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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	Mrs	
First Name	Karen	
Last Name	Tippins	
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.

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.

No

If you have answered 'No' please set out an alternative housing figure and provide reasoning to support your answer.

I have answered 'No' because:-

- Shaftesbury as a town should be excluded from the 'Area of Search' exercise for building houses outside the designated Settlement Boundary due to the fact that Shaftesbury has been building houses at a rate faster than defined in the original NDDC Local Plan signed in Jan 2016. (Gillingham 52 houses from 2011-2017; Shaftesbury over 644 houses for the same time period).
- the figure is of 366 is not evidenced based and there is no supporting NDDC issued 'Housing Need Analysis' that has been performed. Therefore, this figure 366 pa may be irrelevant for a rural region such as North Dorset. Also, Gillingham has not see housing growth and therefore, this issues should have been escalated by NDDC with an action plan for resolution by NDDC.
- Nddc have failed to meet their current target of 280 houses pa because of market conditions not lack of approvals. Increasing the figure to 366, without adequate 'evidence based' justification, makes it worse. I continue to argue for building in large towns where infrastructure exists but the mechanisms are not there despite continued government tinkering with the planning system.
- The 366 houses increase is applied 'broad brush' to all North Dorset towns and villages in North Dorset in a seemingly haphazard manner without taking into account that Shaftesbury is 'ahead' of target; where as Gillingham is seriously lagging 'behind' housing build target with only 52 houses built between 2011-2017 versus over 600 in Shaftesbury. Also, to note that the Planning Committee North Dorset 10th Oct minutes:- ...'The officer drew attention to the fact that the Council could not at present demonstrate a five year housing land supply. However, in the context of Shaftesbury, there was an argument to state there are no problems regarding housing land supply. ..'
- Brownfield sites housing numbers missing for Shaftesbury, calculated under-declared by NDDC by 350 houses for Shaftesbury 75 houses have been built in Shaftesbury, none of these numbers were in the original LP estimates of 1140 (2011-2026). Numbers missing are Churchill 42 (nearly ready for occupation) the NDDC AMR states 32 houses for this site therefore under declared by 10, Cattle Market is on the SHLAA for 25 dwellings and NDDC have successfully sold this property, the former Budgen site at Bell St, Shaftesbury unlikely to sell as retail, and finally the Persimmon A30 Employment land in Shaftesbury could potentially have a further 125 200 houses based on the recent consultation event held by Persimmon at Royal Chase, Shaftesbury in Jan 2018.

Employment

2. Do you consider that additional employment land should be allocated for development at Blandford as part of the Local Plan Review?

	Yes
3.	Do you consider that there is a need to allocate additional employment land in any other part(s) of the District?
	Yes
	(however South of A30 employment land in Shaftesbury development has not progressed to providing additional employment within Shaftesbury, therefore, this land has been 'land-banked' for years now and is in serious danger of being used for further housing development rather than employment. There is a disconnect between providing land for employment and actually supplying employment into the town)
	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
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.
	?
	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
	If you have answered 'Yes' please set out what you see as the further issues.

Blandford was identified as being the second town in North Dorset for housing growth after Gillingham in the 2007 sustainability report issued by NDDC. However, the town's housing development has fallen significantly short of the housing targets and as a consequence of this, NDDC have been approving planning applications in Shaftesbury only to attempt to make up the short fall of housing growth. I believe this indicates that the NDDC scrutiny committee is not functioning in maintaining an oversight of the 'unfair' treatment of Shaftesbury at a town for housing growth and at no point has either Scrutiny or Planning Policy or Planning Committee issued an emergency action plan to rectify the 'overbuilding' of Shaftesbury, which does not have the infrastructure to support this type of growth, vs the under development to the point of no significant housing development in Gillingham and slightly more housing

