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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	Dr.	
First Name	Suzanne	
Last Name	Keene	
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 \square				
	If you have answered 'No' please set out an alternative housing figure and provide reasoning to support your answer.				
	<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 ⊠				
dev Ian Ob	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 \square				
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.
συρροτιτι.
Blandford (Forum and St Mary)
Do you agree with the conclusions regarding the areas of search identified at Blandford?
Yes
No 🗵
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

6.

7.

Blandford is almost completely surrounded by the two AONBs, with the River Stour around the remaining sector. In the Sustainability Appraisal you judge many severely adverse effects even from a relatively limited amount of employment land (Para 4.2.2). in my opinion Blandford should be allocated less housing development. If there really is as much need as you calculate then more should be focused on Gillingham and Shaftesbury. In particular, Gillingham is served by the railway while Blandford is dependent on the A350 for major transport connections.

There is no discussion of the implications of the AONBs. These surround Blandford except to the south as Map 6.1 shows. Yet there is no discussion of the implications. Both the NPPF and LPP1 stress the importance of preserving landscapes and the AONBs have the highest level of legislative protection. They are mentioned as constraints but before they are taken forward possible mitigations, if they are possible, should be set out, to avoid a waste of time. The recent Supreme Court judgement https://www.supremecourt.uk/cases/uksc-2016-0188.html hinges on the requirement for planning committees to give reasons why a development can be permitted if it infringes AONB legislation. Clearly several of the proposed housing development sites would be highly detrimental to the AONBs.

If land in the AONBs is developed for housing and employment a minimum requirement should be special provision for high quality design and layout such as the principles set out in the LPP1 Policy 24 and paragraphs 10.54-10.56. These are obviously seldom observed but in developments in the AONB it is important to set and enforce higher standards. Many **smal**l developments around Blandford illustrate that this is not impossible.

When it comes to deciding the details of development please take into account that high density low rise developments can be very attractive and provide numbers of dwellings comparable to high rise. You only have to look at historic areas of Blandford, most of the historic centre and the area to the west of Salisbury Street, to see how attractive such high density areas can be.

Also I hope that proper connected street patterns can be ensured. The area between the Milldown and Salisbury Road is an example of a horrible incoherent tangle of dead ends and cul-de-sacs that results in no sense of place or location..

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 \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 ⊠			
	No 🗆			
	Water supply. The rivers serving Gillingham are sensitive chalk streams and these are already triggering low level warnings, even before most of the existing development is completed.			
11.	What are the additional infrastructure requirements that are likely to result from potential future development at Gillingham?			
	Water supply. The considerable increase in demand cannot be met from the existing extraction arrangements.			
	<u>Shaftesbury</u>			
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 \square			

Greater weight should be given to the proximity of some areas to the AONB. Land to the east of Wincombe Business Park is almost surrounded by the AONB and if this is developed then a wide margin should be left against the AONB. Areas A and B are also close to or contingent on the AONB. I examined these areas in connection with the current playing fields application and it is quite unsuitable for development because of its high quality landscape and many footpaths, which are well used recreational facilities for Shaftesbury.
What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?
Better provision of playing fields, though not in Wiltshire land to the east as is currently proposed.
Sturminster Newton
Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton? Yes $\ \Box$
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?

Plea	ase set out what you see as the additional infrastructure requirements.
Stall	oridge_
· · · · · · · · · · · · · · · · · · ·	ou agree with the conclusions regarding the areas of search identified at Stalbridge?
Yes	
No	
L9. Are	there any further issues relating to the areas of search that you think should have been idered as part of the assessment process?
Yes	
No	
	t are the most important infrastructure requirements that are likely to result from potential re development at Stalbridge?
Ple	ase set out what you see as the additional infrastructure requirements.
The	<u>Villages</u>
eigh	ou agree with the Council's proposed approach in relation to future development at the teen larger villages within the District or do you think that the Council should consider an native approach?
Yes	
No	

	Para. 11.5: I do not agree that development should be allowed outside the settlement boundary of villages. There are few if any villages that do not have the capacity for small developments within the settlement boundary. If this policy was followed it would be a prescription for sprawl out into the countryside.
	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 \square
	a. Allowing serviced plots to come forward under the current development plan policies. Yes $\;\boxtimes$ No $\;\Box$
	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 \boxtimes
	d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties). Yes \square

