

# North Dorset Local Plan – 2011 to 2026

## Part 1: Pre-submission Document

Analysis of Responses and Identification of Main Issues (Policy by Policy)

General, Introduction, Context, Vision, Objectives and Policies 1 to 15

August 2014



## Pre-submission Document - Analysis of Responses and Identification of Main Issues

### General

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change
121	Hilary Jordan	West Dorset District Council and Weymouth & Portland Borough Council		4188				We do not consider that your strategy raises any matters of strategic significance in relation to West Dorset, nor does it conflict with the approach taken in our adopted or emerging local plan, and on that basis I can confirm that West Dorset District Council have no objection to your draft plan.	
292	E Kingsbury	Iwerne Courtney and Steepleton Group Parish Council		4247				The Parish Council is minded not to make any representation or comment on the preparation or content of this document at this time.	
295	Christine Tuffin	Lydlinch Parish Council		4246		Yes		Lydlinch Parish Council considers the plan to be sound especially for small parishes such as ours as it allows flexibility to opt for changes if the need arises.	
349	Mike Burt	Okeford Fitzpaine Parish Council and DAPTC		4654		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	The level of consultation over the development of the Local Plan has been insufficient in: the number of responses to each stage of consultation; the level of response provided by the Council; and, the timings of the exhibitions.	Sufficient positive consultation should take place.
378	Simon Rutter	Proctor Watts Cole Rutter		4363		No	It is not consistent with national policy	The plan overall is unnecessarily long and wordy which is reflected in policies that are similarly too long, over prescriptive and do not reflect the spirit of the NPPF seeking to envisage every situation when better worded policies could achieve greater degree of flexibility for all participants allowing them to respond to material considerations in a local context.	
410	Georgina Clampitt-Dix	Wiltshire Council		4209				Thank you for consulting Wiltshire Council, as an adjoining authority, on the Draft North Dorset Local Plan Part 1. We welcome the opportunity to respond as part of the continuing dialogue and ongoing co-operation between the two councils. Wiltshire Council supports the proposals contained within the draft and considers that the relationships with Wiltshire have been satisfactorily identified.	

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616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4249				The acknowledgement in paragraph 5.72 of the Duty to Cooperate statement that AONB management Plans are a material consideration in the planning process is appreciated. However I note that the CCWWD AONB is not included in the list of bodies in Appendix A which relates to the Duty to Cooperate on cross border issues.	
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4274				The plan puts emphasis on Neighbourhood Planning. The AONB would like to advise that under section 85 of the CRoW Act, the duty of regard to the purpose of the AONB designation applies to parishes and parish councillors.	
797	Nicola Phillips	Iwerne Minster Parish Council		4394		Yes		The endorsed Iwerne Minster VDS recommended that the village Conservation boundary should conform with the settlement boundary. The Parish Council is concerned that this has not happened and with the removal of the settlement boundary this cannot be achieved. The Council requests that action be taken before the settlement boundary is removed.	
2783	Gill Smith	Dorset County Council		4173	IDP	Yes		Note and updates for the IDP from DCC	<p>Infrastructure Delivery Plan. A general reference number to the rows would assist.</p> <p>4.2 There is a need to distinguish between deficiency in infrastructure and additional needs as a consequence of development.</p> <p>Waitrose junction (Gillingham)– should delete or make not a Dorset County Council scheme.</p> <p>Lodden Bridge footpath (Gillingham) – was NDDC lead not Dorset County Council, but could be deleted as now complete.</p> <p>Town centre landscaping Shaftesbury – contribution is more than the value of the scheme.</p> <p>Arch Bishop Wake (Blandford) – cost and secured £168 000.</p>

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2792	David Beaton	Gillingham Neighbourhood Plan Group		4393		Yes		<p>the Gillingham Neighbourhood Plan Group would like to record its thanks to the Planning Policy Officers of North Dorset District Council for:</p> <ul style="list-style-type: none"> <li>• making the Plan available for consultation at drop-in exhibitions in the four main towns of North Dorset, including an exhibition at the RiversMeet Centre in Gillingham on 9th December 2013;</li> <li>• the hard work that has been put in by North Dorset District Council Planning Policy Officers in the creation of the Local Plan and the careful thought that has been given to the planning needs of the communities of North Dorset;</li> <li>• the structure and layout of the Local Plan, which is clearly expressed and straightforward in its presentation; and</li> <li>• the support that has been given (and is continuing to be given) to the Gillingham Neighbourhood Plan Group in helping it to construct a Neighbourhood Plan for Gillingham.</li> </ul> <p>The Gillingham Neighbourhood Plan Group believes that the Local Plan reflects the aspirations of the community of Gillingham</p>	
2961	David Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	4380				Not legally compliant	
2963	Rachel Caldwell	Shaftesbury Civic Society		4395		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The Shaftesbury Civic Society resolved at a meeting of the committee on 22 January 2014 to support the detailed response prepared by Shaftesbury Town Council Neighbourhood Plan Working Group and in line with the consultation recommendations will not submit a separate comment.	
3023	Sarah Elliot	Homes & Communities Agency		4106		Yes		Comment received: "Thank you for consulting with us but the HCA have no comments at this point."	
3047	Jill Durham			4030				No response	No response
3059	James Sorrentino	Lightwood Strategic Ltd		4154				Legally compliant	

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3059	James Sorrentino	Lightwood Strategic Ltd		4157		No	It is not consistent with national policy	The plan fails to comply with national policy (NPPF). In particular paragraphs 14, 17, 47, 55, 151, 153, 157, 158/9.	
3064	John Lewer	Shaftesbury Town Council		4256		No	It has not been positively prepared		
3064	John Lewer	Shaftesbury Town Council		4264		No	It is not effective	The plan is not based on effective joint working on cross boundary strategic priorities as there has been no co-operation with Wiltshire.	
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4289		No	It is not justified	The present plan does not deviate from the previous Local Plan's restrictive policies. It would appear that this overall approach will hamper rather than enable development, and in some cases inhibit development.	
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4364				General comments - Having reviewed the plan in detail, there appears to be a degree of repetition between different sections of the plan, and many of the policies and supporting text are unnecessarily wordy. We would encourage the Council to consider revisions to the plan to remove repetition and unnecessary content in order to make it a more concise and user friendly document.	
3092	Frank Heels			4647				To make the Plan more comprehensive more of the abbreviations used should be included in the glossary	
3092	Frank Heels			4643		No	It is not justified	A general lack of evidence that the views of local communities have been and will be considered and taken into account.	

# Pre-submission Document - Analysis of Responses and identification of Main Issues

## Introduction

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
113	Sue Green	National Home Builders Federation		4587	1.30	No	It is not effective	<p>At examination of Development Plan Documents, Local Planning Authorities will have to provide evidence that they have complied with the Duty to Cooperate if their plans are not to be rejected by an examiner.</p> <p>The up-dated SHMA report for the Bournemouth &amp; Poole HMA identified that the northern part of North Dorset District including the towns of Gillingham, Shaftesbury, Sturminster Newton and Stalbridge look towards Yeovil and Salisbury whilst the southern part of the District including Blandford lies within the periphery of the Bournemouth &amp; Poole HMA. These important functional linkages should be considered when formulating housing and development policies.</p> <p>The Council must co-operate with all its neighbouring authorities to ensure that all housing needs are addressed. Since the revocation of the RSS for the South West on 20th May 2013, the overall proposed housing provision across the region is estimated to have fallen by more than 18%. Such a substantial reduction in housing provision across the region could have significant implications for future housing provision in North Dorset. It is important that the Council does not assume that just because its neighbouring authorities have not drawn attention to any matters of a strategic nature, such strategic pressures do not exist. If neighbouring authorities are not adequately assessing housing needs and addressing strategic matters, these pressures could impinge upon North Dorset.</p> <p>There has been much uncertainty about the soundness of the Local Plans for South Somerset, Wiltshire and West Dorset and Weymouth, much of which postdates the Memorandums of Understanding with other Dorset authorities and South Somerset District Council and the Statement of Common Ground with Wiltshire. The uncertainties in all these neighbouring areas may have implications for housing provision in North Dorset.</p>		<p>The important functional linkages with other HMAs should be considered when formulating housing and development policies and the Council must co-operate with all its neighbouring authorities to ensure that all housing needs are addressed. Many unresolved issues exist in neighbouring authorities, which may have significant implications on North Dorset. Whilst these issues remain unresolved the Duty to Co-operate has not been satisfied and therefore the plan is unsound.</p>

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								<p>The Inspector of the adopted Purbeck Local Plan stated that the adopted plan was only an appropriate basis for the short term and a partial review was urgently required to commence in 2013. The Inspector’s over-riding view was that the District could accommodate a higher level of housing growth accompanied by appropriate mitigation measures to meet more fully its needs in the medium to long term of 170, rather than 120, dwellings per annum. This additional growth will need to be accommodated within the Purbeck District Council area, if possible. If not as a neighbouring authority North Dorset may be asked to assist in meeting this unmet housing need. East Dorset District Council has prepared a joint Core Strategy with Christchurch District Council. The Examination Hearing sessions were held in September 2013. Although the Councils have consulted on proposed main modifications (ended on 22nd January 2014), the Inspector’s Final Report has not yet been received. In conclusion, the Duty to Co-operate comprises of two distinctive parts, which are irrevocably linked. Firstly legal compliance associated with the process and procedures of co-operation. Secondly the outcomes from such co-operation associated with the NPPF tests of soundness. Many unresolved issues exist in neighbouring authorities, which may have significant implications on North Dorset. Whilst these issues remain unresolved the Duty to Co-operate has not been satisfied in the preparation of the North Dorset Local Plan and therefore the plan is unsound.</p>		
113	Sue Green	National Home Builders Federation		4589	1.9	No	It is not consistent with national policy	<p>The plan period proposed is 2011 - 2026, which if the plan is adopted in 2014 would leave only twelve remaining years. The NPPF in Paragraph 157 advises that plans should preferably run for a period of fifteen years from the date of adoption. Moreover the time periods covered by supporting evidence is of differing and varying lengths, which is confusing and makes comparison of relevant figures difficult. Last year following the suspension of the Examination of the West Northamptonshire Joint Core Strategy, the Joint Planning Unit was requested by the Inspector to extend its plan period beyond 2026. The current Main Modifications consultation proposes to extend the plan period from 2026 to 2029.</p>	The Council should consider extending the proposed plan period to at least 2029 or even longer and increase its housing requirement on a pro-rata basis.	The plan period should be extended to at least 2029 and the housing requirement should be increased on a pro-rata basis.



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								North Dorset District Council provides no reasoned justification for its shortened plan period. Therefore the Council should consider extending the proposed plan period to at least 2029 or even longer and increase its housing requirement on a pro-rata basis.		
113	Sue Green	National Home Builders Federation		4590	1.7	No	It is not consistent with national policy	There is a concern that deferring site allocations and the revision of existing settlement boundaries around the four main towns until a later Local Plan Part 2 document creates uncertainty for both local communities and the development industry. The NPPF does not envisage a two part plan approach. In Examinations, Inspectors have raised concerns about such an approach, for example, the Central Lincolnshire Joint Local Plan, which was withdrawn from examination in December 2013.		The allocation of sites and the revision of existing settlement boundaries should not be deferred until the Local Plan Part 2 as this will create uncertainty.
1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4281	1.11	No	It has not been positively prepared, It is not effective, It is not consistent with national policy	Paragraph 1.11 outlines the strategic approach to development. Whilst the strategic approach to development of the District’s four main towns is supported, an objection is made to the reliance on a single area of development in North Dorset being the Gillingham Southern Extension. This is the largest single allocation and there is no contingency if the site does not deliver as anticipated.	Changes should be made so that additional sites are allocated in the Plan which are consistent with the strategy and will assist in meeting housing needs and provide flexibility and choice in accordance with the NPPF.	The plan should not place so much reliance on the Gillingham Southern Extension to meet North Dorset’s development needs. Additional sites should be allocated to provide flexibility and choice.
1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4285	1.9	No	It has not been positively prepared, It is not consistent with national policy	Para 1.9 What Period Does the Local Plan cover? The Plan Period for the new North Dorset Local Plan is from 2011 – 2026. The NPPF states at para 157 that Local Plans should be “...drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date.” By having such a short plan period (it is already 2014, so only leaving 12 years if the plan was adopted this year), the plan does not look to the longer term and take account of the longer term requirements. It is considered that the plan period should be extended to 2031. On the basis of the Council’s own housing figures – the housing provision should be increased to 5,600 dwellings for the period 2011 – 2031 i.e. at 280 per annum.	The Plan period should be extended so that provision is made for the period to 2011 – 2031 and using the Council’s proposed housing requirement this would be 5,600 dwellings. Changes need to be made to Policy 6 Housing Distribution.	The plan period should be extended to 2031

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1596	Malcolm Brown	Sibbett Gregory	Mrs Linley Abbott	4379	1.9	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The Plan period of 15 years means that the effective plan period (if the Plan is adopted in 2015) is only 11 years. Paragraph 47 of the NPPF states that LPAs should 'identify a supply of specific, deliverable sites, or broad locations for growth for years 6-10 and were possible for years 11-15'. Paragraph 157 states that Plans should be 'drawn up over an appropriate timescale, preferably a 15 year tie horizon, take account of longer term requirements, and be kept up to date.' Local Plans elsewhere are being drawn up to 2031 and the Inspector looking at the West Dorset Weymouth and Portland Local Plan has raised this as an issue.	Amend Paragraph 9 to provide a time horizon in excess of 15 years (e.g. 2031).	The plan period should be extended to 2031
2528	Colin Hampton	Milborne St Andrew Parish Council		4062	1.14-1.22			1.14 - 1.22 Neighbourhood Planning in North Dorset. Milborne St Andrew is currently exploring the viability of providing a Neighbourhood Plan for this parish. The area has been agreed as the whole parish boundary. Neighbourhood Development Orders – it is unclear at this part of the document what the impacts of these orders are. 1.30 Common interest with other authorities must include and seen to include the Parish Councils many of whom believe that their views are not taken into consideration for planning.		There is no reference to the intention of Milborne St Andrew Parish Council to produce a neighbourhood plan. There is a lack of clarity about neighbourhood development orders. The section relating to the Duty to Co-operate does not make reference to parish councils.
2783	Gill Smith	Dorset County Council		4164	1.30 Duty to Co-operate Statement			Notwithstanding the good and continuing record of joint working, emerging plans within the Dorset LEP area currently run the risk of failing to plan effectively for matters of a strategic nature and, in turn, to deliver sustainable development in accordance with the NPPF. While the joint work undertaken to date contributes to a robust evidence base, there is no framework that examines the consistency of the assumptions in those studies, the relationships between the various findings (for example, housing and employment land requirements) and that links them across broader geographical areas. Without the certainty that the various cross-boundary issues set out in the NPPF have been considered strategically, the local planning authorities could be open to challenge. Dorset County Council's ability to provide infrastructure and other services for which it is responsible could be undermined as a consequence of this.	That assurance is given that North Dorset District Council will work with neighbouring authorities across the Local Enterprise Partnership area and other relevant agencies to produce effective policies on strategic cross boundary matters.	Emerging plans in the Dorset LEP area risk the risk of failing to plan effectively for matters of a strategic nature. This could undermine Dorset County Council's ability to provide infrastructure and other services.

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2783	Gill Smith	Dorset County Council		4165	1.30 Duty to Co-operate Statement			In their Duty to Co-operate Statement North Dorset state that a Draft Memorandum of Understanding (MoU) with all Dorset authorities has been approved by their Council. This is welcomed. However the version appended to the Duty to Co-operate Statement varies to that which was agreed by Dorset County Council’s Cabinet in September 2012. The differences tend to weaken the intent by giving a commitment to only “assess” rather than “agree” the overall quality, mix and broad distribution and apportionment of development within the area, and, if development needs cannot be met in one local authority area, to “consider whether” rather than “ensure that” the authorities can plan to meet them in another. Advice in new draft national guidance emphasises the need for local planning authorities to resolve strategic issues and supports the version of the MoU agreed by the County Council. Thus it encourages the joint production of ‘effective policies on strategic cross boundary matters’. This confirms that rather than simply “assessing” the overall quality, mix and broad distribution of development in the area, Local Planning Authorities should be agreeing between themselves how best to tackle issues arising from the evidence and producing effective strategic policy on cross boundary issues. The new guidance also gives advice on situations such as that in Dorset, where Local Plans are being taken forward in different time frames.	In view of the different time frames over which the Dorset authorities are working up their plans North Dorset should also give assurance that it is willing to enter into a formal agreement signed by its elected members, demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters.	North Dorset should give a long term commitment to the production of a jointly agreed strategy on cross boundary matters.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4467	1.3-1.5, 1.14-1.22, 1.35, 1.37	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The following changes are proposed to add clarity and focus to the introductory chapter of the plan.	<ul style="list-style-type: none"> <li>· Paragraphs 1.3 – 1.5 should be included in the glossary instead of the main text.</li> <li>· Paragraphs 1.14 – 1.22 add little to the plan and should be included in the background papers or as a separate advice note on neighbourhood planning</li> <li>· Clarify the requirements for neighbourhood plans by deleting the words ‘be prepared to’ from paragraph 1.15.</li> <li>· If it is unclear within the</li> </ul>	A number of deletions and minor wording changes, mainly relating to local plans, neighbourhood planning and the use of the NPPF to decision-making, are proposed to add clarity and focus to the introduction.

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									<p>policy whether all criteria of that policy are met, it does not provide a clear indication of how a decision maker should react and does not provide certainty in the planning system. Therefore we recommend deleting from paragraph 1.35 the sentence: ‘Many of the policies are criteria based ... from the wording that there are alternatives’.</p> <p>· The weight to be given to emerging policy is set out at para 216 of the NPPF and ‘whether or not the issue is contentious’ is not a test of para 216. Therefore we recommend deleting from paragraph 1.37 the sentence: ‘The weight given ... with policies in the NPPF’</p>	
2989	Sarah Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	4544	1.9	No	<p>It has not been positively prepared, It is not consistent with national policy</p>	<p>The Plan Period for the new North Dorset Local Plan is from 2011 – 2026. The NPPF states at para 157 that Local Plans should be “...drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date.”</p> <p>By having such a short plan period (it is already 2014, so only leaving 12 years if the plan was adopted this year), the plan does not look to the longer term and take account of the longer term requirements. It is considered that the plan period should be extended to 2031. On the basis of the Council’s own housing figures – the housing provision should be increased to 5,600 dwellings for the period 2011 – 2031 i.e. at 280 per annum.</p>	<p>The Plan period should be extended so that provision is made for the period 2011 – 2031 and using the Council’s proposed housing requirement this would be 5,600 dwellings. Changes also need to be made to Policy 6 Housing Distribution.</p>	<p>The plan period should be extended to 2031 and the housing requirement should be increased on a pro-rata basis to 5,600 dwellings</p>

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2989	Sarah Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	4545	1.7	No	It is not justified, It is not effective, It is not consistent with national policy	It is noted that the Council remain intent to produce more than one document which will comprise the Local Plan i.e. Part 1 which addresses the overall housing provision and strategy and Part 2 which is in effect a Site Allocations DPD which will be a subsequent document which will allocate specific sites for housing and employment growth in the main towns and will included a review of the land allocations and settlement boundaries. There does not appear to be any justification for this approach. An objection is made to this approach and considers that the emphasis in the NPPF is that each local planning authority should produce a Local Plan for its area (paragraph 153 of the NPPF) which can be reviewed in whole or in part to respond to changing circumstances. Any additional development plan documents should only be prepared where clearly justified. It is therefore clear from the NPPF that the emphasis is on one single Local Plan document and the use of any other documents only when justified.	In order for the Plan to be sound, a justification for the preparation of the Plan in two Parts should be included in the Introduction. Whilst the Local Plan Part 1 provides a framework of development management policies relevant to the rural areas there remains a degree of uncertainty. Para 157 of the NPPF states that there is a need to provide certainty and clarity on the scale, form and quantum of development to meet housing needs in the plan period.	There is no justification for producing a Local Plan Part 1 and Part 2. The Local Plan Part 1 needs to provide more clarity and certainty about the rural areas
3031	Andrew Roberts	Highways Agency		4141	1.17				Suggest amendment to para 1.17. Mention is made of five designated neighbourhood area within the District, but only four appear to be named.	The list of designated neighbourhood areas seem to be incomplete

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3055	Roger Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	4077	1.11-1.37	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Challenge soundness on the following grounds:</p> <ul style="list-style-type: none"> <li>• The plan has not been positively prepared as it fails to meet objectively assessed needs for housing in the District overall or in specific settlements including Stalbridge;</li> <li>• The plan is not adequately justified because of shortcomings in the Strategic Housing Market Assessment and in the settlement strategy;</li> <li>• The effectiveness of the Plan is undermined by its relatively short timescale (to 2026) which means that it will not have a 15-year time horizon at adoption); its settlement strategy, which places significant settlements such as Stalbridge within the countryside where various restrictive development management policies apply, with no settlement boundaries; and its reliance on neighbourhood plans and local communities to ‘sign up’ to provide new housing development through Part 2 of the Local Plan (a site allocations document);</li> <li>• The plan does not comply with national policy (the NPPF) because of these shortcomings. In particular, it fails to comply with the following paragraphs of the NPPF:               <ul style="list-style-type: none"> <li>- 14: seeking opportunities to meet the objectively assessed development needs of the area with sufficient flexibility to adapt to rapid change;</li> <li>- 17: supporting thriving rural communities;</li> <li>- 47: boosting significantly the supply of housing and ensuring that the Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, consistent with other policies;</li> <li>- 55: promoting sustainable development in rural areas, with housing located to enhance or maintain the vitality of rural communities:</li> <li>- 151 consistency of Local Plans with the objective of contributing to sustainable development and other policies of the Framework;</li> <li>- 153 relying on additional development plan documents only where clearly justified;</li> <li>- 157 drawing up plans for an appropriate timescale, preferably a 15-year time horizon, and taking account of longer term requirements; and</li> <li>- 158/9 having an adequate, up-to-date and relevant evidence base, including a Strategic Housing Market Assessment that assesses the full housing needs of the area.</li> </ul> </li> </ul>	<p>To make the plan sound, the following modifications are proposed:</p> <ul style="list-style-type: none"> <li>• Modifications to Policy 2 to include Stalbridge as a fifth ‘main town’ and one of the District’s service centres; to delete Stalbridge from references that include it with the District’s villages and countryside in policy terms; and to include a commitment to define a revised settlement boundary in Part 2 of the Local Plan.</li> <li>• Modifications to Policy 6 to include Stalbridge with an allocation for about 240 homes.</li> <li>• Modifications to Policy 20 to exclude Stalbridge from the countryside and to include reference to a defined settlement boundary for Stalbridge.</li> <li>• A new policy and inset diagram for Stalbridge, as outlined in paragraph 18 above; similar in form to Policies 16 to 19 including policy commitments to define a revised settlement boundary in Part 2 of the Local Plan and to review the Conservation Area boundary (under Section 69(2) of the Planning (Listed Building and</li> </ul>	<p>The plan fails to meet objectively assessed housing needs and the settlement strategy undermines its effectiveness. These shortcomings could be overcome by modifying a number of policies to allow development at Stalbridge, including the allocation of 240 homes. The plan period should be extended to 2031</p>

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									<p>Conservation Areas) Act 1990).</p> <ul style="list-style-type: none"> <li>• Consequential modifications to Policies 2, 6, 9, 20 and other text in the Plan to add references to Stalbridge as a settlement with a defined boundary and to delete references that associate Stalbridge in policy terms with the District’s villages and countryside.</li> <li>• Overall housing requirements should be re-assessed with the aim of improving access to housing and affordability.</li> <li>• The plan period should be extended to 2031.</li> </ul>	
3059	James Sorrentino	Lightwood Strategic Ltd		4156		No	It is not effective	The effectiveness of the plan is undermined by its relatively short timescale (to 2026 which means that it will not have a 15-year time horizon at adoption) as suggested in NPPF para 157		The plan period should be extended
3059	James Sorrentino	Lightwood Strategic Ltd		4159		No	It is not consistent with national policy	A longer time horizon is necessary to give a more strategic perspective for development proposals and infrastructure requirements. The SHMA, updated in 2012, looked ahead to 2031. It is not clear why the local plans only looks forward to 2026 when NPPF para 157 calls for local plans to drawn up over an appropriate timescale, preferably a 15-year time horizon.	The plan period should be extended to 2031	The plan period should be extended to 2031

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3074	Craig Barnes	Gladman Developments		4397		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	NPPF Para 157 states that plans should be produced preferably to a 15 year time horizon. If the Local Plan is adopted on target (later this year) just over 11 years of the plan period will remain. Also by extending the plan period to 2031 would enable the plan to align with the household and employment projections.	Extend the plan period to 2031. The plan period has been raised by inspectors at examinations in East Devon and South Staffordshire.	The plan period should be extended to 2031



Pre-submission Document - Analysis of Responses and identification of Main Issues

North Dorset Context

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4320	2.12	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>The plan states that the northern part of the district (including the main towns of Gillingham, Shaftesbury and Sturminster Newton) tends to look towards the Yeovil and Salisbury functional housing markets, whilst the south of the district tends to look towards the Bournemouth and Poole functional housing market. The Background Paper Meeting Housing Needs at para 3.18 states that, “the evidence shows that in terms of how housing markets function, North Dorset forms part of: Bournemouth and Poole HMA; the Salisbury HMA; and the South Somerset – West Dorset HMA.” However, for the purposes of the ‘emerging’ RSS, HMAs were defined along administrative boundaries and for planning purposes, North Dorset is defined as falling entirely within the Bournemouth and Poole HMA. The main evidence base studies for North Dorset have therefore been produced to reflect the basis of the HMA.</p> <p>Para 2.12 of the North Dorset Pre- Submission Plan states that the recent SHMA update recognises that the northern part of the District has only a limited functional relationship with the South East Dorset conurbation. The Bournemouth and Poole SHMA was produced in 2007 with an update in 2011 and published in January 2012. This SHMA is the same vintage as the Dorchester/Weymouth Housing Market Area and prepared by the same consultants. The Inspector for the West Dorset, Weymouth and Portland Local Plan Examination has raised this as an issue in his preliminary notes of concern – 10th December 2013. He has noted that despite work to update the original Strategic Housing Market Assessment (SHMA) it is essentially out of date.</p> <p>The NPPF para 158 requires each local planning authority</p>	Consideration should be given to providing an updated SHMA in so far as it relates to the northern part of the district and its neighbouring local planning authorities, having regard to the duty to co-operate.	Concern that the SHMA is out of date and does not take into account fully the northern northern part of the district and its neighbouring local planning authorities, having regard to the duty to co-operate

								<p>to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.</p> <p>Given the above it raises two questions, firstly whether the SHMA is up-to-date and takes full account of relevant market and economic signals and secondly whether the SHMA covers the most appropriate area given the northern part of the district relates to settlements in South Somerset and Wiltshire. This raises the question, whether the SHMA reflects the most appropriate area in terms of assessing housing needs in relation to the wider strategy, and whether a revised SHMA should have been considered in the preparation of the Plan. The robustness in terms of the extent and relevance of the SHMA must therefore be questioned and whether any consideration was given to the northern part of the district being considered in a new SHMA which took into account the neighbouring areas of Yeovil and Salisbury prepared under the duty to co-operate.</p>		
3031	Andrew Roberts	Highways Agency		4142	2.18				<p>Suggests that in para 2.18 that sections of the A31, A35 and A303 are referred to as trunk roads maintained by the Highways Agency. And that in Figures 2.1 and 3.1 the diagrams differentiate between trunk roads and other A roads.</p>	<p>Highway Agency suggest that reference is made and diagrams amended to recognise that the A31, A35 and A303 are trunk roads</p>

Pre-submission Document - Analysis of Responses and identification of Main Issues

Vision for North Dorset

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
1323	Margaret Cluett			4024		No	It is not justified	Too many new houses proposed, inadequate infrastructure.	No response.	Too many new houses proposed, inadequate infrastructure.
1578	Sarah Hamilton-Foy	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4319	2.45 to 2.47	No	It has not been positively prepared, It is not consistent with national policy	It is noted that the vision states that in 15 years’ time North Dorset will have more housing, and in particular more affordable housing, that better meets the diverse needs of the District, and have a more robust and prosperous economy. The AMR 2013 ref para 2.5 states the North Dorset faces a challenge to provide enough affordable housing for local people. There is real disparity between what local people earn and the cost of buying a house in the district. This is reflected in the high house price income ratio in 2012 of 9.93 in the District. The plan does not make sufficient housing provision to address the significant issue of affordable housing. The lack of affordable housing will undermine the objectives of the plan, in particular the economic objectives.	It is considered that an increase in the number of dwellings is required in order to meet housing needs (more market housing will enable more affordable housing to be delivered) and therefore support the local economy and address the growing generational imbalance in the district. The current housing numbers set out in the Plan do not meet the NPPF’s requirements at para 47 to boost significantly the supply of housing.	The plan does not make sufficient housing provision to address the significant issue of affordable housing. The lack of affordable housing will undermine the objectives of the plan, in particular the economic objectives.
2989	Sarah Hamilton-Foy	Pegasus Planning Group	Messrs Drake	4546	2.45 to 2.47	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	It is noted that the vision states that in 15 years’ time North Dorset will have more housing, and in particular more affordable housing, that better meets the diverse needs of the District, and have a more robust and prosperous economy. The AMR 2013 ref para 2.5 states the North Dorset faces a challenge to provide enough affordable housing for local people. There is real disparity between what local people earn and the cost of buying a house in the district. This is reflected in the high house price income ratio in 2012 of 9.93 in the District. The plan does not make sufficient housing provision to address the significant issue of affordable housing. The lack of affordable housing will undermine the objectives of the plan, in particular the economic objectives.	It is considered that an increase in the number of dwellings is required in order to meet housing needs (more market housing will enable more affordable housing to be delivered) and therefore support the local economy and address the growing generational imbalance in the district. The current housing numbers set out in the Plan do not meet the NPPF’s requirements at para 47 to boost significantly the supply of housing.	The plan does not make sufficient housing provision to address the significant issue of affordable housing. The lack of affordable housing will undermine the objectives of the plan, in particular the economic objectives.

Pre-submission Document - Analysis of Responses and identification of Main Issues

Objectives for the Local Plan Part 1

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
388	Tom Munro	Dorset AONB Partnership		4043	2.50	Yes		Suggests that para 2.50 be reworded to 'Ensuring that North Dorset's landscape, wildlife and cultural heritage are protected and well managed'.		
1578	Sarah Hamilton-Foy	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4288	2.51	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Persimmon notes Objective 3 and also the Council's three year economic development strategy which aims to stimulate the economy, create economic growth and jobs, and attract resources and investment in the area. It is noted that the Council's role is to help create an environment in which business can thrive. However, businesses need people of working age, and with an ageing population ( the district profile varies from the national profile with a larger proportion in older age bands) if current trends continue this will lead to the number of key working age bands declining, which will potentially generate a labour shortage in the long term and may act as a barrier to economic growth and therefore undermine the objectives of the Local Plan and also the Sustainable Community Strategy and the Economic Strategy. In addition the District has one of the highest house price income ratios in the country, and consequently unless sufficient provision is made to meet housing needs this will also undermine the objectives of the Plan.	The plan period should be extended to 2031 and the overall housing provision increased commensurate with the proposed strategy.	The plan does not make sufficient housing provision to meet economic objectives. Increase housing provision and extend the plan period to 2031.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4310	2.51	No	It has not been positively prepared, It is not consistent with national policy	<p>Whilst Objective 5 to deliver more housing, including more affordable housing that better meets the diverse needs of the district is, in principle supported; it is considered that this figure should be increased along with the plan period.</p> <p>It is noted that the housing completions in the adopted Local Plan covering the period 1994 – 2011 exceeded the housing requirement ( the housing requirement was 5,900 dwellings i.e. 393 per annum, the actual completions were 6,705 dwellings i.e. an oversupply of 808 dwellings as stated in the AMR 2011. It should also be noted that the completions for 2011/2012 were 375 dwellings.</p> <p>Given that the plan now proposes an annual figure of only 280 dwellings it is not clear how Objective 5 of the plan is going to be achieved and furthermore it is considered that the housing provision is not consistent with the NPPF para 47 which states that Local Planning Authorities should significantly boost the supply of housing and take account of market signals and land prices and affordability.</p> <p>An objection is therefore made to the overall housing requirement for North Dorset.</p>	Changes should be made so that additional sites are allocated in the Plan which are consistent with the strategy and will assist in meeting housing needs and provide flexibility and choice in accordance with the NPPF. Persimmon Homes consider that Land at Windyridge Farm, Gillingham should be allocated in order to meet housing needs and provide a greater choice and flexibility in accordance with the NPPF.	The plan does not make sufficient housing provision to meet economic objectives and is not consistent with the NPPF para 47. Increase housing provision with the inclusion of Windyridge Farm, Gillingham and extend the plan period to 2031.
2528	Colin Hampton	Milborne St Andrew Parish Council		4063	2.49, 2.52, 2.54			<p>2.49 add do not harm the/or industrialise the environment and countryside.</p> <p>2.52 Objective 4. The wording is appears to be weak and could be stronger by dropping the word 'general' before policy. The removal would make it less ambiguous; as written could open the countryside to much larger scale development proposals. The word general can be a little misleading and imply a willingness to accept these larger proposals in the absence of a Neighbourhood Plan.</p> <p>2.54 There is a mismatch of aims, public transport is under considerable strain with the removal of services, the aims of the district and county council to impose higher car parking charges within the Market Towns, making it increasingly difficult to see that this Objective 6 is fair for the rural community.</p>		Objectives are weakly worded

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
2989	Sarah Hamilton-Foy	Pegasus Planning Group	Messrs Drake	4549	2.53	No	It has not been positively prepared, It is not consistent with national policy	<p>Whilst Objective 5 to deliver more housing, including more affordable housing that better meets the diverse needs of the district is, in principle supported; it is considered that this figure should be increased along with the plan period.</p> <p>It is noted that the housing completions in the adopted Local Plan covering the period 1994 – 2011 exceeded the housing requirement (the housing requirement was 5,900 dwellings i.e. 393 per annum, the actual completions were 6,705 dwellings i.e. an oversupply of 808 dwellings as stated in the AMR 2011. It should also be noted that the completions for 2011/2012 were 375 dwellings. In effect the proposed housing provision is a reduction of approximately 20% on what has been achieved. It is noted that the Plan states in para 3.40 that careful management of development of the countryside is required as in recent years past housing development in the rural areas has significantly exceeded planned rates yet did not always enable rural facilities to be retained or enhanced. "The Council does not want to see this unsustainable spatial distribution of development repeated."</p> <p>However, it is considered that a "blanket approach" of strictly controlling development is not consistent with the NPPF. As well as concentrating strategic development at the four main towns, the plan also needs to ensure that the provision is made or that the plan facilitates development in those larger villages with a level of facilities and services i.e. as in the adopted Local Plan. These villages in a largely rural district have a distinct role in terms of meeting local needs.</p> <p>Given that the plan now proposes an annual figure of only 280 dwellings it is not clear how Objective 5 of the plan is going to be achieved. Furthermore, it is considered that the housing provision is not consistent with the NPPF para 47 which states that Local Planning Authorities should significantly boost the supply of housing and take account of market signals and land prices and affordability.</p> <p>An objection is therefore made to the overall housing requirement for North Dorset.</p>	Changes should be made so that the Plan provides the framework for development of sites in the larger villages which have a range of facilities and services i.e. those sustainable settlements in addition to the four main towns. Paragraph 55 of the NPPF states that local planning authorities should promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.	The scale of proposed housing growth is not sufficient to meet the identified housing needs and the diverse needs of the District will not be met. The plan does not provide a positive framework for development in the larger more sustainable settlements that have a range of facilities and services. It is not consistent with the NPPF para 47.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
2989	Sarah Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	4556	2.52	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Whilst it is acknowledged that in order to achieve sustainable development the majority of housing growth will take place in the more sustainable settlements, the plan also needs to ensure that the provision is made or that the plan facilitates development in those larger villages with a level of facilities and services i.e. as in the adopted Local Plan. These villages in a largely rural district have a distinct role in terms of meeting local needs. Therefore, the Local Plan needs to provide the framework for this development to take place.</p> <p>An objection is made to Objective 4 which states that a general policy of restraint outside the District's four main towns will be adopted, whilst enabling essential rural needs to be met. This appears to go beyond the guidance in the NPPF which states in para 55 that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.</p> <p>The Local Plan strategy whilst meeting the majority of the strategic needs for growth at the four main towns (which is consistent with the NPPF), should also provide the framework for the development of sites in the larger villages which have a range of facilities and services i.e. those sustainable settlements in addition to the four main towns.</p> <p>The second bullet point of Objective 4 would appear to be in conflict with the first, as the first applies a policy of restraint to the villages, whilst the second would appear to facilitate development meeting local needs.</p> <p>Whilst the context for individual rural communities to plan to meet their own local needs through neighbourhood plans is consistent with the NPPF, and reflects the results of the Council's consultation with the Town and Parish Councils in late 2011 and early 2012 for a "light touch" strategic approach in the revised Core Strategy and some interest in the preparation of Neighbourhood Plans; just over 52% of the number of parishes expressed an interest but it is not clear how the Neighbourhood Plans will be resourced/funded. There is a legal duty on local planning authorities to provide advice and assistance; this does not extend to financial assistance. Funding is available nationally from the Government.</p> <p>To date there are 4 designations for Neighbourhood</p>	Amend Objective four by deleting the first bullet point and replacing it with alternative wording. After the preamble, which reads "The objective is to enable a network of sustainable smaller rural communities where local services and employment opportunities enable day-to-day needs to be met locally by:" delete the first bullet "adopting a general policy of restraint outside the District's four main towns, whilst also enabling essential rural needs to be met;" and replace with " housing should be located where it will enhance or maintain the vitality of rural communities". Retain the following three bullet points.	The plan does not provide a positive framework for development in the larger more sustainable settlements that have a range of facilities and services.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								Plans and 2 applications for Neighbourhood Plans. Our clients consider that this light touch can still be applied if the Local Plan provides the overall framework; this approach is being adopted in other local authorities in the South West. The key issue for the rural areas is that the Local Plan should facilitate development in sustainable settlements by providing the policy framework; it is considered that this can be included in the Local Plan and still provide the flexibility for those Parishes which then want to prepare a Neighbourhood Plan.		
3031	Andrew Roberts	Highways Agency		4143	2.51, 2.53	Yes		The Highways Agency supports the vision and objectives, particularly the mention of making the four market towns the focus for housing (Objectives 3 and 5) and provision of sufficient employment land (Objective 3)		
3055	Roger Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	4081	2.53	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Objective 5 (Meeting the District’s Housing Needs) aims ‘to deliver more housing, including more affordable housing that better meets the needs of the District...’ with the ‘vast majority of needs’ met in the District’s four main towns and provision elsewhere focused on meeting local housing needs. This objective does not commit the Council ‘to boost significantly the supply of housing’ (and) ‘to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area’, which is the requirement of national policy (NPPF paragraph 47).	To make the plan sound, the following modifications are proposed: • Modifications to Policy 2 to include Stalbridge as a fifth ‘main town’ and one of the District’s service centres; to delete Stalbridge from references that include it with the District’s villages and countryside in policy terms; and to include a commitment to define a revised settlement boundary in Part 2 of the Local Plan. • Modifications to Policy 6 to include Stalbridge with an allocation for about 240 homes. • Modifications to Policy 20 to exclude Stalbridge from the countryside and to include reference to a defined settlement boundary for Stalbridge. • A new policy and inset diagram for Stalbridge, as outlined in paragraph 18	The scale of proposed housing growth is not sufficient to meet the identified housing needs and the diverse needs of the District will not be met. It is not consistent with the NPPF para 47. Stalbridge should be included as a ‘fifth’ town with proposed housing growth and the plan period should be extended to 2031.



ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
									<p>above; similar in form to Policies 16 to 19 including policy commitments to define a revised settlement boundary in Part 2 of the Local Plan and to review the Conservation Area boundary (under Section 69(2) of the Planning (Listed Building and Conservation Areas) Act 1990).</p> <ul style="list-style-type: none"> <li>• Consequential modifications to Policies 2, 6, 9, 20 and other text in the Plan to add references to Stalbridge as a settlement with a defined boundary and to delete references that associate Stalbridge in policy terms with the District's villages and countryside.</li> <li>• Overall housing requirements should be re-assessed with the aim of improving access to housing and affordability.</li> <li>• The plan period should be extended to 2031.</li> </ul>	
3059	James Sorrentino	Lightwood Strategic Ltd		4158	2.53	No	It is not consistent with national policy	Objective 5 (Meeting the District's Housing Needs) aims 'to deliver more housing, including affordable housing that better meets the needs of the District ...' with the 'vast majority of needs' met in the District's four main towns and provision elsewhere focused on meeting local housing needs. This objective does not commit the Council 'to boost significantly the supply of housing' (and) 'to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area', which is the requirement of the NPPF para 47.		The scale of proposed housing growth is not sufficient to meet the identified housing needs. It is not consistent with the NPPF para 47.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3086	Simon Coles	WYG	David Lohfink	4607	2.49	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 2.49, Objective 1 second bullet-point refers to encouraging renewable energy technologies appropriate to the local area. The considerations are wider and should include viability as well as the particular characteristics of the site and the development proposal.	Amend the second bullet-point to read: "encouraging the use of renewable energy technologies appropriate to the site and scheme in question, where these are appropriate to the local area; and"	

## Pre-submission Document - Analysis of Responses and Identification of Main Issues

### Policy 1 – Presumption in Favour of Sustainable Development

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
113	Sue Green	National Home Builders Federation		4597	3.13	No	It is not effective, It is not consistent with national policy	North Dorset Pre Submission Local Plan is unsound because it has not been viability tested in accordance with Paragraphs 173 and 174 of the NPPF. The Council's viability testing is contained within the report "North Dorset District Council Affordable Housing and Developer Contributions in Dorset Final Report" dated January 2010 by Three Dragons. Unfortunately the Council's viability assessment is somewhat out of date and pre-dates the requirements for whole plan viability testing as set out in the NPPF. There are a number of concerns about assumptions used in this out of date viability assessment such as :- <ul style="list-style-type: none"> <li>· Only £5,000 per plot allowance for Section 106 contributions;</li> <li>· Sales figures based on 2009 data;</li> <li>· Development costs BCIS 2009 data;</li> <li>· Developer return only 15% of market value and 6% on development costs for affordable housing;</li> <li>· Insufficient costs for Lifetime Homes and Code for Sustainable Homes;</li> <li>· Low denominations for professional fees, overheads, interest rates and marketing costs.</li> </ul>	An up to date whole plan viability assessment should be undertaken including testing the following policies contained within the Pre Submission Local Plan :- <ul style="list-style-type: none"> <li>· Policy 3 - Climate Change ;</li> <li>· Policy 7 - Delivering Homes ;</li> <li>· Policy 8 – Affordable Housing ;</li> <li>· Policy 13 – Grey Infrastructure ;</li> <li>· Policy 14 – Social Infrastructure ;</li> <li>· Policy 15 – Green Infrastructure ;</li> <li>· Policy 22 – Renewable &amp; Low Carbon Energy ;</li> <li>· Policy 23 – Parking ;</li> <li>· Policy 24 – Design ;</li> <li>· Policy 25 – Amenity.</li> </ul> During the re-appraisal of viability assessments the Council may have to re-consider and choose between its policy requirements.	An up to date whole plan viability assessment should be undertaken including the testing of a range of policies relating to climate change, housing, infrastructure, design, amenity and parking.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4087		Yes		Policy 1 reflects national policy, but many of the other policies in the plan are not written to positively reflect this overriding principle.		Many other policies in the plan do not reflect the principles in Policy 1
388	Tom Munro	Dorset AONB Partnership		4044	3.7	Yes		Supports third bullet point reference to AONB Management Plans.		
388	Tom Munro	Dorset AONB Partnership		4045		Yes		Supports Policy 1 - AONB Management plans give adequate framework as material considerations to enable refusal of planning permission in cases of		

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								harmful impact where no Local Plan policies relevant.		
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4255	3.4	No	It is not consistent with national policy	The discussion of the NPPF in Paragraph 3.4 onwards inadequately covers footnote 9 to paragraph 14. This means that Policy 1 does not take into account the clear indication in the framework that there should be specific policies for those topic areas indicated in footnote 9		The policy and supporting text do not fully reflect the provisions of footnote 9 to paragraph 14 of the NPPF, which establishes that development should be restricted in accordance with specific policies in the framework.
769	Tim Hoskinson	Savills	Taylor Wimpey	4183	3.4 to 3.32	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	In large measure the supporting text to Policy 1 simply repeats various passages of the NPPF. Not all of the supporting text appears to be necessary and we would encourage the Council to consider replacing it with a short explanatory passage to refer to and quote from the NPPF rather than repeating or re-interpreting it.		The supporting text to Policy 1 should be reduced to a short explanatory passage that refers to and quotes from the NPPF
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4603		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	At the heart of the NPPF’s presumption in favour of sustainable is the need for Local Plans to be flexible. Paragraph 14 sets out that, for plan-making sustainable development means that Local Plans should ‘positively seek opportunities to meet the development needs of the area, and: ‘meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: -any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or -specific policies in this Framework indicate development should be restricted.’ The plan suffers generally from a lack of such flexibility, bringing into question the certainty that can be placed upon the policies by decision makers, applicants and third parties and bringing the soundness of the plan into question. Issues with flexibility arise in part through confusion between		The plan is not sufficiently flexible as many of the policies are unduly prescriptive and not adaptable to change. Also the ‘strategic’ policies of the plan set out in chapters 1 -9 go beyond the ‘aspirational and realistic’ requirement set out at para 154 of the NPPF.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								the roles of different parts of the plan. The 'strategic' policies of the plan set out in chapters 1 -9 (amounting to approximately 230 pages) go beyond the 'aspirational and realistic' requirement set out at para 154 of the NPPF; many of the policies as drafted are unnecessarily prescriptive and are not adaptable to change.		
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4611		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	It is important that Local Plan policies set out clearly what will or will not be permitted and where. The NPPF (paragraph 154) sets out that 'only policies that provide a clear indication of how a decision maker should react to a development proposals should be included within the plan'. There are examples throughout the plan where there is a distinct lack of clarity and precision in the requirements of the policies. In the absence of such clarity, the policies cannot be considered sound. Again, this lack of clarity arises from the unnecessary inclusion of overly prescriptive requirements of matters controlled by other legislation within policies which are intended to be strategic in nature. A consequence of the overly prescriptive requirements of the strategic policies in the draft Local Plan is an excessive repetition within the plan, again resulting in a potential lack of clarity.	The Council should consider rewording several policies in the Plan to make it clear to decision takers, applicants and third parties what is expected from development proposals. Greater flexibility and clarity would be provided if the 'strategic' policies (Policies 1 – 21) were concerned only with the Council's strategic aspirations for the District and avoided excessive prescription. Where relevant and particularly within the Development Management Policies, reference should be made to specific targets and timescales, but should not look to control matters dealt with by other legislation (e.g. the Building Regulations).	The plan is not sufficiently flexible as many of the policies are unduly prescriptive and not adaptable to change. Also the 'strategic' policies of the plan set out in chapters 1 -9 go beyond the 'aspirational and realistic' requirement set out at para 154 of the NPPF. The Council should re-word several policies to address this concern.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4468	3.4-3.32	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	In large measure the supporting text to Policy 1 simply repeats various passages of the National Planning Policy Framework, with little changes in wording. The policy accompanying 7 pages of text is considered unnecessary. Indeed their inclusion could have the effect of diluting rather than clarifying the intentions of the NPPF.	· Remove unnecessary supporting text and replace it with a short explanatory passage cross referring to the NPPF, rather than repeating or re-interpreting it.	The supporting text largely repeats the NPPF and much of it is unnecessary.
3064	John Lewer	Shaftesbury Town Council		4266		No	It is not consistent with national policy	These policies give too much power to the LPA and not enough to parishes/towns/neighbourhoods		

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4290		No	It is not consistent with national policy	The plan would benefit from embracing the National Plan policies and applying these more fully to the Local Plan. Development should be encouraged and not be constrained. A more comprehensive and inclusive approach to 'sustainability' will bring the two approaches more in line.		The policies in the plan should reflect the principles in Policy 1
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4365	3.4-3.32	No	It is not consistent with national policy	Supporting text to Policy 1 - paragraphs 3.4 to 3.32 In large measure the supporting text to Policy 1 simply repeats various passages of the National Planning Policy Framework. Not all of the supporting text would appear to be necessary and we would encourage the Council to consider replacing it with a short explanatory passage to refer to (and quote from) the NPPF, rather than repeating or re-interpreting it.		The supporting text to Policy 1 should be reduced to a short explanatory passage that refers to and quotes from the NPPF

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Policy 2 – Core Spatial Strategy

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
16	Richard Miller	Symonds & Sampson	Fidei Holdings Limited	4239		Yes				
22	P Dance	Paul Dance Limited		4004		No	It is not justified, It is not effective, It is not consistent with national policy	The Core Spatial Strategy is unsound as it leaves Stalbridge and the District's villages in a prolonged vacuum of uncertainty. The approach suggests that some development will be permitted whilst countryside policies would be applied until a Neighbourhood Plan or Local Plan Part 2 (Site Allocations) is produced. This process could take several years and gives no certainty. Planning is about giving certainty and this approach does not do so.	The settlement boundaries around Stalbridge and the villages should be retained until reviewed through Local Plan Part 2 and/or a Neighbourhood Plan	The core spatial strategy will result in uncertainty and restricted growth until communities decide whether to prepare a neighbourhood plan or opt in to Local Plan Part 2. Settlement boundaries should be retained to provide some certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4088		No		Policy 2 is not the most appropriate strategy because it does not allow growth in those villages that are located in the immediate hinterland to the sustainable towns. These villages are also sustainable locations that rely on the range of services in the town.		Villages in the immediate hinterland of the towns are sustainable and should be included in the growth policies.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4132		No	It is not justified	Everything outside of the four main towns should not be defined as countryside. Many people live within 2km of a main town or large village with services or next to other dwellings. These places are not isolated and development should be encouraged within a reasonable distance to meet the overarching aims of the NPPF, not restrained, discouraged or excluded by this policy.		Villages in the immediate hinterland of the towns are sustainable and should be included in the growth policies.

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299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4137		No	It is not justified	Does not consider that there is objective evidence to support the assumed limited growth in all areas of the District outside of settlement boundaries. Policy needs to be more flexible to ensure economic growth and that development is more evenly spread across the District.		Lack of evidence and flexibility in the core spatial strategy.
300	Nicola Phillips	Motcombe Parish Council		4116		No	It is not justified	Concern was raised over: the need to retain the identity of Motcombe village, preventing Shaftesbury and Gillingham from coalescing; the need to ensure that there is no overdevelopment in the village; and ensuring the social sustainability of towns before development takes place so that village schools are not used by the towns as they are needed for village children.		Community identity, the risk of overdevelopment in the towns and the impact on village facilities.
378	Simon Rutter	Proctor Watts Cole Rutter		4344		No	It is not justified, It is not consistent with national policy	Does not consider the plan to be the most appropriate strategy as 48% of the population live outside the existing four main towns yet the vast majority of growth is proposed within them. This is unbalanced. The spatial strategy policy is based on the objective of achieving sustainable development as set out in the NPPF. Yet nowhere is there any evidence produced that living beyond the four main settlements is unsustainable, and that living within the four main settlements is sustainable. It appears the plan assumes that rural living is unsustainable but there is no evidence presented. The strategy condemns the rural areas to a cycle of decline.	Housing should be distributed on the basis of the four or five main towns and their catchments so that each town and its catchment villages negotiate and agree how the distribution of housing is met in the first instance. This would satisfy the requirement to allocate the strategic housing without being overly prescriptive of where it is located.	Villages in the immediate hinterland of the towns are sustainable and should be included in the growth policies.
378	Simon Rutter	Proctor Watts Cole Rutter		4345		No	It has not been positively prepared	The meeting of local needs in respect of the countryside (and its villages) is not defined. At the moment because of the lack of housing and housing choice outside the main towns local needs are being met within the towns fragmenting and diluting rural communities.		Not defining or meeting local needs.
388	Tom Munro	Dorset AONB Partnership		4046	4.21	Yes		Supports - AONB Management Plans and advice from AONB team can help LPA establish 'appropriateness' of schemes.		



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641	Laura Cox	Pro Vision Planning and Design	Charborough Estate	4525		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Objects to Policies 2, 6 and 20, which identify Blandford, Gillingham, Shaftesbury and Sturminster Newton as the main focus for growth and severely limit development in the rural areas. Policies 2, 6 and 20 should seek to meet objectively assessed development and infrastructure requirements in the rural areas, to ensure that the Local Plan is positively prepared. The application of a policy of restraint to the rural areas will prevent the delivery of sustainable development. Policies not justified, as insufficient evidence is provided to demonstrate that housing need in North Dorset is focused on the four main towns. Housing should be planned to meet identified need throughout the District, including within the rural areas. Much of the growth in Gillingham is due to the substantial increase in commuting to London from the town. Therefore it is unlikely that housing development in Gillingham will meet local need or be sustainable. Winterbourne Kingston is a sustainable location with a population of over 800, a village hall, a church, a public house, a bakery and local employment. The settlement contains a primary school and there is a regular bus service to Dorchester and Poole. Market housing would help to improve the sustainability of Winterbourne Kingston, provided development was part of a package of housing, employment and a village shop. The settlement and the adjacent brownfield sites should be inset from the countryside designation.	Amendments to Policies 2, 6 and 20 are required to secure consistency with Paragraphs 54 and 55 of the NPPF which promote sustainable development in rural areas. Paragraph 54 states that Local Planning Authorities should plan housing development to meet local need in rural areas, whilst paragraph 55 recognises that housing should be located where it will enhance or maintain the vitality of rural communities. Paragraph 55 acknowledges that housing development is appropriate in the countryside where it would re-use redundant or disused buildings and enhance the immediate setting.	Not meeting local needs outside of the four main towns. Winterborne Kingston and adjacent brownfield sites should be inset from the countryside designation.
682	R Bagnall	Richard Bagnall Associates		4232		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 2 removes settlement boundaries whereas Policy 7 permits infilling if a Neighbourhood Plan is prepared and a new settlement boundary established. By implication, infilling must, as a matter of principle, be sustainable and there is a presumption in favour of it. If a Neighbourhood Plan is not prepared infilling in those villages will not be allowed regardless. This could lead to a situation where infilling is not allowed in a village with a relatively good range of facilities and services because there is no Neighbourhood Plan whilst allowing infilling in a village with far worse access to services and facilities where a Neighbourhood Plan has been prepared.	Settlement Boundaries should be retained in all villages with a reasonable range of services and facilities with Neighbourhood plans then used to guide and manage specific proposals. If a community wishes to oppose a development within a settlement boundary and can justify the opposition with relevant planning reasons, the existing development management process is available and sufficient.	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.

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682	R Bagnall	Richard Bagnall Associates		4233		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Infilling can deliver substantial local benefits (efficient use of land, widening housing choice, smaller market dwellings, replacement of an eyesore/non-conforming land use, improve performance of housing stock, enhance local character, support local services, stimulate local economy, ...) If these benefits can only be exploited if a community prepare a Neighbourhood Plan, it is inevitable that worthwhile and beneficial development opportunities will be lost or delayed.	Retention of Settlement Boundaries while Neighbourhood Plans are in preparation to avoid delay and maintain continuity	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.
682	R Bagnall	Richard Bagnall Associates		4234		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	It is not known when or how many local communities will produce a Neighbourhood Plan. This will cause uncertainty and delay. If it takes two years to produce a Neighbourhood Plan, sustainable infill development that could be allowed now will be delayed for two or more years. This does not accord with the NPPF "presumption in favour".		To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.
682	R Bagnall	Richard Bagnall Associates		4235		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Consultation with parishes has highlighted local concerns, based on past development rates, to avoid excessive rates of village development over the period of the new Plan. Past development rates will never be achieved again, as potential infill sites have already been developed.	If Settlement Boundaries are retained as they are currently, the potential supply of infill sites will be far less than in the 2003 Plan but could still allow selective infilling and windfall opportunities to deliver modest new housing development. If a particular community wishes to enable a greater scale of development it can do so by extending the Settlement Boundary.	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.
682	R Bagnall	Richard Bagnall Associates		4236		No	It has not been positively prepared, It is not justified, It is not effective	There is no definition of infilling within the Local Plan. If the definition is left to individual Neighbourhood Plans there will inevitably be inconsistency and confusion.	The ND Local Plan should define "infilling" and enable "windfall" opportunities as well.	Clarity of the policy in relation to infill development.

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721	P Fry			4640		No	It is not justified	Land off Milton Road, Milborne St Andrew (adjacent to Brooklands and behind Garden Cottage, Edelweiss and Orchard Lodge) should be developed for housing - including low cost and social housing - (and possibly also a doctor's surgery if required). Although a stream runs through part of the site, this could be bridged and most of the site is on a hill, so it should be possible to overcome any flooding issues. Other sites in the village that flooded historically have been successfully developed for housing. There are already a good number of entrances on Milton Road so one more should not cause any problems.	Land off Milton Road, Milborne St Andrew (adjacent to Brooklands and behind Garden Cottage, Edelweiss and Orchard Lodge) should be developed for housing - including low cost and social housing - (and possibly also a doctor's surgery if required).	Proposed housing site in Milton St Andrew suggested.
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4455		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Hall & Woodhouse agree that the significant proportion (as opposed to the vast majority) of the district's future housing growth should be directed to the 4 main towns and also agrees that Blandford (Forum and St Mary), Gillingham, Shaftesbury, and Sturminster Newton are the four main towns within the district. However, it strongly objects to the approach set out for the rest of the district and in particular the villages and smaller settlements. The National Planning Policy Framework (Framework) at Section 3 sets out the government's objectives to secure a strong local rural economy. The approach in this Plan as set out under Policy 2 will not meet this objective for securing a strong local rural economy; the effect will be to stall appropriate further growth and diversity within a wide variety of sustainable and thriving settlements and communities, through the application of restraint policies to all parts of the district outside of the four main towns. One of the Core Principles of the Framework is to support thriving rural communities; this application of a blanket policy of restraint across all the settlements and villages outside of the four main settlements is completely at odds with this fundamental objective of the Framework. This approach also fails to meet the objectives of paragraph 50 of the Framework to plan to deliver a wide choice of family homes. Earlier draft versions of the Plan recognised that many of the villages have significant potential for infilling and redevelopment. This position has not changed and there is no sound basis for the approach now being	The policy approach to development outside of the four main towns needs to be reconsidered to provide a more positive context and approach to development. At the very minimum, the existing settlement boundaries should be retained around those settlements with an existing settlement boundary and development and redevelopment continue to be encouraged within these settlement boundaries in line with other policies in the Plan and the Framework, until there is the opportunity for a formal review through the next stage of the Plan/neighbourhood plans which would be transparent and would be open to detailed scrutiny.	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.

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								<p>taken. Furthermore the Household Survey Data in the SHMA report shows that almost 50% of households live in the rural areas and it is therefore woefully inadequate and unsound not to make more positive provision for growth in these settlements. The supporting text fails to explain the strategy and how such an approach can provide for the needs of the community taken as a whole. Furthermore this approach together with the proposal to remove all settlement boundaries around settlements other than the four main towns is likely to have the result of imposing a moratorium on development in a very large part of the district for some considerable period of time; this is contrary to the spirit and objectives of the Framework for positive planning. As a result this Policy is unsound as it has not been positively prepared; it is not justified, has not been prepared in accordance with national policy and is not effective.</p>		
749	Chris Burton	Tetlow King Planning	South West RSL Planning Consortium	4210		No	It is not consistent with national policy	<p>Our primary concern is the restrictive approach which the Council is seeking to apply to the villages and in particular, the proposal to allow housing to be delivered only in small numbers on exception sites. This will offer our clients' very little scope to deliver the affordable housing that is so readily lacking in rural North Dorset and is therefore contrary to the stated aims and objective of the draft Plan. Our concern is driven by the intention to remove settlement boundaries and place the District's villages in the countryside. It is thus assumed that each will be "subject to countryside policies where development will be strictly controlled unless it is required to enable essential rural needs to be met", unless a village works to define a settlement boundary and/or allocate sites in future plan making ("opting in"). We do not agree that this is a sound approach. Parish Councils may have a conservative attitude to providing more housing and resist opting in. Even if they do decide to pursue a Neighbourhood Plan or have sites allocated in Part 2 of the Local Plan this will take a number of years. The Council should be aware that a similar policy approach has attracted criticism from the Inspector conducting the examination of the Wiltshire Core Strategy – see</p>	<p>We seek for the Council to rectify this by reviewing settlement boundaries, so as to make sure they are fit for purpose. To avoid holding Part 1 up, it may be more appropriate for the boundaries to be redefined in the process of preparing Part 2 however this must be reflected in a revision to the Spatial Strategy in Part 1.</p>	<p>To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.</p>

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								Section 5 of his letter of 2 December 2013, copy enclosed.		
769	Tim Hoskinson	Savills	Taylor Wimpey	4184		No	It is not justified, It is not consistent with national policy	<p>The identification of Sturminster Newton as a 'main town' alongside Blandford, Gillingham and Shaftesbury is fully supported. Sturminster Newton plays an important role as a market town serving a wide rural hinterland in the western part of the District. Sturminster Newton has a range of jobs, services and facilities and an established need for affordable and open market housing.</p> <p>The last paragraph of Policy 2 sets out that settlement boundaries around the four main towns will continue to be used for development management purposes. This aspect of Policy 2 is considered unsound; the existing settlement boundaries around the four main towns in the North Dorset District Wide Local Plan 2003 are out of date, and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF we can see no reason why the Local Plan Part 1 does not formally allocate the land that is identified for development at the other market towns, including the land to the east of the former Creamery site.</p>	<p>In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan reflecting the sites identified for development.</p> <p>Proposed wording:          "The settlement boundaries defined around the four main towns in the North Dorset District-wide Local Plan 2003 are retained and expanded in line with Policies 16, 17, 18, 19 and 21 of this document, which identify the locations for expansion of settlement boundaries at the four main towns. The expanded settlement boundaries will continue to be used for development management purposes, until reviewed either through site allocations in Part 2 of the Local Plan or a neighbourhood plan."</p>	Settlement boundaries around the four main towns are out of date and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF. The Local Plan Part 1 should formally allocate the land that is identified for development in each of the market towns.
1594	Diccon Carpendale	Brimble Lea & Partners		4198	3.46 to 3.56	No	It is not consistent with national policy	<p>The plan proposes in relation to the countryside (including Stalbridge and the villages) to remove settlement boundaries for all of the villages but to permit villages either to bring forward growth through neighbourhood plans or by 'opting in' to the Local Plan Site Allocations process. In effect this policy will prevent any growth within the countryside (other than in terms of normally recognised exceptions) with there being no certainty about the neighbourhood planning or opt-in process. This approach is contrary to para 17 of the NPPF including that plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Similarly it will be contrary</p>	<p>Core Policy 2 in the supporting text should be amended. Existing settlement boundaries should be retained but could be reviewed through the Neighbourhood Planning process or through a subsequent Site Allocations DPD which should consider (where appropriate) amending settlement boundaries.</p>	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.

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								to the principle that planning should support thriving rural communities within the countryside. The NPPF recognises in Part 3 (para 28) that there should be support for a prosperous rural economy. Para 55 does not rule out housing within rural areas. Rather it suggests how it may be located indicating that it will be necessary to support village services.		
1594	Diccon Carpendale	Brimble Lea & Partners		4208		No	It is not consistent with national policy	Object to the removal of the settlement boundaries around all villages from the Proposals Map. This objection links with other objections made in relation to various policeis which propose to remove settlement boundaries from all of the villages and to rely upon Neighbourhood Plans and the Opt-In process.	Leave existing settlement boundaries unchanged but review these through the Neighbourhood Planning process or a subsequent Site Allocations DPD to identify suitable sites for enlargement of the village to incorporate additional housing or other growth.	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.
2528	Colin Hampton	Milborne St Andrew Parish Council		4064				Full meaning of countryside policies as a means of furthering development in the villages needs to be fully understood by those communities before signing up to them.		Communities will not fully understand the implications of countryside policies

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2783	Gill Smith	Dorset County Council		4181		No	It has not been positively prepared	<p>It is not clear what is intended under the option of “Opting in to the Local Plan Part 2 Site Allocations”. If North Dorset intends to allocate further land for development in Part 2 of the Plan the broad scale of development ought to be defined in Part 1. Although North Dorset has not yet introduced a charging schedule under the Community Infrastructure Levy regulations, they have indicated an intention to do so. Associated with this they will need to determine the total amount of development expected in the District over the Plan period. As currently framed the Plan fails to set an overall target that can be used in this way. This could affect the ability of Dorset County Council to plan effectively for infrastructure that it is expected to provide, including the calculation of appropriate levels of contributions from developers.</p> <p>Whilst the aim to give local communities choice in how to address local needs is supported, there could be difficulties with the approach proposed. Neighbourhood Plans must be in general conformity with the local Development Plan for the area. The current approach for Stalbridge and the villages gives little strategic direction for local communities to use as a guide. This in turn could make it difficult for the County Council in terms of planning service provision. North Dorset may wish to consider introducing a generic policy to set a broad scale of development suitable for the rural areas as well as criteria or principles to help steer local communities in making decisions on Neighbourhood Plans. These may, for instance, encourage development in those locations which are served by public transport and/or have local facilities such as a primary school or rural surgery and where additional development may help to sustain them.</p>	<p>North Dorset should reconsider the spatial approach to development in Stalbridge and the Villages to ensure that:</p> <ul style="list-style-type: none"> <li>i) adequate guidance is given on the broad scale and pattern of distribution for future development to ensure that development brought forward through Neighbourhood Plans is steered to the most sustainable locations, bearing in mind the existing distribution of services such as schools, public transport and other services; and</li> <li>ii) the overall level of development allocated to the rural areas is sufficient to help support local services.</li> </ul>	<p>Core Spatial Strategy gives little strategic direction for local communities to guide development to the more sustainable locations. Opting in needs to be focused on the more sustainable settlements to support local services and enable provision of infrastructure.</p>

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2783	Gill Smith	Dorset County Council		4178		No	It has not been positively prepared	Whilst appreciating the background work that has fed into the Plan, it is considered that, in accordance with the Duty to Co-operate, it would benefit from some additional strategic context to show how it fits into the wider area. In particular discussion in Chapter 3 under “Core Spatial Strategy” of how the strategy relates to neighbouring authorities’ plans and what, if any, implications its proposals will have on surrounding settlements and vice versa.	Include in Chapter 3 under “Core Spatial Strategy for North Dorset” a brief description of how the strategy relates to neighbouring authorities’ plans and what, if any, implications its proposals will have on surrounding settlements and vice versa	The core spatial strategy needs to be placed in a wider context and consider strategies and implications of neighbouring authorities.
2790	Nicholas Taylor	Nicholas Taylor and Associates	Mr Jason McGuinness (HABCO Ltd)	4536		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>We object to the Councils plans to direct the spatial distribution of development, particularly housing, to the four main towns to the detriment of the smaller villages.</p> <p>We are concerned that as the draft NDLP seeks to concentrate the vast majority of new development in the four main towns of the District, this leaves very little potential for new development anywhere else in the District. the policy for ‘The Countryside’ states that “development in this area will be subject to countryside policies”. The policy then adds that “the focus will be on meeting local needs”. In our view, the wording of the policy suggests that the Council attaches a lower priority to meeting local needs than applying countryside policies..</p> <p>We consider that the concentration of residential development in the four main towns would have a detrimental impact upon the vitality and viability of Okeford Fitzpaine. The village currently has an aging population. The Parish Profile identifies the dearth of younger adults in their 20s and 30s. In terms of local amenities Okeford Fitzpaine currently has a primary school, village hall and post office all of which are dependent upon a generationally balanced population for their continued existence. The lack of younger adults within the village, within prime child bearing age, is likely to result in a further decrease in young children within the ward and declining student numbers for the local school. Should development, and in particular family sized dwellings, continue to be restricted this will inevitably result in a further reduction in pupil numbers putting the Okeford Fitzpaine Primary School at risk of closure.</p> <p>ACORN socio-economic classifications show that just</p>	<p>Policy 2 Core Spatial Strategy</p> <p>The Countryside (including Stalbridge and the Villages) outside the defined boundaries of the four main towns, the Council will restrict development to the following categories:</p> <ul style="list-style-type: none"> <li>• development that is required to meet essential rural needs;</li> <li>• development that is required to meet local (rather than strategic) needs, which will be delivered primarily through neighbourhood planning or site allocations in Part 2 of the Local Plan</li> </ul> <p>We propose no change to the rest of Policy 2.</p>	The policy needs to make a provision for identified 'essential rural need' as well as promoting neighbourhood planning or opting as a means of meeting 'local needs'.



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								<p>over 78% of all households in Okeford Fitzpaine are in the 'wealthy achievers' category, significantly higher than the County average of 40%. Conversely 9% are categorised as 'comfortably off' much lower than the County average, and almost 13% are 'hard pressed', higher than the County average. This demonstrates a distinct socio-economic divide between residents within the village. The latest revision of NDLP would severely restrict development outside the four main towns. This would result in Okeford Fitzpaine effectively becoming an enclave for the wealthy.</p> <p>In terms of home ownership in 2011 40.9% of residents owned their home outright, 28.3-36.4% of residents were home owners with a mortgage or loan. Again this demonstrates the dichotomy within the ward between the wealthier older population and the younger less affluent residents.</p> <p>We believe the current provision of housing stock is insufficient to meet local needs. Where younger residents are in a position to secure a mortgage demand for dwellings significantly exceeds supply, with resultant increase in house prices. We feel a wider range of properties is required within the parish to meet the need for smaller and family sized dwellings.</p> <p>A Place Survey was undertaken in 2008 for the Bulbarrow Ward which asked residents how satisfied they were with their area as a place to live. Public transport, affordable housing and activities for teenagers were most in need of improvement. We consider the draft NDLP will not address local residents concerns and will prevent the creation of sustainable balanced and mixed communities outside of the four larger towns.</p> <p>Housing need in the parish show that as of January 2014, 17 individuals/families have expressed an interest in living in the area</p> <p>We consider that the NDLP in its current form would stifle development outside of the four main identified towns. In our view the draft NDLP is insufficient to meet the needs of the local population and re-balance the generational divide within the ward at present.</p>		

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2790	Nicholas Taylor	Nicholas Taylor and Associates	Mr Jason McGuinness (HABCO Ltd)	4537		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Policy 2 Paragraph 3.53 – 3.54 We fail to understand the rationale for the ‘opting-in’ method of securing development in villages. It does not sit comfortably alongside the general strategy of supporting major development in the 4 main towns and allowing development in villages where this is both sustainable and meets local needs.</p> <p>Policy 2 Paragraph 3.56 This paragraph introduces, without justification, the word ‘infill’ into the type of development that may be acceptable. If the Council intends that it should cover any amount of development, provided it is within the development boundary established through a neighbourhood plan or through the ‘opt-in’ procedure, then the Council should say so. If this is not the Council’s intention, we would request that the word ‘infill’ is deleted from the text.</p>		
2961	David Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	4386		No	It is not justified	<p>Concerned that the settlement boundaries will not be revised until the site allocations process and that this would unnecessarily delay the incorporation of sustainable housing sites into the Development Plan process.</p>	<p>PCL Planning recommend the Council reconsider this approach and propose that their site (south of A30 and east of Higher Blandford Road) be considered and incorporated into the settlement boundary of Shaftesbury as this is inline with the overall spatial strategy that focusses growth in Shaftesbury to the east of the town. The potential options for their site include i) the development of the site for entirely residential purposes (C3) (circa 120 units) ii) a mixed use development potentially comprising of residential (C3) and retail (A1) iii) a mixed use development comprising of C3 and a community facility (D1) such as a potential education facility. Further details on the benefits of this site are outlined in the supporting letter attached to this representation. This site was not put forward in the SHLAA 2010, but representations advocating its</p>	<p>Settlement boundaries around the four main towns are out of date and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF. The Local Plan Part 1 should formally allocate the land that is identified for development in each of the market towns. In the case of Shaftesbury it should also include the additional site that is south of A30 and east of Higher Blandford Road to accommodate higher housing growth figures.</p>

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									inclusion have since been made in October 2013. The site is suitable, achievable and available. PCL Planning are keen to prepare a development brief for the site to provide greater certainty for future developers of the site.	
2961	David Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	4385		No	It is not justified	PCL Planning agrees in general with the Councils approach to directing the majority of housing growth at the main settlements as the most sustainable approach for the District, in particular directing 27% of growth to Shaftesbury. However, the draft Local Plan proposes an allocation of 1140 dwellings set against proposed District total of 4200. PCL Planning considers that this settlement should be allocated a higher number of dwellings (1890 dwellings being 27% of an increased overall housing requirement of 7000). See representations 4383 and 4384 for reasons to increase housing numbers)	Increase housing numbers overall and there the percentage allocated to Shaftesbury to enable a new allocation to be included.	If increased housing numbers are required additional sites are available in Shaftesbury as it is one of the more sustainable locations.
2974	Andrew Robinson	Symonds & Samspon	John Payne - Camelco Ltd, Milborne Business Centre	4637		No	It is not justified	The Council's proposal to remove the defined settlement boundary from some, if not all, of the villages in North Dorset would be entirely inappropriate for a village such as Milborne St Andrew which has pubs, shops and other facilities and could properly be termed as sustainable.	Our clients would suggest that a defined settlement boundary for Milborne St Andrew should be maintained within any emerging Local Plan because sites do become available on the village fringe where development would be the only sensible way forward. This would make the future building of houses within and around the village edge a realistic possibility. If a boundary is not put in place, there is a concern that applications for residential development at Milborne St Andrew would be refused, which would be bad for village dynamics in the longer term.	To support thriving rural communities within the countryside settlement boundaries should be retained (and amended to include edge of settlement development opportunities) to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan. In particular the settlement boundary around Milborne St Andrew.

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2974	Andrew Robinson	Symonds & Samspon	John Payne - Camelco Ltd, Milborne Business Centre	4638		No	It is not justified	Land at Dairy House Farm (off Little England / Homefield) Milborne St Andrew is a traditional farmyard which has historically been used for dairy farming. That use has now discontinued and the farm has become an arable holding, with a new grain store being constructed just to the south. This area is redundant (already incorporates a pair of cottages) and would be ideal for a small residential scheme within the defined development boundary of the village if a boundary was to be provided.	A settlement boundary around Milborne St Andrew should be retained / provided so that land at Dairy House Farm (off Little England / Homefield) could be developed for a small residential scheme within the defined boundary.	To support thriving rural communities within the countryside settlement boundaries should be retained (and amended to include edge of settlement development opportunities) to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan. In particular the settlement boundary around Milborne St Andrew should be amended to include land at Dairy House Farm.
2974	Andrew Robinson	Symonds & Samspon	John Payne - Camelco Ltd, Milborne Business Centre	4639		No	It is not justified	Land south of Blandford Hill and east of Lane End, Milborne St Andrew is a car parking / settlement pond / open storage area which has been left over from the era when Milborne Business Centre (to the north of the A354) was a dairy factory. This has now become a small commercial business park and the land to the south of the A354, which lies adjacent to the Milborne St Andrew playing fields is derelict and redundant. It could appropriately be developed for residential / commercial purposes, providing it was within the defined boundary of the village.	A settlement boundary around Milborne St Andrew should be provided so that land to the south of the A354 (Blandford Hill) and east of Lane End (car parking / settlement pond / open storage area) could be developed for residential / commercial purposes within the defined boundary.	To support thriving rural communities within the countryside settlement boundaries should be retained (and amended to include edge of settlement development opportunities) to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan. In particular the settlement boundary around Milborne St Andrew should be amended to include land south of Blandford Hill and east of Lane End.

