**
- f. **The use of Local Development Orders to facilitate self-build development.**

Gladman agrees with the principal of providing self-build properties subject to evidence of demand. However, contrary to what is proposed under option c above, Gladman would object to a requirement for the provision of self-build plots on major development sites as this would not boost housing supply but merely changes the delivery mechanism. Gladman would have no objection to options a, b, d, e and f.

Q28. Do you agree that those IOWAs which are protected from development by other planning policies or legislation should be deleted?

Gladman agrees that those IOWAs which are protected from development by other planning policies. Indeed there is a strong case for all IOWAs to be deleted as the underlying concept appears to have been superseded by the ability to make Local Green Space designations introduced by the NPPF.

Q29. 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?

Gladman considers that the land currently identified for the Shaftesbury Outer Bypass should no longer be safeguarded for that purpose. As noted in Paragraph 8.11 of the Consultation Paper, Dorset County Council as Highway Authority, has no funding in place for this scheme and does not consider that funding for the scheme is likely to be available in the foreseeable future.

Paragraph 41 of the NPPF makes it clear that local planning authorities should only “*identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice” (our emphasis). Furthermore Paragraph 173 advises that “*Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.*” Indeed one of the key tests of soundness for Local Plans is effectiveness – Plans must be deliverable.*

In the absence of funding for this scheme, it is clear that it is highly unlikely to be delivered during the plan period and it should therefore not be identified or safeguarded in the Local Plan Review.

I hope you find these comments helpful and constructive. However if you require any further information or wish to meet one of the Gladman team, please do not hesitate to get in touch.



North Dorset Local Plan Review

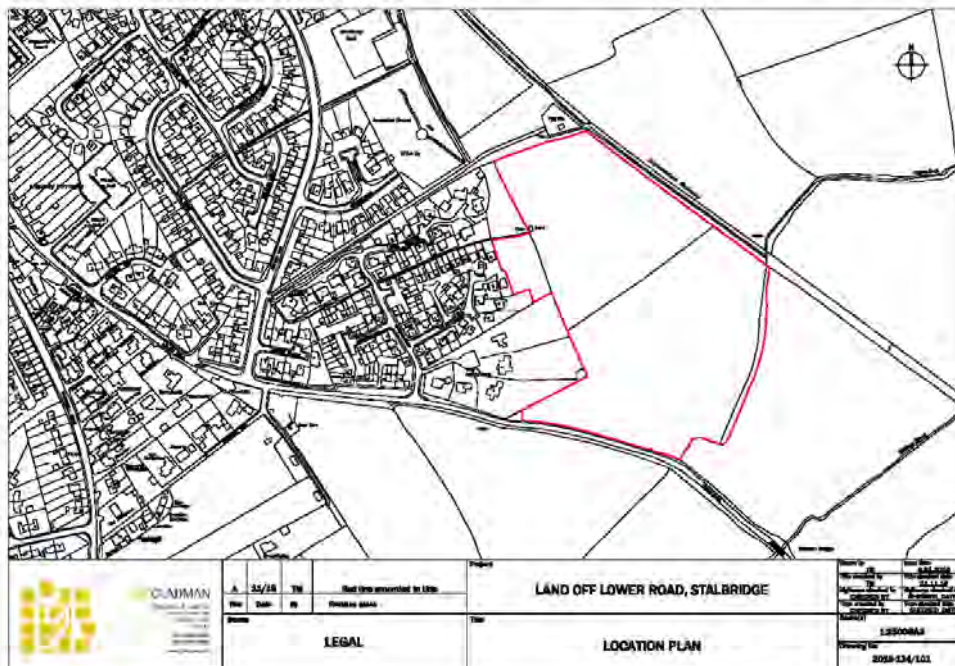
Issues and Options Consultation

January 2018

Land at Lower Road, Stalbridge



Gladman is currently promoting land at Lower Road, Stalbridge for housing development as identified on the Plan below.



The 6.59 ha site lies adjacent to the existing residential development on the edge of Stalbridge and lies within Area of Search B denoted in the Consultation Paper. The site is well contained with defensible boundaries such as the dismantled railway to the north (currently used as a permissive footpath), existing development to the west, Lower Road to the south, and existing hedgerows and trees providing strong containment to all boundaries.

The site benefits from being within easy walking and cycling distance of a range of facilities and services in Stalbridge and represents a logical extension to the town adjacent to the existing urban context. The site is not covered by any statutory or non-statutory designations for landscape quality. It is well contained within the landscape and important trees and other landscape features would be retained. The local highway network has capacity to accommodate the additional traffic associated with the development of the site, without adverse impact. The site presently has a low ecological value and falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding). There are no designated heritage assets within or immediately adjacent to the site, and its development would not affect the setting of any Listed Buildings. The site is therefore free from any major constraints.

A Vision Document for the site has been prepared and is attached below.

DEVELOPMENT BRIEF

Land off Lower Road, Stalbridge

North Dorset District
Council



Introduction

Gladman Developments wish to promote land off Lower Road, Stalbridge for development. The 6.59 hectare site presents an ideal opportunity to create a sustainable, distinctive residential development located in an attractive market location to ensure the delivery of high quality homes.

A residential development on the site would incorporate both new market and affordable housing (of a variety of types, from affordable rented properties to discounted sale properties to help key workers and first time house buyers) to help meet the current and future housing needs of both Stalbridge and the District.

This document includes an illustrative development framework plan, indicating how the site can accommodate a future residential development with high quality open space and landscaping.

**Should you wish to speak to us further, please contact:
Planner: Robert Gaskell**



Site & Planning Context

Site & Surroundings

The 6.59 ha site lies adjacent to the existing residential development on the edge of Stalbridge. The site is well contained with defensible boundaries such as the dismantled railway to the North (currently used as a permissive footpath), existing development to the west, Lower Road to the south, and existing hedgerows and trees providing strong containment to all boundaries.