	Yes	lentifying land in public ownership which would be sold only for self-build development.
	f. Th Yes No	ne use of Local Development Orders to facilitate self-build development.
26.	Are t	here any other approaches that could be used to meet the demand for self-build housing?
	Yes	
	No	
	If yo	u have answered 'Yes' please outline the other approaches which the Council could pursue.
	<u>Ensu</u>	ring the Vitality and Viability of Town Centres
27.		ou consider that the existing hierarchy and network of centres, as set out in LPP1, should be inded to include Stalbridge as a 'local centre'?
	Yes	
	No	
	<u>Impo</u>	rtant Open or Wooded Areas (IOWAs)
28.	-	ou agree that those IOWAs, which are protected from development by other planning policies gislation, should be deleted?
	Yes	
	No	
	The A	A350 Corridor
29.	Вура	ou consider that the land which is identified and safeguarded for the Shaftesbury Outer ss and the Charlton Marshall and Spetisbury Bypass should continue to be identified and tuarded for such purposes?
	Yes	
	No	

I agree with your Sustainability Appraisal Para. 16.2.2. It would be very short sighted to give up on the reserved land, which usefully constrains development in some sensitive areas. The considerable growth in housing and employment both in Shaftesbury and in other towns using the A350, Gillingham and in Wiltshire to the north, will make the existing A350 route inadequate. As is pointed out, there is a lot of lobbying for north-south transport links to be improved. This will only increase over the period of the plan. Any other route for a bypass would be far more damaging and hotly contested. A way should be found to make the construction of this route more likely.

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.

Failure to meet general sustainability criteria

I understand that you are subject to the government's insistence on using a single model for calculating housing demand (not the same as need, as many have pointed out). This model has been questioned by many. I hope that the Council will lobby the government to revise this, as it probably does not reflect the particular demographic of North Dorset population, where the larger proportion of older people will result in a lower formation of new households.

The results of the higher target for North Dorset will be very damaging to the environment and countryside. The proposals are for a quite massive growth in housing when tourism, depending on the attractiveness and tranquility of the countryside, is a major component in North Dorset's economy.

For this reason I consider that the proposed number of new houses would not meet the World Commission's definition of sustainable development, as quoted in Para 1.1 in the Sustanability Appraisal, as by building over so much of Dorset's incomparable asset, its beautiful countryside, it will both "compromise the ability of future generations to meet their own needs" and "enjoy a better quality of life without compromising the quality of life of future generations."

Allied to this is that developers are not building on sites for which permission has already been granted. Solving this is up to the government of course but it is unacceptable that developers, who stand to make enormous profits, should be able to do this. I hope the Council will lobby vigorously for government action on this.

Failure to meet sustainability objectives (Sustainability Appraisal Fig. 2.1)

I agree with your Sustainability Assessment as summarized in your table in Para. 3.2.2, p. 16 of the Sustainability Appraisal.

It is clear that building over so many housing sites even to meet the lower targets will compromise most of these objectives. In particular, because of the large area of land taken and also the insistence of Highways for excessively large roads, together with the additional traffic generated, there will be:

- 1. Biodiversity loss and ecosystem degradation
- 2. Much productive land will be taken
- 3. Water quality will be compromised: especially because of the large amount of additional housing around Gillingham, necessitating water extraction from chalk streams from the Mere area
- 4. Air quality will suffer through traffic growth and because the government has refused to set requirements for energy generation in new developments
- 5. Hence climate change will be exacerbated not limited
- 6. The landscapes of the AONBs will be damaged especially by developments around Blandford and also to the east of Shaftesbury. Nothing in this plan will enhance valued landscapes.
- 7. The historic environment will be compromised unless clear standards for design and layout are set and enforced (see my response to Question 7, above)
- 8. This will be a challenge judging from experience of some around Shaftesbury

	As we see already, the insistence on the primacy of be difficult or impossible to provide housing that the rural economy can afford it	
10.	. We hope.	
		Continue on a separate sheet if nece

Signature: Date:	
If submitting the form electronically, no signature is required.	
When completed please send form to planningpolicy@north-dorset.gov.uk	