

North Dorset Local Plan – 2011 to 2026

Part 1: Pre-submission Document

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

Policy 16 to 33, Implementation and Appendix

August 2014

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

Policy 16– Blandford

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
9	John Turnbull	Howard, Shreeve & Turnbull		4636		No	It has not been positively prepared, It is not justified, It is not effective	Supports A350/A354 site as better from traffic point of view - people living in houses on this site would work away from Blandford and vehicles would have direct access to A350 and A354 without driving into town. Traffic from Crown Meadow would only have access to one-way system. Traffic in town centre is now probably at pre-bypass levels. Additional traffic would put historic environment at risk and increase pollution. Development of Crown Meadows would result in loss of historic habitats and damage to flora and fauna. NDDC has already accepted visual impact in the A35/A354 area by accepting the Bryanston Hills development which is visually apparent so it should accept the same impact from development on the A350/A354 land, which actually would fall in a slight valley. The Crown Meadow s site will be more susceptible to flooding from high water tables as it is formed of rich topsoil on gravel whereas the A350/A354 land is of thin soil on chalk which will drain much more effectively.		Supports A350/A354 site - traffic direct to bypass, no impact on one way system. Crown Meadows development results in loss of historic environment. No flood risk for land off A350/A354. Visual impact acceptable for development of A354/A350 site.

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278	Linda Scott-Giles	Blandford Forum Town Council		4070		No	It has not been positively prepared, It is not justified, It is not effective	<p>Blandford Town Council does not have the legal knowledge to challenge the legality of the Local Plan's preparation. The Town Council has concerns that there are inaccuracies initiated by using out of date information. There are also conflicts and inconsistencies in fact, approach or interpretation particularly in relation to Dorset County Council reductions. The Town Council's response to the Plan is as follows:</p> <p>Positively Prepared – Blandford Town Council does not consider that the plan has been based on strategy which seeks to meet objectively assessed development and infrastructure requirements because:</p> <ul style="list-style-type: none"> - The data used is not current and projections are weakened by using out of date information which can be seen by reviewing the publication dates of NDDC's Local Plan Evidence Base; - There is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows). The Market Towns Site Selection Background Paper prepared by NDDC refers to several transport studies. These studies identify Crown Meadows as accessible, but it does not measure the impact the development will have on the local highway network. A recent planning application, that would have needed to use the same road that is proposed for access to the development on Crown Meadows, was refused (2/2012/0849/PLNG). One of the reasons being the increased use onto the B3082 would be likely to cause additional danger to road users. The application was only for one dwelling. No evidence has been provided that would mitigate the impact of the proposed 150 homes on the highway network in Blandford Forum; - Paragraph 8.24 in the Local Plan states that the Council's preferred approach is to develop land west of Blandford Forum and west of Blandford St Mary. This is not the community's preferred approach, which has been made clear to NDDC by the submission of a petition of approximately 5000 signatures. The community supports development and growth within their local area, and have suggested a alternative sites (Land to the North-East of Blandford Forum and Land adjacent A350/A354 Junction Blandford St Mary). Blandford Town Council are also hoping to review Land North of the bypass as a further 	<p>Up to date data and projections should be used. Highway study to be carried out to measure impact of traffic on one way system in Blandford and how 150 dwellings' usage of road acceptable. The community's wishes should be respected and the Crown Meadows site be removed as an allocation for development. The Local Plan should be amended so as to be factually correct. AONB boundaries should be reviewed to be realistic. Completed development should be removed from the allocated 960 dwellings for Blandford to reflect realistic growth though the plan period.</p>	<p>Out of date information used. No evidence that highway infrastructure could cope with 150 houses on Crown Meadows. Community preference is for land at A354/A350 junction. Not sufficient services for current population - if new services are provided will not be in time to serve expanded population. No evidence regarding mitigation of traffic impacts. Neighbourhood plan will be looking at and to north of Blandford for housing/employment.</p>