A Vibrant Community

Stalbridge is a vibrant settlement and hosts a population of over 2,500 people according to the 2011 Census.

Stalbridge is an active and successful community and provides residents to access to community facilities including:

- Primary School;
- Village Hub and Library;
- Post Office;
- Supermarket; and
- Range of local shops on High Street.

Stalbridge is well placed to host additional development to meet future housing need and support future economic growth.

Principle of Development

The Local Plan Review is considering whether Stalbridge, as the fifth largest settlement in the District, should meet some of the strategic development needs of the District. Gladman believe that Stalbridge is capable of supporting further growth.

The site benefits from being within easy walking and cycling distance from a range of facilities and services and represents a logical extension to the town adjacent to the existing urban context, and is free from any major constraints.



The subsequent sections of this document provide an overview of the key attributes that make Land off Lower Road, Stalbridge an inherently deliverable and suitable location for residential development.

Site Development Potential

Land off Lower Road offers a unique opportunity for North Dorset District Council to plan, and importantly – deliver, a new exemplary development where people will genuinely want to live, whilst embracing the character and distinctiveness of the surrounding area. This will be achieved by:

Housing Delivery



It is envisaged that the site could deliver up to 120 homes on a developable area of 6.59 hectares, achieving a net density of 30 dwellings per hectare.

40% of the on-site homes would be provided as affordable housing equating to circa 48 additional affordable dwellings, making a valuable contribution to addressing the District's affordable housing needs.

Land Ownership and Delivery



There are no known technical, landownership or infrastructure impediments to the delivery of residential development on land off Lower Road: -

- The site is in the control of a willing landowner, who wishes to bring the site forward for residential development;
- The site can be appropriately served by gas, telecommunications, water and electrical infrastructure; and
- There are no known land contamination issues that would prevent the site's development.

Landscape Character



The site, nor the immediate landscape, contains any rare or unusual landscape features, and its development can be sensitively designed to sit within the wider landscape.

Proposals will aim to retain notable existing landscape features, including hedgerow and woodland boundaries.

The site is well contained adjacent to the existing urban context, representing a logical extension to the settlement and therefore the proposals would not adversely impact on the landscape character of the site.

Biodiversity, Green Infrastructure & Local Wildlife

Ecological Appraisals have assessed the site's potential to support protected species. Habitats of ecological interest are to be retained with the exception of a small amount of hedgerow necessary for access off Lower Road. The mitigation opportunities will lead to net-biodiversity gains.

The indicative framework plan has been sensitively designed with generous off sets and habitat buffers along hedgerows and woodland edges, leading to an increase in the biodiversity value of the site.

Market Appeal

It is anticipated that if granted planning permission, the site could be brought to the market and acquired by a housebuilder over a short period of time.

Heritage

An archaeology and built heritage assessment has identified that there are no designated or non-designated archaeological assets recorded for the site and that there is a low theoretical potential for previously undiscovered archaeological evidence within the site.

Hydrology

The development proposal falls within the Environment Agency Flood Risk Zone 1 in its entirety i.e. land assessed as having a less than 1 in 1,000 annual probability of flooding.

Design



The site could deliver a high quality, sustainable residential development. Any future proposal would be based on sound design principles, and would be in scale and character with its surroundings and Stalbridge, through delivering dwellings of a suitable size and through utilising materials which reflect the local vernacular.

Green infrastructure would sit as an integral part of any development proposal, and would be key in creating an accessible, open and engaging place within which to live. A high-quality housing development would be a positive addition to Stalbridge, complementing the character of the surrounding area in terms of character and quality.

Topography



There are no technical barriers to overcome in order to secure the development of the site.

Accessibility



Development in this location will provide the quality pedestrian, cycle and public transport connections.

The site is within walking distance of a bus stop which benefits from a regular bus service throughout the day to Yeovil, Blandford, and Sturminster Newton. The site could be developed without an unacceptable impact on the safe and satisfactory operation of the local highway network. Access is proposed off Lower Road.

Socio-economic



If developed, the site could result in a number of important economic benefits. These include:

- An estimated construction spend of £13.32 million and additional GVA of £4.4 million over the build-out period;
- Around 114 FTE construction jobs per annum, and an additional 124 in-direct jobs in associate industries;
- Household expenditure of £4.8 million per year and 135 residents are expected to be economically active.

Site Plan with Indicative Framework Plan



- KEY**
- Site Boundary: 6.59ha
 - Proposed Residential Area: 3.97ha (up to 120 dwellings @ 30 dph)
 - Proposed Vehicular Access
 - Existing Public Rights of Way
 - Existing Permissive Footpath
 - Proposed Pedestrian Route
 - ◆ Indicative Pedestrian Access Point
 - Existing Dense Conifer Plantation
 - Existing Broadleaf Semi-Natural Woodland
 - Existing Hedgerow
 - Proposed Planting / Green Infrastructure

Note. Total Green and Blue Infrastructure Area: 2.62ha



Rev.	Date	Amendment	Drawn	CHK'd	App'd



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Client: **Gladman Developments Ltd**

Project Title: **Lower Road, Stalbridge**

Drawing Title: **Development Framework**

Drawn	Date	Checked	Date	Approved	Date
ED	17/02/17	DL	17/02/17	DL	17/02/17

Scale: **1:2000**

Orig Size: **A3**

Status: **Final**

Drawing No: **RSK/M/P661250/04/02/01**

Rev No: **RSK/M/P661250/04/02/02/01/01**

Scale: **0 20 40 60 80 100m**





Gladman Land

**If you have any questions, contact your Project
Manager:**