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2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4469		No	It is not justified	<p>The identification of the four main towns as the main focus for growth is supported; these towns represent the most sustainable locations for growth. The reference to the strategic site allocation at Gillingham (Policy 21) is also supported.</p> <p>The last paragraph of Policy 2 states that ‘the settlement boundaries around the four main towns in the North Dorset District Wide Local Plan 2003 are retained and will continue to be used for development management purposes until reviewed either: through the North Dorset Local Plan – Part 2: Site Allocations or a neighbourhood plan.</p> <p>This aspect of Policy 2 is considered unsound; the existing settlement boundaries around the four main towns in the North Dorset District Wide Local Plan 2003 are out of date, and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF.</p>	<p>In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan reflecting SSA allocations. In the absence of revised settlement boundaries, the following amendments should be made:</p> <ul style="list-style-type: none"> <li>· Modify the text of Policy 2 as follows: “The settlement boundaries defined around the four main towns in the North Dorset District-wide Local Plan 2003 are retained and, in conjunction with Policies 16, 17, 18, 19 and 21 of this document, which identify the locations for expansion of settlement boundaries at the four main towns, will continue to be used for development management purposes, until reviewed either through site allocations in Part 2 of the Local Plan or a neighbourhood plan.”</li> </ul>	<p>Retaining existing settlement boundaries around the four main towns is unsound as they are out of date and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF. In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan reflecting SSA allocations. In the absence of revised settlement boundaries amended text is suggested that recognises that the settlement boundaries are retained and, in conjunction with Policies 16, 17, 18, 19 and 21, the locations for expansion of settlement boundaries at the four main towns are identified.</p>

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2986	Neil Hall	AMEC	Crown Estate	4439		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Policy 2 is not considered to be sound. The Crown Estate generally supports Policy 2 and the recognition of Blandford Forum as a location for housing growth as growth here will make a significant contribution to a sustainable development strategy. Whilst generally supporting Policy 2, The Crown Estate does not support the reliance on the settlement boundaries around the four main towns as currently defined in the North Dorset Local Plan (2003), which will be retained until they are reviewed in the Local Plan Part 2 or a neighbourhood plan. We also do not agree with the part of the policy which currently states that sites will primarily be brought forward through Part 2 of the Local Plan, the exception being the urban extension at southern Gillingham. This approach does not provide a sound planning policy basis because it is not consistent with the NPPF, effective or justified. The 2003 settlement boundaries cannot be considered up-to-date in the context of the new Local Plan and NPPF, particularly as the Local Plan was adopted prior to the Planning and Compulsory Purchase Act 2004. The Council has sufficient evidence to support revisions of the settlement boundaries at the main towns to incorporate strategic sites. This would provide a more positive and justified planning policy basis. A process of allocating all sites in the Local Plan Part 2, other than Gillingham, will lead to unnecessary delays, impact on the Council's ability to maintain a deliverable housing land supply and would not accord with the emphasis of NPPF to boost significantly the supply of housing. Without allocating more strategic sites in the Local Plan Part 1 it is unclear how the Council will maintain the required five year (plus flexibility of 5-20%) rolling land supply. The approach is also inconsistent with the treatment of land at Gillingham which is effectively excluded from the Local Plan Part 2 allocation requirements. Strategic allocations should be identified in the Local Plan Part 1 rather than waiting for the preparation of Local Plan Part 2. This approach would avoid the problems that Wiltshire Council has recently run into, where its Core Strategy was in danger of being found unsound unless it modified its approach, which relied on dated settlement boundaries.</p>	<p>We recommend the following amendments to Policy 2:</p> <ol style="list-style-type: none"> <li>1. The Council should prepare a housing trajectory which shows a positive position in significantly boosting housing supply in line with the emphasis of NPPF. This should set out a deliverable supply of sites covering a 15 year period from the date of adoption (also see our response to Policy 6).</li> <li>2. The Plan needs to be specific about strategic sites (see our response to policy 16) and allocate more sites given the Council's marginal housing land supply.</li> <li>3. Settlement boundaries around the four main towns should be amended now or it should be made clear that they can be reviewed as a part of a master planning exercise which is undertaken as part of a planning application for a strategic site identified in the Plan Part 1. All references to settlement boundaries in the policy and supporting text should be amended accordingly. Suggested amendment to Policy 2 Paragraph 3 should read: Policies 16 to 19 set out the main locations for growth at the four main towns, which are allocated through the settlement policies of this Local Plan Part 1. Delete the final paragraph of the policy relating to settlement boundaries.</li> </ol>	<p>Retaining existing settlement boundaries around the four main towns is unsound as they are out of date and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF. In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan reflecting SSA allocations. In the absence of revised settlement boundaries amended text is suggested that recognises that the settlement boundaries are retained and, in conjunction with Policies 16, 17, 18, 19 and 21, the locations for expansion of settlement boundaries at the four main towns are identified.</p>

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2989	Sarah Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	4551	3.46 to 3.48	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Whilst the distribution of the majority of growth to the districts four main towns is consistent with the NPPF, our clients consider that there is a need to recognise that local housing needs can be accommodated in the larger villages. The approach in Policy 2 is very restrictive and limited development to the four main towns. The restrictive approach even applies to Stalbridge and the larger villages, there appears to be no assessment of the villages in terms of their capacity to accommodate development. Instead local and essential rural needs will be met through:</p> <ul style="list-style-type: none"> <li>· The countryside policies;</li> <li>· Neighbourhood planning; or</li> <li>· By opting in to the Local Plan Part 2 Site Allocations</li> </ul> <p>Our clients consider that the “wash over” all settlements outside the four main towns with a policy that would not permit infilling until Neighbourhood Plans are produced is unnecessarily restrictive and inconsistent with the NPPF (para 55). It would appear that a more flexible approach would only arise if a Neighbourhood Plan was prepared; this seems unlikely if only 52% of parishes expressed an interest in preparing a Neighbourhood Plan. It is noted that there have only been 4 Neighbourhood Plan Areas have been designated and there have been two applications have been submitted to the Council for Neighbourhood Plan Areas. Neighbourhood Plans are to be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan.</p>	<p>The strategy whilst meeting the majority of the strategic needs for growth at the four main towns (which is consistent with the NPPF), should also provide the framework for the development of sites in the larger villages which have a range of facilities and services i.e. those sustainable settlements in addition to the four main towns. Paragraph 55 of the NPPF states that local planning authorities should promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The plan needs to ensure that the provision is made or that the plan facilitates development in those larger villages with a level of facilities and services i.e. as in the adopted Local Plan. These villages in a largely rural district have a distinct role in terms of meeting local needs. Therefore, the Local Plan needs to provide the framework for this development to take place. (see also comments on Policy 2 Core Spatial Strategy)</p>	<p>Core Spatial Strategy should provide a framework for growth in the larger more sustainable villages as they play an important role in the rural areas.</p>

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2989	Sarah Hamilton Foy	Pegasus Planning Group	Messrs Drake	4554		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>An objection is raised to Core Policy 2 in respect of the spatial strategy for the larger villages. The policy restricts development outside the four main towns so that in the remainder of the district (including Stalbridge and the larger villages) will be subject to countryside polices where development will be strictly controlled, unless it is required to enable essential rural needs to be met. There needs to be a clear definition of what essential rural needs are and what local needs are as the plan loosely uses these terms which appear to be interchangeable. The Draft Core Policy identified Stalbridge and 18 of the Districts larger villages as ‘local centres’ and the main focus for growth outside the four main towns. Child Okeford was identified as one of the larger villages. Draft Core Policy 3 then applied the policy of restraint to the smaller villages. This approach has not been continued in the Pre-Submission Plan</p> <p>Our clients consider that the “wash over” all settlements outside the four main towns with a policy that would not permit infilling until Neighbourhood Plans are produced is unnecessarily restrictive and inconsistent with the NPPF para 55. The Plan envisages local needs being met and delivered through neighbourhood planning.</p> <p>However, it would appear that a more flexible approach would only arise if a Neighbourhood Plan was prepared; this seems unlikely if only 52% of parishes expressed an interest in preparing a Neighbourhood Plan. Neighbourhood Plans are to be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan.</p> <p>Our clients consider that the Plan will not meet housing needs, North Dorset already has one of the highest affordable housing needs, the lack of housing will not fulfil the Government objectives of significantly increasing the housing land supply as set out in the NPPF. As it is not clear what the policy framework is for the larger villages the plan is unsound as it cannot be effectively delivered.</p> <p>Sustainable development in rural areas should be promoted as it will enhance and maintain the vitality of rural communities (para 55 of the NPPF). If</p>	<p>The strategy whilst meeting the majority of the strategic needs for growth at the four main towns (which is consistent with the NPPF), should also provide the framework for the development of sites in the larger villages which have a range of facilities and services i.e. those sustainable settlements in addition to the four main towns. Paragraph 55 of the NPPF states that local planning authorities should promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The plan needs to ensure that the provision is made or that the plan facilitates development in those larger villages with a level of facilities and services i.e. as in the adopted Local Plan. These villages in a largely rural district have a distinct role in terms of meeting local needs. Therefore, the Local Plan needs to provide the framework for this development to take place. Our clients consider that whilst not necessarily including an overall housing provision figure for Stalbridge and the larger villages, a policy framework which is flexible should be included in the Local Plan, this can then be taken forward through Neighbourhood Plans or provide the guidance necessary to determine planning applications. Para 17 of the NPPF states that Plans should provide a practical framework within which decisions on planning applications can be made with a high degree of</p>	<p>Local needs are not clearly defined in the policy. A more flexible approach towards the larger villages to facilitate development is required</p>



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								Neighbourhood Plans are not prepared then there will be a policy of restraint which will reduce the housing supply and undermine the objectives of the Plan.	<p>predictability and efficiency. There is risk that if the Council relies on Neighbourhood Plans to deliver growth that this will not happen and instead will result in planning by appeal. Furthermore, our clients would not support an approach which priorities infilling as a means of meeting local needs as this would be inconsistent with the NPPF.</p> <p>In summary the overall housing provision should be increased and the plan period extended to 2031. A more flexible approach towards the larger villages should be encouraged and a policy framework included in the Local Plan; this will ensure that the Local Plan is sound and consistent with the NPPF and assist in meeting local housing needs.</p>	
2989	Sarah Hamilton-Foy	Pegasus Planning Group	Messrs Drake	4555	3.39	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>An objection is made to the strategy which strictly controls development outside the four main towns. Whilst it is acknowledged that in order to achieve sustainable development the majority of housing growth will take place in the more sustainable settlements, the plan also needs to ensure that the provision is made or that the plan facilitates development in those larger villages with a level of facilities and services i.e. as in the adopted Local Plan. These villages in a largely rural district have a distinct role in terms of meeting local needs. Therefore, the Local Plan needs to provide the framework for this development to take place. The strategy whilst meeting the majority of the strategic needs for growth at the four main towns (which is consistent with the NPPF), should also provide the framework for the development of sites in the larger villages which have a range of facilities and services i.e. those sustainable settlements in addition to the four main towns. Paragraph 55 of the NPPF states that local planning authorities should promote sustainable development in</p>	<p>Our clients consider that the “wash over” all settlements outside the four main towns with a policy that would not permit infilling until Neighbourhood Plans are produced is unnecessarily restrictive and inconsistent with the NPPF para 55).</p> <p>It would appear that a more flexible approach would only arise if a Neighbourhood Plan was prepared; this seems unlikely if only 52% of parishes expressed an interest in preparing a Neighbourhood Plan. Neighbourhood Plans are to be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. Our clients consider that</p>	<p>Communities are not committed to neighbourhood planning. Concern that larger more sustainable villages will not grow. Against maintaining settlement boundaries but suggests other flexible approaches to growth are included in the plan.</p>

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								<p>rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The key issue for the rural areas is that the Local Plan should facilitate development in sustainable settlements by providing the policy framework; it is considered that this can be included in the Local Plan and still provide the flexibility for those Parishes which then want to prepare a Neighbourhood Plan. Child Okeford was classified as a larger village with a settlement boundary as it has a cohesive built up nature and a reasonable range of community facilities and services to support further growth. (Doctors Surgery (3 doctors), Village Hall, Community Centre, Centre for Care and Learning St Nicholas CE VA Primary School, The Ark Nursery, Post Office, Tea Rooms &amp; Shop, Gold Hill Organic Farm Shop, Cross Store (general convenience), 2 pubs (The Bakers Arm &amp; The Saxon Inn), and a recreation ground). Our clients site i.e. Land off Haywards Lane (ref 2/11/0502 in the SHLAA) is identified in the SHLAA as a suitable site for development of approximately 25 dwellings. The site is well contained by existing mature vegetation and man-made features (housing and a road) such that it lends itself as a development site well related to the physical form of the village without encroaching out into open countryside. Its close proximity to the school is also an added benefit. Moreover its size is of a scale in proportion to the size of the village which would not result in it generating disproportionate amount of residential development. The site can be accessed off Haywards Lane.</p>	<p>whilst not necessarily including an overall housing provision figure for Stalbridge and the larger villages, a policy framework which is flexible should be included in the Local Plan, this can then be taken forward through Neighbourhood Plans or provide the guidance necessary to determine planning applications. There is risk that if the Council relies on Neighbourhood Plans to deliver growth that this will not happen and instead will result in planning by appeal. Furthermore our clients would not support an approach which priorities infilling as a means of meeting local needs as this would be inconsistent with the NPPF.</p>	
2989	Sarah Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	4550	3.49 to 3.52	No	<p>It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy</p>	<p>Whilst the principle of Neighbourhood Plans is supported and is consistent with the NPPF, it is not clear what contribution to the overall housing requirement they are intended to make. Neighbourhood Plans are to be prepared so that they are consistent with the Local Plan. As stated in the NPPF, the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. "Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan... Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to</p>	<p>Apart from meeting essential rural needs there needs to be a policy which provides the framework for development in the larger villages, this is particularly important in a rural district where there are significant affordable housing issues as outlined in response to paras 5.12 – 5.14.</p>	<p>Core Spatial Strategy gives little strategic direction in terms of housing requirements for local communities preparing neighbourhood plans. Growth needs to be guided to the more sustainable villages.</p>

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								<p>support them.” (para 184 of the NPPF).</p> <p>It is noted that there are already 4 designated Neighbourhood Plan Areas, but two of these are for the main towns.</p> <p>The Plan states in Figure 5.1 that at least 230 dwellings will be in the countryside (including Stalbridge and the Villages) this amounts to 5.4% of the development for the whole plan period, which is only about 15 dwellings a year across the district in a mainly rural district.</p> <p>The other issue is the cost of resourcing the preparation of Neighbourhood Plans which have to be prepared, consulted on and are subject to Examination. Whilst the District Council can provide advice and assistance, this does not extend to financial advice. There is a national fund where grants of up to £7,000 per parished area can be available upon application, but this will only provide a small amount of assistance compared with the cost of the preparation of a Neighbourhood Plan.</p>		
3048	Hamish Macbeth	Cawdor Construction Ltd		4036	3.33-3.56	No			Re-establish settlement boundaries for all villages.	Maintain settlement boundaries around all villages
3055	Roger Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	4082		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>1. The settlement strategy is included primarily in Policy 2 (Core Spatial Strategy) and Policy 6 (Housing Distribution). It comprises a concentration on the ‘main towns’ of Blandford, Gillingham, Shaftesbury and Sturminster Newton as the main focus for growth. Outside the four ‘main towns’, the remainder of the District, including Stalbridge and all the District’s villages, will be subject to countryside policies where ‘development will be strictly controlled unless it is required to enable essential rural needs to be met’.</p> <p>This strategy is a radical change of approach from the 2003 Local Plan and the 2010 Core Strategy consultation on the New Plan for North Dorset and is not a sound approach; especially in relation to Stalbridge.</p> <p>2. The North Dorset District-Wide Local Plan to 2011 (1st Revision), adopted on 31st January 2003, included in Policy 2.3 (Distribution of Development) a statement that the approximate scale and rate of development in Stalbridge should be 170 (10 dwellings per year),</p>	To make the Plan sound, the following modifications are proposed : • Stalbridge should be identified in the policy as a fifth ‘main town’ with its own allocation of housing, rather than treated as part of the countryside and sharing an allocation of 230 dwellings for 2011 to 2026 (about 15 per year) as one of 50 or more settlements. Modifications to Policy 2 to include Stalbridge as a fifth ‘main town’ and one of the District’s service centres; to delete Stalbridge from references that include it with the District’s villages and countryside in policy terms; and to include a commitment to define a revised settlement boundary in Part 2 of the Local Plan. • Modifications to	Due to its size and level of facilities Stalbridge should be have its own allocation of housing. It should have its own policy and inset map. The plan should also be extended to 2031 and include a review of the Conservation Area boundary.

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								<p>towards an overall Dorset Structure Plan allocation for North Dorset of about 5,900 for the 17-year period of 1994 to 2011. Policy ST 1 stated that ‘In accordance with the overall Local Plan Strategy, Stalbridge will act as a local centre and will receive limited housing and employment growth together with the development of local community services.’ Table 40.2 showed an estimate (in 2003) of 183 housing completions between 1994 and 2011.</p> <p>3. The Draft Core Strategy and Draft Development Management Policies Consultation Document of March 2010 included Draft Core Policy 19 for Stalbridge and the larger villages: ‘About 1,200 homes will be provided in the remaining RSS Development Policy C Settlements (excluding Sturminster Newton, but including Stalbridge and 18 of the larger villages in the District, as listed in draft Core Policy 3). About 600 homes will be built in the period up to 2016 with about 600 built thereafter. In the period up to 2026 the housing needs of these settlements will be met through:</p> <ul style="list-style-type: none"> <li>• infilling and redevelopment within defined settlement boundaries; and</li> <li>• the development of additional housing sites identified in the Site Allocations DPD.’</li> </ul> <p>4. Following the Consultation on Key Issues from 29th October to 21st December 2012, the Council changed its approach to Stalbridge radically in the Pre-Submission Local Plan consultation. The 2012 consultation included Stalbridge with the District’s larger villages (Options 1 and 2) or with all the District’s villages (Option 3) and did not offer an option in which Stalbridge was recognised as a higher order settlement.</p> <p>5. Stalbridge, which is described as one of the ‘market towns’ in the north of the District (with Gillingham, Shaftesbury and Sturminster Newton) in paragraph 3.37 of the Pre Submission Local Plan, is now proposed to be included with the District’s villages as ‘countryside’ without a settlement boundary and subject to countryside polices.</p> <p>6. This downgrading of Stalbridge is not justified by the evidence base of the plan. Stalbridge had a population of 2,698 in 2011 which made it the fifth largest settlement in the District after the four ‘main towns’;</p>	<p>Policy 6 to include Stalbridge with an allocation for about 240 homes.</p> <ul style="list-style-type: none"> <li>• Modifications to Policy 20 to exclude Stalbridge from the countryside and to include reference to a defined settlement boundary for Stalbridge.</li> <li>• A new policy and inset diagram for Stalbridge, similar in form to Policies 16 to 19 including policy commitments to define a revised settlement boundary in Part 2 of the Local Plan and to review the Conservation Area boundary (under Section 69(2) of the Planning (Listed Building and Conservation Areas) Act 1990).</li> <li>• Consequential modifications to Policies 2, 6, 9, 20 and other text in the Plan to add references to Stalbridge as a settlement with a defined boundary and to delete references that associate Stalbridge in policy terms with the District’s villages and countryside.</li> <li>• Overall housing requirements should be re-assessed with the aim of improving access to housing and affordability.</li> </ul> <p>The plan period should be extended to 2031. Consequential modifications should also be made to Policies 2 and 6 and other related text in the draft Local Plan; including commitments to define a new settlement boundary for Stalbridge in Part 2 of the Local Plan and to review the Conservation Area boundary.</p>	

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								<p>ahead of Marnhull with its population of 1,998 and nine other settlements with populations of more than 1,000. The Sustainable Development Strategy Background Paper of November 2013 (paragraph 5.21) shows Stalbridge in the second category of settlement by size of population (2,000 to 3,500), with Sturminster Newton and Marnhull.</p> <p>7.The Sustainable Development Strategy Background Paper (paragraph 5.26, supported by Figure 3) also shows Stalbridge to have proximity to a relatively high level of services: ‘relative proximity to services is high around the three main towns, but it is also high in the north-western part of the District where Sturminster Newton, Stalbridge and Marnhull (the District’s largest village) are</p> <p>8.Stalbridge is a small town with a supermarket a number of other shops and other services in its small High Street, including bank, post office, pharmacy, electrical goods retailer, butcher, convenience store, take-away meal outlets, two inns and professional services including dental surgery. The town has a 7-class primary school and separate pre-school facilities. There are local employment areas to the east of the town, which is also only 7 or 8 miles from Sturminster Newton, Sherborne and Wincanton, and 11 or 12 miles from Shaftesbury or Yeovil with their wider ranges of employment, shopping and other facilities. Railway services are three miles away at Templecombe. There are regular bus services to Sherborne and Yeovil with additional services to other towns in the area.</p> <p>9.The effects of downgrading Stalbridge with all the District’s villages to the status of ‘countryside’ are to reduce the scope for it to remain a sustainable settlement in the future by developing sufficient housing to maintain or expand its population and retain local services. The justification for this approach is explained in the Sustainable Development Strategy Background Paper in the following terms: ‘the abolition of regional planning means that there is no longer a requirement for Stalbridge and the District’ villages to be categorised according to RSS Development Policies B and C, as the draft Core Strategy attempted to do.’</p> <p>10.The new approach relies on neighbourhood plans or</p>		

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								<p>on local communities ‘opting-in’ to Part 2 of the Local Plan. This approach is not consistent with paragraph 55 of the NPPF, which states: ‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.’ It is not clear how the Council’s proposed approach can account for the interdependence of settlements within the District – or across District boundaries.</p> <p>11.The Background Paper notes that ‘Local communities also require sufficient strategic direction to guide future development.’ The proposed inclusion of Stalbridge in the draft Local Plan with all the District’s village and open ‘countryside’ does not provide sufficient strategic direction for the future of Stalbridge as a small market town, especially as the objective (described in Objective 4, paragraph 2.52) is ‘focusing on local (rather than strategic needs) in Stalbridge...’</p> <p>12.The Background paper also says that local communities are concerned that if housing is allocated on the basis of existing local facilities, the proposed housing may no longer be justified if facilities close. There is no mention of the increased risk of facilities closing with declining population as a result of falling household sizes and ageing populations, when there is no new housebuilding in a settlement.</p> <p>13.It is not appropriate to make a settlement as significant as Stalbridge subject to countryside policies, as proposed in Policy 2 (Core Spatial Strategy), based on ‘essential rural need’ and ‘local needs’, subject to neighbourhood planning or ‘opting in’ to site allocations in Part 2 of the Local Plan. Nor is it appropriate for there to be no settlement boundary, as is also proposed in Policy 2, so that countryside policies apply within the built-up area of the town.</p> <p>14.Policy 6 (Housing Distribution) is also inappropriate</p> <p>15.By comparison with Sturminster Newton, which had a population of 4,292 in 2011 and where Policy 6 proposed an allocation of 380 homes, an allocation for Stalbridge of 240 homes would be proportionate, in</p>		

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								<p>conjunction with new and improved community facilities. The allocation would entail defining a new settlement boundary for the town to allow its expansion, whilst allowing for infill development on appropriate sites within the town. The new settlement boundary may also involve amending the Conservation Area boundary.</p> <p>16.A new policy and inset diagram should be included for Stalbridge as a ‘main town’: similar to Policies 16 to 19 for the other four ‘main towns’. The new policy should state (inter alia) that:</p> <p>‘Stalbridge will continue to function as an important service centre, in conjunction with other settlements in the north west of the District through:</p> <ul style="list-style-type: none"> <li>a.development and redevelopment within the existing built-up area;</li> <li>b.greenfield extensions to the south and west of the town as defined in Part 2 of the Local Plan; and</li> <li>c.other opportunities identified by neighbourhood planning</li> </ul> <p>About 240 new homes will be provided at Stalbridge during the period 2011-2026. Housing needs will be met through... (the above locations).</p> <p>Employment needs will be met at the Station Road employment area and the Gibbs Marsh Trading Estate. The vitality and viability of Stalbridge as a local shopping centre will be maintained and promoted. Additional retail and service uses (A1, A2 and A3) will be permitted and changes of use of existing retail and service uses will not be permitted unless there is evidence that the existing uses are no longer viable.</p>		

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3058	Stephen Graeser	Stephen Graeser Planning		4115	3.56	No	It is not justified, It is not effective	The strategy is derived from the former RSS of the South West which promotes top down hierarchy for the concentration of new development. This is unsound due to the sporadic dispersion of larger settlements throughout the south west within Dorset and within North Dorset. The concentration of development within the four main towns and the removal of settlement boundaries from villages and towns is considered inappropriate and unsustainable leading to the over development of the towns and under development of the villages. The resultant urban concentration is ineffective and it is not supportinve of villages, village facilities or the needs of the rural area. it is not sustainable in terms of villages and rural communities providing and maintaining their own local services. The policy positively undermines the future welfare of village communities.	it would be more appropriate to retain settlement boundaries for all settlements as specified in the existing Local Plan until each settlement has a Neighbourhood plan in place. This will enable a degree of development to occur thereby contributing to the retention, survival and possibly enhancement of village services. Settlement boundaries could be removed once a settlement has a Neighbourhood Plan in place.	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages until they are reviewed through Local Plan Part 2 and/or a neighbourhood plan.



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3059	James Sorrentino	Lightwood Strategic Ltd		4162		No	It is not justified	<p>Draft Core Strategy in 2010 identified Stalbridge as a town for growth along with the larger villages in the District and proposed 1200 new homes to be built through infilling and site allocations. 2012 Key Issues Consultation saw a radical change. Stalbridge was not recognised as a higher order settlement and was grouped with the villages to be washed over with countryside policy. Stalbridge is described as one of the 'market towns' in the District in para 3.37 of the Pre-submission Local Plan. The evidence in the Sustainable Development Background Paper (Nov 2013) shows Stalbridge in the second category of settlement size of population with Sturminster Newton and Marnhull. The same background paper shows Stalbridge to have proximity to a relatively high level of services (Stalbridge has a supermarket, a small high street including bank, PO, pharmacy, electrical retailer, butcher, convenience store, take away meal outlets, public houses and professional services including doctors and dentist. The town has a 7 class primary school, with separate pre-school. There are local employment areas to the east of the town and the town is only 7 miles to Sturminster Newton, 11 miles to Sherborne and Wincanton, 11 miles from Shaftesbury and Yeovil. 3miles to Templecombe railway station and well served by public transport. The effects of downgrading Stalbridge with all the District's village to the status of 'countryside' will reduce the towns ability to remain a sustainable settlement. Relying on neighbourhood planning and 'opting-in' to Part 2 of the Local Plan is not consistent with para 55 of NPPF. The countryside policy does not provide sufficient strategic direction for the town and Stalbridge should be identified in CP2 as a fifth 'main town' rather than sharing an allocation of 230 dwellings for 2011 to 2026 as one of 50 or more settlements in the countryside.</p>	<p>Stalbridge should be a town with a settlement boundary and site allocations (see original representation for further information on proposed sites and conceptual development proposals). A new policy and inset diagram is required for Stalbridge similar to policies 16 to 19 for the other four main towns. Full wording suggested in original representation (page 8 para 3.17) Consequential modifications should also be made to policies 2 and 6 and other related text in the local plan. Areas for expansion are identified to the south and west of Stalbridge, both areas in SHLAA.</p>	<p>Due to its size and level of facilities Stalbridge should have its own allocation of housing. It should have its own policy and inset map. Areas for expansion are identified to the south and west of the town.</p>

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3061	Colin David Tebb	Chesterton Humberts		4240		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The proposed abolition of all village/settlement boundaries which consequently prevents any new homes being built (other than affordable - exception sites) is extremely blinkered. Modest, well designed housing, with good access and no impact upon neighbours, which enables new families and others to remain and live in a village, would add to the vitality and vibrancy of the village and perhaps most importantly would ensure the village services (shops, post office, church, public house, school, etc) remain open.	Retention of village boundaries, to stimulate modest and controlled housing growth, would ensure villages (and their vital community services) survive. This policy has succeeded with NDDC's old Local Plan for almost 15 years on this basis, whilst trying to force Parish Council's to develop their own Neighbourhood Plans is the wrong approach. Many Parish Councils do not have the time or resources to write Neighbourhood Plans and the retention of boundaries would enable NDDC and Parish Councils to continue to have input into where new homes and other development are built.	To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages. Relying on neighbourhood planning places a burden on parish councils who do not have the time or resources to produce a plan.
3064	John Lewer	Shaftesbury Town Council		4258		No	It is not justified	Policy 2 focuses too much on environmental sustainability and not enough on social sustainability. The policy is too tightly defined and will neither allow adequate development in "the countryside" nor guarantee acceptable development in the towns.		Policy needs to consider social sustainability rather than environmental sustainability in its distribution of housing.
3066	Rosie Baker	Terence O'Rourke Limited	Mr Matthew Richardson	4273		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Gleeson Strategic Land Limited fully supports the identification of Shaftesbury as a Main Town, to function as a main service centre for the District and the spatial strategy to distribute the majority of the housing growth to the four main towns, including Shaftesbury. However, policy 2 is both ineffectual and lacks the positive approach required by the NPPF by seeking to retain the existing settlement boundaries for the main towns, even if that retention is only proposed for a temporary period. These settlement boundaries were fixed in the North Dorset District-Wide Local plan to 2011, adopted 2003. They were identified on the basis of now out of date evidence of need and are time expired. They are out of date and, the plan confirms, through the implications of Policy 6 and associated locations for growth as identified on the inset diagrams, cannot be retained if the objectively assessed housing needs of the District are to be met, under the presumption in favour of sustainable development for plan making. Indeed, it is relevant that the settlement	The Core Strategy should review the settlement boundaries, allocate sites for development in the growth locations identified, and then redefine the settlement boundaries so that the allocated sites included within the settlement boundaries, could be included as deliverable sites in the 5 year supply and therefore could be used to demonstrate the effectiveness and delivery of the plan. Included with this response is a delivery statement for the land to the west of the A350 in Shaftesbury. This statement identifies a suitable site boundary for the comprehensive development of the site, which would enable the delivery of about 150-200 new homes along with	Retaining existing settlement boundaries around the four main towns is unsound as they are out of date and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF. In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan.

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								<p>boundary of Shaftesbury has already been breached. Clearly, housing provisions at these main towns are central to the strategy and the timely delivery of planned development relies heavily on a review of these boundaries. Without settlement boundary review in the Core Strategy, specifically in relation to the main settlements and locations for growth (rather than every settlement boundary within the District) the sites cannot be called allocations and therefore confirmed as 'deliverable' under paragraph 47 of the NPPF (including footnotes 11 &amp; 12). This makes the plan ineffective and undeliverable, weakening the housing land supply position of the district and rendering the plan ineffective. Wiltshire Council took a similar approach to the retention of existing settlement boundaries, set in old style local plans, relying on neighbourhood planning a later Allocations DPD to meet the objectives assessment of need through the plan-led approach. However, the Core Strategy Inspector recently concluded that: "it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the purposes of the CS plan period". The Inspector felt that these out of date settlement boundaries could "potentially stymie development .... And therefore not represent a positive form of planning" (Procedural Letter number 10, dated 2 December 2013). In that case, and in order to expedite adoption of the Core Strategy, the Inspector has suggested the progression of a separate DPD but it is also relevant that he has asked for confirmation that the District has a 5 year housing supply, from the existing allocations and commitments made, as this is essential for the plan to be found sound. Whilst it is recognised that the settlement boundaries will be reviewed in a future DPD this work should be undertaken now as part of the Core Strategy to ensure the plan is positively prepared and meets the requirements of the NPPF to "allocate sites to promote development...bringing forward new land where necessary, and provide details on form, scale, access and quantum of development were appropriate (Paragraph 157, NPPF) and to ensure the Council can continue to demonstrate a "supply of specific</p>	<p>significant areas of new green infrastructure that will benefit both new and existing residents.</p>	

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								deliverable sites sufficient to provide five years worth of housing against their housing requirements" (Paragraph 46, NPPF)		
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4291		No	It is not justified	The concept of sustainable development should be expanded to villages. This will address the effect of business closures, lack of employment, and lack of affordable housing. Development should be encouraged in Villages and neighbourhood plans must reflect local need. Concentrating development in major towns will be to the detriment of villages		Villages should be included in the allocations to make them more sustainable.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4332		No	It is not justified	Not providing development boundaries to villages, and relying on the impact on the countryside will have a detrimental impact on sustainable communities within the AONB. Specific provision should be made for development growth of villages, also within the AONB. The current approach will have the effect of preventing any growth of villages and seriously hamper their sustainability. Affordable housing should be encouraged by providing an allocation with each and every small development in villages.		To support thriving rural communities within the countryside settlement boundaries should be retained to provide certainty that some growth will be delivered in Stalbridge and the District's villages.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4299		No	It is not justified, It is not effective	The current planning approach favours the big developer whereas in the countryside the smaller and single home developer is not recognised and catered for, restricting the development of the local economy. Gillingham Plan should be acknowledging this especially. Also for the next phase of Shaftesbury housing expansion. Shaftesbury suffers from the effect of external large developers who have no stake or interest in the wellbeing of the local community, nor the local economy. This is a far cry from the sustainable development being promoted. Smaller local developers will have a positive impact on the local economy and people. Developments can be divided up as two phase projects – provision of infrastructure and amenities, and then the delivery of buildings, with more useable and meaningful open spaces. Evidence – the problems experienced at Shaftesbury Eastern development. This will have the added benefit of ensuring that planning conditions are met and better control of delivery.		Small developers require more flexibility in the policy. Large allocations favour big developers.

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3069	Mike Burt	Okeford Fitzpaine Village Hall		4313		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	On-line consultation not appropriate in rural areas due to restriction on broadband accessibility. The policies in the plan are in direct conflict with the RSS, which proposed a greater level of housing and recommended development in villages to satisfy both need and sustainability. The strategy to concentrate strategic development at the towns is not recommended. Encouragement to produce neighbourhood plans is in conflict with Policy 20 Countryside because: it removes all village settlements boundaries; it does not allow for substantial growth for a community to meet its own needs.	Extended consultation period to take into consideration Christmas period. Policy 20 should be revised to be more flexible to accommodate changes in the future wants for development.	Policy is too restrictive and will not meet the housing needs in the villages.
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4366		No	It is not justified	The identification of the four main towns as the main focus for growth is supported; these towns represent the most sustainable locations for growth. The last paragraph of Policy 2 states that ‘the settlement boundaries around the four main towns in the North Dorset District Wide Local Plan 2003 are retained and will continue to be used for development management purposes until reviewed either: through the North Dorset Local Plan – Part 2: Site Allocations or a neighbourhood plan.’ This aspect of Policy 2 is considered unsound; the existing settlement boundaries around the four main towns in the North Dorset District Wide Local Plan 2003 are out of date, and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF. The emerging Local Plan only identifies one new site allocation, the strategic site at Gillingham. Further detail for the remaining main locations for growth identified the four main towns is proposed for Part 2 of the Local Plan. As set out in our response to Policy 18, we can see no reason why the Local Plan Part 1 does not formally allocate the land that is identified for development at the other market towns, including the land south east of Wincombe Business Park (criterion h of Policy 18).	In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan reflecting the sites identified for development in Policies 16, 17, 18, 19 and 21. The text of Policy 2 should be modified as follows, with accompanying amendments to the Proposals Maps: “The settlement boundaries defined around the four main towns in the North Dorset District-wide Local Plan 2003 are retained and expanded in line with Policies 16, 17, 18, 19 and 21 of this document, which identify the locations for expansion of settlement boundaries at the four main towns. The expanded settlement boundaries will continue to be used for development management purposes, until reviewed either through site allocations in Part 2 of the Local Plan or a neighbourhood plan.”	Retaining existing settlement boundaries around the four main towns is unsound as they are out of date and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF. In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan.

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3073	Suzanne Keene	CPRE North Dorset Branch		4423	3.39, 3.46	No	It is not effective	In general, we strongly support the Core Spatial Strategy. We hope that it takes account of recent planning inspectors' and other decisions and statements on calculating 5 year housing supply and countryside protection issues ( <a href="http://bit.ly/1mnPpr6">http://bit.ly/1mnPpr6</a> , <a href="http://bit.ly/1bfoRTE">http://bit.ly/1bfoRTE</a> ). The policy is unsound because imprecise wording, using 'should' instead of 'must', and 'strictly controlled' instead of 'development will be refused' leave the policy open to various interpretations. This is not necessary; explanatory paragraphs leave plenty of room for exceptional circumstances.	Para 3.39 and Para 3.46 say: ... development will be more strictly controlled with an emphasis on meeting local and essential rural needs Re-word Para. 3.39 and Para. 3.46: ... development will be strictly controlled and only permitted if clear evidence is presented that it is required to meet local and essential rural needs Policy 2, 1st paragraph: All development proposals should be located Re-word: All development proposals must be located ... Policy 2, 4th paragraph: ... where development will be strictly controlled ... Re-word: ... where development will be refused ...	Suggests stronger wording for the policy text.
3074	Craig Barnes	Gladman Developments		4400		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The percentage of housing in the countryside (6%) is not a reflection of needs, but rather a residual that the Council has determined cannot be met within the market towns. This approach is in conflict with NPPD and the objective of the plan to support the sustainability of rural settlements. Gladman do not contend that development should be focussed towards the more sustainable settlements, however the Council must ensure that the proportion of growth allocated for settlements outside the main towns is sufficient to account for the evidenced needs of these areas to address affordability and ensure that the sustainability/viability of rural services is not threatened.		Concerned that allocated growth for the countryside is not sufficient to meet need in these areas.

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3076	Malcolm Brown	Sibbett Gregory	Mr Vernon Knapper	4419	3.46	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy unsound as fails to comply with para 47 of NPPF - does not 'boost significantly' supply of housing. Plan fails to take account of para 158 of NPPF as LPA has not taken full account of relevant market and economic signals. NPPF identifies presumption in favour of sustainable development but cannot assume that development outside main settlements not sustainable.	Policy 2 should be amended to enable provision of greater choice of location and meeting sustainability of communities. Require a hierarchy of settlements.	Policy needs to promote growth in the more sustainable villages.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4472	3.55	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Paragraph 3.55 states that the existing settlement boundaries contained in the North Dorset District Wide Local Plan 2003 will continue to be used for development control purposes – until such time as a review is undertaken through the Local Plan Part 2. This approach is not considered sound. In particular, the Local Development Scheme, November 2013, targets December 2016 as the proposed adoption date for Part 2. There will be uncertainty in the intervening period. Prior to 2016 it is likely that an application for planning permission will be submitted by Persimmon Homes for the development of land allocated for housing at Blandford St. Mary. It would not be appropriate for this to be assessed against the 2003 Local Plan. There will be considerable ambiguity between the 2003 document and an assessment of policies from Part 1 of the Local Plan.  This paragraph of the Local Plan is also in conflict with the NPPF, with Paragraph 17 stressing the need for plans to be kept up to date. Relying on a 2003 Local Plan will be inconsistent with the main thrust of the NPPF, which is to allow planning applications that promote sustainable development to be approved without delay. Assessing a planning application outside of the settlement boundaries of an old Local Plan is likely to cause confusion and delay.	The Local Plan Part 1 should include a series of detailed inset maps showing where settlement boundaries are to be amended.	Settlement boundaries around the four main towns are out of date and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3083	Edward Dyke	Symonds and Sampson	Mr Michael Miller	4540		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	<p>National Policy is not properly accounted for in the Core Spatial Strategy. In part it seems to contradict the principles set out in Part 3 of the NPPF which seeks to support a prosperous rural economy.</p> <p>The Core Strategy does not simply focus development on the 4 major towns, it effectively eliminates a significant proportion of development anywhere outside of these 4 settlements. The Core Strategy does not take into consideration that there are a number of large villages that have all the essential services mentioned and need an element of growth to maintain sustainability.</p> <p>We would suggest that “carefully managing of development” should apply equally to the 4 major towns as well as the countryside. NDDC has always been playing catch up in respect of housing numbers and should seek to adopt an approach which promotes sustainable development in the rural community in line with Part 3 of the NPPF.</p> <p>North Dorset is a rural district and as such the communities it encompasses are largely reliant on the private car for transport. We do not feel this is a substantiated reason to place such a marked restriction on development outside of the 4 towns.</p> <p>The Countryside Policies provide for development in a number of very limited scenarios. There is minimal scope for the development within sustainable and sizable villages to provide private homes for rural families. We argue that these policies do not therefore meet the “essential rural needs”</p> <p>The Neighbourhood Plans will be limited in their ability to meet local needs as they are constrained by the Local Plan policies for the Countryside. Para 5.20 indicates that the number of residential units allocated to the Countryside is “At least 230” in order to meet the regional allocation of 4,200. There are in excess of 50 village parishes within North Dorset and approximately 50% of the population current resides outside of the 4 main towns. If an allocation of 230 units is presented this would afford each parish one new unit every 3 years. Notwithstanding the number of units that have already been consented and built since the start of the plan period in 2011. We would argue</p>	We suggest that the blanket removal of settlement boundaries needs to be removed and the boundaries retained where appropriate.	We suggest that the blanket removal of settlement boundaries needs to be removed and the boundaries retained where appropriate.



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								<p>that this is an unrealistically small number and contrary to NPPF guidance on supporting a prosperous rural economy (Part 3) and delivering a wide choice of quality homes (Part 5).</p> <ul style="list-style-type: none"> <li>• Para 54 of the NPPF states “local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing”. In their blanket approach of removal of the settlement boundaries, which were designated in the first place only around those villages that were deemed sustainable and suitable, NDDC have spurned their responsibility under the NPPF to respond to the local needs, instead leaving the response and future of the communities of North Dorset to the residents themselves. We have grave concerns that allowing communities to ‘self determine’ through writing their own Neighbourhood Plan is unlikely to produce the desired results with personal preference of those in decision making roles being projected into Neighbourhood Plans. We are also concerned that some smaller communities will lack the resources and enthusiasm to produce effective and sustainable plans.</li> <li>• The Landscape of North Dorset has evolved over hundreds of years, by exercising a blanket removal of settlement boundaries NDDC is limiting the ability of the rural community to continue to grow sustainably and organically.</li> </ul>		
3083	Edward Dyke	Symonds and Sampson	Mr Michael Miller	4543		No	<p>It has not been positively prepared, It is not effective, It is not consistent with national policy</p>	<p>Little or no information is available on Part 2 of the NDLP. It is unreasonable that following the blanket removal of settlement boundaries NDDC has chosen to give such limited information at this stage, as the policies set out in Part 1 will have a significant impact on the allocations identified in Part 2.</p> <ul style="list-style-type: none"> <li>• The plans, which are provided in Appendix B, to show the removal of the settlement boundaries are wholly unhelpful. These plans, which were out of date at the time of their initial production and adoption in 2003 and continue to present an inaccurate picture of development in the villages. The relevance of these documents as an aide to Part 2 of the NDLP is farcical and shows scant regard for the policies set out in Part 3 of the NPPF.</li> </ul>		

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								<ul style="list-style-type: none"> <li>Part 2 of the Plan has yet to be produced, in relation to Policy 2 this is fundamental and commenting on the suitability of this plan is therefore challenging at best!</li> </ul>		
3085	David Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	4598		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	PCL Planning agrees in general with the Council's approach to directing the majority of housing growth at the main settlements as the most sustainable approach for the District.		
3092	Frank Heels			4645		No	It is not justified	Without the publication of practical proposals (in Part 2 of the Plan) it is not realistic to expect communities to decide whether to spend valuable resources on preparing a neighbourhood plan now or to wait and see what possible advantages/disadvantages Part 2 will offer (Para 8.192)		Concern that communities will not embrace neighbourhood planning.

