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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](mailto: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	Mr
First Name	Julian	Simon
Last Name	Trim	Rutter
Job Title( <i>where</i> )		Planning Consultant
Organisation ( <i>where relevant</i> )		Proctor Watts Cole Rutter Ltd
Address		██████████ ██████████ ██████████
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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.*

### **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.*

### **Q5 and Q21 Spatial Strategy**

The current strategy as set out in Policy 2 is to concentrate the vast majority of housing and other development in the four principal towns, with Stalbridge and the eighteen larger villages to meet local needs. In housing numbers this was set out as at least 825 dwellings in these areas against at least 4935, some 16.7% of the total.

The population of rural areas outside the four main towns is 48% of the total.

### **Context**

LPP1 at para 3.37 describes the north of the district as having "a dense pattern of villages resulting in most of the population living in relatively close proximity to a range of services."

In corollary the population is significantly higher in the north of the district with a higher number of the larger villages.

The NPPF at para 55 promotes sustainable development in rural areas to enhance and maintain the vitality of rural communities. It set out that development in one village may support services in a village nearby – highly pertinent in North Dorset.

The AONB designations skirt the eastern boundary and covers 40% of the land area of the district largely on the southern and south eastern parts. This designation surrounds Blandford Forum and it now borders the eastern expansion of Shaftesbury.

Allowing for the major housing allocations being built out in Shaftesbury, along with the large additional housing permissions granted together with the large allocation for the Gillingham southern extension, the district has demonstrably failed to deliver sufficient homes in the district and can be characterised as too many housing 'eggs' in too few settlement 'baskets'! It is noted that 70% of the Gillingham 5-year housing land supply is stated as being either an allocation or SHLAA land brings into question the housing trajectory updated in 2016.

Small builders have historically delivered, if not over delivered housing supply in the district as evidenced under the former North Dorset District Wide Local Plan 2011 (NDDWLP) where many more villages in the district had the opportunity for development. The spatial strategy in LLP1 of confining the vast majority of housing to the four main towns with a token element to the fewer larger villages, has prevented this means of supply assisting with the district's housing targets. This is a reflection of the planning system nationally which has developed to limit the supply of small

scale development sites, which in turn has excluded smaller and medium sized enterprises from making their historically significant contribution to the delivery of houses that has seen a major decline in the last 30 years (Federation of Master Builders report on annual survey 2017).

The Sustainability Appraisal states that dispersing housing to rural areas will have a more significant impact upon the landscape and setting of heritage assets. This effect is greatly overstated. There has been a very large impact of the expansion of the four main towns in recent years which when viewed for nearby vantage points now amounts to urban sprawl, and in the case of Blandford and Shaftesbury has an visual impact on their setting in and around AONB's. This impact is set to increase under current allocations.

The expansion is over green field sites.

The northern part of the district is not within the AONB.

Large employment land allocations within the district have not been taken up. One of the key components of concentrating development in the four main towns was to enable the creation of balanced development. This was certainly a significant factor for the Planning Inspector in examining the proposals for Eastern Expansion of Shaftesbury where employment land was a requirement to ensure balanced development with the housing land. Yet none of this employment land has been taken up. A similar situation pertains in Gillingham where the Brickfields Business Park allocation is not delivering employment space and only limited expansion at the Kingsmead Business Park. The Annual Monitoring Report for 2016 shows no additional employment space created in Sturminster Newton. Thus the idea that the spatial strategy will reinforce the sustainability of the four main towns has not proven to be the case, without commuting to employment the only realistic option for the great majority of new residents.

## **Review of Spatial Strategy**

The larger villages identified were originally as part of an earlier exercise to identify sustainable villages in developing its current Core Strategy (Assessment of Settlements NDDC 2007). NDDC accepted that this assessment could quickly become out of date, but was never-the-less used to identify in the Core Strategy a set of villages that were deemed 'more sustainable' using a combination of population and range of services. The concept of what is a sustainable settlement needs to be reviewed as this original work is now ten years old, and did not appear to take into account the concept of linked villages and density of settlements, particularly in the north of the district and the need to increase housing land supply as a national priority. For example West Stour has a good range of services that

supports a number of the surrounding settlements including East Stour, itself named as one of the 18 larger villages.

The identification of the larger villages is based on meeting local needs. Clearly in a market based economy other than affordable housing, there is no way of ensuring that such needs are met where housing land is restricted. The broadening of the amount of supply spread across a greater number of sites in an area of the district which already has dense network of linked villages would ensure that Para 55 is more easily achieved where a restricted supply does not result in the creation or sustenance of more balanced communities.