development in Blandford.			
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.			
There should be an action plan issued by NDDC to publically state why Blandford and Gillingham are behind on their housing targets to the expense of Shaftesbury.			
<u>Gillingham</u>			
Do you agree with the conclusions regarding the areas of search identified at Gillingham? Yes $\ \square$			
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 □			
If you have answered 'Yes' please set out what you see as the further issues.			
Gillingham was identified in the 2007, NDDC Sustainability document as being the first town within North Dorset which could sustain housing growth. In the Annual Monitoring Report 2017, it is clear that there is a serious problem with Gillingham and underperforming on housing growth. It is not upto North Dorset District Council to start off-setting the underperformance of Gillingham, by saturating the housing growth and planning applications on Shaftesbury, where this town was identified as being 'third' for 'sustainability' of housing growth. NDDC appear to be ignoring the 'right house right place' policy and allowing planning permission in Shaftesbury which has caused a 'saturation' of the housing market in Shaftesbury during 2014, where 80% of a parcel of Persimmon development was sold for Social Housing where the government maximum is 30% of social housing. This agreement voted in by NDDC due to the fact they have saturated the housing market in Shaftesbury, but have not been building houses in Gillingham, has caused the town irreparable damage. There should be controls or scrutiny applied to NDDC before any further planning applications are voted through in Greenfield sites in Shaftesbury and there should be a report into why Gillingham has been able not to compile with the housing targets defined in the NDDC Local Plan 2016.			

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.

Gillingham has a) Train Station b) Rivermeet c) better road links. There has been a report issued stating even more LEP money is going to Gillingham – but Gillingham is not expanding. Shaftesbury is taking all of the housing growth, therefore this LEP money should be re-diverted to Shaftesbury – not Gillingham.

This newspaper article has appeared to be totally untrue – stating that Gillingham is rapidly expanding – it isn't – Shaftesbury is:-

http://www.bournemouthecho.co.uk/news/15128215.1_800_new_homes_and_improved_road_links__T own_to_be_turned_into_commuter_route_to_London/

Shaftesbury

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

Nο

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

If you have answered 'Yes' please set out what you see as the further issues.

Shaftesbury is a unique hilltop town with unparalleled views of countryside merging into town and beyond. This will be threatened by any development going beyond the existing town settlement boundaries and impact upon the economy, tourism and well-being of inhabitants in Shaftesbury.

There needs to be a green belt which prevents Gillingham, Motcombe and Shaftesbury becoming one large conurbation.

Making Sense of These Numbers

Town	2011-2017	% contribution	2018-2022	% contribution	Burden to 2022
Blandford	309	24%	504	34%	29.5%
Gillingham	52	4%	233	16%	10.3%
Shaftesbury	644	50%	401	27%	37.9%
Sturminster Newton	29	2.2%	71	4.8%	3.6%
Stalbridge & Villages	252	19.6%	264	17.9%	18.7%
TOTALS	1286	99.8% (rounding)	1473	99.7% (rounding)	100%

- Shaftesbury as a town should be excluded from the 'Area of Search' exercise for building houses outside the designated Settlement Boundary due to the fact that Shaftesbury has been building houses at a rate faster than defined in the original Local Plan signed in Jan 2016.

- The rate of housing growth for Shaftesbury, as shown in the table above, is 10 times faster than Gillingham (2011-2016 Gillingham 52 houses versus Shaftesbury 644 houses for the same period). Gillingham was nominated has the 1st sustainable town in 2007 NDDC assessment for housing growth based on the fact it has a Station and Community Leisure Facility. Blandford was ranked second, because its town already supported over 11,000 people and has a Community Leisure Facility.
- Shaftesbury was ranked third for growth sustainability in May 2007 NDDC Sustainability Report with population over 7,000, but is currently growing and predicted to grow at the fastest rate. Gillingham's housing growth over the next 5 years is predicted to be 233 houses versus 401 for Shaftesbury.
- North Dorset District Council should only be undertaking the 'Area of Search' exercise for towns
 that have proven 'sustainability' infrastructure and also have missed the housing build targets.
 NDDC should be concentrating on the Area of Search on Gillingham as a priority and exclude
 Shaftesbury until 2022/2026.
- certain areas identified for housing development are actually in Wiltshire, or in fall outside the Shaftesbury Parish Boundary, outside the Settlement Boundary and outside the Shaftesbury designated area for Neighbourhood plan, into Motcombe or Mebury Abbas/Cann which means the new housing developments will access all Shaftesbury's overloaded infrastructure [medical centre, schools, etc] while actually paying their council tax and Developers Contributions (s106) to other authorities.
- The proposed additional Shaftesbury housing is to compensate for Gillingham's shortfall in building new houses. This is unacceptable.
- Some of the proposed development areas are in protected AONB zones, which implies that NDDC wants to relax its policy regarding building in sensitive sites. Zone A, which is close to Cranbourne Chase AONB, and moves into Wiltshire should never have been included in the 'Area of Search' by NDDC Planning Policy.
- one absolute priority would seem to be the replacement of the existing A350 with the outer Bypass; without that there should be no further development. All future housing developments will require employment particularly for those in social housing; all light industry will require good road communications; QED the A350 is key to any further development the Bypass Corridor must continue to be protected from housing development.
- South of A30 employment land in Shaftesbury development has not progressed to providing additional employment within Shaftesbury, therefore, this land has been 'land-banked' for years now and is in serious danger of being used for further housing development rather than employment. There is a disconnect between providing land for employment and actually supplying employment into the town
- 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.