## Pre-submission Document - Analysis of Responses and Identification of Main Issues

### Policy 3 – Climate Change

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
378	Simon Rutter	Proctor Watts Cole Rutter		4346		No	It is not consistent with national policy	Robust design of housing should be considered as an alternative option to an outright prohibition on building in the margins of flood plains.	Policy text point f) Robust design of housing should be considered as an alternative option	Flood risk can be tackled though design
388	Tom Munro	Dorset AONB Partnership		4047		Yes		The Policy seems to focus almost entirely on securing climate change mitigation and adaption to development. Suggest inclusion of policy statement referring to renewable energy developments in their own right, reflecting par 4.21.		
404	Michael Holm	Environment Agency		4216		Yes		Support policy, but also suggest the following changes. We note that the main policy position relating to flood risk has been situated under Policy 3 - Climate Change. We would prefer that flood risk was more given a more prominent position or that at a minimum Policy 3 is entitled Environment and Climate Change. We are concerned that in places the text reads as though the increase in flood risk due to climate change is the key issue. This is obviously one of the key flood risk issues, but principle flood risk issue is the existing flood risk. This message is somewhat lost under the climate change heading. We support that the existing flood risk related texts written under Policy 3 do highlight the main flood risk sources and the need to refer to National Planning Policy including planning principles - Sequential and Exception Tests.	Many of the comments we recommend are to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position. We would prefer that flood risk more generally, not just flood risk due to climate change, was more given a more prominent position in the policy or that at a minimum Policy 3 is entitled Environment and Climate Change.	Flood risk is not only a Climate Change issue, should also refer to existing flood risk
404	Michael Holm	Environment Agency		4217	4.27	Yes		Not only can features such as hard surfacing and the canalisation of watercourses be avoided in developments, but development gain could aid removal / reversal of such features and associated impacts.	Many of the comments we recommend are to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position. Paragraph 4.27 could be strengthened by stating that development gain could aid removal / reversal of features such as hard	Development gain in relation to flood risk should be sought especially through removal of features which exacerbate flood risk

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
									surfacing and the canalisation of watercourses and associated impacts.	
404	Michael Holm	Environment Agency		4218	4.28 4.30 4.31	Yes		The comments we recommend are to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position. A number of changes to the text on Page 46 are proposed.	Proposed Changes to paragraphs on Page 46 are: 4.28. Areas liable to fluvial and groundwater are shown in the 'Level 1' Strategic Flood Risk Assessment (SFRA) for the district. As set out in national policy development proposals should avoid areas at highest risk of flooding having regard to the Sequential and Exception tests. 4.30 If following the application of the sequential test, development is proposed in a flood risk area or where the site is greater than 1 hectare in area even in Flood Zone 1, a site specific Flood Risk Assessment taking into account all sources of flood risk, including fluvial, groundwater, surface water (both site derived and other overland flow) etc., and the impact of climate change, will be required to accompany the planning application. 4.31 Flood Risk Assessments must demonstrate that development itself is not at risk from flooding nor does it increase flood risk elsewhere. Development proposals provide opportunities to minimise the risk and impacts of flooding from all sources both to the development and elsewhere. Flood risk mitigation and flood resistance and resilience measures may be required as part of development proposals.	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
404	Michael Holm	Environment Agency		4230	4.26	Yes		The comment we recommend to the section on Water Resources and Paragraph 4.26 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	4.26 Please include reference to reducing water's use by restricting flow rate in showers, as these will use a significant proportion of daily use of water. There should be reference to the protection of groundwater in this section. This should include reference to redevelopment of brownfield sites that may have been contaminated, despite the retention of policies 1.16 and 1.20 of the 2003 local plan.	Protection of groundwater. Redevelopment of contaminated brownfield sites
769	Tim Hoskinson	Savills	Taylor Wimpey	4185		No	It is not justified	Although the principle of mitigating climate change is accepted, various requirements in this policy are either unclear, unjustified, duplicate Building Regulations, or are at risk of becoming out-dated within a short timeframe. Likewise as currently worded the draft policy and supporting text lack the perspective of deliverability and viability and are not justified by the evidence base.	Modify Policy 3 and supporting text to clarify that development should reflect current national targets, remove the requirement for energy statements, include considerations of deliverability and viability, and remove duplication with other parts of the plan.	Development should reflect national standards. Energy statements should not be required. Include consideration of viability and deliverability
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4604		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 3 sets out an overly prescriptive approach to climate change and sustainability which specifies that a building should meet all criteria set out at (a) to (g). Notwithstanding the fact that there is considerable overlap with the Building Regulations, improving building performance and reducing carbon emissions should be taken as a balanced approach rather than a set of prescriptive criteria. No flexibility is provided in which of these objectives should be given priority. There is a lack of clarity with Policy 3 where no specific guidance is given on the generalised requirements set out at (a) to (g), such as reference to meeting or exceeding 'current national targets for energy performance'; there is no clear definition as what targets are referred to (one is perhaps left to assume it's the Building Regulations – which is self-regulatory).		Overly prescriptive in relation to building performance. No flexibility built in and no priority within criteria

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
2528	Colin Hampton	Milborne St Andrew Parish Council		4065				4.1 The impact of industrial wind farms and possible large scale solar farms will not meet this object of enhancing the local environment and making it more attractive. 4.27 – 4.31 Flood Risk. There are a lot of fine words but too little direct action in tackling these issues which have clearly been made worse by previous planning and development decisions. Active policies to reduce risk should be placed on developers and NDDC, DCC and EA. 4.13 Agree with the need for facilities to avoid unnecessary travel. This is why it is imperative to retain a regular bus service in villages like MSA. Para 4.30 Absolutely disagree. Development should NOT be proposed in areas of flooding. Large scale wind farms should be refused when they impact on AONB in accordance with recent Government Policy Changes. Local Plans could write in a requirement not to be sited within 2 kilometres of residences (adopting the 2km guideline adopted elsewhere by other authorities).		Active policies should be put in place to reduce flood risk. Absolutely NO development in areas at risk of flooding. Large wind farms and solar farms have an impact on the AONB/landscape.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4470	4.14, 4.18	No	It is not justified	Although the principle of mitigating climate change is accepted, various requirements in this policy are either unclear, unjustified, duplicate Building Regulations, or are at risk of becoming out-dated within a short timeframe. Likewise as currently worded the draft policy and supporting text lack the perspective of deliverability and viability. Various amendments to the policy and supporting text are proposed to address this.	<ul style="list-style-type: none"> <li>· The first sentence of Policy 3 is unclear, provides no guidance to decision makers, and should be deleted.</li> <li>· The second sentence of Policy 3 should be modified to read as follows: “Where the proposal includes new buildings they should, wherever it is appropriate and viable to do so, [...]”</li> <li>· Criteria a to d of Policy 3 are all ‘and’ requirements i.e. all of them are required. This is considered unreasonable and overly prescriptive. Criterion a is a repetition of Policy 2 and should be deleted. The requirement in criterion c to exceed national targets is not justified, and should be amended to read ‘to meet the current ....’ Criterion d is unclear, is not justified and should be deleted.</li> <li>· Delete the following text in Policy 3, to remove an overly prescriptive element: “Detailed energy statements should be submitted to support development proposals setting out the expected level of greenhouse gas emissions that will arise from the development and</li> </ul>	Viability needs to be taken into account. The criteria in the policy are overly prescriptive. Exceeding national standards for energy performance is not justified. Contributing to renewable energy targets is not justified. Energy Statements should not be required. Remove reference to Allowable Solutions.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
									<p>measures incorporated to minimise emissions.”</p> <ul style="list-style-type: none"> <li>· Delete the following text in Policy 3, to remove wording that is framed vaguely and which has little obvious purpose.: Many features of a development will be multi-functional and help to adapt to a range of climate change impacts. Multi-functional elements should be considered as part of development proposals ensuring that the primary function of the feature is not lost</li> <li>· Modify paragraph 4.18 as follows to remove superfluous cross-reference to separate policy: “In certain circumstances, on-site measures to attain the requirements of Zero Carbon policy may be difficult to achieve due to for example, the physical characteristics of the site, the location of the site or for viability reasons. In these instances, contributions towards near-site or off-site measures will be acceptable. ”</li> <li>· Modify paragraph 4.14 by removing the text “such measures include” and the following sequence of three bullet points.</li> <li>· The fourth paragraph of paragraph 4.8 is unclear and should be deleted or modified to refer to evidence or specific standards</li> <li>· The last sentence of paragraph 4.16 is not justified and should be deleted.</li> <li>· Paragraph 4.17 is overly prescriptive, unnecessary, and should be deleted.</li> <li>· Paragraph 4.19 indicates that detailed energy statements be required for all planning applications. This is unnecessary and overly prescriptive and should be deleted.</li> </ul>	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4367		No	It is not justified	Although the principle of mitigating climate change is accepted, various requirements in this policy are either unclear, unjustified, duplicate Building Regulations, or are at risk of becoming out-dated within a short timeframe. Likewise as currently worded the draft policy and supporting text lack the perspective of deliverability and viability and are not justified by the evidence base.	Modify Policy 3 and supporting text to clarify that development should reflect current national targets, remove the requirement for energy statements, include considerations of deliverability and viability, and remove duplication with other parts of the plan.	Clarify that development should reflect current national targets. Remove the requirement for energy statements. Include considerations of deliverability and viability.
3073	Suzanne Keene	CPRE North Dorset Branch		4530		No	It is not effective	CPRE strongly supports the introductory paragraphs accepting that the climate is changing, that this will have deleterious results, and that change may be mitigated by adopting less carbon intensive practices. However, some of the wording in the explanatory paragraphs and in the policy itself should be clarified. If the policy is to be effective and enforceable the Council must do more than “seek to ...” and “encourage ...”.	Para 4.8 - 4th bullet point: incorporating the highest standards of construction ... This is covered and more clearly and strongly worded in Para. 4.16. “highest standards” is vague Para 4.14 - 1st bullet point: ... through establishing safe routes between development sites and the existing built areas ... Figs. 10.1 – Ease of Movement, Fig. 10.2 – Layout, reflected in Policy 24, state that new developments must be connected to the existing street pattern and not be designed as cul-de-sac, as these require pedestrians and cyclists go round via roads designed primarily for cars. The provisions in the Manual for Streets should be followed. This could also be referenced here. Para 4.15 - If the Council’s policy is to be met, developers not merely “should” but surely “must” at least consider measures such as these. Re-word. Para 4.19 - Line 5-6 ... the submission of detailed energy statements will be expected ... Re-word: ... detailed energy statements must be submitted ... Last sentence: Such energy statements will need to set out ... not enforceable, re-word: Such energy statements must set out ... Para 4.20 - Dorset’s target is to generate 7.5% of its requirements from renewable sources by 2020. Insert this fact. Para 4.21 - Whilst encouraging schemes, adverse impacts including cumulative landscape and visual impacts will need to	Safe routes through developments sites - reference should be made to Manual for Streets. Adverse impacts including landscape and visual impacts need to be addressed. Include reference to planting reducing flood events



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									<p>be satisfactorily addressed. This is unclear and unenforceable and conflicts with policies on landscape character and AONBs, e.g. Para. 4.59 and Policy 4. Re-word suitably to clarify what is required under Policy 3.</p> <p>Para 4.33 - To adapt to extreme heat events ... Planting of all kinds can help to reduce flooding, including in the higher reaches of rivers and natural drainage systems Re-word: To adapt to extreme heat events and heavy rainfall</p> <p>Policy 3 - Policy 3: Climate change - Strengthen and clarify wording: replace occurrences of "should" with "must" or similarly unambiguous term. in 1st sentence, replace ... seek to ... with ... incorporate measures to ... Second sentence, delete ... seek to ... Sentence above point e) – delete ... seek to ...</p>	
3086	Simon Coles	WYG	David Lohfink	4608	4.8, 4.16, 4.17	No	It has not been positively prepared, It is not justified, It is not effective	<p>Paragraph 4.8 fourth bullet-point refers to development incorporating the highest standards of construction, including the use of renewable energy where appropriate. It is considered that this is imprecise and unclear in terms of what these standards are and who will be the arbiter of the what are highest construction standards. Paragraph 4.16 indicates that the Council will rely on the Government's Zero Carbon Policy but then sets out an expectation that developments should go further than this. This lacks clarity and provides inadequate guidance for communities and developers. Paragraph 4.17 is based on the premise that the most efficient way of meeting Zero Carbon requirements is to incorporate renewable or low carbon technology, which should be the priority for all new developments. This claim is not properly evidenced. Use of the word "should" is too prescriptive.</p>	<p>Delete "...the highest standards of construction..." and replace with "...sustainable construction techniques..."</p> <p>Delete the final sentence of paragraph 4.16 and make any consequential changes to other Plan text and policy. Amend paragraph 4.17 to read: To meet the requirements of the Government's Zero Carbon policy, developments should first consider measures....Secondly developers should consider renewable or low carbon energy technology initiatives, subject to site and scheme characteristics and viability."</p>	Sustainable construction standards should be based on viability and deliverability

## Pre-submission Document - Analysis of Responses and identification of Main Issues

## Policy 4 – The Natural Environment

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
87	James Parkin	Dorset Wildlife Trust		4011		No	It is not consistent with national policy	paragraph 2 of Policy 4 is considered to be not consistent with national policy as it does not mention enhancing locally designated sites where opportunities exist (NPPF paras 109 and 114)	Wording should be added to encourage applicants to consider if their proposals could enhance sites rather than just mitigate adverse impacts on locally designated sites. Suggested the following: "as a last resort, compensation measures may be acceptable if effective mitigation cannot prevent residual biodiversity loss. Such compensation must offer gains equivalent in magnitude to the loss resulting from development. Where possible, proposals should seek to enhance the biodiversity value of sites.	Encourage gains in biodiversity where opportunities exist
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4259		No	It is not effective	Landscape is a more holistic concept in reality than the 'Natural Environment'. It embraces historic and cultural associations in addition to geology, topography and wildlife.	It would provide greater clarity if there were separate policy sections for Landscape, Wildlife and the Historic Environment. This would enable the weight being given to the topics to be more readily identified and appreciated. In the case of AONBs it could serve to emphasise the national importance and local stewardship of these landscapes.	Policy does not capture all elements of landscape - historic and cultural as well as geology, topography and wildlife
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4261	4.58	No	It is not consistent with national policy	In Para 4.58 the primary purpose of the AONB designation is correctly set out. However there is no secondary purpose of designation in the CROW Act and therefore the statement that there is 'the secondary purpose to increase the understanding, enjoyment of the special qualities of the area' is incorrect.		The policy mentions a secondary purpose of the AONB designation. This is incorrect as there is no secondary purpose
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4263	4.59	No	It is not consistent with national policy	Para 4.59 omits reference to exceptional circumstances which is a key aspect of NPPF para 116		Major development in AONB in exceptional circumstances only

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616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4265	4.64	No	It is not effective	In connection with decisions on development proposals, the Local Plan states it will 'have regard to the objectives included in the two AONB Management Plans'. This was found to be insufficiently clear or robust in relation to the Wiltshire Plan at the EIP. Emphasis should be put on the applicant to demonstrate achievement and compliance with the AONB objectives rather than the LPA having to tease out whether or not that has been done.	Recommend the following wording: "proposals for development within or affecting the Areas of Outstanding Natural Beauty... shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant management Plans of those areas"	Developments should be required to demonstrate compliance with AONB management plans
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4271		No	It is not effective	The policy seems to be worded in a circular way that does not provide any particular robust guidance or criteria for decision making.	Suggests the following wording" within the areas designated as AONB, and their settings, development will be managed in order to conserve and enhance the natural beauty of the area. Development proposals will need to demonstrate that they have taken account of the objectives, policies and actions of the AONB Management Plans.	Conserve and enhance natural beauty of AONB. demonstrate compliance with AONB management plans
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4275		No	It is not consistent with national policy	The Plan does not follow the guidance in the NPPF that there should be special policies for AONBs to indicate how planning matters will be handled differently from non-designated areas. Para 17 bullet 5 - take account of different areas as well as the intrinsic character of the beauty of the countryside. Para 17 bullet 7 - conserving and enhancing the natural environment. Para 109 bullet 1 - enhancing valued landscapes. Para 110 - allocate land with least environmental amenity value. Para 113 - criteria based policies should be established for landscape areas. Para 115 AONB given highest level of protection in relation to landscape and scenic beauty. Para 116 major development should be refused except in exceptional circumstances and when in public interest.	The overall thrust of the NPPF has been a valid consideration at other EIPs in that local plans should have policies that indicate how development in AONBs will be treated differently to other areas.	Policy should highlight how development in AONBs will be treated differently to other areas.

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616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4280		No	It has not been positively prepared	A statement of the special qualities in Para 4.61 should be included for the AONB	The birth ground of modern archaeology, Cranborne Chase and West Wiltshire is deeply rural and tranquil. It is largely unspoilt and aesthetically pleasing, of great ecological and cultural importance , and characterised by extensive land holdings, panoramic views over rolling chalk down land, enclosed wooded vales, steep escarpments, level farmed terraces and elevated woodlands.	
641	Laura Cox	Pro Vision Planning and Design	Charborough Estate	4524		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Objects to the overall and suggested approach to addressing the impacts from development within 5km of the Dorset heathlands, set out in Policy 4. Other factors should be considered in addition to the distance from the Dorset heathlands when assessing the likely impact. For example, the residential development of a site with a direct footpath to protected heathland would undoubtedly have a greater impact from recreation and cat predation than the development of a closer site which is physically separated by a road or river. Alternative accessible recreation space should reflect the ecosystems services approach. For instance, subject to careful management provisions, commercial woodland can provide public access to an attractive natural experience, whilst continuing to contribute to a prosperous rural economy through forestry activity. Farmland could be used to provide alternative accessible recreation space via designated routes across privately owned land which might also be grazed or cropped.	Amendments to Policy 4 are necessary to ensure that the Local Plan is effective, and flexible enough to respond to the range of circumstances in which the provision of alternative accessible recreation space may be required. The policy should be changed to secure consistency with national policy, as paragraph 109 of the NPPF states that the planning system should recognise the wider benefits of ecosystems services.	Suggests that the approach to heathland mitigation is too inflexible. Suggests that the approach to heathland mitigation should embrace ecosystem services

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748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4456	4.105	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Objection is raised to both paragraph 4.105 and consequently Policy 4 and so both are addressed together here in this representation. There is no objection, in principle, to the fact that forthcoming Neighbourhood Plans should consider the designation of Local Green Spaces. However, the term Local Green Space does not even appear with Policy 4 – there is reference to Local Designated Natural Environment Sites but this would appear to relate to sites of nature conservation importance. It is fundamentally wrong and inappropriate to try to introduce policy through supporting text.</p> <p>It is not clear whether Local Green Spaces are intended to replace the Important Open/Wooded Areas within settlements (IOWAs) which are addressed by Policy 1.9 of the existing Local Plan. It is indicated under the Schedule of Policies to be retained that this policy is intended to be retained and reconsidered through the next stage of the Local Plan/Neighbourhood Plans. Whilst this may be the correct approach to the detailed designations, it adds further ambiguity as there is no reference to IOWAs or their replacement in Policy 4 and therefore no overarching policy for their continued existence in the Local Plan Part 1. Moreover the Inspector at the previous Local Plan examination questioned the appropriateness of this designation and invited the Council to reappraise the policy and the designations but this has not yet been undertaken. If IOWAs are to be carried forward into the new Local plan strategy there should be an explicit commitment to their review at the appropriate stage.</p> <p>These representations also cross refer to Policy 15: Green infrastructure and its supporting text.</p>	Delete paragraph 4.105. Clarify the future of IOWAs in this plan and make explicit the timescale and form a thorough review of such designations to meet the terms of the Inspector from the previous Local Plan inquiry	Policy doesn't reflect the supporting text in relation to IOWAs and Local Green Space. Clarification needed in relation to IOWAs

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769	Tim Hoskinson	Savills	Taylor Wimpey	4186	4.105	No	It is not justified	The key principles of this policy are supported, however we consider certain passages to be unnecessary, imprecise, or overly prescriptive.	The second paragraph of Policy 4 should be amended to encourage developments that offer gains in biodiversity. The first sentence of the fifth paragraph of Policy 4 should seek to protect important landscape features. The reference in the supporting text to protecting local green space in line with national policy should be deleted.	encourage gains in biodiversity where opportunities exist
2784	Alison Appleby	Natural England		4569	4.84	No	It is not effective	We wish to point out that the Local Plan currently refers to the Dorset Heathlands Joint Development Plan Document as setting out the mitigation measures (which supersedes the Dorset Heathlands Planning Framework). However, the Dorset Heathlands Planning Framework Supplementary Planning Document is now the core document which details the strategic approach to mitigation for Dorset Heathlands. Please refer to Mr Jacobs at the Borough of Poole for clarification on this matter.	The Dorset Heathlands Planning Framework Supplementary Planning Document is now the core document which details the strategic approach to mitigation for Dorset Heathlands. Please refer to Mr Jacobs at the Borough of Poole for clarification on this matter.	Reference should be made to the Dorset Heathlands Planning Framework SPD rather than the joint DPD
2784	Alison Appleby	Natural England		4571		No	It is not consistent with national policy	Soils and Best and Most Versatile Land Whilst there are a number of references to soils throughout the Local Plan, there seems to be a lack of more specific reference to them in the context of protection and enhancement of soils, and their sustainable use (NPPF 109). You may like to consider referring to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. In addition, the Plan appears not to safeguard the long term capability of best and most versatile agricultural land and does not make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land (NPPF 112). We therefore recommend that consideration should be given to inclusion of additional wording in the Local Plan to cover these aspects of soil use/protection.	We recommend that consideration should be given to inclusion of additional wording in the Local Plan to cover these aspects of soil use/protection/best and most versatile land. In relation to use of soils, you may also like to consider referring to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.	No mention of the need to protect and enhance soils and promotion of their sustainable use especially on construction sites. No mention of best and most versatile agricultural land

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2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4471	4.105	No	It is not justified	The key principles of this policy are supported however we consider certain passages to be unnecessary, imprecise, or overly prescriptive. Changes are proposed below to address this.	<ul style="list-style-type: none"> <li>· Amend second paragraph of Policy 4 as follows: 'Developments that offer gains in biodiversity whether through the restoration of habitats or the creation of linkages between existing sites, will be encouraged.'</li> <li>· Amend second paragraph of Policy 4 as follows: "The landscape character of the district will be protected through identification and where possible retention of the important features that characterise the area. The loss of important features will only be supported with suitable mitigation. "</li> <li>· The first sentence of paragraph 4.41 is unclear, does not accord with the NPPF, and should be deleted.</li> <li>· Amend the last sentence of paragraph 4.42 to state: Almost 40% of the District is covered by ....'</li> <li>· Paragraph 4.105 attempts to apply national policy on Green Belt to local green space. This is unsound, unjustified, and not in accordance with the NPPF. Paragraph 4.105 should be deleted.</li> </ul>	encourage gains in biodiversity where opportunities exist. Suggestion that greenbelt policy applied to Local Green Space is unjustified
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4368	4.105	No	It is not justified	The key principles of this policy are supported, however we consider certain passages to be unnecessary, imprecise, or overly prescriptive. Changes are proposed below to address this.	The second paragraph of Policy 4 should be amended to encourage developments that offer gains in biodiversity. The first sentence of the fifth paragraph of Policy 4 should seek to protect important landscape features. The reference in the supporting text to protecting local green space in line with national policy should be deleted.	encourage gains in biodiversity where opportunities exist
3073	Suzanne Keene	CPRE North Dorset Branch		4429		No	It is not effective	The CPRE very much supports this policy to conserve and enhance the natural environment. However, we notice that weak and unclear terms such as 'should' are used in the Policy and in explanatory paragraphs. This leaves applicants unclear as to whether they have to meet the requirements of the policy or whether this is optional. The wording needs to be clarified and strengthened to avoid doubt.	Delete Para. 4.44. In this text, as we read it, the meaning is ambiguous and unclear and contradicted by Para. 4.70 below, and others dealing with Landscape Character Areas, AONBs and IOWAs, such as the clear statement in Para. 4.65. Policy 1 already defines the presumption in favour of sustainable development and Paras. 4.43	High quality environment should shape the way development is managed. Concern over the incremental degradation of the landscape in and around the AONBs. Stronger support for AONB

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								<p>As it is the policy is unsound because it would be difficult to enforce</p>	<p>immediately above reinforces this.                      A preferable wording for Para. 4.44, if retained, would be: The high quality natural environment should shape the way that growth is managed within the District. Businesses should be developed imaginatively to take advantage of North Dorset’s natural assets without causing damage or deterioration.                      Para 4.45 Delete “achieved through the establishment of coherent ecological networks and the creation of multi-functional spaces”.                      The planning system has to protect environments and ecological systems that are of public value because they have taken centuries to form, it can’t create them.                      Para 4.65 “Where development is proposed within an AONB or that may harm the setting of an AONB and is at a scale above the needs of those who live and work in the area, the Council will require developers to clearly demonstrate that the development is in the public interest.” A major concern for the CPRE is the gradual and cumulative degradation of landscape in and around AONBs, whether on new sites or at outlying farms. These include large structures, however described, wind turbines and solar installations. We argue that the Council must provide an effective mechanism for scrutinising such developments more closely than has been the case in the past that ensures close cooperation with AONB bodies. A positive approach to landscape protection is required, we believe, to support and supplement the new and sensible housing policies. This para. 4.65 should be reworded to provide stronger support for AONB management plans.</p>	<p>management plans. GI is about public access and recreation which is not the purpose of SSSIs and AONBs. Object to biodiversity offsetting.</p>



ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
									<p>Para 4.70 We welcome this clear commitment to prevent impact on internationally designated sites. This section as a whole, headed International Wildlife Designations, could perhaps be revised as the paragraphs taken together present a somewhat confused picture of what will or will not be permitted.</p> <p>Para 4.99 The relationship should be clarified between the green infrastructure network and nationally designated wildlife sites, SSSIs and AONBs etc.. Green infrastructure is about public access, recreation and enjoyment, which is not the purpose of these designated areas. The Green Infrastructure network components as set out in Para. 7.121 do not include these environmentally important areas. Delete references to the Green Infrastructure network in Para. 4.99.</p> <p>Para 4.100 Either development should be permitted in these areas (Paras. 4.102 - 4.104 clearly state it is not) or it should be refused. This Para. appears to deal with a situation that according to your policies will not arise.</p> <p>Para 4.111, 4.112 Where significant harm is identified which is unavoidable, permission will be refused unless it can be demonstrated that the impact is adequately mitigated or effective compensation can be put in place. ... the last resort would be for any biodiversity loss to be compensated for through the provision of equivalent, alternative and suitable habitat in close proximity to the area of habitat loss. We consider that these paragraphs should be deleted as they constitute an open invitation to developers. The concluding sentence in Para. 4.112 is not sufficient modification. The concept of "offsetting" if habitats and natural</p>	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
									<p>areas are destroyed is flawed, since it is impossible to re-establish ecosystems that have evolved over centuries. We object strongly to these paragraphs and wish them to be deleted as developments that destroyed or harmed such areas would not be compliant with international law and agreements.</p> <p>The NPPF Paragraph 109 is referenced (Para. 4.110). The NPPF makes no mention of compensating for damage.</p> <p>Policy 4: The natural environment: 3rd paragraph: re-word Developments must respect the natural environment (not "should") "Should" is unclear and unenforceable. Replace with "must" throughout this policy.</p>	
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4474	4.64	No	<p>It has not been positively prepared, It is not justified, It is not effective</p>	<p>Paragraph 4.64 states that the Council will seek advice on landscape impact from the AONB management teams. However, a landscape appraisal of land at Blandford St. Mary has already been undertaken by Dorset County Council as part of the background evidence to inform the Local Plan. Titled "Landscape Impact Assessment of Potential Housing Sites in Blandford and Shaftesbury", this was part of a district wide study so as to establish a consistent approach for all of the major development sites as proposed within the Local Plan. The impact on the AONB has therefore already been informed by this exercise.</p> <p>A planning application for the development of land at Blandford St. Mary will be accompanied by a more detailed landscape assessment. Future consultations on the development proposals should only deal with the effectiveness of the landscape strategy for the site, and should not revisit the evidence base that has already been used to confirm the development allocation.</p>	<p>Omit Paragraph 4.64 from the Local Plan.</p>	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3086	Simon Coles	WYG	David Lohfink	4610	4.41, 4.89, 4.41	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 4.41: The claim that reducing pressure on habitats can be achieved by reducing development pressure is imprecise, misleading, and inconsistent with the NPPF and not based on evidence. Paragraph 4.89: The requirement "...for developments within Poole Harbour catchment to be nitrogen neutral..." is imprecise and not based on evidence. The meaning of developments / large and small scale developments is unclear. The examples provided for mitigation are misleading and the precise mitigation would need to be assessed on the basis of the effects of a particular development and the nature of the site. Policy 4 part d): Part d is overly prescriptive and imposes unrealistic and unjustified requirements on development i.e. for it to be carbon neutral. Defining mitigation is unnecessary in Policy and is a detailed matter for individual developments.	Delete "...reductions in development pressure particularly in sensitive locations,..." from the first sentence of paragraph 4.41. Delete paragraph 4.41 and replace with: Development in the Poole Harbour SPA and Poole Harbour Ramsar Site should deliver appropriate mitigation based on the objectively assessed effects of the development, taking into account the Strategy for Managing Nitrogen for Poole Harbour. Amend Policy 4 part d) to read: Development in the Poole Harbour SPA and Poole Harbour Ramsar Site will be required to include appropriate effect-based mitigation.	Do not agree with the Strategy for Managing Nitrogen in Poole Harbour, Mitigation should be on a site by site basis
87	James Parkin	Dorset Wildlife Trust		4010		Yes		NDDC has signed up to the Dorset Biodiversity Protocol as administered by Dorset County Council which ensures that protected species are adequately considered through the planning process. This should be referenced in the policy	Insert additional text within the policy to refer to the Natural Environment Team at Dorset County Council: "This should be appropriate to the scale of the development and be informed initially through consultation with the local environmental records centre and the Natural Environment Team at Dorset County Council"	
87	James Parkin	Dorset Wildlife Trust		4125		Yes			We would recommend clarifying that for a planning application to be looked upon favourably, it must also safeguard existing environmental assets. Suggested wording: "Developments that retain and protect existing environmental assets, and offer gains in biodiversity, whether through the restoration of habitats or the creation of linkages between sites, will be looked upon favourably in the decision making process."	developments should safeguard existing environmental assets

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388	Tom Munro	Dorset AONB Partnership		4048	4.36-4.57	Yes		Landscape is a concept (and term) that encompasses geology, topography, wildlife, cultural associations, land use and the historic and built environment. It is greater than 'The Natural Environment'. Suggests having separate policy sections for Landscape, Wildlife and Historic Environment. Suggests re-wording the final sentence of 4.42 to: 'The landscape of North Dorset is nationally important with almost 40% being covered by Area of Outstanding Natural Beauty designation'. Suggest re-wording of 2nd sentence of 4.43 to: 'Development in inappropriate locations and of poor design and/or materials can harm the landscape and erode the character of an area'. Suggests re-wording 1st sentence of 4.56 to: 'Where there may be a significant impact on the landscape, development proposals should be accompanied by a landscape and visual impact (LVIA) based on best practice guidance'.		Landscape is a concept that encompasses geology, topography, wildlife, cultural associations, land use and the historic and built environment. It is greater than 'The Natural Environment'. Development should not harm AONB/landscape and should be accompanied by a landscape and visual impact assessment.
388	Tom Munro	Dorset AONB Partnership		4050		Yes		Chapter 4 should be restructured to separate policies relating to landscape from those relating to wildlife. Policy statement with specific reference to AONBs seems limited and potentially weak, particularly having given nationally important landscapes a thorough introduction. Suggests clearer, stronger policy statements along the lines of: <ul style="list-style-type: none"> <li>• The plan area’s exceptional landscapes will be protected, taking into account the objectives of the AONB Management Plans</li> <li>• Development which would harm the natural beauty of the AONBs including their characteristic special qualities, will not be permitted.</li> <li>• Development should be located and designed so that it does not detract from and, where reasonable, enhances the local landscape character. Any development that would otherwise have an adverse impact on the landscape of the area will only be acceptable if the impact will be adequately mitigated'.</li> </ul>		policy wording in relation to AONB needs strengthening

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
404	Michael Holm	Environment Agency		4407	4.36	Yes		The comment we recommend to the section on the Natural Environment and paragraph 4.36 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	Uncertain whether the example of climate change is useful or most straightforward - it can be a difficult concept for those without habitat knowledge, and it does not align with the previous sentence regarding how the impact is on "the way we live our lives".	
404	Michael Holm	Environment Agency		4409	4.37	Yes		The comment we recommend to the section on the Natural Environment and paragraph 4.37 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	Para 4.37 - it would be pertinent to mention, under regulating services, not only the filtering of pollutants by vegetation, but the water attenuation of wetlands and natural flood risk management.	
404	Michael Holm	Environment Agency		4410	4.36 to 4.41	Yes		The comment we recommend to the section on the Natural Environment and paragraphs 4.36 to 4.41 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	Para 4.36 - 4.41 in general, it's very pleasing to see ecosystem services hold such a prominent place in the policy introduction. However, it might be useful to expand slightly on the link between that and protection of habitats and species (in particular the latter) because of their indicative/flagship nature and the intrinsic value that they can provide to cultural wellbeing, and the bequest value to future generations. We are concerned that to not make this clear would be to undermine the protection that habitats/species have in their own right because of European/national rarity/richness/diversity.	
404	Michael Holm	Environment Agency		4411	4.45	Yes		The comment we recommend to the section on the Natural Environment and paragraphs 4.45 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	4.45 - Would request that you add "to result in an overall gain where possible" at the end of the paragraph.	gains in biodiversity where possible (para 4.45)

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
404	Michael Holm	Environment Agency		4412	4.49	Yes		The comment we recommend to the section on the Natural Environment and paragraph 4.49 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	4.49 - would like to add "and minimise disturbance" at the end of the para.	
404	Michael Holm	Environment Agency		4413	4.85 to 4.89	Yes		The comment we recommend to the section on the Natural Environment and paragraphs 4.85 to 4.89 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	Paragraphs 4.85 to 4.89 We support the requirement for development to be nitrogen neutral to prevent any increased impact on the designations and that the supporting Policy includes this point.	EA support the requirement for development within the Poole Harbour catchment to be nitrogen neutral
404	Michael Holm	Environment Agency		4414	4.100	Yes		The comment we recommend to the section on the Natural Environment and paragraph 4.100 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	Para 4.100 - Would request that you add "to result in an overall gain where possible" at the end of the paragraph.	
404	Michael Holm	Environment Agency		4415		Yes		The comment we recommend to Policy 4 - The Natural Environment is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	There is no mention of working with natural processes e.g. river morphology, wetland habitat succession to ensure that the current (and future) environment is most resilient, cost effective and most sustainable to best available knowledge. Similar to paragraph 2 in the final policy wording (whereby gains in biodiversity will be looked upon favourably, we feel would be highly beneficial to include wording of natural processes in this policy. The policy should ensure that the protected habitat/species network is protected and that it provides a structure to ensure that gain and environmental investment is maximised in such areas. This will ensure resilience in the ecosystem services that it may provide and links to the Green Infrastructure policy. We would ask you to consider whether the policy needs to consider	No mention of working with natural processes. Use habitats/species network as a framework for biodiversity gain. Include habitat creation and links with GI

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
									and include the aspirations of the England Biodiversity Strategy 2020, in particular the emphasis on habitat creation.	
404	Michael Holm	Environment Agency		4416		Yes		The comment we recommend to Policy 4 - The Natural Environment is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	There is no mention of invasive non-native species or their pathways, or biosecurity. With the upcoming direction from the EU, it may be prudent to include a paragraph to at least limit spread in accordance with the Wildlife and Countryside Act 1981, and ensure that pathways are minimised and biosecurity measures incorporated to protect native biodiversity. This could include the recommendation of native only planting in landscaping, etc.	no mention of invasive non-native species, especially in relation to non-native landscape planting
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4248		Yes		There are many aspects of the Pre-submission Document and the supporting documents that the AONB support		
388	Tom Munro	Dorset AONB Partnership		4049	4.58-4.65	Yes		While paraphrasing NPPF, paragraph 4.59 should include reference to the need to prove “exceptional circumstance” as well as public interest. In addition, the second bullet should include reference to seeking to meet the need for the development in another way. Also the third bullet should refer to effects being ‘moderated’ (as per NPPF) as this would include consideration of avoidance and potential compensation for residual effects rather than solely mitigation. Suggests rewording 2nd sentence of 4.60to: ‘The two AONBs have Management Plans which encourage a partnership approach to long-term action to protect the AONB’s landscape character and special qualities’. This para also includes a repeated reference to the presumption against major development unless there is an overriding need - again, wherever this is stated it would be beneficial to include reference to the need to prove “exceptional circumstance”. Suggests rewording 2nd sentence of 4.62 to: ‘Outside the District the Dorset AONB occupies the down land to the south of the Blackmore Vale, the downs,		Need to prove Exceptional Circumstances as well as Public Interest in relation to major development in AONB. Need to consider alternative sites in relation to development proposals where harm is identified. Greater recreational use within AONB masks need to manage access better.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								<p>vales and hills of West Dorset and much of the coast from Lyme Regis to Poole'. Points out that forestry occupies a surprising area of NDDC's Dorset AONB area, with large woodlands around Milton Abbas, Bulbarrow and Blandford Forest. Suggests re-wording 3rd sentence of 4.62 to reflect this: 'The part of the AONB within the District is characterised by chalk down land with agriculture and forestry being the major land uses, including mixed arable and livestock grazing'. Suggests additional inclusion of a statement outlining the area's special qualities (for consistency this should also be done for CCWWD AONB in the preceding para) such as: 'The Dorset AONB is noted for its diversity of landscape types, its tranquillity and sense of remoteness, wildlife of national and international significance, exceptionally-well preserved historic environment providing a 'living textbook' and a rich legacy of cultural associations'. Suggests rewording 1st bullet of 4.63 to: 'The need for the distinctive characteristics and special qualities of the AONBs to be understood and valued'. The example of greater recreational use seems superfluous and could be read to ignore the need to manage access better rather than simply increasing volumes. Suggests rewording of 2nd sentence of 4.64 to better reflect Countryside and Rights of Way Act (2000): 'The aim will be to conserve and enhance the natural beauty of the designated landscape whilst recognising the social and economic needs of local communities'. Feels that there is a lack of clarity in the phrase "at a scale above the needs of the people who live and work in the area" in 4.65. Paragraph could be reworked to add greater definition to 'major development' as stated in NPPF Para 116. As with 4.59 &amp; 4.60, wherever there is reference to demonstrating that development is in the public interest there should also be reference to the need to demonstrate exceptional circumstances.</p>		



## Pre-submission Document - Analysis of Responses and identification of Main Issues

### Policy 5 – The Historic Environment

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4089		Yes		In essence this policy is acceptable, although the wording is open to wide interpretation by officers and this needs to be addressed		
378	Simon Rutter	Proctor Watts Cole Rutter		4347		No	It is not consistent with national policy	This policy is unnecessarily long in trying to expand on the guidance within the NPPF which in itself provides adequate policy guidance. In seeking to add a local interpretation on the NPPF the tests and requirement for change to a heritage asset is set too high and are too onerous and over prescriptive. Therefore the policy as worded may well lead, perversely, to those with an interest in heritage assets to avoid making applications for work or undertaking work involving building features and fabrics that might contribute to the significance of an asset without making formal applications.		The policy is too onerous and too prescriptive
403	Rohan Torkildsen	English Heritage		4572		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	English Heritage support the clear and comprehensive commitment to the conservation of North Dorset's historic environment reflected in Policy 5 and its associated positive strategy (subject to representations made in relation to Policies 6, 16 and 21).		
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4293		No	It is not consistent with national policy	The historic environment should be protected and enhanced where possible. We would wish to see the wording made clearer, to ensure that the future interpretation, once adopted, ensures pragmatism and a more balanced view be adopted, in line with wider NPPF guidance, i.e. the principle of 'harm outweighing benefit' is evidenced and all policies are given weight and consideration, rather than this policy being considered over and above all others.		A pragmatic position should be taken in relation to the protection of the historic environment

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3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4292	4.118, 4.139, 4.145, 4.163	No	It is not justified	<p>4.118 - Resources should be conserved, sustained and also enhanced.</p> <p>4.139 - Shaftesbury has exceptional topographical elevation &amp; views. The visual impact should be taken into account.</p> <p>4.145 - The criteria stated are crude – the impact of each proposal should be assessed in detail on a case by case basis.</p> <p>4.163 - Shaftesbury has a considerable heritage resource of national if not international significance &amp; the quality of the town centre &amp; open spaces offers considerable scope for fundamental comprehensive enhancements to promote local interest and tourism.</p>		Visual impact should be taken into account. Impact of proposals should be assessed on a case-by-case basis. Shaftesbury's heritage has opportunities for enhancement to promote tourism
3073	Suzanne Keene	CPRE North Dorset Branch		4428	4.144, 4.148	No	It is not effective	<p>We welcome the clear and unequivocal wording of this policy with terms like “wholly exceptional” and “refused”. We commend this and hope that other policies will be similarly clarified.</p>	<p>Paragraph 4.144 says “The Council will encourage developers to take the significance of a heritage asset into account ...” “Encourage” does not reflect Policy 5. Re-word: The Council will require developers ...</p> <p>Paragraph 4.148 says “The Council will expect developers to be able to demonstrate that all reasonable steps have been taken to mitigate the harm...” The term “all reasonable” is legally weak. Re-word as 'best endeavours'.</p> <p>Policy 5 - Section relating to justifying less than substantial harm to a designated heritage asset says “Where a development proposal will lead to less than substantial harm ...” Add ... (including cumulative harm that would add to earlier harmful interventions).</p>	The policy should be made stronger

