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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	Jon	
Last Name	Murray OBE	
Job Title <i>(where</i>		
Organisation (where relevant)		
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.

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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 ⊠
	We had a figure of 285 in LLP1. While I do not object to 366 what is there to say that the figure will not increase again between 2019-2024 and beyond. We need a flexible plan. The Consultancy paper does not as yet provide flexibility. Given that projected Housing needs is the issue here we need to have a more pragmatic approach in adapting the well thought through LLP1, developed over many years, rather than a knee jerk approach to planning.
	<u>Employment</u>
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 \square
	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 \square

	If you have answered 'Yes' please set out your alternative spatial strategy and provide reasoning to
	support it.
	Blandford (Forum and St Mary)
6.	Do you agree with the conclusions regarding the areas of search identified at Blandford?
	Yes
	No \square
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.
	<u>Gillingham</u>
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 ⊠

In para 1.3 of the Consultation paper the Inspector advises (no reference is provided for this advice or indeed who the Inspector is, or who he represents – although I take it he is a Government Inspector) that the plan:

'will ensure that the Plan remains appropriate for the District and confirm that the plan continues to encourage and secure the development and infrastructure that the District requires.' The paragraph continues: 'If the Council does not review the plan it will become increasingly out of date and the Council will have less control in deciding where development is located within the District.'

It seems incongruous that years of well documented planning has now been placed on hold while we wait on a further plan to confirm/or amend the previous findings. All this appears to have done is stall previously agreed development. The Gillingham Southern Extension being a primary example. Flexibility of LLP1 appears to be the critical factor.

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

Flood Risk: There is little assurance in the Consultation paper that the proposed potential additional development around Gillingham (Areas A-K - which are in addition to the agreed development in the Southern Extension) will not cause an additional flooding risk. The removal of pasture land (which in winter months hold a colossal amount of generally ankle deep excess water) will leave nowhere for the excess water to run to.

Specific Issue: The proposed Area I in Peacemarch is particularly vulnerable to flooding. Further consultation is required on how this water will be managed and removed from the area. It cannot be an option to drain this excess water into the three rivers which are already running to capacity in the winter. A new flood risk review is required to understand the effect of losing the green field sites around Gillingham (less the Southern Extension) and replacing them with new substantial urban development.

Medical and Dental Facilities: LLP1 takes account of the increase of people in Gillingham based upon the Southern Extension. No consideration has been given for the increase in Medical and Dental facilities for the additional requirements in potential development Areas A-K.

Schools: LLP1 takes account of the increase of children in Gillingham based upon the Southern Extension. No consideration has been given for the increase in Schools (Nursery, Junior, Middle, Upper) for the additional children in potential development Areas A-K.

Roads: The Consultation paper does not indicate how Gillingham's current road network will be developed to manage such a large-scale increase in traffic.

Specific Issue: The potential development in Area I, to the north of Wavering Lane West is of particular concern. Although Wavering Lane West is mentioned on page 48 in the Area Search section, the paper does not consider how access to a new development would be managed on this road. The road is not wide enough or suitable to take this additional traffic. Further analysis of potential access is required.

Milton-on-Stour: Any development in Areas I, J, K will have a detrimental effect on this village. There are two key concerns. Firstly, the encroachment of Gillingham Town to Milton-on-Stour and secondly the increase of traffic that will use the village as a rat run to/from B3092. Further consultation is required to advise how both these concerns can be avoided.

Shaftesbury 12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury? No \square 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 \square No \square 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 \square No \square 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 \square No \square 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.
<u>Stalbridge</u>
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 \square

	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 \square
	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 $\ \square$ No $\ \square$
	f. The use of Local Development Orders to facilitate self-build development. Yes $\ \Box$ No $\ \Box$
26.	Are there any other approaches that could be used to meet the demand for self-build housing?
	Yes ⊠
	No \square
	When the Council deem the proposal is in line with current planning criteria.
	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 🗆

Overall Comments

Government Policy: I draw the Planning Department's attention to the Chancellor's Autumn Statement. In it he said the Government would consult on:

Strengthening the Housing Delivery Test with tougher consequences where planned homes are not being built, by setting the threshold at which the presumption in favour of development applies at 75% of housing delivery by 2020.

Expecting local authorities to bring forward 20% of their housing supply as small sites. This will speed up the building of new homes and supports the government's wider ambition to increase competition in the house building market.

Speeding up the development process by removing the exemptions from the deemed discharge rules. This will get builders on site more quickly, ensuring that development is not held back by delays in discharging planning conditions.

The Government are reported to have said it would intervene if it found Developers had been granted planning permission for new housing but then failed to build on it. It has been reported that the big developers have been storing up empty plots of land to push prices up. The Southern Extension in Gillingham is a case in point. Developers have the go ahead to build yet no ground has yet to be broken.

Current Adopted Plan: North Dorset County Council published and had its Local Plan (2011-2031) adopted in January 2016. Due to the Government Inspector's direction to review this highly developed and considered Plan, it appears to have been stalled. The Southern Extension in Gillingham is a perfect example.

Local Plan Review, Issues and Options, Consultation Paper: The Council has sought to further develop LLP1 in a very short space of time. As a result, in places, the detail is scant and lacks maturity.

The paper appears at odds with the direction of the Government to get on and build. We had a plan and now we appear to have put it into suspended animation in favour of a short-sighted review to identify further development opportunity.

This paper is currently lacking appropriate depth of detail, particularly in the 'Areas of Search' sections. Infrastructure requirements and second order effects are not considered in enough detail yet. The areas identified as future potential sites require far more development before they become remotely mature. This can, and maybe should, be run in parallel to already agreed development opportunities.

It would be welcomed if both the Inspector and Council placed pressure on Developers to get on and build on the Southern Extension site in Gillingham. I fear the Consultancy paper provides the Developers the opportunity to:

Sit on the Southern Extension development plot with a view of enhancing future revenue return.

Consider a more financially rewarding development opportunity that could be presented in Areas - A-K in Gillingham in favour of the Southern Extension development.

Strategy: North Dorset Council has a strategic vision, developed over many years, which is now sitting in abeyance. The strategic initiative needs to be seized back from the Developers and we need to start building homes in the approved Gillingham Southern Extension site.

Conclusion: We have a plan and we need to get on with it. The Inspector's concerns should run in parallel
and not jeopardise years of consultation and planning. The Government's direction is clear, 'we need to get
on and build.' With that in mind the Council needs to find a mechanism to get Developers to build on the
sites they already have approval to do so. In addition, LLP1 should act as the bedrock of the Council's
planning strategy and should be flexible enough to meet the future needs of North Dorset housing
requirements.
Let us crack on and deliver the needs of the North Dorset people.
Do you wish to be contacted about future consultations relating to the Local Plan Review?
Yes ⊠
No 🗆
Signature: Jon Murray OBE Date: 19 January 2018
If submitting the form electronically, no signature is required.

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