Water supplies, sewage, education at all levels, health provision and social services, employment, amenities and green space for all.

Legally binding impact assessments must be in place for all of the above.

Sturminster Newton

15.	. Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton?
	Yes
	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
	No \square
	Here have an accounted West places set out what you see as the first har issues
	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
Ι/.	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.

	future development at Stalbridge?
	Please set out what you see as the additional infrastructure requirements.
	The Villages
!1	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 🗆
	Affordable Housing
22	Affordable Housing 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?
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	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
	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 Do you consider that the existing policy approach, which seeks to prevent exception sites coming
	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 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?
23	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 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 Here I is evidence of local need in exception of nine dwellings?
23	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 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 Do you consider that the Council should continue with its existing policy approach, which allows

Self-Build and Custom-Build Housing

No \square

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 $\ \square$ No $\ \square$
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 \Box No \Box
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 \Box No \Box
d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties). Yes \Box No \Box
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 $\ \square$ No $\ \square$
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.
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

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?

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

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.

This form is difficult to access, understand and complete so we feel consultation is not welcome

- The Sustainability Appraisal seems to have been largely ignored
- Health and Well-being (e.g. walkers, dog walkers, cyclists, the needs of children and teenagers) have been ignored
- Wildlife, particularly wildlife corridors, and Shaftesbury's natural richness has been ignored
- Some land already acquired for development has not been developed and this has been ignored
- Some developments which have taken place have not provided the promised amenities or infrastructure and this has been ignored.

We need to ensure PROPER consultation takes place with all local people to see what the Shaftesbury community actually needs and wants.

- this consultation appears to have been started prematurely, it should have occurred after NDDC issued the Annual Monitoring Report 2017 and the 'Area of Search' should have been based on which towns are not full-filling their housing build obligations. The LP review smacks of giving NDDC 'carte blanche' to completely ruin Shaftesbury as a town, by opening up building outside the defined Settlement Boundary and into Greenfield sites. Just because no action plan has been put in place by NDDC regarding housing growth for Gillingham and Blandford.
- Proposing to build outside the Settlement Boundary and outside Shaftesbury Parish Council for Shaftesbury is making a nonsense of the Designated Neighbourhood Plan area, which is only applicable to Shaftesbury Parish Council Boundary.

In conclusion, NDDC Area of Search in relation to Shaftesbury appears to be disregarding the Designated Neighbourhood Plan Area, Shaftsbury Parish Boundary, the County Boundaries with Wiltshire and also the close proximity of Cranbourne Chase AONB. The relationship between the Parish Boundary and the Settlement Boundary is no longer logical and subsequently implying that the Shaftesbury Neighbourhood plan will be ineffectual, because NDDC are attempting to push for being able to grant planning permission outside the designated area for the Shaftesbury Neighbourhood Plan.

Do you wish to be contacted about future consultations relating	g to the Local Plan Review?
Yes	
	D
Signature: Karen Tippins If submitting the form electronically, no signature is required.	Date: <u>22/01/2018</u>
If submitting the form electronically, no signature is required.	
When completed please send form to planningpolicy@north-dorset.	zovuk

When completed please send form to <u>p</u>