Pre-submission Document - Analysis of Responses and identification of Main Issues

Policy 6 – Housing Distribution

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
16	Richard Miller	Symonds & Sampson	Fidei Holdings Limited	4238		Yes				Policy considered to be sound.
113	Sue Green	National Home Builders Federation		4591		No	It has not been positively prepared, It is not consistent with national policy	<p>There is a concern that the proposed distribution of only 230 dwellings across the District outside of the four main towns will not be sufficient to meet housing needs in these areas.</p> <p>Previously the RSS for the SW proposed 7,000 (350 dwellings per annum) for 2006 – 2026 in North Dorset. The Council has not adequately demonstrated the change in circumstances, which have led to the reduced housing requirement of only 280 dwellings per annum in the North Dorset Pre submission Local Plan.</p> <p>The figure projected household growth figure of around 273 dwellings per annum for the period 2011 – 2031 and the proposed housing delivery figure of around 280 dwellings per annum (to take account of small vacancy rate) from the 2012 SHMA Update are overly dependent on 2011-based population and household projections, which over emphasise the effects of the recession on household formation rates. A hybrid approach to household projections, which would reflect a gradual return to established long term trends after an extraordinary period of recession has been endorsed elsewhere (South Worcestershire and Lichfield).</p> <p>The Christchurch &amp; East Dorset main modifications consultation includes an increase in the housing requirement figure in order to correct the use of an unrealistically low vacancy rate and the exclusion of a second homes allowance in the calculation to convert household growth into dwellings in the up dated Bournemouth &amp; Poole SHMA report. As the North Dorset calculation also contains this same error, a correction should be applied to the North Dorset housing requirement figure.</p> <p>The Inspector examining the Weymouth &amp; Portland and West Dorset Joint Local Plan has raised concerns about the appropriateness of an up dated SHMA based on an original SHMA dating from 2008 at a time when the RSS</p>	<p>There are a number of concerns about North Dorset’s housing requirement, which include :-</p> <ul style="list-style-type: none"> <li>· the two part plan approach ;</li> <li>· the overall reduction in housing numbers ;</li> <li>· not meeting affordable housing needs and housing needs beyond the four main towns ;</li> <li>· inconsistencies between policy and recommendations made in evidence on housing type and tenure mix ;</li> <li>· the lack of an NPPF compliant viability assessment.</li> </ul> <p>Moreover the Council’s objective assessment of housing need and 5 year land supply are based on sub-standard evidence bases. Therefore the North Dorset Pre Submission Local Plan is unsound.</p>	<p>Insufficient provision is made for housing outside the four main towns. The proposed housing delivery figure of 280 dwellings per annum is not justified and over emphasises the effects of the recession on household formation rates. Similar concerns have been expressed in relation to local plans elsewhere in Dorset.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								for the South West existed. The up dated evidence for North Dorset is formulated on the same basis, therefore the same criticism applies.		
113	Sue Green	National Home Builders Federation		4595		No	It has not been positively prepared, It is not consistent with national policy	Paragraph 47 of the NPPF emphasises that LPAs should continue to demonstrate a 5 years housing land supply, which is to be supplemented by an additional buffer of 5% to ensure choice and competition in the land market or where there has been a record of consistent under delivery of housing an additional buffer of 20%. The Council's latest SHLAA is dated 2011, this requires up dating to demonstrate that the Council continues to have a 5 year land supply including a 5% buffer.	There are a number of concerns about North Dorset's housing requirement, which include :- <ul style="list-style-type: none"> <li>· the two part plan approach ;</li> <li>· the overall reduction in housing numbers ;</li> <li>· not meeting affordable housing needs and housing needs beyond the four main towns ;</li> <li>· inconsistencies between policy and recommendations made in evidence on housing type and tenure mix ;</li> <li>· the lack of an NPPF compliant viability assessment.</li> </ul> Moreover the Council's objective assessment of housing need and 5 year land supply are based on sub-standard evidence bases. Therefore the North Dorset Pre Submission Local Plan is unsound.	Updated information is required to demonstrate that the Council continues to have a 5-year supply including a buffer of 5%
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4090		No	It has not been positively prepared	The plan has not be prepared based on a strategy that seeks to meet objectively assessed housing requirements in the areas outside of the towns.		The plan has not been prepared based on a strategy that seeks to meet objectively assessed housing requirements outside the four main towns.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4091		No	It is not justified	Not the most appropriate strategy as large scale developments on the edge of small towns bring their own social and economic problems.		Policy 6 is not the most appropriate strategy as large scale developments on the edge of small towns bring their own social and economic problems.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4092		No	It is not effective	The plan, in relation to the Gillingham SSA (Policy 21) has not been based on effective joint working on cross boundary issues such as infrastructure		Policy 21 (Gillingham SSA) has not been based on effective joint working on cross boundary issues such as infrastructure.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4093		No	It has not been positively prepared	Concerned that the plans for Gillingham in particular have not be prepared based on a strategy to meet the infrastructure requirements of the town.		The plans for Gillingham have not been prepared based on a strategy to meet the infrastructure needs of the town.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4124		No	It is not justified	The distribution of growth, in particular growth at Shaftesbury, is not the most appropriate strategy as it will impact on the amenity of residents in Melbury Abbas as traffic will use the C13. This is a traffic bottle neck with HGV's causing noise and vibration.		Growth at Shaftesbury, is not the most appropriate strategy as traffic using the C13 will impact on the amenity of residents in Melbury Abbas.
349	Mike Burt	Okeford Fitzpaine Parish Council and DAPTC		4655		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	The policies in the plan are in direct conflict with the RSS, which proposed a greater level of housing and recommended development in villages to satisfy both need and sustainability. The Council has not acted on pages 40-46 of the Matthew Taylor Report as this deals with the issue of sustainability in villages.		The plan conflicts with the RSS, which proposed a greater level of housing and recommended development in villages to satisfy need and sustainability.
378	Simon Rutter	Proctor Watts Cole Rutter		4348		No	It has not been positively prepared	Concerned that 48% of population live outside the four main towns but only 5% of new houses are allocated to this area in the plan. This is wholly disproportionate and unbalanced. This will exacerbate the concentration of affordable housing within urban areas further unbalancing the social and economic structure between towns and countryside. Further the figure in the previous 15 year plan was 5900 and is now reduced to 4200 although housing need has risen.		The proposed distribution of development is disproportionate and unbalanced. It will exacerbate the concentration of affordable housing within urban areas further unbalancing the social and economic structure between towns and countryside. Also concerned about the reduction in the housing provision figure to 4,200 as housing need has risen.
378	Simon Rutter	Proctor Watts Cole Rutter		4349		No	It is not justified	By allocating the majority of the housing to the towns this will result in urban sprawl, most noticeable in Shaftesbury from the higher land of the Cranborne Chase AONB nearby. This point was raised by the AONB at the 2003 Local Plan inquiry. A similar scale of development can be assimilated into the landscape more evenly. Large scale growth concentrated on one location is hard to assimilate into existing communities particular in where there are physical barriers (such as principal roads and railways).		Allocating the majority of housing to the four main towns will result in urban sprawl, especially at Shaftesbury.

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403	Rohan Torkildsen	English Heritage		4573		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Whilst English Heritage support the clear and comprehensive commitment to the conservation of North Dorset’s historic environment reflected in Policy 5 and its associated positive strategy, it should be recognised however that the NPPF requires a Local Plan, as a whole, to set out a positive strategy for the conservation and enjoyment of the historic environment. This means ensuring that proposed allocations will assist in delivering such a strategy and not contradict it.</p> <p>I note at paragraph 5.18/page 85 that the distribution of future housing has been informed by the need to protect and enhance the environment and in particular recognition of environmental constraints. This is a reassuring statement which appears to respond to the NPPFs policies for the historic environment. Nevertheless it is not clear whether this is the case in practice. It is not apparent what evidence and assessment process has been employed relating to the need to conserve the significance of the historic environment and consequently the rationale for the housing distribution in Policy 6 has to be questioned, particularly the 960 housing figure for Blandford.</p>		Housing allocations should assist in delivering a positive strategy for conserving the historic environment and should not contradict it. It is not clear that this is the case, especially in relation to the 960 homes proposed for Blandford.

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748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4457		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Hall &amp; Woodhouse supports the identification of the net additional homes as a minimum figure, through the use of the term, ‘at least’.</p> <p>It also supports the identification of Blandford as one of the key settlements to take additional residential development. It confirms that the Brewery site has planning permission for a mixed use regeneration including housing, which has been implemented with the construction of the new brewery and remains a suitable and sustainable site to take a sizeable proportion of the town’s future housing growth during the Plan period.</p> <p>However, it objects to the approach to the rest of the district outside of the four main towns, and this objection directly follows on from the objection to Policy 2 and also relates to the objection under Policy 20. One of the Core Principles of the Framework is to support thriving rural communities; this application of a blanket policy of restraint except to meet identified local and essential rural needs across all the settlements and villages outside of the four main settlements is completely at odds with this fundamental objective of the Framework.</p> <p>This approach also fails to meet the objectives of paragraph 50 of the Framework to plan to deliver a wide choice of family homes.</p> <p>Earlier draft versions of the Plan recognised that many of the villages have significant potential for infilling and redevelopment. This position has not changed and there is no sound basis for the approach now being taken.</p> <p>Furthermore the Household Survey Data in the SHMA report shows that almost 50% of households live in the rural areas and it is therefore woefully inadequate and unsound not to make more positive provision for growth in these settlements.</p>	The policy approach to development outside of the four main towns needs to be reconsidered to provide a more positive context and approach to development.	The approach to development outside of the four main towns (i.e. restraint except to meet identified local and essential rural needs) should be reconsidered to provide a more positive context and approach to development.
749	Chris Burton	Tetlow King Planning	South West RSL Planning Consortium	4211		No	It is not consistent with national policy	Assuming Part 1 is adopted in 2014, the current housing target to 2026 will mean the Council only has a housing supply of 12 years as opposed to the 15 required by the NPPF (paragraph 157, bullet point 2).	We seek for this to be rectified by an appropriate extension and suggest a 20 year time horizon is optimum.	The plan period should be extended, preferably to give a 20 year time horizon.

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769	Tim Hoskinson	Savills	Taylor Wimpey	4187		No	It is not justified	<p>The proposed level of housing of at least 4,200 net additional homes between 2011 and 2026 (280 per annum) is in line with the household change projections contained in the 2011 Strategic Housing Market Assessment Update (SHMA). We are concerned that this figure represents a substantial drop from the housing provision of 350 dwellings per annum proposed in the March 2010 draft Core Strategy, and would be well below the average build rate for North Dorset between 2000 and 2011, which has averaged 370 dwellings per annum. This would appear to be a departure from the national objective (expressed in paragraph 47 of the NPPF) of significantly boosting housing supply. Other factors such as housing need, affordability and economic growth would support a higher level of housing provision. The expression of the housing target as a minimum figure through the words “at least” in policy 6 does address this to some extent, however the words “at least” should also be repeated against individual sub-targets.</p> <p>In order to provide sufficient specific, deliverable sites for development in the plan period, a housing trajectory should be included in the plan to demonstrate how housing provision will be delivered, with site specific allocations for the sites that are identified for development.</p> <p>The policy also sets out the ‘the approximate scale of affordable housing development that will be sought at the four main towns..’. However, the criteria-based approach to affordable housing delivery is set out in Policy 8, including a 35% requirement. There is no strategy within Policy 6 for achieving the ‘approximate scale’ of affordable housing identified. And how the per-town targets for affordable housing might be used in terms of decision making is not clear.</p>	<p>A clear housing trajectory should be provided to identify specific, deliverable sites for development over the plan period, with the inclusion of site allocations for the sites that are identified for development.</p> <p>Before each numerical housing target, place the words “at least”. Remove the following passage of Policy 6: “The approximate scale of affordable housing development that will be sought at the four main towns during the period 2011 - 2026 will be as follows: (e) Blandford (Forum and St. Mary) – about 380 affordable homes; (f) Gillingham – about 500 affordable homes; (g) Shaftesbury – about 450 affordable homes; (h) Sturminster Newton – about 150 affordable homes.”</p>	<p>The housing provision figures, which have been reduced from previous draft figures) and are lower than past delivery rates, would not significantly boost housing supply. The sites identified for development in the plan should be specifically allocated. The town-based figures for affordable housing should be deleted as it is inconsistent with the criteria-based approach in Policy 8.</p>
1578	Sarah Hamilton-Foy	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4312		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>An objection is made to Policy 6 which states that at least 4,200 dwellings will be provided in North Dorset between 2011-2026, representations on paragraphs 5.12 and 5.14 address this issue.</p> <p>Firstly it is considered that the Plan period should be extended to 2031 in order to meet the requirements of the NPPF para 157.</p> <p>Secondly concerns are also raised that the housing provision appears to be based on trend data of around</p>	<p>It is considered that this strategy is inconsistent with the NPPF para 47 which aims to significantly boost housing land supply, instead the Council has reduced the housing requirement to 280 per annum. Persimmon Homes considers that the overall housing provision should be increased to</p>	<p>The housing provision figures, which have been reduced from previous draft figures) and are lower than past delivery rates, would not significantly boost housing supply. The overall housing provision figure should be</p>



ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								<p>273 dwellings per annum rather than putting forward a figure which would significantly boost housing supply in the district in accordance with the NPPF para 47. The proposed provision does not provide a step change in housing provision and is in fact lower than the adopted Local Plan which had a figure of 347 dwellings per annum over the period 1994 – 2011 i.e. a total requirement of 5,900 dwellings over the 15 year plan period compared with what is proposed which is 4,200 dwellings.</p> <p>It should also be noted that the Local Plan provision of 5,900 was actually exceeded by 808 dwellings resulting in an average figure of 447 dwellings per annum. More recent evidence for the period 2011/12 indicates that 375 dwellings were completed.</p> <p>Furthermore the background papers and evidence base acknowledge that there is a significant affordable housing issue in the district (the AMR indicates at para 2.5 that the district faces a real challenge in providing enough affordable housing for local people) and that there is real disparity between what people earn and the cost of buying a house in the district. This is reflected in the high house price income ratio for 2012 of 9.93.</p> <p>The SHMA also indicates that as well as an ageing population (the district profile varies from the national profile with a larger proportion in older age bands), if current trends continue this will lead to the number of people in key working age bands declining which will potentially generate a labour shortage in the long term. This may then act as a barrier to economic growth in the District.</p> <p>The Availability of Land does not appear to be a constraint in the district as more land has been identified than meets the housing requirement. The distribution to the main towns is supported, although it is considered that further development can be accommodated at Gillingham in addition to the proposed allocation for the southern urban extension in order to meet housing needs and provide a wider choice of housing, see representations on Policy 17.</p>	<p>at least 5,600 dwellings and the plan period extended to at least 2031.</p>	<p>increased to at least 5,600 dwellings and the plan period extended to at least 2031.</p>

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1578	Sarah Hamilton-Foy	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4315	5.12 to 5.14	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>The update to the SHMA was intended to provide an understanding of the current housing market in the county and in particular focused on housing needs and market demand, however, as the information base is 2011, it is questionable whether this is the most recent information available, especially given the changes in the last two years and also the comments of the Inspector for the neighbouring local planning authority. By the time the Examination Hearing Sessions take place the data will be three years out of date.</p> <p>The NPPF states in para 158 that: "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects for the area. Local Planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals." The National Planning Practice Guidance states that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. It should also be kept up-to-date and when approaching submission, if key studies are already reliant on a date that is a few years old, they should be updated to reflect the most recent information available and if necessary the plan adjusted in the light of this information.</p> <p>Given the Inspector's view on the West Dorset Weymouth and Portland Local Plan (Inspector's concerns 10th December 2013) which are set out below, an objection is made to the evidence base that North Dorset District Council relies on to determine the overall housing provision (as the SHMA for Bournemouth and Poole was produced at the same time as the SHMA for Dorchester/Weymouth in 2007 and similarly was updated in 2011 and again published in January 2012. The SHMA was also prepared by JG consulting and CBA). The Inspector for West Dorset, Weymouth and Portland has stated that he has fundamental concerns about the plan because he has reservations about the evidence base supporting the housing need assessment for both plans.</p> <p>The Inspector has asked for an explanation of why housing numbers have changed since studies for the draft Regional Strategy and has asked for an explanation</p>	<p>The Plan period should be extended to 2031 in order to be consistent with the NPPF para 157 so that the plan provides certainty over the plan period and so that there is a 15 year period post adoption. There is a need to take into account the longer term requirements and for the plan to be kept up to date in accordance with the NPPF.</p> <p>In accordance with extending the plan period the housing provision should be increased to at least 5,600 dwellings, it is noted that affordability is a critical issue in the district with the house price income ratio being 9.93. A range of housing in terms of scale and mix and range of tenures that the local population is likely to need over the plan period should therefore be delivered in order to address the imbalance in the housing stock.</p> <p>Consideration should also be given to increasing the housing provision over and above 5,600 dwellings based on the SHMA, particularly as the SHMA update January 2012 has identified that the affordable housing need is actually 387 additional units affordable housing per annum. Whilst the SMHA states that in reality 387 affordable units per annum in not likely to be achieved, an increase in the housing provision above 280 dwellings per annum as proposed would be a positive action in addressing the significant house price income ratio in North Dorset.</p>	<p>The overall housing provision figure should be increased to at least 5,600 dwellings and the plan period extended to at least 2031. Consideration should also be given to increasing the housing provision figure above 5,600 to take account of the very high levels of need for affordable housing in the District.</p>

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								<p>of the components of household change in the Dorset districts. The Regional Strategy housing target for North Dorset was 350 dpa.</p> <p>The proposed housing provision of 280 dwellings equates to 4,200 dwellings over the plan period 2011 – 2026, this is derived from trend based data suggesting household growth of around 273 per annum, however, it is considered that this does not provide a “step change” in housing provision or significantly boost the housing supply over the plan period in accordance with the NPPF para 47.</p> <p>The adopted Local Plan covered the period 1994 - 2011 it is noted that housing completions exceeded the provision in the adopted Local Plan ( the housing requirement was 5,900 dwellings i.e. an average of 347 per annum, the actual completions were 6,705 i.e. an oversupply of 808 dwellings according to the AMR April 2011).</p> <p>Housing affordability is a key issue. The strategic priority in The South West Housing Strategy prepared in 2005 related to housing is that “everyone can live in a good quality home and neighbourhood that meets their needs.” This priority focusses on the lack of affordability, which is caused by high house prices and low incomes. It is considered that that low housing provision of only 280 per annum compared with past rates in the adopted Local Plan and more recently evidence since the recession, will not address the housing needs of the district, in particular the affordable housing needs. Evidence from the latest AMR 2013 at para 2.5 states that North Dorset faces a challenge to provide enough affordable housing for local people. “There is a real disparity between what local people earn and the cost of buying a house in the District this is reflected in the high house price income ratio for 2012 of 9.93.</p>		

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1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4318	5.20	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>consultation on the Key Issues in December 2012 reduced the overall housing provision and rebased the housing provision to 2011 – 2026. For Gillingham housing provision was reduced from 2,300 dwellings for 2006 – 2026 to 1,490 dwellings over the period 2011 – 2026, but a higher percentage of the distribution was identified for Gillingham.</p> <p>The proposed revised distribution of housing is supported in so far as the increase to Gillingham. The distribution of 35% of the housing growth reflects the economic potential of the town, the availability of suitable sites and the relative lack of environmental constraints.</p> <p>The strategy is supported i.e. that Gillingham’s role as the main service centre in the north of the district will be enhanced through housing growth. However, Persimmon objects to the strategy for Gillingham, which is based on the vast majority of housing being built on the southern extension to the town.</p> <p>Given Gillingham’s role in the settlement hierarchy and in the northern part of the district further development opportunities should be recognised at the town and identified in the Local Plan.</p> <p>Given the views already expressed in relation to the overall housing provision and the plan period, and given Gillingham’s strategic role as one of the four main towns, it is considered that an additional strategic allocation should be included in the plan. The additional allocation at Windyridge Farm which has been promoted in the SHLAA and is considered to be deliverable and available and can assist in meeting housing needs and deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. (NPPF para 50). In this context it should also be noted that the AMR 2013 reports that no affordable housing has been built in Gillingham since 2009/2010.</p>	<p>In accordance with representations made in respect of the Plan period and the overall level of housing provision, and in order to ensure the deliverability of housing to meet local needs, additional sites need to be identified at Gillingham; this will assist the Government’s objective of securing economic growth and significantly increasing the supply of housing in accordance with the NPPF</p> <p>Land at Windyridge Farm should be identified as an additional release of land in the short term, to proposals in the southern extension of Gillingham.</p> <p>It can be seen that the land at Windyridge Farm has been considered in the 2009 Growth Study and whilst the growth of Gillingham is not being pursued as envisaged when the Atkins Report was commissioned, it nevertheless provides a useful context in which to consider the long term directions of growth and the potential development opportunities that could be identified in the Local Plan.</p>	<p>Additional sites need to be identified at Gillingham to address the overall shortfall in housing provision and the need to extend the plan period. Land at Windyridge Farm should be identified as an additional release of land in the short term, to proposals in the southern extension of Gillingham.</p>

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1594	Diccon Carpendale	Brimble Lea & Partners		4200	5.27	No	It is not consistent with national policy	The approach to housing distribution advocated in Policy 6 which follows on from Policy 2 indicates that a minimal level of growth in the countryside (which it is understood may already have been provided). The plan proposes in relation to the countryside (including Stalbridge and the villages) to remove settlement boundaries for all of the villages but to permit villages either to bring forward growth through neighbourhood plans or by 'opting in' to the Local Plan Site Allocations process. This is reflected in Policy 2: Core Spatial Strategy. In effect this policy will prevent any growth within the countryside (other than in terms of normally recognised exceptions) with there being no certainty about the neighbourhood planning or opt-in process. This approach is contrary to para 17 of the NPPF including that plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Similarly it will be contrary to the principle that planning should support thriving rural communities within the countryside. The NPPF recognises in Part 3 (para 28) that there should be support for a prosperous rural economy. Para 55 does not rule out housing within rural areas. Rather it suggests how it may be located indicating that it will be necessary to support village services.	Core Policy 6 in the supporting text should be amended. Existing settlement boundaries should be retained but could be reviewed through the Neighbourhood Planning process or through a subsequent Site Allocations DPD which should consider (where appropriate) amending settlement boundaries.	The approach to development in Stalbridge and the villages does not provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Existing settlement boundaries should be retained and reviewed through Neighbourhood Planning or a Site Allocations DPD which should also consider (where appropriate) amending settlement boundaries.
1596	Malcolm Brown	Sibbett Gregory	Mrs Linley Abbott	4283	5.8, 5.10-5.14	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy		Policy 6 should read: 'At least 6000 net additional homes will be provided in North Dorset between 2011 and 2026 at an average annual rate of a minimum of 400 dwellings per annum' OR 'At least 8000 net additional homes will be provided in North Dorset between 2011 and 2031 at an average annual rate of a minimum of 400 dwellings per annum'. In the next line 'vast' should be deleted. At (a) 'about 960 homes' should be deleted and '1400 homes' OR '1860 homes' (if the Plan end date is 2031) inserted. At (e) 'about 380 affordable	The average annualised rate of housing provision should be increased to 400 dpa, requiring 6,000 homes in the period up to 2026 or 8,000 homes if the plan period was extended to 2031. The housing provision figures for each town should be adjusted accordingly.

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									homes' should be deleted and '490 affordable homes' OR '650 affordable homes' (if the Plan end date is 2031) inserted. The numbers of dwellings at Gillingham, Shaftesbury, Sturminster Newton and other settlements will need to be increased to secure the suggested increased provision.	
1865	Lawrence de Whalley			4028	6.16	No	It is not effective	Plan states need for 3630 jobs but only Brewery site and Shaftesbury Lane put forward for employment use. Not enough to provide sufficient jobs for potential new houses in Blandford. Already high rate of commuting to conurbation.	Provide additional 5-10 ha of employment land at Letton Park or Sunrise.	A further additional 5-10 ha of employment land is required at Blandford (either at Letton Park or Sunrise Business Park) to meet the need for jobs in the town arising from the proposed housing development.
2528	Colin Hampton	Milborne St Andrew Parish Council		4066				Concern here is that if there is no Neighbourhood Plan then villages are in a situation where exception and housing can be imposed. There needs to be a focus on developing the built environment and infrastructure in tandem with any further housing in the villages. Not clear as to whether affordable housing is in addition to 4200 proposed and what 'affordable' actually means. It is proposed that a minimum of 6% of housing (230) is built in the villages during the life of the plan but feel that this level could be easily broken without a firm Neighbourhood Plan in place.		Concern about the threat of development in villages and the sub-area figure of 230 dwellings being exceeded.
2961	David Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	4381		No	It has not been positively prepared, It is not consistent with national policy	Concerned that Local Plan does not provide for a sufficient supply of new homes in the District. NPPF Para 47 requires LPAs to deliver a wide choice of high-quality homes and to "boost significantly the supply of housing". To do this LPA should use their evidence base, but Local Plan does not have appropriate regard to the evidence base of the draft RSS that made provision for 7000 net additional dwellings in the District in the period 2006 to 2026 at an annual rate of 350 dwellings per annum.	In accordance with emerging RSS as the most up to date, robust and tested evidence base the District wide housing figure for the plan period 2011 to 2026 should be 5,250 dwellings.	The housing provision figure should be increased to 5,250 over the plan period.

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2961	David Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	4383		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	The 2008 SHMA identified the total net annual housing need in North Dorset to be 399 dwellings per annum. This equates to 5,985 over the plan period which is broadly consistent with draft RSS. The updated SHMA in 2012 relies on trend based population projections during a period of economic downturn. Para 158 of the NPPF requires LPAs to "take full account of relevant market and economic signals". There appears to be a distinct lack of regard for this evidential requirement in the Council's approach to the assessment of housing requirement. The NPPF is clear that LPAs should boost significantly the supply of housing.	Increase the overall housing number for the plan period to 5,250 (as supported by the draft RSS and SHMA). This is further compounded by the evidence in SHMA update that states that to meet existing affordable housing needs alone, the Council would need to secure 387 units of affordable housing per annum if all needs are to be met (in the 5 year period from 2011 to 2016)	The housing provision figure should be increased to 5,250 over the plan period, as supported by the draft RSS and SHMA.
2961	David Seaton	PCL Planning Ltd	Shaftesbury LVA LLP and Land Value Alliances	4384		No	It has not been positively prepared, It is not effective	Housing provision over the period 2006 to 2013 (which formed part of the plan period for the draft RSS) needs to be considered. The emerging RSS advised a provision of 2450 new homes over this period however, the Councils AMR 2013 demonstrated that 1653 new net additional dwellings have been provided. There has therefore been a shortfall to date of some 797 dwellings which should be planned for, to be provided in the next five years.	Increase housing numbers to 5250 as supported by the draft RSS and SHMA	The housing provision figure should be increased to 5,250 over the plan period, as supported by the draft RSS and SHMA.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4473		No	It is not justified	The proposed level of housing of at least 4,200 net additional homes between 2011 and 2026 (280 per annum) is in line with the household change projections contained in the 2011 Strategic Housing Market Assessment Update (SHMA). This figure represents a substantial drop from the housing provision of 350 dwellings per annum proposed in the March 2010 draft Core Strategy, and would be well below the average build rate for North Dorset between 2000 and 2011, which has averaged 370 dwellings per annum. This lower annual target figure therefore departs from the national objective (expressed in paragraph 47 of the NPPF) of significantly boosting housing supply, and other factors such as housing need, affordability and economic growth that would all support a higher level of housing provision. The expression of the housing target as a minimum figure through the words "at least" in policy 6 does address this to some extent, however the words "at least" should also be repeated against individual sub-targets. The approximate scale of housing development for Gillingham in the period 2011 – 2026 is "about 1,490 homes". However, the level of housing provision for	· Before each numerical housing target, place the words "at least". · Remove the following passage of Policy 6: "The approximate scale of affordable housing development that will be sought at the four main towns during the period 2011 - 2026 will be as follows: (e) Blandford (Forum and St. Mary) – about 380 affordable homes; (f) Gillingham – about 500 affordable homes; (g) Shaftesbury – about 450 affordable homes; (h) Sturminster Newton – about 150 affordable homes."	The housing provision figures, which have been reduced from previous draft figures) and are lower than past delivery rates, would not significantly boost housing supply. The sub-area targets should be expressed as minima through the addition of the words "at least". The plan does not fully reflect the full potential of Gillingham SSA, which will extend beyond the plan period. The town-based figures for affordable housing should be deleted as it is inconsistent with the criteria-based approach in Policy 8.

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								<p>Gillingham does not reflect the full potential of the strategic site allocation, which will extend beyond the plan period.</p> <p>The policy also sets out 'the approximate scale of affordable housing development that will be sought at the four main towns.'. However, the criteria-based approach to affordable housing delivery is set out in Policy 8, including a target of 35%. There is no strategy within Policy 6 for achieving the 'approximate scale' of affordable housing identified and how the per-town targets for affordable housing might be used in terms of decision making is not clear.</p>		
2986	Neil Hall	AMEC	Crown Estate	4446		No	<p>It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy</p>	<p>Policy 6 is not considered to be sound. The Crown Estate supports the allocation of at least 23 per cent of the District's housing provision to Blandford and considers that The Crown Estate's sites in Blandford Forum and Blandford St. Mary are well placed to assist in housing delivery as part of a sustainable growth strategy. However, the time horizon of the plan needs extending by three years to ensure a period of 15 years following the adoption of the Plan is covered. Unless the plan period is extended, it would be immediately out of date. Assuming the plan is adopted later in 2014, the plan period should be extended to 2029 to ensure that a full 15 year period is covered from the date of adoption. Three additional years should be added to the district wide housing requirement set out in Policy 6. This would mean that the overall housing requirement is increased from 4,200 in the period 2011-2026 to 5,040 in the period 2011 to 2029. Additional strategic sites need to be allocated in the Local Plan Part 1 to take account of the higher requirement.</p>	<p>Suggested amendment to Policy 6 At least 5,040 net additional homes will be provided in North Dorset between 2011 and 2029 at an average annual rate of about 280 dwellings per annum. The vast majority of housing growth will be concentrated at the District's four main towns of Blandford (Forum and St. Mary), Gillingham, Shaftesbury and Sturminster Newton. The approximate scale of housing development at the four main towns during the period 2011-2029 will be as follows: a Blandford (Forum and St. Mary) - about 1,160 homes; b Gillingham – about 1,765 homes; c Shaftesbury – about 1,360 homes; d Sturminster Newton – about 450 homes.</p>	<p>The plan period needs to be extended to 2029 and the overall level of housing provision increased to 5,040. Additional strategic sites need to be allocated to take account of the higher requirement.</p>



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2989	Sarah Hamilton-Foy	Pegasus Planning Group	Messrs Drake	4548	5.12 to 5.14	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Para 5.12 refers to the SHMA produced in 2008 and para 5.13 refers to the updated SHMA produced in 2011 (and published in January 2012, which pre-dates the NPPF and is based on the 2007 DCLG guidance and PPS 3. As the information base in the SHMA Update is 2011, it is questionable whether this is the most recent information available. By the time the Examination Hearing Sessions take place the data will be three years out of date, which does not reflect the requirements of para. 158 of the NPPF or more recent guidance in the NPPG.</p> <p>An objection is made to the evidence base that North Dorset District Council relies on to determine the overall housing provision. This was prepared by the same consultants that prepared the SHMA Update Dorchester/Weymouth in 2011 which gave rise to fundamental concerns about the West Dorset Weymouth and Portland Local Plan and reservations about the evidence base supporting the housing need assessment underpinning it.</p> <p>The updated SHMA in relation to North Dorset suggests household growth of around 273 per annum and a housing delivery figure of around 280 per annum (to take account of a small vacancy rate), as set out in para 5.13 of the Local Plan. This is a reduction from 7,000 homes over 20 years (2006 – 2026) that was included in the Proposed Changes to the RSS. 280 dwellings per annum equates to 4,200 dwellings over the plan period 2011 – 2026. It is considered that this does not provide a “step change” in housing provision or significantly boost the housing supply over the plan period in accordance with the NPPF para 47. Completions for the last 5 years reflect the lower completions during the recession, although there was a significant increase for completions for the period 2011/12 at 375 dwellings. The adopted 2003 Local Plan covered the period 1994 - 2011 and it is noted that housing completions exceeded the provision during that period (the housing requirement was 5,900 dwellings i.e. an average of 347 per annum, the actual completions were 6,705 i.e. an oversupply of 808 dwellings. Low housing provision of only 280 per annum compared with past rates in the adopted Local Plan and more recently evidence since the recession, will not address the housing needs of the district, in particular the affordable housing needs.</p>	<p>The Plan period should be extended to 2031 in order to be consistent with the NPPF para 157 so that the plan provides certainty over the plan period and so that there is a 15 year period post adoption. There is a need to take into account the longer term requirements and for the plan to be kept up to date in accordance with the NPPF. (It should be noted that the SHMA update refers the housing market model, which was designed to look at the likely impact of demographic change on both market and affordable housing requirements over the next 20 years i.e. to 2031 and was based on studying occupancy pattern and how these might change in the future as the overall population and age structure of an area develops. (Para 6.7 of the SHMA summary) In accordance with extending the plan period the housing provision should be increased to at least 5,600 dwellings, it is noted that affordability is a critical issue in the district with the house price income ratio being 9.93. A range of housing in terms of scale and mix and range of tenures that the local population is likely to need over the plan period should therefore be delivered in order to address the imbalance in the housing stock. Consideration should also be given to increasing the housing provision over and above 5,600 dwellings based on the SHMA, particularly as the SHMA update January 2012 has identified that the affordable housing need is</p>	<p>The SHMA and the viability study which inform the plan are out of date. The housing provision figures, which have been reduced from previous draft figures) and are lower than past delivery rates, would not significantly boost housing supply. The plan period should be extended to 2031, which is also the end date for the updated SHMA. The overall level of housing provision should be increased to 5,600. The shortfall in housing provision could also give rise to shortages in labour supply. The availability of land does not appear to be a constraint in the District. Consideration should also be given to a higher level of housing provision to address the very high level of need for affordable housing.</p>

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								<p>North Dorset has a high house price to income ratio and a bias towards larger properties. The housing provision now proposed will not address these issues in the District and across the wider HMA, especially given the need for 387 affordable units pa, as set out in the 2011 SHMA Update. The Three Dragons Viability study from January 2010 is also considered to be out of date, contrary to the NPPG.</p> <p>The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities. It should also be noted that there is an ageing population and if current trends continue then the number of people in key working age bands is likely to decline which may potentially generate a labour shortage over the plan period. This may act as a barrier to economic growth in the District and undermine the vision and objectives of the plan.</p> <p>The SHLAA identifies a land supply with a capacity in excess of 13,000 dwellings and the background paper Meeting Housing Needs states that using the 2010 base year, 1,872 dwellings were considered to be deliverable within 5 years as they had no policy ownership constraints relating to them, this is about 374 dwellings per annum. The supply of suitable housing sites is therefore not an issue constraining the overall housing provision proposed in the plan as more land can be identified than is required to meet the proposed provision of 4,200 dwellings (280 per annum).</p> <p>The key issue for the rural areas is that the Local Plan should facilitate development in sustainable settlements by providing the policy framework to deliver this.</p>	<p>actually 387 additional units affordable housing per annum which is virtually the same as that derived from the 2007/08 SHMA and suggests that there is still a significant need to provide additional affordable housing in the district. (para 5.2 of the SHMA update summary for North Dorset). Whilst the SMHA states that in reality 387 affordable units per annum in not likely to be achieved, an increase in the housing provision above 280 dwellings per annum as proposed would be a positive action in addressing the significant house price income ratio in North Dorset.</p>	
2989	Sarah Hamilton-Foy	Pegasus Planning Group	Messrs Drake	4557		No	<p>It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy</p>	<p>An objection is made to Policy 6 which states that at least 4,200 dwellings will be provided in North Dorset between 2011 - 2026, representations on paragraphs 5.12 and 5.14 address this issue.</p> <p>Firstly it is considered that the Plan period should be extended to 2031 in order to meet the requirements of the NPPF para 157.</p> <p>Secondly concerns are also raised that the housing provision appears to be based on trend data of around 273 dwellings per annum rather than putting forward a figure which would significantly boost housing supply in</p>	<p>It is considered that this strategy is inconsistent with the NPPF para 47 which aims to significantly boost housing land supply, instead the Council has reduced the housing requirement to 280 per annum. It is considered that the overall housing provision should be increased to at least 5,600 dwellings and the plan period extended to at least 2031,</p>	<p>The plan period should be extended to 2031. The housing provision figures, which have been reduced from previous draft figures) and are lower than past delivery rates, would not significantly boost housing supply. The overall housing provision should be increased to at least</p>

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								<p>the district in accordance with the NPPF para 47. The proposed provision does not provide a step change in housing provision and is in fact lower than the adopted Local Plan which had a figure of 347 dwellings per annum over the period 1994 – 2011 i.e. a total requirement of 5,900 dwellings over the 15 year plan period compared with what is proposed which is 4,200 dwellings. It should also be noted that the Local Plan provision of 5,900 was actually exceeded by 808 dwellings resulting in an average figure of 447 dwellings per annum. More recent evidence for the period 2011/12 indicates that 375 dwellings were completed. Furthermore the background papers and evidence base acknowledge that there is a significant affordable housing issue in the district (the AMR indicates at para 2.5) that the district faces a real challenge in providing enough affordable housing for local people and that there is real disparity between what people earn and the cost of buying a house in the district. This is reflected in the high house price income ratio for 2012 of 9.93.</p> <p>The SHMA also indicates that as well as an ageing population ( the district profile varies from the national profile with a larger proportion in older age bands), if current trends continue this will lead to the number of people in key working age bands declining which will potentially generate a labour shortage in the long term. This may then act as a barrier to economic growth in the District. The Availability of Land does not appear to be a constraint in the district as more land has been identified than meets the housing requirement. Whilst it is acknowledged that in order to achieve sustainable development the majority of housing growth will take place in the more sustainable settlements, the plan also needs to ensure that the provision is made or that the plan facilitates development in those larger villages with a level of facilities and services i.e. as in the adopted Local Plan, rather than rely on the “take up” of Neighbourhood Plans of parishes “opting in” to Part 2 of the Local Plan. These larger villages in a mainly rural district have a distinct role in terms of meeting local needs.</p>	<p>and a provision made or that the plan facilitates development in the larger villages with a level of facilities and services i.e. as in the adopted Local Plan.</p>	<p>5,600 dwellings. Consideration should also be given to a higher level of housing provision to address the very high level of need for affordable housing. The shortfall in housing provision could also give rise to shortages in labour supply. The availability of land does not appear to be a constraint in the District. The plan needs to facilitate development in the District's larger villages.</p>

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3055	Roger Daniels	Pegasus Planning Group	Lightwood Strategic Ltd	4084	5.7-5.29	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>1. Policy 6 proposes the provision of 4,200 homes over the 15 years 2011 to 2025; a rate of 280 per annum, which is based on the Strategic Housing Market Area Assessment (SHMA) of 2008, updated in 2012. The SHMA advised that ‘trend-based data suggests household growth of around 273 per annum for the period from 2011 to 2031 and so a housing delivery figure (on the basis of this figure) might be around 280 per annum (to take account of a small vacancy rate).’</p> <p>2. As the SHMA looked ahead to 2031, it is not clear why the Local Plan only looks forward to 2026, especially as paragraph 157 of the NPPF calls for local plans to be drawn up over an appropriate timescale, preferably a 15-year time horizon, and to take account of longer-term requirements. The Council does not expect adoption of the plan before winter 2014; by which time the plan’s time horizon will be only just over 11 years and it will be more than 11 years since the previous Local Plan was adopted. A longer time horizon is necessary to give a more strategic perspective for development proposals and infrastructure requirements, and to allow time for the Council to undertake a review before the plan’s time horizon has expired.</p> <p>3. The target housing completion rate of 280 p.a is low compared with past rates between 1994/5 and 2005/06 and compared with the Council’s forecast recovery in housing completions from a low point of 144 completions in 2012/13. It implies a 40% drop in completions from the 2017/18 peak of 454.</p> <p>4. Population and household projections on which the SHMA is based were undertaken by Dorset County Council, ‘linked to the 2008-based ONS/CLG population/ household projections’, and ‘updated to a mid-2011 base’. It is beyond the scope of these representations to review the SHMA in detail, but updating to a mid-2011 base may raise some issues that are also apparent in CLG’s Interim 2011-based Household Projections, which project household growth in North Dorset of only 175 p.a. between 2011 and 2021, compared with 252 p.a. for the same period in the 2008-based projections.</p> <p>5. Household formation from 2001 to 2011 was much lower than previously projected and it is generally agreed that the reasons include economic constraints on household formation and lower rates of household</p>	<p>To make the plan sound, the following modifications are proposed:</p> <ul style="list-style-type: none"> <li>• Modifications to Policy 2 to include Stalbridge as a fifth ‘main town’ and one of the District’s service centres; to delete Stalbridge from references that include it with the District’s villages and countryside in policy terms; and to include a commitment to define a revised settlement boundary in Part 2 of the Local Plan.</li> <li>• Modifications to Policy 6 to include Stalbridge with an allocation for about 240 homes.</li> <li>• Modifications to Policy 20 to exclude Stalbridge from the countryside and to include reference to a defined settlement boundary for Stalbridge.</li> <li>• A new policy and inset diagram for Stalbridge, as outlined in paragraph 18 above; similar in form to Policies 16 to 19 including policy commitments to define a revised settlement boundary in Part 2 of the Local Plan and to review the Conservation Area boundary (under Section 69(2) of the Planning (Listed Building and Conservation Areas) Act 1990).</li> <li>• Consequential modifications to Policies 2, 6, 9, 20 and other text in the Plan to add references to Stalbridge as a settlement with a defined boundary and to delete references that associate Stalbridge in policy terms with the District’s villages and countryside.</li> <li>• Overall housing requirements should be re-assessed with the aim of improving access to</li> </ul>	<p>The plan period should be extended to 2031. Overall housing requirements should be re-assessed with the aim of improving access to housing and affordability. Stalbridge should be identified as the fifth main town with a defined settlement boundary. Policy 6 should give Stalbridge a housing provision figure of about 240 homes. The extent of the Stalbridge Conservation Area should be reviewed.</p>

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								<p>formation among migrants than among the indigenous population. In North Dorset, the steep fall in housing completions after 2005/6 will also have affected the migration trends that underlie the population projections.</p> <p>6. It is interesting to note that the Inspector who is examining the West Dorset, Weymouth and Portland Local Plan has raised questions about the household projections in that case, which come from the same sources as the North Dorset SHMA. (Note of Inspector’s Concerns dated 10 December 2013.) He has noted reasons for the recent downward trend in household formation, has asked for an explanation of why housing numbers have changed since studies for the draft Regional Strategy and has asked for an explanation of the components of household change in the Dorset districts. The Regional Strategy housing target for North Dorset was 350 dpa.</p> <p>7. Similar doubts about the robustness of the SHMA apply in relation to North Dorset. As the SHMA for North Dorset was prepared as part of the SHMA for the Bournemouth/Poole Housing Market Area, there are also questions about whether it adequately reflects functional linkages with South Somerset and Wiltshire. There should be opportunities to update the SHMA, in the light of the 2011-based household projections and the release of further 2011 Census data, later this year.</p> <p>8. The Housing Background Paper and the SHMA identified the affordability of housing as an important issue in North Dorset, where house price to income ratios are among the highest in the country. There was an upward trend in the ratio of lower quartile house prices to lower quartile earnings from 1997: outpacing the national trend and rising above the Dorset County average in the past couple of years.</p> <p>9. Between 1998 and 2008 only 12% of the 4,000 homes completed were affordable housing, compared with the planning target of 35%. In these circumstances, the SHMA and the Local Plan should address the scale of provision that is needed to improve both the overall affordability of market housing and the provision of ‘affordable housing’. The reduction in supply that is represented by a target housing completion rate of 280 dpa will not be sufficient to have the required impact on affordability and access to housing.</p>	<p>housing and affordability.</p> <ul style="list-style-type: none"> <li>• The plan period should be extended to 2031.</li> </ul>	

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								10.In these circumstances, the planning strategy needs to take advantage of all sustainable opportunities for housing development without arbitrary restrictions on housing development in sustainable settlements.		
3059	James Sorrentino	Lightwood Strategic Ltd		4155		No	It has not been positively prepared	The plan has not been positively prepared as it fails to meet objectively assessed needs for housing in the District overall or in specific settlement including Stalbridge.		The plan has not been positively prepared as it fails to meet objectively assessed needs for housing in the District overall or in specific settlements including Stalbridge.
3059	James Sorrentino	Lightwood Strategic Ltd		4160		No	It is not justified	Concerns about the SHMA (2008) and its update (2012) similar to those raised by the Inspector who is examining the West Dorset, Weymouth and Portland Local Plan. In summary enquiring why housing numbers have changed since studies for the draft RSS where North Dorset had a target of 350dpa. Also concerned that the SHMA does not adequately reflect functional linkages with South Somerset and Wiltshire.	The SHMA needs to be updated in light of the 2011-based household projections and the release of further 2011 Census data later this year.	An updated SHMA is needed to reflect more recent housing projections.
3059	James Sorrentino	Lightwood Strategic Ltd		4161		No	It is not effective	The level of housing proposed (280 dpa) will not be sufficient to have the required impact on affordability and access to housing as identified in SHMA.		The level of housing proposed (280 dpa) will not be sufficient to have the required impact on affordability and access to housing as identified in SHMA.
3059	James Sorrentino	Lightwood Strategic Ltd		4163		No	It is not justified	Countryside policy for Stalbridge is not the most appropriate strategy. It is a sustainable town and should be allocated a housing growth figure.	In comparison Sturminster Newton, which has a population of 4,292 in 2011 is allocated 380 new homes. An allocation of 240 would be proportionate for Stalbridge in conjunction with improved community facilities.	Applying countryside policy to Stalbridge is not the most appropriate strategy. It is a sustainable town and should be allocated a housing growth figure of 240 dwellings.