The proposed strategy is in effect more of the same and has constrained housing land supply leading directly to the creation of over large housing allocations within its principal towns. In turn these have not, collectively, delivered planned for housing number and which in any case are unable to achieve social or spatially cohesive within the district.

The link between sustainability and transport needs to be reviewed in North Dorset where there is a dense pattern of villages in relatively close proximity to a range of services. The demise of public transport means that accessibility of most settlements in North Dorset, and in more rural and urban areas, is entirely reliant on the car. Where a significant increase in the use of electric cars is foreseeable, and being planned for at national level, what this means in terms of sustainable transport needs to be considered.

The lack of employment growth in the towns to balance increases in planned populations raises a similar question as to that of housing in that the limited geographic spread, number and type of sites brings has constrained growth and brings into question the sustainability of population growth in the district unless it is truly balanced.

The point is generally made and is repeated in central government's budget statement that more smaller sites are needed to increase housing land supply, with a figure of 20%. A similar approach to employment land would arguably have the same effect and help create more balanced development across the district. Whilst an argument about tailoring the percentage amount for each district, the principal of more and smaller sites is one that now appears to be accepted.

In relation to the spatial strategy this would indicate that a more generous approach to both the amount of development and increasing the number of villages that could accept development should be considered. Whilst the named large villages stemmed from what is now an historical assessment of sustainability a review to expand this number would now be appropriate. The original number of villages which were identified with a settlement boundary

in the former NDDWLP numbered fifty-two, and this undeniably delivered a more than adequate housing land supply as an important and significant part of the overall house land supply. The wording used to regulate development was "The scale and form of development will be related to their size and character and to the availability of services". This would enable the local planning authority to ensure that development would be appropriate in the context of each village which would of course include landscape impact. Unfortunately this approach has not been used for the towns where the amount of development allowed has created urban sprawl, that is damaging to the landscape greater than the more dispersed approach to accommodating development in a greater number of settlements under the NDDWLP.

A point made in earlier representations was that the restriction of development to the larger villages of the district exacerbates social division between town and country, and therefore does not meet one of the three dimensions to sustainable development – the social role. There is a concentration of affordable houses in the towns out of proportion to the population that reinforces this point. At the other end of the scale the lack of higher quality housing in the large planned housing estates reinforces the lack of social balance with estates and towns, and between towns and rural hinterlands.

*See attached letter*

### **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.*

Accessibility. Proximity to the A303 on the NW round to NE of Gillingham is an important consideration given two access points on to that road. Southern extension is generally less accessible. Coalescence with Milton over stated and this could be preserved without sterilizing the whole of the subject areas where this is identified as an issue. Gillingham is a series of coalesced villages so this is a continuation of an historical trend. Better building land than on SW to SE sides and further from flooding 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.*

Given the continuation expansion of Gillingham and the single crossing of the railway which divides the town a further vehicular crossing is required to retain coalescence and cohesion of the town. This should be linked to a new by-pass that would allow better access for all, including A303. Opportunity here for combining with a new railway station with larger car park.

### **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.*

The impact of the lack of by-pass will continue to be an issue separating the two parts of the town as in Gillingham. Given existing extant and planned permissions this will be exacerbated along with the increased traffic generated by Gillingham expansion along with traffic from Poole up the A350. Situation further aggravated by lack of employment grown/balance development increasing out commuting traffic..

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.*

Shaftesbury has good range of services and its town centre but needs more parking given its wide hinterland. The A30/A350 road is a barrier that divides the town with its inadequate provision for pedestrian crossings to link the town properly. A by-pass would allow better social and community cohesion and relieve unnecessary congestion particularly in the summer months. Generally fast growth is not desirable for community creation and cohesion and the rapid expansion allowed in the last decade should be allowed to bed in without any further large allocations.

### **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.*

By-pass for Sturminster Newton.

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.*

Need for by-pass.

### **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.*

*Improvements to A357 avoiding town centre – links/linking to Henstridge and Gibbs Marsh Trading Estates.*

### **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.*

*See attached letter*

### **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.*

*Policy provision to allow self build plots in the villages in accordance with alternative spatial strategy outline in attached letter.*

### **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.

Town Centre Viability.

Policies that support positive change in town centres to create more mixed and varied development which encourages people to meet. This means not focusing on retail uses but uses which encourage people to meet. Over more than a decade expert opinion has said that retail is the most dynamic and fast changing of all land uses and policy can not hope to keep up as has proven to be the case. Policies more widely drawing to encourage vibrant town centres which are places for people to meet and shopping is a by-product. Why continue to keep town centre values high to the benefit of private landowners.

*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: 19<sup>th</sup> January 2018

*If submitting the form electronically, no signature is required.*

When completed please send form to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)