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3066	Rosie Baker	Terence O'Rourke Limited	Mr Matthew Richardson	4276		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Gleeson Strategic Land Limited fully supports the distribution of the majority of the growth to the four main settlements in the District. This approach clearly accords with the principles and objectives of the NPPF in terms of contributing to the achievement of sustainable development and enabling sustainable communities to grow and accommodate housing needs. However, we are concerned that the overall level of housing development proposed will not be achieve the aims set out in the NPPF to "boost significantly the supply of housing" (Paragraph 47) and is not robustly justified. It does not present a high enough target to meet the aims and objectives of the NPPF and test of soundness. The NPPF sets out a number of tests in respect of identifying and meeting objectively assessed housing needs. These tests are set within the presumption in favour of sustainable development, paragraph 14 for 'plan-making', and further explained at paragraphs 47 and 159 of he NPPF. These paragraphs confirm the LPAs must boost the supply of housing land, using the evidence base to meet the full objectively assessed need (47), and that the objective assessment must MEET household and population projections (159). Further that in identifying need they must cater for housing demand, and the scale of supply, necessary to MEET this demand (my emphasis). The intended effect is confirmed by the following Core Principle - "Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth" (NPPF 17, extract from 3rd bullet). Firstly, whilst the plan period covers 15 years (2011 to 2026), at the time of adoption this is likely to have reduced to 11 years. Whilst the NPPF is not prescriptive on the period that should be planned for, it is clear that plans should be drawn up over "an appropriate timescales...to take account of longer term requirements, and to be kept up to date" (Paragraph 157). Given the plan period, we are not convinced that, at the point of adoption, the plan will present the most up to date strategy. Extending the plan period would clearly lead to a need to plan for more homes, but would also present the longer term certainty for the plan-led approach to development sought by the NPPF. Secondly we are concerned that the number of new homes proposed does not meet the</p>	<p>The plan period should be lengthened to ensure that at the point of adoption the Council is planning for a 15-year time horizon. The Council should provide more evidence to justify their assessment of the objectively assessed housing need and if that evidence presents higher assessment of need then this need should be met. Further explanation should be provided to demonstrate why affordable housing need will not be fully met by the current housing target, and if this evidence demonstrates there is no reason not to meet this need the housing requirement should be increased.</p>	<p>The housing provision figures would not significantly boost housing supply as required by the NPPF. The plan should have a 15-year time horizon on adoption. More evidence is needed to justify the plan's assessment of housing need and if that evidence suggests a higher level of need then this need should be met. The level of housing provision should be increased to take account of the very high levels of need for affordable housing in the District.</p>

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								<p>objectively assessed housing need of the District. The number of new homes proposed does not meet the objectively assessed housing need of the District. The number of new homes required is based on now out of date evidence. The SHMA report was published in 2012 and is based on population projections from the 2001 census, dated evidence, which has therefore not taken into account more recently published census data and does not provide an NPPF consistent interpretation of that information. It is further noted that adjacent districts are intending to update their SHMAs and it may be that this will also result in further housing requirement under the duty to co-operate - whilst this is unknown currently this situation must be kept under review before the plan is submitted. In the meantime it would be beneficial for the Council to provide a technical paper on their assessment of the objectively assessed need as it is not clear what the difference is, in the evidence and interpretation of that evidence, between the draft SW RSS requirement for 350 dwellings per annum and the proposed requirement in the pre-submission plan for 280 dwellings per annum. Equally, it is not clear from the SHMA if there has been a consideration of the Council's economic aspirations for the four main towns and how these might impact the objectively assessed housing need. The Framework is also clear that the Core Strategy should meet objectively assessed needs for both market and affordable housing (Paragraph 47). It is generally accepted that a higher policy requirement enables the increased potential to provide affordable housing. Increasing the annual requirement would provide for affordable housing. Increasing the annual requirement would provide the Council with greater potential to go further towards addressing the affordable housing shortfall. The 2012 SHMA identified that there is an annual need of 387 additional affordable homes (paragraph 5.2 of the Summary Report for North Dorset). Even if the Council were to achieve the desired level of affordable housing on new sites, the number of affordable homes per annum would fall woefully short of this figure. Clearly capping the dwelling requirement at 280 homes per annum is not going to help to meet the affordable housing need. Having identified the objective assessment of need, it is appropriate for the Council</p>		



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								through the plan making process to seek opportunities to meet that need in full. The Framework, paragraph 14, is clear that the only justifiable reason for not meeting need is that "any adverse impacts of doing so would significantly or demonstrably outweigh the benefits.... Or specific policies in the Framework indicate development should be restricted". This exemption has not been demonstrated in this case; indeed the previous evidence base, for example, confirmed that the District Could accommodate at least 350 dwellings per annum (this relates to the draft SW RSS - which is never going to progress but did through testing demonstrate the District's ability to accommodate housing levels above these currently proposed)		
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4295		No	It is not consistent with national policy	Most of the new housing will be concentrated in one town. The interpretation of the National Plan indicates that it would be more desirable to spread some of this development across surrounding villages.		The new housing should not be so concentrated at Gillingham. Some of it should be spread across surrounding villages.
3070	Bernard May			4316	2.38 & 2.54	No	It is not effective	Insufficient attention has been given to healthcare in the north of the district. Particularly hospital provision. With an ageing population and lack of public transport leading to difficulties with access to the current level of services.	Consideration should be given to providing a new general hospital in Gillingham.	Consideration should be given to providing a new general hospital in Gillingham.
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4369		No	It is not justified	The proposed level of housing of at least 4,200 net additional homes between 2011 and 2026 (280 per annum) is in line with the household change projections contained in the 2011 Strategic Housing Market Assessment Update (SHMA). We are concerned that this figure represents a substantial drop from the housing provision of 350 dwellings per annum proposed in the March 2010 draft Core Strategy, and would be well below the average build rate for North Dorset between 2000 and 2011, which has averaged 370 dwellings per annum. This would appear to be a departure from the national objective (expressed in paragraph 47 of the NPPF) of significantly boosting housing supply. Other factors such as housing need, affordability and economic growth would support a higher level of housing provision. The expression of the housing target as a minimum figure through the words "at least" in policy 6 does address this to some extent, however the words	A clear housing trajectory should be provided with the inclusion of site allocations for the sites at the four market towns that are identified for development in Polices 16, 17, 18, 19, and 21. Consideration should be given to rolling the plan period forward to 2030 to provide a 15 year plan period from adoption. Before each numerical housing target, place the words "at least". Remove the following passage of Policy 6: "The approximate scale of affordable housing development that will be sought at the four main towns during the period 2011 - 2026 will be as	The housing provision figures, which have been reduced from previous draft figures) and are lower than past delivery rates, would not significantly boost housing supply. A higher level of housing provision is required. The sub-area figures should be expressed as minima, by inserting 'at least' before them. The town-based figures for affordable housing should be deleted as it is inconsistent with the criteria-based

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								<p>“at least” should also be repeated against individual sub-targets.</p> <p>In order to provide sufficient specific, deliverable sites for development in the plan period, a housing trajectory should be included in the plan to demonstrate how housing provision will be delivered, with site specific allocations for the sites that are identified for development in Polices 16, 17, 18, 19 and 21. The policy also sets out the ‘the approximate scale of affordable housing development that will be sought at the four main towns..’. However, the criteria-based approach to affordable housing delivery is set out in Policy 8, including a 35% requirement. There is no strategy within Policy 6 for achieving the ‘approximate scale’ of affordable housing identified. and how the per-town targets for affordable housing might be used in terms of decision making is not clear.</p>	<p>follows: (e) Blandford (Forum and St. Mary) – about 380 affordable homes; (f) Gillingham – about 500 affordable homes; (g) Shaftesbury – about 450 affordable homes; (h) Sturminster Newton – about 150 affordable homes.”</p>	<p>approach in Policy 8.</p>
3074	Craig Barnes	Gladman Developments		4399		No	<p>It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy</p>	<p>The level of housing proposed (280 dpa) is higher than the more recent 2011 based interim household projections but significantly lower than the draft RSS (350dpa) and the former Structure Plan (336dpa). Gladman consider that proposed housing requirement will artificially suppress housing land supply as a result of incomplete assessment of housing needs, and as a result is not based on a full objective assessment of housing need, and is therefore unsound. It does not take sufficient account of existing housing needs and affordability as required in paras 47 and 159 of NPPF. The findings of the 2012 SHMA are largely incomplete and are not in full compliance with NPPF. It does not assess market need, lacks consideration given to concealed households and does not consider the influence of the South Somerset HMA. The quantum of affordable need reported by its findings suggest that the plan requirement should be higher than currently proposed.</p>	<p>Gladman accept that it would be unrealistic to deliver the level of growth required that would see affordability needs addressed in its entirety. However, consideration of the findings contained within the 2011 SHLAA (the identification of a potential land supply of 13,000 dwellings), the 2010 SA (identifying that the RAA proposed 350dpa was deliverable) and historic delivery rates achieved (annual net completion rates have averaged 350 in the last 10 years - including complete economic cycle of boom and bust) would suggest that the District is capable of delivering a level of growth that is higher than currently proposed. Gladman believe that there is a need for North Dorset to re-examine it housing figure to reflect need and capacity paying special attention to the requirements of Paras 14, 47, 152 and 159 of NPPF.</p>	<p>The plan is not based on a full objective assessment of housing need. The District is capable of delivering a level of growth that is higher than currently proposed. There is a need for North Dorset to re-examine it's housing figure to reflect need.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3076	Malcolm Brown	Sibbett Gregory	Mr Vernon Knapper	4408		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy unsound as fails to comply with para 47 of NPPF - does not 'boost significantly' supply of housing. Plan fails to take account of para 158 of NPPF as LPA has not taken full account of relevant market and economic signals. NPPF identifies presumption in favour of sustainable development but cannot assume that development outside main settlements not sustainable.	Policy 6 should identify larger villages in which some market and affordable housing will be provided in the plan period. Plan should identify settlement boundary for Charlton Marshall and allocate SHLAA site between Newland Manor House and Tannery Court, Bournemouth Road.	Policy 6 should identify larger villages in which some market and affordable housing will be provided. A settlement boundary should be identified for Charlton Marshall and the site between Newland Manor House and Tannery Court, Bournemouth Road should be allocated for housing.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4475	5.16	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 5.16 of the Local Plan introduces a two tiered approach to the provision of affordable housing. Across the district a quota of 40% is set, but this is reduced in the settlement of Gillingham. This is based upon the findings of a background report prepared by 'Three Dragons'. In turn, the Three Dragons report justifies this approach by reference to differing residual land values in the district. It is submitted that this is not a sound approach to providing affordable housing. The relationship between gross development value and residual land value is generally the same, in percentage terms, irrespective of the location of any given site in the district. Introducing a two tier system therefore discriminates against landowners and developers in perceived higher value areas without necessarily providing the level affordable housing commensurate with need. The Final Three Dragons Report considered that a target of 30% affordable housing would be a reasonable starting point for the delivery of affordable housing. That approach is endorsed, but should be applied across the district.	Amend Paragraph 5.16 to refer to a single affordable housing target of 30%.	A single housing target of 30% should apply across the District.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4490		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	In accordance with our representations in respect of Paragraph 5.16 and Policy 8 of the Local Plan, the affordable housing targets should be amended to reflect a district delivery rate of 30%	Adjust the affordable housing targets for Blandford, Shaftesbury and Sturminster Newton to 30%.	The affordable housing targets for Blandford, Shaftesbury and Sturminster Newton should be adjusted to 30%.
3078	Sarah Reeves			4435		No	It has not been positively prepared, It is not consistent with national policy	It would be good to see local councils work with communities to proactively identify potential self builds sites which will far exceed the benefits of any volume house builder. I wonder if with any future housing e.g.: large-scale extensions to towns if a wider choice of developers could be invited to bid such as Cornwall Eco Villages	Local Councils should work with communities to proactively identify potential self builds sites. A wider choice of developers should be invited to bid for any future housing e.g.: large-scale extensions to towns, such as Cornwall Eco Villages	Local Councils should work with communities to proactively identify potential self builds sites.
3085	David Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	4596		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Insufficient level of housing supply identified through SHMA. Then draft RSS represents the most up to date, robust and tested evidence available. It is inappropriate to base future planning on the SHMA Update which was informed by changes arising from a severe economic downturn nationally.	The plan should be prepared to meet the figure of 5,250 over the plan period, as supported by the draft RSS and SHMA.	The housing provision figure should be increased to 5,250 over the plan period, as supported by the draft RSS and SHMA.

## Pre-submission Document - Analysis of Responses and identification of Main Issues

### Policy 7 – Delivering Homes

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
113	Sue Green	National Home Builders Federation		4592		No	It is not consistent with national policy	<p>Policy 7 : Delivering Homes sets out percentages for the housing mix on market (40% 1 &amp; 2 bed and 60% 3+ beds) and affordable (60% 1 &amp; 2 beds and 40% 3+ beds) housing developments for sites of more than 10 units as recommended in the “Bournemouth &amp; Poole HMA 2011 SHMA Update Summary Report for North Dorset District Council” dated January 2012 by JG Consulting and CBA. However this policy proposal is inconsistent with housing mix typologies used in the viability assessments carried out by Three Dragons consultancy on behalf of the Council (refer to Viability section below). Therefore this policy has not been viability tested as required by the NPPF.</p>	<p>There are a number of concerns about North Dorset’s housing requirement, which include :-</p> <ul style="list-style-type: none"> <li>· the two part plan approach ;</li> <li>· the overall reduction in housing numbers ;</li> <li>· not meeting affordable housing needs and housing needs beyond the four main towns ;</li> <li>· inconsistencies between policy and recommendations made in evidence on housing type and tenure mix ;</li> <li>· the lack of an NPPF compliant viability assessment.</li> </ul> <p>Moreover the Council’s objective assessment of housing need and 5 year land supply are based on sub-standard evidence bases. Therefore the North Dorset Pre Submission Local Plan is unsound.</p>	The housing mixes being sought for market and affordable homes (from the 2011 SHMA Update Report) have not been viability tested
378	Simon Rutter	Proctor Watts Cole Rutter		4350		No	It is not justified	<p>Policy text point b) respects the character and distinctiveness of the locality. This approach has failed in Shaftesbury. When considering large scale housing projects unrelated to the historic growth of the host settlement there should be a 'house' style adopted for the new development.</p>		There should be a 'house style' for large scale housing projects

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4458		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The National Planning Policy Framework seeks at paragraph 50 for a wide choice of homes and that consideration should be given for a mix of housing to meet the needs of different groups within the community. However, it is not considered a positive and effective approach to set out strict percentage requirements for size of houses across the whole district over the Plan period for the larger sites. Whilst the policy indicates that these proportions would be the starting point for negotiation, it is not considered that such a rigid or prescriptive approach to housing mix is likely to be useful or effective. It is considered that the more effective approach to secure a wide choice of homes for all sectors of the community would be to address the mix of housing on individual sites in relation to known local and market requirements at that point in time.	The Housing Mix should move away from a prescriptive approach and be reworded to allow more flexibility to reflect local market conditions at the time of promoting development.	The plan should not set out strict percentage requirements for house sizes for larger housing sites. The policy should be reworded to allow more flexibility so that the housing mix on any large site can reflect local market conditions at the time of promoting development.
749	Chris Burton	Tetlow King Planning	South West RSL Planning Consortium	4215		No	It is not consistent with national policy	As per our previous representation on the Plan we are concerned about the lack of policy coverage for older people. Paragraph 7.7 of the SHMA draws attention to the proportion of household growth for older people: "The results are striking, although consistent with regional and national trends. The data shows that over the next twenty years in the HMA there is expected to be a dramatic increase in the population of those aged over 60, and decreases (or only very modest increases) in the population of all other age groups." Within the life of the Plan, failure to address these needs could cause unintended consequences. Planning for older people and building desirable homes for them to live in also helps to free up family size homes and so create more fluidity in the housing market.	We re-emphasise the need for a specific policy response in the Local Plan Part 1 to deal with the issues of housing for older people.	There should be a specific policy response in the Local Plan to deal with the issues of housing for older people.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
769	Tim Hoskinson	Savills	Taylor Wimpey	4189		No	It is not justified	A flexible approach to housing mix is sought in order to reflect local circumstances and viability. The policy is also unclear in relation to target of 60% of market homes being 3+ bedroom, and the reference to an 'emphasis' on smaller units. We therefore propose the omission of the latter reference.	Amend wording of Policy 7 as follows: These proportions will be the starting point for negotiations on the mix of house sizes on all sites where 10 or more dwellings are proposed, although a different mix may be permitted if it can be soundly justified by local circumstances or on grounds of viability." Amend wording of Policy 7 as follows: "In the period to 2026, the Council will seek to deliver 40% of market housing in North Dorset as one or two bedroom properties and 60% of market housing as three or more bedroom properties."	Policy 7 should be reworded to allow a departure from the housing mix sought on larger sites, not only due to local circumstances, but also on grounds of viability. The reference to an emphasis on smaller (2 and 3 bedroom units) market homes in the policy should be deleted.
2783	Gill Smith	Dorset County Council		4174		No	It has not been positively prepared	The need for adapted housing for older or disabled households and for housing for vulnerable people of all ages that have special housing needs is discussed in paragraphs 5.48 – 5.53 of the Plan, but is not considered to be adequately addressed in Policies 7 and 8. This is an area of particular concern to the County Council in view of the rising number of elderly and vulnerable households in the County and the growing need for accommodation that can adapt to their changing needs and enable them to continue living in their local community for as long as possible.	County Council officers have been in discussion with housing and planning officers in East Dorset and Christchurch over the wording of their policies on this subject. A form of wording has been agreed which will enable the provision of specially adapted housing as part of the affordable quota in larger developments. New text and a policy have also been agreed to set general principles for all residential developments, to ensure that new development offers opportunities for older and more vulnerable people to live securely, independently and inclusively within communities. A similar form of wording is recommended to North Dorset to ensure consistency of approach across Dorset. See Representation for full wording proposed.	The policy should be reworded to ensure that new development offers opportunities for older and more vulnerable people to live securely, independently and inclusively within communities.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
2783	Gill Smith	Dorset County Council		4176		No	It has not been positively prepared	To achieve sustainable and inclusive communities, larger scale developments and new neighbourhoods should make provision for older and vulnerable people in both the market and affordable housing sectors. Including, but not limited to older and younger people and people with physical or learning disabilities. By requiring appropriate and adaptable housing, good layout and design, such schemes should create opportunities for older and vulnerable people to live securely, independently and inclusively within communities. Across all types and tenures the Council will therefore encourage the provision of homes which incorporate flexible and sustainable design principles, including the 'Lifetime Homes' standards and those that contribute to achieving affordable warmth. Mutual and co-housing models will be supported where a group of households with supported or specialised housing requirements, meet their own needs collectively, procuring and managing their own housing.	Policy should be reworded to deal with Housing and Accommodation Proposals for Vulnerable People covering Category C2 health and care related development proposals and Non C2 residential development proposals for older and vulnerable people. See representation for full policy wording.	The policy should be reworded to ensure that new development offers opportunities for older and more vulnerable people to live securely, independently and inclusively within communities. The policy should encourage the provision of homes that incorporate flexible and sustainable design principles.
2783	Gill Smith	Dorset County Council		4167	5.56	Yes		Self Build / CIL Para 5.56 - Self build is now exempt from paying CIL – this will influence development in the rural areas regarding neighbourhood plans and the “meaningful proportion” if / when CIL is introduced. Care must be taken when assessing CIL viability since development is not being proposed in the rural areas – these areas will need to be assessed as any eligible development will still need to be charged.		Any assessment of CIL viability should have regard to the fact that it is not payable on self-build properties.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4478		No	It is not justified	As regards housing mix the policy acknowledges that housing mix may be varied 'if it can be soundly justified by local circumstances'. The unit mix within a residential scheme might have a significant impact in terms of viability. NPPF para 173 acknowledges that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking'. The policy is not in accordance with the NPPF in this regard unless greater reference is made to viability. Amendments to the policy wording are thus proposed. The policy also states: In the period to 2026, the Council will seek to deliver 40% of market housing in North	<ul style="list-style-type: none"> <li>· Amend wording of Policy 7 as follows: These proportions will be the starting point for negotiations on the mix of house sizes on all sites where 10 or more dwellings are proposed, although a different mix may be permitted if it can be soundly justified by local circumstances or on grounds of viability.”</li> <li>· Amend wording of Policy 7 as follows: “In the period to 2026, the Council will seek to deliver 40% of market housing in North Dorset as one or two bedroom</li> </ul>	Policy 7 should be reworded to allow a departure from the housing mix sought on larger sites, not only due to local circumstances, but also on grounds of viability. The reference to an emphasis on smaller (2 and 3 bedroom units) market homes in the policy should be deleted.



ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								Dorset as one or two bedroom properties and 60% of market housing as three or more bedroom properties, with an emphasis on the provision of two and three bedroom properties. From the above, there is a contradiction between the target of 60% of market homes being 3+ bedroom, and the reference to an 'emphasis' on smaller units. We therefore propose the omission of the latter reference.	properties and 60% of market housing as three or more bedroom properties."	
2986	Neil Hall	AMEC	Crown Estate	4449		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 7 is prescriptive about the mix of market dwellings to be provided stating that the Council will seek to deliver 40% of market housing as one or two bedroom properties and 60% as three or more bedroom properties with an emphasis on two and three bedroom properties. The Crown Estate believes that the policy should be less prescriptive and that the mix and density of new homes should be informed by the character of the local area and housing need (including market demands) at the time a particular site comes forward. This approach would reflect guidance in NPPF (paragraph 50).	Suggested amendments to Policy 7 Second paragraph In the period to 2026, the Council will seek to deliver a mix of dwelling types which reflects the character of the area and is informed by an up-to-date assessment of need (including a consideration of market demands). Third paragraph In the period to 2026, the Council will seek to deliver a mix of affordable homes which is informed by an up-to-date assessment of need.	Policy 7 should not stipulate the precise housing mix to be sought on larger sites, but should indicate that the mix sought should be based on an up to date assessment of need having regard to market demands.
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4370		No	It is not justified	A flexible approach to housing mix is sought in order to reflect local circumstances and viability. The policy is also unclear in relation to target of 60% of market homes being 3+ bedroom, and the reference to an 'emphasis' on smaller units. We therefore propose the omission of the latter reference.	Amend wording of Policy 7 as follows: These proportions will be the starting point for negotiations on the mix of house sizes on all sites where 10 or more dwellings are proposed, although a different mix may be permitted if it can be soundly justified by local circumstances or on grounds of viability." Amend wording of Policy 7 as follows: "In the period to 2026, the Council will seek to deliver 40% of market housing in North Dorset as one or two bedroom properties and 60% of market housing as three or more bedroom properties."	Policy 7 should be re-worded to allow a departure from the housing mix sought on larger sites, not only due to local circumstances, but also on grounds of viability. The reference to an emphasis on smaller (2 and 3 bedroom units) market homes in the policy should be deleted.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4476	5.34	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 5.34 of the Local Plan refers to the Council seeking a mix of housing across the district, in terms of bedroom size. This appears ambiguous, as the reference to 'size' implies a concern relating to the dimensions of rooms within a dwelling. It is more likely that the Local Plan is concerned about housing mix in terms of the number of bedrooms, as opposed to their dimensions.	Paragraph 5.34 needs to be re-written with its intention clarified.	The supporting text should clarify whether the Council is concerned about mix in terms of number of bedrooms, or in relation to the dimensions of the rooms within a dwelling.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4477	5.41	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 5.41 of the Local Plan recommends a policy target for the mix of affordable housing. Although this is based on the findings of the SHMA, there may be circumstances where local needs require a different mix of accommodation. The Local Plan therefore needs to have more flexibility to take into account situations where the local needs are different.	Add the following text to the end of Paragraph 5.41: “...; subject to any variation that may be required to take into account local needs.”	The policy should be re-worded to allow a departure from the mix of affordable homes being sought, if the variation is required to take account of local needs.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4479	5.42	No	It has not been positively prepared, It is not justified, It is not effective	Our representations in respect of Paragraph 5.42, relating to open market housing, reflect those that we have set out relating to Paragraph 5.41 regarding a policy target for the mix of affordable housing. Although this is based on the findings of the SHMA, there may be circumstances where local demand requires a different mix of accommodation. The Local Plan therefore needs to have more flexibility to take account of situations where market circumstances are different.	Add the following text to the end of Paragraph 5.42: “...; again, subject to any variation that may be required to take into account local needs.”	The policy should be re-worded to allow a departure from the mix of market homes being sought, if the variation is required to take account of local needs.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4491		No	It has not been positively prepared, It is not justified, It is not effective	Our representations in respect of Policy 7 reflect those that we have set out relating to Paragraphs 5.41 and 5.42 regarding a target for the mix of affordable housing. Although this is based on the findings of the SHMA, there may be circumstances where local needs require a different mix of accommodation. The Local Plan therefore needs to have more flexibility to take account of situations where local needs are different.	Add the following text to the end of the second and third sentences of Policy 7: “...; subject to any variation that may be required to take into account local needs.”	The policy should be re-worded to allow a departure from the mix of market or affordable homes being sought, if the variation is required to take account of local needs.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3083	Edward Dyke	Symonds and Sampson	Mr Michael Miller	4541		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	The NDLP correctly identifies the importance of small scale development in rural communities. However by placing the control outside of NDDC we feel it is shunning its responsibility to fulfil its own targets. Infill sites offer opportunities in rural communities that would otherwise be outside the reach of many local people, through partnership with small scale developers these sites play a key role in the rural economy.	We suggest that the blanket removal of settlement boundaries need to be removed and the boundaries retained where appropriate.	Settlement boundaries should be retained where appropriate to allow small scale infill development to help meet the needs of rural communities.
3086	Simon Coles	WYG	David Lohfink	4619	5.40-5.42	No	It has not been positively prepared, It is not justified, It is not effective	Paragraphs 5.40 - 5.42 and Policy 7 Housing Mix: The prescribed proportion of unit sizes/bedroom numbers for affordable and market housing to 2026 is not based on evidence and is inflexible to meet identified needs and market demand that may change over time.	Delete references and replace with a requirement that housing developments seek to provide a mix of housing types and sizes that respond to prevailing need and market demand.	The policy should not prescribe the unit size / bedroom numbers for affordable and market homes. The policy should be re-worded to allow a mix to be provided that responds to the prevailing need and market demand

## Pre-submission Document - Analysis of Responses and identification of Main Issues

## Policy 8 - Affordable Housing

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
113	Sue Green	National Home Builders Federation		4593		No	It is not consistent with national policy	<p>Policy 8 : Affordable Housing proposes on sites of more than 3 units 30% affordable housing provision on sites in Gillingham or 35% on the sustainable urban extension in Gillingham subject to viability. Elsewhere on sites of more than 3 units a 40% affordable housing provision is proposed. If less affordable housing is provided on a development, such schemes are subject to open book viability checking and future claw-back clauses in case viability improves over time. This proposed level of affordable housing provision is recommended in Clauses 6.14, 6.19 and 6.25 of the “Conclusions and Recommendations” of the “North Dorset District Council Affordable Housing and Developer Contributions in Dorset Final Report” dated January 2010 by Three Dragons. Unfortunately this report is now somewhat out of date and pre-dates the requirements for whole plan viability testing as set out in the NPPF. Therefore the Council has not proven Policy 8 to be financially viable (refer to Viability section below). Under Policy 8, affordable housing will be provided as 70 – 85% affordable and / or social rent and 15 – 30% intermediate housing. However the up dated SHMAA report recommended 60% social rent, 26% affordable rent and 14% intermediate housing.</p>	<p>There are a number of concerns about North Dorset’s housing requirement, which include :-</p> <ul style="list-style-type: none"> <li>· the two part plan approach ;</li> <li>· the overall reduction in housing numbers ;</li> <li>· not meeting affordable housing needs and housing needs beyond the four main towns ;</li> <li>· inconsistencies between policy and recommendations made in evidence on housing type and tenure mix ;</li> <li>· the lack of an NPPF compliant viability assessment.</li> </ul> <p>Moreover the Council’s objective assessment of housing need and 5 year land supply are based on sub-standard evidence bases. Therefore the North Dorset Pre Submission Local Plan is unsound.</p>	<p>The Three Dragons Viability Assessment from 2009 is out of date and pre-dates the requirement for whole plan viability testing. Since Policy 8 has been based on this study, it cannot be demonstrated that these percentages are viable. A whole plan viability assessment is required. This forms part of a wider concern about the Plan's approach to the assessment of housing needs and housing provision.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
113	Sue Green	National Home Builders Federation		4594		No	It has not been positively prepared, It is not consistent with national policy	The Council's affordable housing need is identified as much higher than the numbers proposed in the Local Plan. The up dated SHMAA report identified 387 affordable housing units per annum (over the next 5 years) to meet need. Therefore the Council is not meeting in full this objectively assessed need as required by the NPPF. The Council have not provided evidence of fully exploring options to deliver more affordable housing or to justify curtailment of affordable housing provision. This is a concern as affordability is identified as a major issue in North Dorset. Table 1 of "North Dorset District Council Housing Topic Paper" dated November 2012 illustrates a house price to income ratio of 9.45.	There are a number of concerns about North Dorset's housing requirement, which include :- <ul style="list-style-type: none"> <li>· the two part plan approach ;</li> <li>· the overall reduction in housing numbers ;</li> <li>· not meeting affordable housing needs and housing needs beyond the four main towns ;</li> <li>· inconsistencies between policy and recommendations made in evidence on housing type and tenure mix ;</li> <li>· the lack of an NPPF compliant viability assessment.</li> </ul> Moreover the Council's objective assessment of housing need and 5 year land supply are based on sub-standard evidence bases. Therefore the North Dorset Pre Submission Local Plan is unsound.	The Council is not meeting the full objectively assessed need for affordable housing and has not provided evidence to show that options to deliver more, or curtail provision of, affordable housing have been fully explored. This forms part of a wider concern about the Plan's approach to the assessment of housing needs and housing provision.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4094		No	It is not justified	Policy 8 is not the most appropriate strategy as it will result in large concentrated affordable housing estates with little or no local facilities.		Concern that Policy 8 as drafted will result in large affordable housing estates with little or no facilities.
378	Simon Rutter	Proctor Watts Cole Rutter		4351		No	It is not justified	This policy compounds the overly restrictive development policy for the countryside in that any affordable housing will, for the most part, come under the definition of an exception site. It substitutes its own interpretation of sustainability for that set out in the NPPF rather than seeking to provide guidance on how this might be interpreted locally. The local housing needs survey will inevitably show the need for non-affordable as well as affordable housing. Policies within the plan make it very difficult for communities to plan for non-affordable housing as it could not come within the terms of this exception site or other policy and without a neighbourhood plan would have to go without. The way provision of market housing is to be provided is too inflexible.		Policy 8 compounds the overly restrictive approach to development in the countryside and the provision of rural exception sites. The overall approach to the provision of market housing is too inflexible.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4454		No	<p>It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy</p>	<p>The district’s need to provide a range of housing, including affordable housing is not questioned and is supported.                      The recognition within the policy of the need for flexibility over affordable housing levels for individual sites is welcomed.                      However, the threshold of affordable housing being triggered by a development that creates three or more net additional houses is set too low. It will have the effect of stalling appropriate development and redevelopment of smaller sites, particularly small sites which are seeking to find positive new uses to bring vacant and underused sites back into effective use. Such a low threshold is likely to lead to greater use of viability assessments which again add further delay and cost to a development project. The threshold should therefore be reviewed to a higher figure.                      The threshold as currently proposed is not sound in terms of being effective and in accordance with national policy.                      Furthermore, concern is expressed with the proposal for any obligation to require a subsequent review with a view to increasing the scale of affordable development prior to or during the construction of the site. This would lead to considerable uncertainty and delay in the disposal and development of sites which would defeat the Local Plan objectives. This part of the policy is not sound in terms of being effective and in accordance with national policy and should be deleted.</p>	<p>Review the threshold for requiring the provision for affordable housing to a higher number of net additional dwellings (an alternative threshold level is not suggested).                      Delete the fifth paragraph starting If it can be demonstrated....</p>	<p>The threshold for the provision of affordable housing is set too low as it will stall the development and redevelopment of small sites. There should be no requirement to review the level of affordable housing with a view to increasing the level of provision once it has been established in a planning obligation.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
769	Tim Hoskinson	Savills	Taylor Wimpey	4190	5.93	No	It is not justified	It should be noted that the viability study used to support the affordable housing target proportions was prepared by Three Dragons in June 2009. Given the age of this document a detailed review of the approach used should be undertaken. More specifically with regards to viability, it may not be satisfactory for an applicant to 'rely upon the conclusions of the District Valuer' as this reduces any certainty in the decision making process for the developer. It is normal practice that the Council may seek a second opinion in terms of viability (and often for this to be paid for by the applicant), though viability is a subjective matter and it may not always be possible to rely on the conclusions of the third party. The policy indicates that where the level of affordable housing proposed is below the target, 'the developer may be offered an opportunity (subject to certain requirements) to involve the District Valuer with a view to securing a mutually agreed level of affordable housing provision'. This does not give a clear indication of how a decision-maker should approach issues of viability, not least because the criteria for referral to the District Valuer are not specified.	Amend wording of paragraph 5.93 as follows: "The parties may agree to rely upon the conclusions of an independent assessor for the purposes of the application" Replace 4th paragraph of Policy 8 to read: "Where it is demonstrated to the Council's satisfaction through an independent 'open book' assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be accepted."	The Three Dragons Viability Assessment from 2009 is out of date and should be reviewed. When working with the Council to reach a mutually agreed position on viability, the policy should permit the use of an independent assessor, rather than just the District Valuer. The policy should explicitly set out that a reduced level of affordable housing provision may be acceptable, if justified by an open book viability assessment.
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4103	5.95; 5.99	No	It has not been positively prepared, It is not effective, It is not consistent with national policy	The Local Plan states, at paragraph 5.81, that it wishes to "avoid a situation where viability assessments become a requirement for every housing development proposal," and at paragraph 5.92 it proposes that developers should pay for "a single assessment of viability by the District Valuer". It is then proposed that, only in circumstances where the LPA is unsuccessful "(t)he Council will therefore aim to reclaim any shortfall in provision on a scheme that has been granted permission" (paragraph 5.95) by the requirement for ongoing viability assessments throughout a development. The Local Plan will be in force for many years. There is no reason to assume that the housing market will be healthy for all or any part of that period. It is inappropriate that the LPA should be able to disregard the determination of the District Valuer. Either there should be a line	Revised wording is put forward as follows. 5.95 The delivery of affordable housing below the proportions set out in the policy could potentially undermine the Council's ability to deliver as much housing as possible as affordable. The Council will therefore aim to reclaim any shortfall in provision on a scheme that has been granted permission, but has not yet been completed, if financial conditions improve. In such cases, developers will be expected to enter into a legal agreement requiring further site-based viability assessments to be carried out by the District Valuer, at the Council's expense and not more than once in any two year period, prior to completion of a scheme. In the event that a more up-	Where the viability of affordable housing provision on a site is being re-assessed, the re-assessment should allow the level of provision to be reduced, as well as increased. The policy should also allow this principle to be applied to off-site contributions. Where viability is in dispute, the costs of any assessment should be borne by the unsuccessful party.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
								<p>drawn upon the results of the District Valuer or alternatively the developer should have the same rights as the LPA to 'claw-back' if the proportion of Affordable Housing is found to be too high. The costs of viability studies are disproportionately high for small developments. For reasons of natural justice, in all cases the costs of the first viability assessment should be awarded by a decision of the District Valuer and against the unsuccessful party.</p>	<p>to-date assessment shows that a higher level of affordable housing would be viable, the developer would be expected to provide it and if it shows that only a lower level of affordable housing would be viable, the Council would be expected to adjust its requirement and re-imburse the developer and pay the costs of the assessment.</p> <p>5.99 In cases where the Council considers it acceptable for an off-site financial contribution of 'broadly equivalent value' to be made, a level of contribution will be sought based on a realistic assessment of the overall cost of delivering affordable homes and the alternative use values. The Council may (at its own cost) ask the District Valuer to periodically recalculate the costs of delivering different sizes of affordable units in North Dorset and may seek different levels of off-site contributions based on these calculations which would include appropriate re-imbursement to developers.</p> <p>POLICY 8.....If it can be demonstrated that a level of affordable housing provision below the percentages set out above can be justified on grounds of viability (taking account of grant funding or any other subsidy) an obligation will be required:</p> <p>(d) to secure the maximum level of provision achievable at the time of the assessment; and</p> <p>(e) to enable the level of provision to be reviewed in the future, subject to a further assessment, in the event of a change in the relevant financial circumstances prior to or during the construction of the site.</p>	



ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4105		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	<p>There is no support for mixed use development (as defined in Appendix D) or regeneration in the town centres in the Local Plan and no policy to encourage appropriate residential development in town centres. This is supported in the 2003 Local Plan by paragraphs 3.38, 3.53 and Policy 3.27. However, the Council is not intending to retain Policy 3.27 when the Local Plan Part 1 is adopted (as set out in Appendix A). Consequently, the Local Plan neither recognises nor supports the advice in paragraph 23 of the NPPF that residential development can play an important role in ensuring the vitality of town centres. The Local Plan focuses on limiting all town centre uses to retail and other ground floor uses and there is no recognition of the evening economy. Indeed the Local Plan seeks to move mixed use regeneration away from town centres to out-of-centre sites. The Local Plan omits support for mixed use development in Blandford town centre. Mixed-use regeneration schemes in town centres, such as Blandford Forum, will inevitably be small scale and deal with unique opportunities with abnormal long-term liabilities to support heritage assets. Such schemes need a heritage-led integrated approach to land use and management and individual elements are not susceptible to separate short-term viability analysis and have a high existing alternative-use value. Policy 8 of the Local Plan should state that heritage-led regeneration should not require viability assessments for the purpose of assessing liability to affordable housing.</p>	<p>The Local Plan should:</p> <ol style="list-style-type: none"> <li>1. Incorporate within the chapter on the Economy recognition that residential development can play an important role in ensuring the vitality of town centres and amend Policy 11 accordingly.</li> <li>2. Save Adopted Plan Policy 3.27 and incorporate it into Policy 12.</li> <li>3. Recognise the exceptional costs of sensitively implementing heritage led mixed use regeneration in town centres defined by the status of its listed buildings and amend Policy 8.</li> <li>4. Incorporate and support the terms of NPPF paragraph 23.</li> </ol>	<p>The requirement to provide affordable housing could discourage heritage-led regeneration in town centres, particularly Blandford. Policy 8 of the Local Plan should state that heritage-led regeneration should not require viability assessments for the purpose of assessing liability to affordable housing.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
2783	Gill Smith	Dorset County Council		4175		No	It has not been positively prepared	<p>The need for adapted housing for older or disabled households and for housing for vulnerable people of all ages that have special housing needs is discussed in paragraphs 5.48 – 5.53 of the Plan, but is not considered to be adequately addressed in Policies 7 and 8. This is an area of particular concern to the County Council in view of the rising number of elderly and vulnerable households in the County and the growing need for accommodation that can adapt to their changing needs and enable them to continue living in their local community for as long as possible.</p>	<p>Proposed changes:                      i) That additional clauses should be added to Core Policy 8 (Affordable Housing) as follows:</p> <p>Where developments are required to provide 10 or more affordable homes, 10% of the affordable housing element should be planned for households requiring specially adapted or supported housing. However, if a requirement for specialised affordable housing (or a viable delivery mechanism) cannot be demonstrated by the Council at the point of submitting a planning application, the quota shall revert to 100% general need affordable housing.</p> <p>Under no circumstances will the financial consequences of including 10% adapted or supported housing result in a greater cost to the development than would arise through an acceptable, viable and proportionate mix of general need affordable housing</p>	<p>In relation to larger sites, the policy should reflect the needs of older and disabled households. On sites of 10 or more affordable homes, 10% of the affordable housing element should be planned for households requiring specially adapted or supported housing</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4482	5.93	No	It is not justified	<p>It should be noted that the viability study used to support the affordable housing target proportions was prepared by Three Dragons in June 2009. Given the age of this document a detailed review of the approach used should be undertaken. More specifically with regards to viability, it may not be satisfactory for an applicant to ‘rely upon the conclusions of the District Valuer’ as this reduces any certainty in the decision making process for the developer. It is normal practice that the Council may seek a second opinion in terms of viability (and often for this to be paid for by the applicant), though viability is a subjective matter and it may not always be possible to rely on the conclusions of the third party. The policy indicates that where the level of affordable housing proposed is below the target, ‘the developer may be offered an opportunity (subject to certain requirements) to involve the District Valuer with a view to securing a mutually agreed level of affordable housing provision’. This does not give a clear indication of how a decision-maker should approach issues of viability, not least because the criteria for referral to the District Valuer are not specified.</p>	<ul style="list-style-type: none"> <li>· Amend wording of paragraph 5.93 as follows: “The parties may agree to rely upon the conclusions of an independent assessor for the purposes of the application”</li> <li>· Replace 4th paragraph of Policy 8 to read: “In exceptional circumstances where it is demonstrated to the Council’s satisfaction through an independent ‘open book’ assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be accepted.”</li> </ul>	<p>The Three Dragons Viability Assessment from 2009 is out of date and should be reviewed. When working with the Council to reach a mutually agreed position on viability, the policy should permit the use of an independent assessor, rather than just the District Valuer. The policy should explicitly set out that a reduced level of affordable housing provision may be acceptable , if justified by an open book viability assessment.</p>
2986	Neil Hall	AMEC	Crown Estate	4450		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>In terms of tenure, The Crown Estate believes that the market / affordable split should be decided on a case by case basis to be informed by a robust assessment of need reflecting local circumstances and affordable housing needs. This approach would recognise that there will be variations in need between different locations within the District, as well as also enabling decisions to be informed by an up to date assessment of need. We also consider that the mix of affordable housing should consider viability and deliverability. This approach would be consistent with paragraph 50 of NPPF which advises that affordable housing policies should be “sufficiently flexible to take account of changing market conditions over time”.</p>	<p>Suggested amendment to Policy 8 Second paragraph Such development will contribute to the provision of affordable housing. The Council will seek to deliver the following targets which will be informed by an assessment of viability and deliverability: a within the settlement boundary of Gillingham 30% of the total number of dwellings will be affordable; and b within the southern extension to Gillingham 35% of the total number of dwellings will be affordable; and c elsewhere in the District 40% of the total number of dwellings will be affordable.</p>	<p>The policy should be more flexible with regard to target proportions for affordable housing provision. The policy should indicate that the Council will seek to deliver the target proportions informed by an assessment of viability and deliverability .</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
3066	Rosie Baker	Terence O'Rourke Limited	Mr Matthew Richardson	4286		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 8, affordable housing, lacks flexibility that could constrain deliverability of new homes in the District. The policy requires a strict percentage of affordable housing to be delivered even though it recognises that this may not always be possible due to economic viability of development proposals. If the plan is to be more prescriptive then further viability evidence must be submitted and the target amended downwards to recognise this work. Otherwise, the policy should be reworded to make it clear that 40% affordable housing is a target the Council seeks to achieve but clearly recognises constraints to achieving this, that include development viability. The reference to grant funding being used to maximise the level of affordable housing removes certainty from the policy and should therefore be removed. The current policy wording does not provide a flexible or positive enough approach to ensure consistency with the requirements of the NPPF. Whilst the wording allows for testing of viability on a case by case basis, it should be clear that the percentage requirements for affordable housing targets that the Council will aim to achieve and should a developer need to enter into negotiations the District Valuer will be involved in an 'open book' approach to ensure both parties can agree a suitable level of affordable housing for the site.	The second paragraph of the policy should be re-worded too clarify the percentages presented are the Council's maximum targets, against which policy compliance can be considered in development management decisions. The fourth paragraph of the policy should be reworded to ensure developers are able to take an 'open book' approach to affordable housing if required. We suggest the following wording : "Such development will contribute to the provision of affordable housing based on the following targets as the Council's starting point for negotiations." "In cases where a level of affordable housing provision below target is being proposed, the developer will be offered the opportunity to involve the District Valuer with a view to securing a mutually agreed level of affordable housing provision."	The target percentages in policy should be expressed as maxima that the Council will seek, subject to constraints including viability. Developers should be able to take an 'open book' approach to affordable housing provision if required.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4296		No	It is not justified	Concentrating social and affordable housing in one location, brings with it social problems as evidenced in recent issues aired in the press and public meetings in Shaftesbury. This is due to the fact that the need of the demographic is not recognised. A socially sustainable approach will identify what needs to be provided for a sustainable community. Affordable housing has special needs which have to be recognised. In this instance it will be beneficial to locate these in close proximity to benefit from the essential services that support these communities, such as schools, doctors, social services. This is evidenced by the problems experienced		Affordable housing should be provided in a way that recognises the demographic of a place and locates it close to adequate essential services. Failure to do so can result in social problems .

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
								by the new large community east of Shaftesbury. No provision exists in the town or if they exist are not adequate. This leads to stress in the community.		
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4371	5.93	No	It is not justified	It should be noted that the viability study used to support the affordable housing target proportions was prepared by Three Dragons in June 2009. Given the age of this document a detailed review of the approach used should be undertaken. More specifically with regards to viability, it may not be satisfactory for an applicant to 'rely upon the conclusions of the District Valuer' as this reduces any certainty in the decision making process for the developer. It is normal practice that the Council may seek a second opinion in terms of viability (and often for this to be paid for by the applicant), though viability is a subjective matter and it may not always be possible to rely on the conclusions of the third party. The policy indicates that where the level of affordable housing proposed is below the target, 'the developer may be offered an opportunity (subject to certain requirements) to involve the District Valuer with a view to securing a mutually agreed level of affordable housing provision'. This does not give a clear indication of how a decision-maker should approach issues of viability, not least because the criteria for referral to the District Valuer are not specified.	Amend wording of paragraph 5.93 as follows: "The parties may agree to rely upon the conclusions of an independent assessor for the purposes of the application" Replace 4th paragraph of Policy 8 to read: "Where it is demonstrated to the Council's satisfaction through an independent 'open book' assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be accepted."	The Three Dragons Viability Assessment from 2009 is out of date and should be reviewed. When working with the Council to reach a mutually agreed position on viability, the policy should permit the use of an independent assessor, rather than just the District Valuer. The policy should explicitly set out that a reduced level of affordable housing provision may be acceptable, if justified by an open book viability assessment.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4480	5.105	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Paragraph 5.105 of the Local Plan states that the Council will seek social rented housing in certain locations. This is considered unreasonable and inconsistent with the NPPF, which does not prescribe any requirement to provide one type, and one type only, of affordable housing. Developers should be free to propose affordable rented as part of their development proposals, in addition to intermediate housing.	Omit the last sentence of Paragraph 5.105.	There should be no requirement for social rented housing to be provided in locations where those in housing need are unlikely to be able to afford to occupy affordable rented properties.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4493		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>In accordance with our representations in respect of Paragraph 5.16, Local Plan Policy 8 introduces a two tiered approach to the provision of affordable housing. Across the district a quota of 40% is set, but this is reduced in the settlement of Gillingham. This is based upon the findings of a background report prepared by 'Three Dragons'. In turn, the Three Dragons report justifies this approach by reference to differing residual land values in the district.</p> <p>It is submitted that this is not a sound approach to providing affordable housing. The relationship between gross development value and residual land value is generally the same, in percentage terms, irrespective of the location of any given site in the district. Introducing a two tier system therefore discriminates against landowners and developers in perceived higher value areas without necessarily providing the level affordable housing commensurate with need. The Final Three Dragons Report considered that a target of 30% affordable housing would be a reasonable starting point for the delivery of affordable housing. That approach is endorsed, but should be applied across the district. Additionally, and in accordance with our representations in respect of Paragraph 5.105, the policy should not set out a preference for social rented housing. Developers should be free to propose affordable rented as part of their development proposals, in addition to intermediate housing.</p> <p>Finally, the reference to 'pepper potting' implies very small clusters of housing that may not be suitable for effective management by a Registered Social Landlord. Development in small groups would be more appropriate.</p>	<p>Amend Policy 8 to refer to a single affordable housing target of 30%. Omit the preference for social rented housing. Replace 'pepper-potting' with 'small groups'.</p>	<p>The target proportion of affordable housing sought should be the same (30%) across the District. The 'two-tier' approach of seeking 40% everywhere, except at Gillingham, is not sound. There should be no requirement for social rented housing to be provided in locations where those in housing need are unlikely to be able to afford to occupy affordable rented properties. The policy should not seek the 'pepper-potting' of the affordable units on housing sites. Development in small groups is more appropriate.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
3078	Sarah Reeves			4433		No	It is not consistent with national policy	The Government aims to increase custom-build as a mainstream building option and a further emphasis on the range of affordable housing could be highlighted in the Local Plan e.g.: community led, co-operatives, co-housing (e.g.: Threshold Centre), land trusts, mutals etc...	Further emphasis on the range of affordable housing could be highlighted in Policy 8 e.g.: community led, co-operatives, co-housing (e.g.: Threshold Centre), land trusts, mutals etc...	Policy 8 should have a stronger emphasis on other types of affordable housing including co-operatives and land trusts.
3078	Sarah Reeves			4434		No	It has not been positively prepared, It is not justified	The content of the affordable housing section is mostly focused on a social housing option rather than acknowledging that self-build in itself is a route to affordable housing. Could there be a % of community self build (as Teignbridge District Council have done?). There needs to be a Housing Needs Assessment to build an Evidence Base for this, but to date these assessments have not included the question of self-Build, which the Government is advocating. The quota for affordable housing mostly rests with social housing, yet there is significant proportion of people who do not qualify for social housing yet do not have the financial means to get a mortgage (lack of funds, age etc.), which is where community-led custom build projects can assist. Social housing as a route to affordable housing is a myth as you only own a share of your home which is valued at a market price, again self-build is a route to building higher quality affordable housing that better meets the needs of local communities.	Policy 8 should require a % of community self build. There needs to be a Housing Needs Assessment to build an Evidence Base for this.	Policy 8 should require a percentage of housing to be for community self-build.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Representation comment	Summary of Main Issues
3086	Simon Coles	WYG	David Lohfink	4620	5.81, 5.100-5.103, 5.105, 5.108	No	It has not been positively prepared, It is not justified, It is not effective	<p>Paragraph 5.81 justifies an approach whereby affordable housing is sought on sites with capacity for three or more dwellings inter alia because it will assist small local builders. This distinction is arbitrary and is not supported by evidence. Paragraphs 5.100 - 5.103 and Policy 8: The proposed tenure types and split have not been fully evidenced. They are also too inflexible to respond to changes over the next 14 years. Furthermore, they do not take proper account of the contribution of the private rented sector or other tenures such as discount market housing in perpetuity at a percentage of market value. C G Fry has experience in delivering discount market housing e.g. Tolpuddle (West Dorset DC). Paragraph 5.105: The measure of affordability and who will be the arbiter is unclear and this provides the potential for uncertainty and confusion.</p> <p>Paragraph 5.108: The layout and design of a housing development, including the location and concentration of affordable housing, is a detailed matter to be considered on a site and scheme specific basis, taking account of the views of stakeholders and viability/deliverability considerations. Any Local Lettings Plan would need to be prepared in conjunction with and agreed by the developer.</p>	<p>Remove "...or local builders..." from the fourth bullet point of paragraph 5.81. Amend the relevant paragraphs 5.100-5.103 and Policy 8 to refer to discount market housing and incorporate flexibility for affordable housing provision to respond to prevailing need, new forms of tenure that may emerge over time and viability considerations. Delete paragraph 5.105. The matter would be addressed satisfactorily by the changes sought to paragraphs 5.100 - 5.103 above. Amend paragraph 5.108 as follows: The location and concentration of affordable housing within large housing developments should help deliver mixed and balanced communities, subject to site specific circumstances, deliverability and the requirements of affordable housing providers.</p>	<p>The threshold of three, above which affordable housing is sought, is arbitrary and there is no evidence that this threshold will help to support local builders. The tenure split being sought for affordable housing is not fully evidenced and too inflexible to respond to changes in needs, new forms of affordable housing that might arise and viability considerations. The location and concentration of affordable housing should be considered on a site and scheme specific basis. Any Local Lettings Plan should be prepared in conjunction with and agreed by the developer.</p>



Pre-submission Document - Analysis of Responses and identification of Main Issues

**Policy 9 – Rural Exception Affordable Housing**

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4096		No	It is not consistent with national policy	Policy 9 is not consistent with NPPF. It is overly restrictive and will prohibit sustainability of the local and rural economy.		The policy is overly restrictive. It will prohibit sustainability of the local and the rural economy
749	Chris Burton	Tetlow King Planning	South West RSL Planning Consortium	4212		No	It is not consistent with national policy	Our concern here follows on from those in relation to Policies 2 and 6. Via the proposed Spatial Strategy (policy 2) which we are objecting to, the Council has already sought to restrict rural house building to exception sites. It is creating further difficulties by restricting schemes to an arbitrary figure of nine dwellings and no more than one third market housing. We prefer the Council to adopt an approach akin to that being taken in Mendip - please refer to Policy DP12 of the Pre-Submission Local Plan which will shortly undergo examination. This is a criteria-based policy which allows the level of affordable and market housing to be determined on a site by site basis taking into account important factors such as scheme viability. We remind the Council that this policy will be easier to operate if it has settlement boundaries around the villages. As drafted, the policy refers to the need for a site to be “adjoining the existing built-up area” which does not offer sufficient clarity for our clients.	This should be a criteria-based policy which allows the level of affordable and market housing to be determined on a site by site basis taking into account important factors such as scheme viability.	Restricting schemes to 9 dwellings and only one third market housing is arbitrary. The levels of affordable and market housing should be determined on a site-by-site basis, having regard to viability. The removal of settlement boundaries will lead to uncertainty about whether any rural exception scheme would 'adjoin the existing built up area'.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4108	5.115 to 5.150	No	It has not been positively prepared, It is not effective, It is not consistent with national policy	The NPPF supports the established principle of “enabling-development” to bring forward affordable housing in rural areas, but the Local Plan puts barriers in place to the delivery of rural exceptions sites, when it should be enabling this form of development. Paragraph 5.115 limits support for enabling-development to schemes providing “any market element is similar (or smaller) in size and type to the rural exception affordable homes being proposed.” The Plan states that “the small numbers of market homes proposed should be the minimum necessary to support the provision of the affordable homes on that site.” (paragraph 5.137). Placing restrictions on the form of housing that can be marketed without consideration of achieving best or any market value reduces profit per unit thereby requiring more market housing to achieve the minimum necessary to enable the provision of the affordable homes on a site. The policy element in paragraph 5.115 fails to recognise that the exception site should be integrated into the fabric of a rural settlement in order to enhance or maintain the vitality of rural communities. The market element should be designed as a bridge between the affordable and existing properties of a settlement. The criteria for evidencing local needs and connections are unduly onerous, it is not referenced in the NPPF and is contrary to the NPPF intention of enhancing or maintaining the vitality of rural communities. Overall the paragraphs on Rural Exception Sites should be rewritten in a concise form to support, and positively enable, the implementation of exception sites in accordance with national policy.	All duplication and repetition in paragraphs 5.115 to 5.150 should be deleted. Further the following changes are considered to be appropriate and necessary. Delete the second bullet point in Paragraph 5.115, which requires that any market element on a rural exception scheme is similar (or smaller) in size and type to the rural exception affordable homes being proposed. In paragraph 5.121 delete all text after the first sentence, which sets out in detail what 'local connection' means. Delete criteria (f) and (g) in Policy 9, which seek to restrict the size of market homes on rural exception sites. Add a further criterion to Policy 9 stating that any rural exception scheme should be integrated into the fabric of a rural settlement in order to enhance or maintain the vitality of rural communities.	The policy and supporting text should be more concise to support and enable the implementation of exception sites in accordance with national policy. The policy should not seek to restrict the size of market homes to being similar or smaller in size to the affordable homes. The criteria for assessing local need and local connection are unduly onerous . The policy should state that any rural exception scheme should be integrated into the fabric of a rural settlement to enhance or maintain the vitality of rural communities.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3073	Suzanne Keene	CPRE North Dorset Branch		4392		No	It is not effective	Add words to the Policy to accurately reflect Para 5.130. Otherwise the considerations in Para 5.130 are not included as policy and it is unclear whether they should have any effect on applications.	Policy 9 Add after Points a) and b) - to reflect Para 5.130. Point c) the development meets all other relevant planning policies including those relating to sustainability, design and the protection of the environment.	The supporting text indicating that rural exception schemes should meet all other relevant planning policies including those relating to sustainability, design and the protection of the environment, should be reflected in the policy itself
3031	Andrew Roberts	Highways Agency		4653		Yes		The Highways Agency previously objected to this proposal. However, the HA does not think it is sustainable to maintain an objection. There is unlikely to be severe impact on the Strategic Road Network. Whilst there is still a concern about the potential for unsustainable patterns of growth, the HA are sufficiently satisfied that the numbers are likely to be small on any individual site and as the total numbers are also likely to be small any effects will be very diluted. In addition these types of development are directed to places (villages) with some facilities which will offer some form of containment of trips and some opportunity for public transport (albeit limited). There is a need to balance the impacts of trips with the need for this form of development and the HA is content for the Inspector to consider the matter. The HA would be concerned to see any significant development proposals of this sort in less sustainable places coming forward whether individually or cumulatively and there will be a need to monitor this and for an effective development management framework.		The Highways Agency considers that any effects of this policy, in terms of impacts on the strategic road network, are likely to be very diluted. However, the policy should be monitored to ensure there are no adverse individual or cumulative impacts

## Pre-submission Document - Analysis of Responses and identification of Main Issues

**Policy 10 – Gypsies, Travellers and Travelling Showpeople**

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4097		No	It is not justified	Not the most appropriate strategy as it does not provide a defined limit on the number of occupants on individual sites or provide a maximum number of sites in the District. It does not include a strategy for the long term replacement of the temporary gypsy site in Shaftesbury which is currently located on the protected bypass corridor.		1. Policy does not place a limit on number of occupiers of sites or number of sites in North Dorset. 2. Does not include strategy for replacing temporary site at Shaftesbury.
2783	Gill Smith	Dorset County Council		4168	5.157-5.158	Yes		Gypsies and Travellers - Paras 5.157 – 5.158 - These paragraphs refer to the original Dorset Traveller Needs Assessment of 2007. The Plan should be updated to refer to the "Bournemouth, Dorset and Poole Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2013" by Opinion Research Services which is now publicly available.		Need to refer to the most up to date Gypsy and Traveller Needs Assessment.

Pre-submission Document - Analysis of Responses and identification of Main Issues

Policy 11 – The Economy

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4099		No	It is not justified, It is not consistent with national policy	Does not consider the plan to be the most appropriate strategy as it does not support entrepreneurial ventures in the rural areas. The policy is negatively written which is not in accordance with NPPF.		The policy is not a positive strategy, as it does not specifically support entrepreneurial ventures, and therefore does not meet the requirement of the NPPF.
388	Tom Munro	Dorset AONB Partnership		4051		Yes		Having identified “increased equine development” as a source of landscape impacts in 4.63, its inclusion in the second bullet of 6.12 should be removed or at least expressed in a more nuanced fashion to reflect its potential to harm the landscape.		Policy 11 should be aligned with the Natural Environment Policy 4 to acknowledge the landscape impacts of increased equine development.
640	Scott Norman	DT11 Forum		4432	6.34			Suggests a paragraph be inserted, along the lines of: ‘Homeworking is becoming an increasingly significant part of the way people work, particularly as work patterns change, IT infrastructure improves, and the public transport network reduces. It also reduces the need to travel, so contributing to sustainability. The Council supports the development of homeworking, subject to working within the constraints set by planning legislation such as Permitted Development Rights’. Also, In para 6.34 some of the rural recreational opportunities such as the North Dorset Trailway and long distance footpaths are highlighted. However, under the countryside policies (Policies 29 to 32), the range of development opportunities is constrained to particular categories, for understandable reasons. This does not appear to allow development of infrastructure to support, for example, the North Dorset Trailway such as car parks and toilets, cycle hire facilities, if needed within the countryside area. Suggests that this needs to be considered.		Policy should recognise popularity of homeworking. The policy should include reference to infrastructure e.g. car parks, required to support tourism e.g. Trailway.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4459		No	It has not been positively prepared, It is not justified, It is not consistent with national policy	<p>Hall &amp; Woodhouse Ltd support Policy 11 and the inclusion of the Brewery site as a mixed use regeneration site of which part will comprise employment generating uses. Part of the site comprises the brewery and associated operations and 3 hectares for employment generating uses. Hall &amp; Woodhouse Ltd also support the proposal to widen the range of uses for employment sites, in recognition that there is approximately double the amount of employment land available to meet the identified need up until 2026. However, reflecting the amount of employment land available and the contribution that this site already makes to employment objectives through the Brewery, as well as the need for flexibility to ensure that the site also meets the objective for a sustainable mixed use regeneration, flexibility should also be built into the policy by indicating the 3 hectares to be an approximate figure. This would also accord with the approach to the housing figures which are set out as approximate rather than specific figures. Similarly, given the changing economy and new uses which may develop over the Plan period the part of the policy which sets out a wider range of uses which may be permissible should indicate that the uses listed are indicative rather than necessarily the whole list of possible future uses. There is no need to specifically exclude retail uses from employment sites as the approach to retail development is properly set out under Policy 12. Moreover, the retail sector is an important creator of a range of jobs and its contribution to the prosperity of the economy is important to recognise and encourage. As currently drafted the Policy is not positively prepared, does not accord with national policy and is not effective in meeting its objectives – however, the amendments as proposed would strengthen the policy and assist in assuring that employment development and sites help to meet the economic objectives of the Plan.</p>	<p>Reference to the site area for the Brewery site under 'f' should be reworded to indicate 'in the order of 3 hectares'. Under the Section on uses on Employment Sites, the following changes are sought. At the end of 'On such sites, the Council will permit employment (B-class) uses and where it would support business and / or provide a wider range of jobs may also permit' add 'other employment generating uses, including...'. Add another line under o, p q and r to read: S Town centre uses which accord with Policy 12 – Retail, Leisure and other Commercial Developments</p>	<p>The policy should be more flexible by setting out the land area for employment as an approximate figure and not excluding retail from employment sites. The policy should also identify the wider range of uses as being indicative and not prescriptive.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
749	Chris Burton	Tetlow King Planning	South West RSL Planning Consortium	4213		No	It is not consistent with national policy	We refer the Council to paragraph 22 of the NPPF which asserts that: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities". Employment land has not been designated in perpetuity so if suitable and more practical uses are available we suggest that the Council takes this into consideration, via a more flexible policy.	A more flexible policy is required so that land is not designated as employment land in perpetuity and other suitable and more practical uses are allowed.	A more flexible policy is required so that land is not designated as employment land in perpetuity and other suitable and more practical uses are allowed.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4109	6.9	No	It has not been positively prepared, It is not effective, It is not consistent with national policy	<p>There is no support for mixed use development (as defined in Appendix D) or regeneration in the town centres in the Local Plan and no policy to encourage appropriate residential development in town centres. This is supported in the 2003 Local Plan by paragraphs 3.38, 3.53 and Policy 3.27. However, the Council is not intending to retain Policy 3.27 when the Local Plan Part 1 is adopted (as set out in Appendix A). Consequently, the Local Plan neither recognises nor supports the advice in paragraph 23 of the NPPF that residential development can play an important role in ensuring the vitality of town centres. The Local Plan focuses on limiting all town centre uses to retail and other ground floor uses and there is no recognition of the evening economy. Indeed the Local Plan seeks to move mixed use regeneration away from town centres to out-of-centre sites. The Local Plan omits support for mixed use development in Blandford town centre. The Local Plan should:</p> <ol style="list-style-type: none"> <li>1. Incorporate within the chapter on the Economy recognition that residential development can play an important role in ensuring the vitality of town centres and amend Policy 11 accordingly.</li> <li>2. Save Adopted Plan Policy 3.27 and incorporate it into Policy 12.</li> <li>3. Recognise the exceptional costs of sensitively implementing heritage led mixed use regeneration in town centres defined by the status of its listed buildings and amend Policy 8.</li> <li>4. Incorporate and support the terms of NPPF paragraph 23.</li> </ol>	Amend the second bullet of paragraph 6.9 so that bringing forward mixed use regeneration in town centres, as well as on edge of centre sites, is one of the key elements of the Council's approach to economic development in the four main towns. Add two additional criteria to paragraph 6.9, which would be key elements of the Council's approach to economic development in the four main towns, which should be: to recognise that town centre residential development can play an important role in ensuring the vitality of town centres; and to support the evening economy of town centres. Add three additional criteria to the 'spatial approach to economic development' part of Policy 11, setting out that the economic development of the four main towns will be supported by: the mixed-use regeneration of sites in the town centres; the recognition that town centre residential development can play an important role in ensuring the vitality of town centres; and encouragement of the evening economy of town centres.	A more flexible policy is required to allow mixed use regeneration in town centres to improve vitality, and not just on the edge of town centres.
1598	Malcolm Brown	Sibbett Gregory	Mr Michael Taylor	4405		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Evidence on which Policy 11 is based is seriously flawed. Workspace Strategy is seriously out of date and representations on need for and availability of employment land in and around Blandford have been ignored. Own research shows not a great range of industrial units available. Some sites also not available. LPA does not understand business needs within local economic market. LPA's policy inconsistent with paras 19-21 of NPPF and paras 160-161.	11 (f) and (k) should be deleted as no longer available and (g) should be reduced to approx 1.75ha. New allocation should be added - land adjoining Sunrise Business Park (12 ha), Blandford.	Policy should be more flexible in recognising business needs and ensure consistency with NPPF. A allocation at Sunrise Business Park, Blandford should be added.



ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
1808	David Ramsay	Vail Williams LLP	Neals Yard Remedies	4602		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 11 is unsound as it does not allow for the full complement of alternative uses (including residential) to be considered for an employment site if there is no reasonable prospect of it being used for that purpose. This is in conflict with para 22 of the NPPF in that it doesn't allow for the full range of alternative uses to be considered for underused/vacant employment sites with regard to market signals. Given the significant oversupply of employment land it is unreasonable to restrict what already is an employment site (and will predominantly remain as such) to 'employment' uses in its entirety. The Employment Land Review that accompanies these representations shows that there is both sufficient employment land available in the District and that there is no demand for additional employment floorspace. Furthermore, speculative development of commercial floorspace is not viable on the site. In effect, the identified site will remain vacant if restricted to employment uses which is not in conformity with the flexibility required in NPPF policy.	At the very least the policy should be amended to add in "... or other uses (including residential) where need / demand can be demonstrated" beneath bullet point 'r'.	Policy should be amended to allow residential as one of the uses permitted on employment sites.
2783	Gill Smith	Dorset County Council		4179		No	It has not been positively prepared	<p>The Draft Plan advocates a sustainable strategy for future development based on balancing the needs of the economy with those of society and the environment. It proposes strategic allocations in the four main settlements in the District. Altogether almost 50 hectares of land is allocated for employment development which will help to bring forward around 3,630 new jobs. Alongside this around 4,200 new dwellings are proposed between 2011 and 2026.</p> <p>Whilst appreciating the background work that has fed into the Plan, it is considered that, in accordance with the Duty to Co-operate, it would benefit from some additional strategic context to show how it fits into the wider area. In particular clarification in the background evidence of the linkages between employment allocations, projected job creation and housing provision to ensure that there is an appropriate balance.</p>	Include in the background evidence an explanation of the linkages between the employment allocations, projected job creation and housing provision to ensure that there is an appropriate balance between them.	Contextual background paper work should show strategic level linkages between employment allocation, projected job creation and housing provision.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4483	6.27	No		<p>Paragraph 6.27 states: Uses on employment sites are often limited to those that fall within Class B1 (business), Class B2 (general industrial) and Class B8 (storage and distribution). However, since the level of supply is above the projected level of future need, the Council has adopted a more flexible approach and will permit other uses that provide employment, but do not fall within the B-Class use definitions.</p> <p>The table at 6.1 underlines this with figures to indicate an oversupply of almost 90%. This appears to contradict the requirement under Policy 11 for: 'the development of key strategic sites to meet the identified need for employment land'.</p>	Given such an oversupply of employment land, the policy would benefit from clarification as to the nature of the need for further employment land, including that proposed as mixed-use urban extensions.	Given such an oversupply of employment land, the policy would benefit from clarification as to the nature of the need on existing key strategic employment sites, including that proposed as mixed-use urban extensions.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4298		No	It is not justified, It is not consistent with national policy	<p>Shaftesbury relies heavily on tourism. Sustainable tourism provides income and growth. The National Plan approach favours this development, whereas the Local Plan has the effect of being more restrictive and has less understanding and grasp of how tourism driven industry is changing and how the general economy is changing.</p> <p>Evidence – lack of outdoor pursuits and all year enjoyment of the environment due to restrictive approach to planning. Local businesses prevented from providing affordable &amp; sustainable holiday accommodation.</p> <p>A more diverse &amp; flexible approach should be encouraged for mixed development so that all aspects of the economy can benefit, while utilising local resources in a more sustainable manner</p>		The policy needs to reflect the tourism industry's needs.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3073	Suzanne Keene	CPRE North Dorset Branch		4422	6.12, 6.14, 6.33, 6.34, 6.39	No	It is not effective	The policy is not sound because it does not go far enough to supporting the Council's aspirations for a thriving economy in the district. CPRE strongly supports the Council's policy to link housing and development to employment. Nevertheless, we feel that there should be greater emphasis on developing employment and economic activity in the villages. For example arts and cultural activities are economically valuable, with the Blandford art trail and music events held throughout the district.	Para. 6.12 - Economic activities should not diminish or damage the countryside, AONBs, SSSIs, etc or the environment – rather, they should use them as valuable assets to be cherished and enhanced. The list of possible economic activities is unimaginative and considering the caveats on environmental downside of equine related activities (Para. 10.221) in our opinion this is given undue prominence. For example, the project, Wild Anglia ( <a href="http://www.wildanglia.org">www.wildanglia.org</a> ), sets out a vision of how enhancing the environment also enhances the economy. Para. 6.14 - Key actions ...Include here jobs and businesses improving the housing stock and installing insulation, heat pumps, domestic solar panels and other renewable technologies. These are badly needed in Dorset, require skilled workers, and generate substantial numbers of jobs. Promoting the provision of broadband internet access is key to a thriving economy in the 21st century. We consider that the Council should be more positive about this, especially for rural areas. Paras. 6.33, 6.34 - Sustainable tourism We think the Council should be more positive about this, one of the economic activities that directly derives from the Dorset landscape and countryside. As a start, a research report should be commissioned to investigate imaginative new types of tourism that would mean that visitors spent more and were willing to pay more for accommodation. For example there are very few high quality restaurants in the region despite the excellent local produce. Cultural tourism is another well established way to generate higher value tourism. Para. 6.39 - Skills and training / knowledge based companies - Greatly improved broadband will be required for knowledge based companies and to promote skills and training. We note that not every village will have broadband communications but in our view the Council should do all it can to get this provided, to promote jobs and work in the countryside.	The policy needs to be more imaginative in considering rural economy providers and reflect the tourism industry's needs.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3079	Mike Pennock	Savills	Davis and Coats families	4443		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 11 and Policy 30 need to be made consistent to allow for the extension of all sites in the countryside. In terms of Policy 11, land to the north east of Blandford Forum can provide a sustainable location for mixed use development. A suitable access strategy can be provided and there is the potential to deliver a package of measures on conjunction with development proposals to improve sustainable transport modes.		Policy 11 and Policy 30 should be consistent in allowing extension to existing employment sites in the countryside.

Pre-submission Document - Analysis of Responses and identification of Main Issues

**Policy 12 – Retail, Leisure and Other Commercial Developments**

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested Change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4101		No	It is not justified, It is not consistent with national policy	Focussing retail and leisure growth in the four main towns fails to meet the needs of the rural area. This is not consistent with national policy that encourages development.		Focussing retail and leisure growth in the four main towns fails to meet the needs of the rural area. This is not consistent with national policy that encourages development.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4102		No	It has not been positively prepared	Policy fails to include provision of parking for tourists especially coaches.		Policy fails to include provision of parking for tourists especially coaches.
378	Simon Rutter	Proctor Watts Cole Rutter		4352		No	It is not consistent with national policy	This policy is behind current thinking on the future of town centres which means encouraging their use as a meeting place and activities for people. The key ingredient to centres is allowing active uses which encourage people to visit and inhabit them and this is not restricted to retail uses. Definitions of primary and secondary frontages is therefore obsolete and introduction of whatever uses which result in high levels of footfall is required.		Definition of primary and secondary frontages is obsolete, discouraging non-retail uses that bring activity to town centres.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested Change	Summary of Main Issues
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4110	6.51	No	It has not been positively prepared, It is not effective, It is not consistent with national policy	<p>There is no support for mixed use development (as defined in Appendix D) or regeneration in the town centres in the Local Plan and no policy to encourage appropriate residential development in town centres. This is supported in the 2003 Local Plan by paragraphs 3.38, 3.53 and Policy 3.27. However, the Council is not intending to retain Policy 3.27 when the Local Plan Part 1 is adopted (as set out in Appendix A). Consequently, the Local Plan neither recognises nor supports the advice in paragraph 23 of the NPPF that residential development can play an important role in ensuring the vitality of town centres. The Local Plan focuses on limiting all town centre uses to retail and other ground floor uses and there is no recognition of the evening economy. Indeed the Local Plan seeks to move mixed use regeneration away from town centres to out-of-centre sites. The Local Plan omits support for mixed use development in Blandford town centre. The Local Plan should:</p> <ol style="list-style-type: none"> <li>1. Incorporate within the chapter on the Economy recognition that residential development can play an important role in ensuring the vitality of town centres and amend Policy 11 accordingly.</li> <li>2. Save Adopted Plan Policy 3.27 and incorporate it into Policy 12.</li> <li>3. Recognise the exceptional costs of sensitively implementing heritage led mixed use regeneration in town centres defined by the status of its listed buildings and amend Policy 8.</li> <li>4. Incorporate and support the terms of NPPF paragraph 23.</li> </ol>	<p>At the end of paragraph 6.51 add a new sentence - "This will include appropriate residential development". Amend the preamble to the 'uses in town centres' section of Policy 12 to read "Development for retail and other main town centre uses (including appropriate residential uses) will be supported within a town centre provided that...". Amend criterion (c) of Policy 12 to read "in the case of non-retail main town centre uses on the ground-floor street frontage the proposal does not undermine the focus on retailing in primary shopping areas". After criterion (c), add a new section of policy to read "The residential development of space over commercial property will be supported, providing that adequate standards of amenity and privacy are maintained and appropriate pedestrian access and parking can be provided. Where residential use is unacceptable alternative uses will be considered, providing a retail use is retained on the street frontage at ground floor level". Amend criterion (f) of Policy 12 through deletion to read "permitting retail and other main town centre uses in town centres". Amend the deleted section of criterion (f) and add as a new criterion to read "permitting retail and other main town centre uses on sites identified for mixed use regeneration on the edge of Gillingham, Shaftesbury and Sturminster Newton town centres, as identified in Policy 11 – The Economy and Policies 17 to 19 providing such proposals can demonstrate that they do not prejudice the vitality and regeneration of the town centre". Add new criterion to Policy 12 to read "recognising the exceptional costs of mixed-use regeneration of town centres".</p>	<p>No support for mixed use development or regeneration in town centres. Plan therefore goes against NPPF. No recognition of evening economy.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested Change	Summary of Main Issues
2790	Nicholas Taylor	Nicholas Taylor and Associates	Mr Jason McGuinness (HABCO Ltd)	4538		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	We note that the policy deals with retail development in the four main towns of the District. There is no policy guidance here in relation to retail development outside these four locations. This might suggest that the Council is not interested in such development. we note that Policy 27 does in fact deal with commercial development in villages, as well as community development. It may be better if the reference to commercial development is transposed to Policy 12 since this would in our view be a more logical place for it.	Insert a new section after ‘Town Centre Uses Outside Town Centres’ Commercial uses in Stalbridge and the Villages The Council will: a. Respond positively to applications for extending existing commercial development, where this is necessary to improve their viability or to ensure their continued use. B. Development which involves the loss of commercial facilities which provide an important asset to the community will be resisted unless the applicant can show that it is no longer practical to retain the facility. C. Respond positively to applications for new commercial development where this serves a local need and does not threaten the vitality or viability of a nearby town centre.	No policy guidance on retail and town centre uses for Stalbridge and the villages and rural parts.
2920	Matthew Kendrick	Grass Roots Planning Ltd	Hopkins Developments Ltd	4128		No	It is not justified	Increase in convenience retail expenditure due to the Southern Extension at Gillingham, would equate to a need for an additional 873 sqm of convenience retail floor space in the town on a sales density of £7500 per sqm which is considered appropriate for this area based on the retail analysis undertaken in relation to nearby Wincanton. In addition to this, further demand will be generated by increased spending power of the existing population. The Cooperative store located on the High St (owned by HDL) was shut due to fire damage and remains unoccupied. No interest has been shown from other convenience store operators many of which have confirmed that the unit was too small.	A supermarket is needed to serve the existing and future residents in the southern part of the town. Such a use should be the anchor element of the new neighbourhood centre proposed as part of the southern extension. Policy should be amended to include the provision of retail facilities within neighbourhood centres without having to test for the impact on existing town centres if they fall within defined thresholds (NPPF para 26 suggests 2500 sqm)	Gillingham SSA needs new supermarket - policy should be amended to allow retailing in neighbourhood centres without testing for town centre impact.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested Change	Summary of Main Issues
2920	Matthew Kendrick	Grass Roots Planning Ltd	Hopkins Developments Ltd	4138		No	It is not justified	There is an increased demand for comparison goods floorspace at Gillingham. On the basis of the 3353 new residents, calculated total potential comparison retail spend will be around £17788033.80. Based on a sales density of £4000 per sqm, which is considered to be a low estimate, a further 4447 sqm of comparison retail floor space should be required at the town. The Southern Extension to the town will exacerbate the existing need for further retail provision and the issues identified by Nathaniel Litchfield report cannot be addressed by constraining future retail growth to the town centre alone (for example there is extremely limited capacity to accommodate new chain stores, particularly bulky retail, within or adjacent to the town centre).	Consider that some comparison retail floorspace could be accommodated at the Kingsmead Business Park at Gillingham where bulky goods sales will have synergies with some of the existing and future businesses. Policy 12 should be amended to include the provision of retail facilities within proposed neighbourhood centres.	Policy 12 should be amended to include the provision of retail facilities within proposed neighbourhood centres.
2920	Matthew Kendrick	Grass Roots Planning Ltd	Hopkins Developments Ltd	4139		No	It is not consistent with national policy	The existing town centre is located in the historic core of Gillingham where redevelopment opportunities are extremely limited. Further analysis of potential sites adjacent to this core shows that the capacity to accommodate any significant retail floor space in the towns primary shopping area is negligible and the only potentially available sites near to the town centre lie within the Station Rd area. The Station Rd Area is occupied by numerous businesses and shows limited amounts of vacancy, therefore wholesale redevelopment will be problematic from a land assembly point of view and in terms of practicalities given the potential ground conditions issues that will be associated with its previous usage.	Alternative options for accommodating retail growth at the town should be considered to provide the flexibility required by the NPPF.	Limited regeneration options in Gillingham centre so should look for alternative options to accommodate retail growth.
3073	Suzanne Keene	CPRE North Dorset Branch		4440		No	It is not effective	Strongly supports town centre enhancement for retail - Policy 12 i) and j) should be strictly enforced. However, policy does not do enough to support Blandford so is unsound and not effective. No special mention of Blandford despite forthcoming large ASDA development.	Would like to see specific measures in policy to support Blandford town centre. Should exclude national chains from development.	Policy does not support Blandford enough.



## Pre-submission Document - Analysis of Responses and identification of Main Issues

### Policy 13 – Grey Infrastructure

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4098		No	It is not justified	The plan is not the most appropriate strategy in terms of grey infrastructure as it does not consider the infrastructure requirements such as improved road links and re-instating Semley Station to take pressure away from Gillingham.		Grey infrastructure needs are not fully reflected in Policy 13.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4100		Yes		Trailway is a resounding success and needs to be continued to Stalbridge. Local Plan needs to include cycle friendly routes to Gillingham and Shaftesbury		Trailway should be extended to Stalbridge and cycle friendly routes should be established between Gillingham and Shaftesbury
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4118		No	It is not justified	Roads in the District will not support any future housing expansion. This is stated in the Buro Happold report. The plan is not the most appropriate strategy as it does not consider future traffic growth through the District. There is also an imbalance of priorities by putting the relief road at Enmore Green ahead of the A350/C13 corridor as it is not part of the main strategic route.		Roads in the District cannot cope with future housing expansion. Disagree with the early implementation of the Enmore Green link ahead of improvements to the A350/C13 corridor
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4119		No	It has not been positively prepared	The plan has not been positively prepared as there appears to be no liaison with adjacent Counties in forming a strategy for traffic movements through the District. A co-ordinated approach is required for the communities along the A350/C13 corridor. Part of Shaftesbury By-Pass is shown as protected but the plan does not include a protected route for the Melbury Abbas By-Pass.		Liaison with adjoining counties is required to resolve problems in the A350/C13 corridor. A protected route for the Melbury Abbas By-pass should be shown.
378	Simon Rutter	Proctor Watts Cole Rutter		4353		No	It has not been positively prepared	The growth of Gillingham will add only a fraction of pressure on the A303 and it is over simplistic to suggest that placing housing growth in Gillingham to the south will avoid any additional pressure on this road. Completion of the dualling of the A303 along its length would be more beneficial. The alternative A30 route is not really an alternative as it is far inferior quality, narrow and winding, running through many villages and		Dualling of the A303 would be a better alternative to encouraging greater use of the A30, which is of inferior quality.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								towns that are unsuitable for such traffic therefore diminishing residents' amenity.		
378	Simon Rutter	Proctor Watts Cole Rutter		4354		No	It is not justified	There is no alternative to the car yet in the plan there is no commitment to improve the existing network around Shaftesbury or Gillingham which are subject to regular congestion.		The road network around Shaftesbury and Gillingham should be improved.
388	Tom Munro	Dorset AONB Partnership		4052	7.50	Yes		&.50 should include mention of the potential to place underground the electricity distribution lines which have greatest negative impact on the area's protected landscapes. This does not include high-voltage transmission managed by National Grid. Strongly supports f in Policy 13. This policy could be more complete if considerations of Dorset Rural Roads Protocol were mentioned. Also, 'public realm' not just artwork can enhance the streetscape - sensitive streetscape design using the principles of shared space can influence driver behaviour (making roads safer) while enhancing the environment.		Need to refer to Dorset Rural Roads Protocol. Plan should seek to place power lines underground in protected landscapes.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
404	Michael Holm	Environment Agency		4219	7.55 7.56 7.57	Yes		The comments we recommend to paragraphs 5.55, 7.56 and 7.57 are to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	7.55 We would like the additional text included at the end of this paragraph: Site specific Flood Risk Assessment taking into account all sources of flood risk including surface water management, and the impact of climate change, will be required to accompany planning applications. Also in footnote 198 they reference the Local Authority as the SUDS approval body. This needs amending as the Lead Local Flood Authority needs to be referenced as they are likely to be the SUDS approving body under the legislation. 7.56 We request that this is amended in the first sentence to read: Site level SUDS features can be multi-functional and incorporated into the green infrastructure network on and beyond the site, although should avoid flood risk areas including fluvial floodplains, creating safe amenity features. 7.57. We request that the paragraph removes the reference that the Environment Agency is responsible for Flood Management as the responsibility is spread across many bodies. It should state that there are Environment Agency built and maintained flood defence schemes in Blandford and Gillingham. These will require improvement as the impacts of climate change on flood flows are realised, and therefore contributions to any improvements should be secured from any new development that is reliant on the scheme to make their development safe. There is also a need to reference the Lead Local Flood Authority as the SUDS approving body.	Supporting text should refer to site specific Flood Risk Assessments; provide more detail on SUDS; and clarify flood management responsibilities.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
404	Michael Holm	Environment Agency		4418	7.60 to 7.61	Yes		The comment we recommend to Policy 13 - Grey Infrastructure and paras 7.60 to 7.61 are to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	The Environment Agency would encourage the reduction of the total amount of waste produced each year, and the application of the waste hierarchy in order to reduce the environmental damage caused by sending waste to landfill. This particular focus upon priority waste streams is essential to achieving a zero waste economy. Construction and demolition continues to present problems in terms of its successful application to the waste hierarchy. Using sustainable and recycled materials in terms of new build and separating waste in 'streams' will contribute to the reduction of this waste to landfill. This should be highlighted within this section.	The waste hierarchy and the benefits of recycling construction/demolition waste should be highlighted in this section.
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4460		No	It has not been positively prepared, It is not effective	Hall & Woodhouse supports the general objectives of this policy but under Drainage and Flood Protection, considers that the requirement for sustainable drainage solutions to be incorporated into all new development of two dwellings or more is too prescriptive. Whilst the policy includes the wording appropriate to the development and underlying ground conditions, it is considered that this should be further qualified, particularly on smaller sites, to include the wording and where practical. The addition of this wording would make this part of the policy more positively prepared and effective.	Under Drainage and Flood Prevention – change the second paragraph to read: Sustainable drainage solutions, where practical and appropriate to the development and underlying ground conditions...	Policy should recognise the practicalities of SUDS provision.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
763	Ginny Hall	Mono Operators Association	The Mobile Operators Association	4035	7.52	Yes			<p>Supports paragraphs 7.52 to 7.54 but would like to see a DM Policy relating to telecommunications. Suggests the following: Proposals for telecommunications development will be permitted provided that the following criteria are met - 1. The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; 2. If on a building, the apparatus should be sited and designed in order to seek to minimise impact to the external appearance of the host building; 3. If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority; 4. If proposing development in sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regards to the operational requirements of telecommunications networks and the technical limitations of the technology.</p>	<p>The plan should include a development management policy for telecoms - detailed policy wording provided.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
769	Tim Hoskinson	Savills	Taylor Wimpey	4191		No	It is not justified	This policy is primarily a statement of how NDDC will work with statutory undertakers. In the course of the planning process, infrastructure required to mitigate the effects of development will be delivered by the development, and thus we do not consider that a specific policy is required. In any event, much of the wording of the policy is too general to be enforceable or used in any meaningful way as a decision-making tool. Certain parts of the policy and supporting text could potentially remain within the Local Plan, but as background information only. Insofar as there is a requirement for transportation, drainage or other issues to be considered, these would better be described in policies which refer to specific towns or allocations.	Delete the policy, or shorten to retain only the first two paragraphs	Policy is too general and should be deleted.
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4605		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 13 sets out an overly prescriptive and perhaps unrealistic approach to infrastructure which gives no indication as to how the decision maker should react to specific proposals; the policy does not include flexibility to assess individual applications in terms of what infrastructure / contributions will be sought on a case by case basis. The policy doesn't allow for infrastructure requirements identified after the adoption of the plan.		Lack of flexibility in Policy - overly prescriptive.
2783	Gill Smith	Dorset County Council		4169	7.60-7.61	Yes		Waste - Para 7.60 - The partnership now covers all the authorities in Dorset. Para 7.61 - A direct link to the "recycle for Dorset" service could be made from para 7.61. Footnote 203 is incorrect. Also to note in line with the Duty to Co-operate, any new waste related issues should aim to be co-ordinated across Dorset and not just addressed within a single authority.	First sentence Para 7.60 should read "The Dorset Waste Partnership (DWP) is responsible for running waste services on behalf of a partnership of the seven Dorset authorities...." Para 7.61 insert a direct link to the "recycle for Dorset". Footnote 203 should read "The Partnership was officially formed in December 2010 after the signing of a legally binding Inter Authority Agreement and went live in April 2011."	Wording in relation to the Dorset Waste Partnership requires updating.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
2783	Gil Smith	Dorset County Council		4180	IDP			The delivery of the proposed amount of development will place significant demands on local infrastructure – particularly transport. The County Council will wish to continue to work closely with North Dorset District Council to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL and Section106 obligations are clearly set out.		
2922	Belinda Ridout			4083	7.60	No	It has not been positively prepared	The Local Plan Part 1 refers to working with the DWP to ensure appropriate arrangements are made to deal with the waste produced by any new development. There is no specific reference to the provision for waste in the remainder of the plan. Furthermore due to a difference in the time periods of the production process of the Local Plan, SSA and the County Waste Plan potential sites may be lost and inadequate waste provision delivered over a considerable length of time as a result.	Make provision for waste to be addressed in the Local Plan, at least identifying site for household recycling centres or waste management centres and make provision to upgrade existing sites to ensure a continuity of provision.	The plan should make provision for waste facilities.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4485		No	It is not justified	This policy is primarily a statement of how NDDC will work with statutory undertakers. In the course of the planning process, infrastructure required to mitigate the effects of development will be delivered by the development, and thus we do not consider that a specific policy is required. In any event, much of the wording of the policy is too general to be enforceable or used in any meaningful way as a decision-making tool. Certain parts of the policy and supporting text could potentially remain within the Local Plan, but as background information only. Insofar as there is a requirement for transportation, drainage or other issues to be considered, these would better be described in policies which refer to specific towns or allocations. There is also a lack of evidence for specific measures in policy 13, for example public art, which is sought on (undefined) 'prominent sites'. The evidence to support the statements in paragraphs 7.29 and 7.30 is unclear.	Delete policy. If this policy is retained, amend the first sentence of the final paragraph as follows: 'Where viable the Council will encourage public art in the interests of good urban design and enhancement of the public realm...'	Policy is too general and should be deleted. If retained the wording relating to public art should be re-worded to be less prescriptive.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3031	Andrew Roberts	Highways Agency		4146	7.28	Yes		Explanatory text on making best use of the SRN is welcomed.	However, need to update text to be in accordance with DfT Circular 02/2013 that explains that 'only after travel plan and demand management, measures have been fully explored and applied will capacity enhancement measures be considered' for the SRN. As developers bring schemes forward they will need to demonstrate the impacts on the SRN and where appropriate provide mitigation to ensure safe and effective operation of the SRN.	Wording should be amended to ensure the impacts of proposed development on the Strategic Road Network are taken into account and mitigation provided.
3031	Andrew Roberts	Highways Agency		4147	7.31				The text currently states that the 'Council also will work with the Highways Agency and Dorset County Council to reduce as far as possible the potential for increased trips from development at Gillingham onto the A303.' DfT Circular 02/2013 explains that the Highways Agency should engage in the local plan process to reduce the potential for creating congestion on the SRN and consider capacity enhancements after demand management measures have been fully applied.	
3031	Andrew Roberts	Highways Agency		4148					Highway Agency suggest that it may be pertinent to add reference capacity enhancement to A303 junctions if identified as being necessary by Transport Assessment.	Highway Agency suggest that it may be pertinent to add reference to capacity enhancement to A303 junctions if identified as being necessary by Transport Assessment.
3044	Anne Kaile	Dorset Road Group		4012		No	It has not been positively prepared	The plans contents do not line up with reality on the ground with regards to roads infrastructure. If more houses are to be built, all of the infrastructure has to be considered and not "left to others". Figures are fudged.		Road infrastructure needs are not fully reflected in the plan.
3064	John Lewer	Shaftesbury Town Council		4269		No	It is not justified	Not the most appropriate strategy as it does not consider i) the need for expansion of parking at Gillingham train station ii) the need for an additional station (near Gillingham) or re-open Semley.		An additional railway station near Gillingham is required. Parking at Gillingham Station needs expanding.



ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3064	John Lewer	Shaftesbury Town Council		4270		No	It is not justified	Policy does not acknowledge the existing traffic densities in A350 corridor (including C13) and the implications of additional traffic as a result of growth at Gillingham. Additional growth at Gillingham will overwhelm this corridor long before 2026. This is at odds with turning Christy's Lane into a street.	Suggests that the A350 is moved to the west of Shaftesbury so it could also serve Gillingham. This should be shown on the inset map.	A by-pass route to the west of Shaftesbury should be identified and shown on the Proposals Map.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4297		No	It is not justified	Priority must be given to infrastructure such as good road links to the south of the county. Rail services – i.e. parking and facilities at railway stations are inadequate and will not satisfy the demand that the increase in housing will bring. It is necessary to enhance local railway facilities and provide new parking areas. Land for parking & other commuter connections at railway stations must not be sacrificed to housing. Evidence – Gillingham Plan does not provide adequate parking and access infrastructure is poor and not addressed at all.		More parking required at railway stations, especially Gillingham.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4300		No	It is not justified	Historically railways have been removed – while reinstatement efforts for tourism bring ‘train spotter’ pounds. Freight transportation through North Dorset is not recognised and infrastructure needs to be improved to cope with this.		Freight transportation not recognised.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4301		No	It has not been positively prepared	The existing roads will not be able to accommodate the need of projected development. Evidence – Buro Happold report.		Roads will not cope with traffic from proposed development.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4302		No	It is not effective	Liaison with adjacent counties should be addressed to facilitate planning for future traffic movements. Evidence – Map does not show Shaftesbury bypass nor adjacent information – Wiltshire		Liaison with adjoining counties is required to resolve traffic issues.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4303	7.18, 7.25, 7.30	No	It is not justified	7.18 - Understanding must be broadened to integrate with ‘green’ infrastructure devices. 7.25 - To promote & implement integrated footpath cycleway networks as a fundamental structuring element. 7.30 - A link exists so is an additional one necessary. Improve/upgrade Lox lane link?		Footpath/cycleway improvements should be promoted. The need for the Enmore Green link is questioned. Should consider using Lox Lane instead.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4304	7.62	No	It is not justified	Public Realm (Para 7.62) - Confusing statement – rather ‘Public Realm is the public open space in towns and cities used by all citizens – where public authorities can bring about more controlled general improvement in living conditions. Urban environment plays a major part in the personal free development of every citizen. Configuration and design elements can stimulate sense of well-being or unease & are investments to humanise our environment & enhance cultural assets’. Art is not infrastructure. Public realm is not public art. A better understanding of Art and how it is created is required. Evidence – Shaftesbury Commons ‘Art’ project and negative outcomes. Landscaping of roundabouts can be led by professional input.	Probably best to abandon Policy 7.65	The role of art in the public realm requires clarification. Delete Para 7.65 relating to art/landscaping of roundabouts.
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4372		No	It is not justified	This policy is primarily a statement of how NDDC will work with statutory undertakers. In the course of the planning process, infrastructure required to mitigate the effects of development will be delivered by the development, and thus we do not consider that a specific policy is required. In any event, much of the wording of the policy is too general to be enforceable or used in any meaningful way as a decision-making tool. Certain parts of the policy and supporting text could potentially remain within the Local Plan, but as background information only. Insofar as there is a requirement for transportation, drainage or other issues to be considered, these would better be described in policies which refer to specific towns or allocations.	Delete the policy, or shorten to retain only the first two paragraphs.	The policy is too general and should be deleted.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3073	Suzanne Keene	CPRE North Dorset Branch		4442		No	It is not effective, It is not consistent with national policy	Without improvements to rail network envisaged economic and social growth will not be achieved. A policy should be included to work towards this with appropriate organisations. Also, policy on flooding is important as recent events have shown. Policy commitment on flooding is unclear and vague and should be strengthened. County council now has flooding responsibilities as well as EA.	Policy 13 - Drainage and Flood Prevention - should be reworded to read 'The Council will work with the Environment agency, Dorset County Council and other relevant bodies to minimise the risk of flooding to homes, businesses and the infrastructure as a priority in drainage and flood prevention. The Council will also work with these bodies to deal with the transfer and treatment of wastewater and the introduction of sustainable drainage systems. Sustainable drainage solutions appropriate to the development and underlying ground conditions should be incorporated into all new developments of two dwellings or more and connect with the overall surface water management approach for the area.'	Reference to wastewater needed in Policy.
3092	Frank Heels			4650		No	It is not justified	Drainage should apply to all constructions proposed, not dwellings only and even to single dwellings. Highway drainage should be specifically referred to (Para 7.58)		The policy should require drainage for all developments, including single dwellings and highways.

## Pre-submission Document - Analysis of Responses and identification of Main Issues

### Policy 14 – Social Infrastructure

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 RSuggested Change	Summary of Main Issues
404	Michael Holm	Environment Agency		4231	7.113 – 7.116	Yes		The comment we recommend to Policy 14 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	7.113 – 7.116 We support the Cemetery and Burial Ground position in regards to protecting water resources.	
604	Rose Freeman	The Theatres Trust	The Theatres Trust	4032	7.67			Sound document but too long - should have Part 1 for strategic policies and Part 2 for site allocations and DM policies. Pleased to see cultural content but unsure about use of term 'viable' - commercial viability for arts facilities may not be related to community benefits. Suggest that policy wording at 'h' refers to 'performance spaces' for consistency. Feels that 'k' relates to community facilities rather than social infrastructure - not consistent with Policy 27. (See other comment re Policy 27.)		
769	Tim Hoskinson	Savills	Taylor Wimpey	4192		No	It is not justified	This policy addresses a range of matters that are not land-use related and/or cannot not be controlled through a Local Plan. It would be preferable to focus on the needs in individual parts of the district and address these in the relevant settlement specific policies .	Delete the policy, or shorten to retain only the first paragraph	Policy addresses a range of matters that are not land-use related and/or cannot be controlled through the Local Plan. Policy should be deleted as it duplicates settlement specific policies.
2587	Carol Tilley	Whitecliff Group Practice		4031		No	It has not been positively prepared, It is not consistent with national policy	Raises concern about NHS funding for new or expanded doctor surgery in Blandford. Suggests that a third surgery in the town would go against NHS strategy.	Ensure that there is sufficient healthcare in the town to meet both the increasing needs from existing residents and an increase due to large scale development. NHS Wessex should be involved in this as the commissioning body for GP services.	Concerns about funding for additional healthcare provision in Blandford

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 R Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4487		No	It is not justified	This policy addresses a range of matters that are not land-use related and/or cannot be controlled through a Local Plan. Examples of this include "ensuring" that hospitals are "retained and enhanced", whereas many of the facilities identified as social infrastructure are delivered by other agencies over which NDDC does not have control. No objective assessment of the need for key facilities (such as surgeries and health centres) has been carried out or made available in relation to specific parts of the district. Insofar as 'social infrastructure' is required to be addressed in the Local Plan, it would be preferable to focus on the needs in individual parts of the district and address these in the policies dealing with individual urban extensions.	<ul style="list-style-type: none"> <li>Either delete the whole of the policy, or retain only the first paragraph, as follows: "The Council will work with partners and developers to ensure that the level of social infrastructure across the District meets identified needs through the retention and improvement of existing facilities and new provision, where required."</li> <li>Replace final sentence to 7.93 as follows: "The scale and nature of new health facilities provided as a result of the Gillingham Southern Extension shall be agreed subject to further assessment of the likely needs generated by the development. These may include new health facilities including a doctor's surgery, dentist and pharmacy"</li> </ul>	Policy addresses a range of matters that are not land-use related and/or cannot be controlled through the Local Plan. A shorter, more general policy is required. Further assessment of need for healthcare facilities in Gillingham required.
3049	Richard Emms	The Shaftesbury Practice		4038		No		No mention of viability of healthcare provision. Appears to be no provision for additional medical capacity in Shaftesbury. Should not have further building in Shaftesbury without investment in healthcare infrastructure. Current premises fully occupied and car parking and access become problems. No room to expand on site and no funding to build on new site.	Healthcare funding and provision needs to be completely reconsidered. Funding needs to be provided to expand current premises, build on new site or build branch surgery.	Further assessment of need and funding for healthcare provision in Shaftesbury.
3068	Richard Tippens	Shaftesbury Neighbourhood Plan Group		4294	7.7	No		7.7 - Local Plan Part 2 affects brief for Neighbourhood Plan – the relationship needs to be stated. 7.15 - 'Meaningful' is open to interpretation and a firmer commitment to funding is required.		
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4373		Yes	It is not justified	This policy addresses a range of matters that are not land-use related and/or cannot be controlled through a Local Plan. It would be preferable to focus on the needs in individual parts of the district and address these in the relevant settlement specific policies.	Delete the policy, or shorten to retain only the first paragraph.	Policy addresses a range of matters that are not land-use related and/or cannot be controlled through the Local Plan. Duplication of settlement specific policies.

## Pre-submission Document - Analysis of Responses and identification of Main Issues

## Policy 15–Green Infrastructure

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
388	Tom Munro	Dorset AONB Partnership		4053		Yes		Supports Policy and welcomes forthcoming development of a Green Infrastructure Plan and would like to be involved either as a consultee or providing advisory input via working group.		
404	Michael Holm	Environment Agency		4220	Fig 7.2	Yes		The comment we recommend to Figure 7.2 is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	Figure 7.2 In the 'Climate change adaption and water management' row, reiterate that SuDS must be sited to avoid flood risk areas including fluvial floodplains.	SuDS should be outside of floodplains
404	Michael Holm	Environment Agency		4417		Yes		The comment we recommend to Policy 15 - Green Infrastructure is to ensure that key messages being put forward are consistent with National Planning Policy whilst meeting the aspirations of your Authority. These are not that the plan is unsound it is felt that these changes would strengthen your position.	We support the principles, notwithstanding comments towards Policy 4 – Natural Environment.	
661	Michel Nublat			4086	7.134	No	It is not justified, It is not effective, It is not consistent with national policy	The retention of Saved Policy 1.9 of the North Dorset District-wide Local Plan 2003 regarding Important Open and Wooded Areas is not consistent with National Planning Policy Framework (NPPF) and contributes towards making The North Dorset Plan 2011-2026 Part 1 'unsound'. The information and evidence justifying and supporting this representation is itemised below. 1. Policy 1.9 of The North Dorset District-wide Local Plan 2003 designated areas of land as IOWA with the intention in protecting those areas from development; 2. North Dorset Local Plan – 2011-2026 Part 1 – Paragraph 8.98 "It has long been recognised that the potential for expansion at Shaftesbury is limited by environmental (mainly landscape and biodiversity) constraints and the limited number of potentially developable sites where the town could be expanded further." Consequently all proposed sustainable	Council should take different approach to designation of IOWAs. Believes the Council had it right when Policy 1.9 of the Local Plan 2001 was replaced in The New Plan for North Dorset March 2010 by DMP3. Suggests that the existing Policies in North Dorset Local Plan – 2001 to 2026 Part 1 accompanied with the supporting documents are sufficiently comprehensive to enable the Council to analyse development proposals without the need to rely upon redundant Policy 1.9.  In allowing sustainable developments on IOWA sites to go forward the Council would be encouraging growth and allowing	Policy 1.9 from the 2003 Local Plan relating to IOWAS should not be retained (saved).

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								<p>developments enhancing the existing landscape and providing amenity space and facilities should be welcomed. In doing so The Council will be compliant with the vision, aims and objectives of the NPPF in promoting growth. (see 3a – 3d below)</p> <p>3. The Strategic Housing Land Availability Assessment (SHLAA) - following an exhaustive assessment process sites were evaluated, some IOWA designated, some not. The final report listed the ‘included’ sites, those having development potential and the ‘excluded’ those considered unsuitable for development. Some of the ‘included’ were IOWA designated sites and were considered as potential development sites but unavailable until the IOWA designation was reviewed in a future local plan.</p> <p>In the Ministerial foreword to NPPF The Minister states :</p> <p>a. “Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices ;</p> <p>b. “Our historic environment – buildings, landscapes, towns and villages – can be cherished if their spirit of place thrives, rather than withers”;</p> <p>c. “Development that is sustainable should go ahead without delay..”</p> <p>d. “...planning must not simply be about scrutiny. Planning be a creative exercise in finding ways to enhance and improve places in which we live our lives” (also appears in paragraph 17 of NPPF)</p> <p>The retention of outdated Policy 1.9 (IOWA) will contribute in the holding back of potential sustainable developments on IOWA designated sites and thus putting a break on the growth to the region with the consequent loss of much needed infrastructure contributions from developers. Consequently retaining Policy 1.9 as a saved policy is in conflict with the aims &amp; objectives of The NPPF. (see 3a-3d above);</p> <p>4. Consent for development has been given for areas designated as IOWA - Planning Application numbers 2.2012/1374/PLNG &amp; 2.2012/0066/PLNG are two examples.</p>	<p>the community to benefit from facilities and employment potential that these developments would provide. Should the development be residential, The Council and the community will also benefit from the Governments New Homes Bonus Payments made in recognition of their contribution to building new homes sustainably.</p>	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								<p>This sets precedence and invalidates the initial intention of the designation IOWA consequently making their designation redundant and out of date. (see 6a below);</p> <p>5. The North Dorset District-wide Local Plan 2003 expired in 2011. As the New Plan was being drafted, policies from the expired Plan were ‘Saved’ whilst others were replaced. In The Plan for North Dorset dated March 2010 Policy 1.9 regarding IOWAs was replaced by the comprehensive and detailed Development Management Policy 3 (DMP 3) regarding design &amp; the development of open spaces. However, The Pre-submission Document of North Dorset Local Plan – 2011 to 2026, now in consultation, retains Policy 1.9 as a ‘saved’ policy and to be discussed later in Part2.</p> <p>Having initially replaced Policy 1.9 the Council must have considered Policy 1.9 outdated and restrictive to growth and consequently had not envisaged carrying this policy over to the New Local Plan. DMP3 was amply detailed allowing any proposed development, on IOWAs and on other sensitive sites, to be rigorously analyzed enabling The Council to determine and measure the sustainability and appropriateness of any proposed development. In retaining Policy 1.9 sustainable developments will be blocked and delayed reducing the potential growth of the region. Future developments are not limited to the provision of dwellings and infrastructure but ones that also deliver employment for the community. (see 3a-3d above and 6a below)</p> <p>6. Paragraph 14 of The NPPF states:</p> <p>a. “ At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-making.....For decision making this means: .....where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:.....”</p> <p>Although the North Dorset Local Plan Part 1 is titled as covering the period 2011-2026, in fact Part 1 is expected to be adopted only in late 2014. Several years will have elapsed before North-Dorset will be equipped with up-to-date planning policies that are in line with and compliant with The NPPF.</p>		



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								<p>Consequently in the years ahead until a complete North Dorset Plan in its entirety is complete and adopted all proposed developments in the area should be judged in accordance with the aims and the objectives of the NPPF and the continual use of 'selected' and redundant policies such as 'saved' policy 1.9 should be discontinued and development should go ahead without delay.(see 3c above)</p> <p>7. The Infrastructure Delivery Plan (IDP) November 2013</p> <p>a. Paragraph 1.1 of the IDP states: "The Infrastructure Delivery Plan (IDP) is a supporting document for Local Plan Part 1. It covers the plan period to 2026. The IDP will play a key role in coordinating the level of infrastructure and services so that they meet existing and future demands"</p> <p>b. Paragraph 7.10 of the North Dorset Local Plan Part 1 states "The IDP provides detail on how infrastructure projects will be delivered, it aims to set out- what infrastructure is required / when the necessary infrastructure will be put in place / what likely costs are involved / how those costs will be met / who will deliver that infrastructure " - this includes the provision of - allotments, amenity open space, informal open space, formal outdoor facilities, village greens, parks and gardens, nature reserves, natural semi-natural green space and green corridors - all detailed in Appendices A &amp; B of the IDP.</p> <p>To what purpose is Policy 1.9 being retained if future Local Green Spaces as required by the NPPF have in the main already been identified? The designation IOWA is particular to the region and is restrictive to economic and social growth. It also prevents in converting existing 'stagnant' open areas into amenity areas that the community can benefit from, as was done successfully in the two planning applications mentioned in item 4 above. In these cases The Council acted in accordance with the aims and objectives of The NPPF, they acted creatively in enhancing those sites. (see 3a-3d above)</p> <p>8. Paragraph 7.134 of North Dorset Local Plan – 2011-2026 states:</p> <p>a. "the Important Open or Wooded Areas identified in the North Dorset District-wide Local Plan 2003 will continue to be used for development management</p>		

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								<p>purposes.”                      If planning applications are to be analysed and judged against planning policy, the phrase “for development management purposes” is not transparent with the risk that potential justifiable, sustainable and necessary developments providing facilities and employment for the community be barred unjustifiably. (see 3c above)</p>		
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4461	7.132 to 7.135	No	<p>It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy</p>	<p>These representations also cross refer to the representations submitted under Policy 4. There is concern from paragraph 7.134 that existing Important Open or Wooded Areas (IOWAs) in the Local Plan 2003 will become Local Green Space in the new plan. The National Planning Policy Framework makes it very clear that these designations are to be used very sparingly and will not be appropriate for most green spaces and open areas (paragraph 77 of the Framework). Paragraph 7.134 suggests that it is anticipated that the existing IOWAs may become Local Green Space. However, it is understood that there are some 350 IOWA designations across the district and it is clear that the continuation with such a number would not be consistent with government policy and that such designations are only for very special places. Moreover the Inspector at the previous Local Plan examination questioned the appropriateness of the IOWA designation and invited the Council to reappraise the policy and the designations which has not yet been undertaken. If IOWAs are to be carried forward into the new Local plan strategy there should be an explicit commitment to their review at the appropriate stage. The purpose of the Green Infrastructure Strategy referenced under Policy 15 should be to set out the Council’s approach to green spaces. Criterion c appears to pre-judge the outcome where it states that existing open space is to be protected and enhanced. The whole objective should be to review all existing designations.</p>	<p>Criteria c : Amend to read 'Review existing, and where appropriate continue to protect and enhance....'</p>	<p>Disagrees with the retention of the IOWA policy. Disagrees with IOWAs becoming Local Green Space. Review of IOWAs needed.</p>

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769	Tim Hoskinson	Savills	Taylor Wimpey	4193		No	It is not justified	we consider that this is not required. Rather, any assessment of what green infrastructure is required would more appropriately take place on a case-by-case basis responding to the specific impacts of each development. Green Infrastructure strategies for individual settlements are set out elsewhere in the plan; the need for an overarching and non-specific policy such as Policy 15 is therefore questioned.	Delete the policy, or shorten to retain only the first paragraph	GI would more appropriately be dealt with on a case by case basis. Strategic GI can be delivered at a town scale
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4489		No	It is not justified	Again we consider that this is not required. Rather, any assessment of what green infrastructure is required would more appropriately take place on a case-by-case basis responding to the specific impacts of each development. Green Infrastructure strategies for individual allocations are described elsewhere in the draft plan; this means that there is no need for an overarching and non-specific policy such as Policy 15.	· Either delete the whole of the policy, or retain only the first paragraph, amended as follows: "The Council will seek to provide an integrated network of green spaces, green links and other green elements. Subsequent sections of this plan outline key Green Infrastructure considerations for individual parts of the district."	GI would more appropriately be dealt with on a case by case basis. Strategic GI can be delivered at a town scale
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4305	7.126	No	It is not justified	Para 7.126 - Green infrastructure to be implemented by developers as part of an overall strategy. Possibly also in existing developments. Evidence - What provision for Shaftesbury eastern development? Open space usurped – how is this addressed?		
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4306	7.131	No	It is not effective	Para 7.131 - Wiltshire must be identified as neighbouring – must be shown on plan.		
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4307	7.135	No	It is not justified	Local Green Space (Para 7.135) - Green infrastructure should be determined either before or in conjunction with the Neighbourhood Plan, and not as a result of.		GI should be part of Neighbourhood Plan
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4308	7.143	No	It is not justified	Para 7.143 - District, neighbourhood & individual development plan implementation – should form a logical hierarchical sequence and not rely on developer to determine this.		

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3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4374		No	It is not justified	Again we consider that this is not required. Rather, any assessment of what green infrastructure is required would more appropriately take place on a case-by-case basis responding to the specific impacts of each development. Green Infrastructure strategies for individual settlements are set out elsewhere in the plan; the need for an overarching and non-specific policy such as Policy 15 is therefore questioned.	Delete the policy, or shorten to retain only the first paragraph.	GI would more appropriately be dealt with on a case by case basis. Strategic GI can be delivered at a town scale
3073	Suzanne Keene	CPRE North Dorset Branch		4427		No	It is not effective, It is not consistent with national policy	The CPRE N Dorset welcomes the Green Infrastructure concept, but we are concerned that there is confusion from including designated areas such as SSSIs, Nature Reserves, AONBs etc. The Plan does not meet legal requirements because the purpose of such areas as defined in legislation is not recreation and public enjoyment (Policy 4, and Para. 4.66 onwards). In the case of AONBs, these public functions are specifically not included by legislation. We are therefore concerned that areas important for rare species, ecology and landscape would be compromised if they are seen as central to a green network devoted to public access and recreation. Indeed, there is mention of the need to more carefully manage public access to Melbury Down (Policy 4, point a) IOWAs – Important Open and Wooded Areas – we understand that the status of these in planning is somewhat uncertain at present. However, it is the clear intention of the Council that the areas currently designated as IOWAs continue to be protected from development (unless revised in Neighbourhood Plans), so we hope that they will be fully included in the Green Infrastructure or as Green Spaces. Green infrastructure in the upper reaches of rivers, not just in flood plains, can assist flood control. We hope that the Green Infrastructure Strategy will clearly define Green Networks and its relationship with these other, designated areas, and we will wish to comment further on that.	Clearly define the areas discussed above as distinct from Green Infrastructure network areas for public recreation. Add mention of Green Infrastructure in upper reaches of rivers as beneficial for flood prevention	Concern that GI infers public access and recreation and hence inclusion of SAC, SPA SSSI, AONB and other Nature Reserves may harm them. IOWAs, once reviewed, should form part of the GI network.

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3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4430	7.138	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 7.138 of the Local Plan requires outdoor sports and play space to be provided in line with the Fields in Trust Standards. Whilst there is no fundamental objection to this approach, the Fields in Trust set out differing standards for urban and rural locations. The Local Plan does not make it clear which should be applied in North Dorset. For example, it is understood that the district as a whole is identified as being rural. However, the towns of Blandford and Gillingham have sufficient populations to be classified as urban. It is therefore unclear as to which of the Fields in Trust targets for the provision of outdoor sport and play space should be applied.	Clarify which parts of North Dorset are to be identified as rural; and which parts are urban for the purposes of applying the Fields in Trust Standards	clarify which parts of NDDC are urban and which are rural for application of FiT standards
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4481	7.139	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 7.139 is unclear as to its intention; and is confusing. It refers to an ambition to achieve one allotment plot for every 60 people in a settlement, and then appears to link this to sites where development is proposed. This implies that development sites will be required to take up any shortfall that may exist within any particular settlement. There may be some development sites where it is wholly inappropriate, in terms of visual amenity, to provide allotments. In these instances it would be more appropriate for finance to be made available for the provision of allotments off site as part of a community infrastructure package.	Omit Paragraph 7.139 from the Local Plan.	Disagree with requirement for developments to make up shortfall in allotments. On-site provision is not always appropriate. Policy should permit financial contributions to off site provision.
3092	Frank Heels			4651		No	It is not justified	Table 7.2 Ecology and biodiversity must include urban and rural areas	Add the word "rural"	Ecology and Biodiversity benefits can be realised in urban and rural areas