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								<p>potential alternative site which may be suitable for housing or employment. It is considered, and the message from Central Government is, that Local Authorities should set the number of housing and employment land required for the area, and Neighbourhood Plans should be able to set the area in which the local community wants development. A precedent has also been set by Thame Town Council, who's Local Authority had to remove their preferred approach from the Local Plan, following an examination by the Planning Inspectorate, to give the local community their voice and Blandford Town Council requests that its local community is given its voice;</p> <ul style="list-style-type: none"> - Policy 16.x states that new sports pitches and associated facilities is to be provided within the built up area of Blandford Forum. This is not accurate as no new sports pitches are being provided. The proposals referred to in the Local Plan is a refurbishment of existing sports pitches, not the provision of new pitches; - Paragraph 7.71 of the Local Plan states that NDDC have worked with other authorities and providers to assess the quality and capacity of existing social infrastructure. It is not clear how the high number of our aging population and other vulnerable adults is being cared for or even how applications for care facilities will be dealt with should they come forward; - Paragraph 5.18 of the North and North East Dorset Transport Study, which is part of NDDC's Evidence Base for the Local Plan states that Blandford St Mary School can serve the development to the west of Blandford St Mary. It is unclear where the school will extend to, as the existing site cannot sustain an extension. This highlights a further inconsistency in use of data. <p>Effective – Blandford Town Council does not consider that the Local Plan, in its current form, is deliverable over its period, in terms of sound infrastructure delivery planning and in working with delivery partners to make the Local Plan deliverable and achievable because:</p> <ul style="list-style-type: none"> - 960 homes is not an appropriate number of housing for the area, considering that most of these proposed homes are either already built or have received planning permission and is due to be built in the near future. The Local Plan serves the area until 2026 and there is concern that this will result in NDDC refusing planning applications based on oversupply for the area within as little as two years; 		

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								<p>As stated above there is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows);</p> <ul style="list-style-type: none"> - Policy 16.a states that development should be built where existing services are, but sufficient services are not being provided on an already strained service centre. Where services are being promised it is unlikely to be provided at the time of the proposed development for the area as most of the proposed development is already complete, taking place or will be taking place in the near future; - Policy 16.q states that grey infrastructure growth will include the provision and enhancement of public transport. Dorset County Council have confirmed that these services faces cuts not improvements, which highlights inconsistency in the Local Plan and failure to engage in factual information with delivery partners; - Policy 16.s highlights the provision of a neighbourhood hall for the northern part of the town. The terminology used for such a facility is not considered correct as it is hoped that this community facility could accommodate much needed infrastructure for the northern part of the town; - Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. A further inconsistency in the Local Plan and a further failure to engage in factual information with delivery partners. Justified – Blandford Town Council accepts that there may be evidence of participation of the local community who have a stake in the area, however considers that the term participation has been used loosely. It also considers that the research and fact finding, which resulted in the choices made in the Local Plan, is not backed up by facts because: <ul style="list-style-type: none"> - A petition with approximately 5000 signatures, as mentioned above, was submitted to NDDC which has not resulted in any review or investigation into alternative sites that is preferred by the local community; - The local community are being told that the Crown Meadows development would result in recreational open space being provided to the community, however Paragraph 8.47 in the Local Plan implies that this open 		

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								<p>space will not be accessible to the public, but only serve the development proposed;</p> <ul style="list-style-type: none"> - It is considered that the sites for development proposed in Policy 16 of the Local Plan is too restrictive and that NDDC have failed to listen to the local community; - Paragraph 8.45 refers to the Blandford School Pyramid, whereas this has long since been changed to the Blandford School Network; - An inconsistent approach in terming the river and the bypass as a constraint for development is used by NDDC, as three of the main areas for development proposed is outside this 'constraint'. It is also important to note that any development near the Stour River valley will impact on the Grater Horseshoe Bats feeding ground; - Paragraph 8.32 refers to Tesco Stores as out of town, but it is more accurately at the edge of the town, nor does it recognise Homebase as contributing to the area's retail floorspace; - As highlighted before, a further inconsistency in fact is found at Policy 16.x which is not accurate as no new sports pitches are being provided; - It is not considered that the use of the protection that an AONB enforces is being used appropriately by NDDC, and considers that these boundaries need to be reviewed. Therefore Blandford Town Council considers that Local Plan Policy 4 should be reviewed. Where development is halted, for example on land outside of the bypass, existing industrial estates are operating from; - As before, Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. Blandford Town Council therefore, does not consider that a fair assessment is being given to the need for childcare facilities. 		
388	Tom Munro	Dorset AONB Partnership		4054	8.18,8.23	Yes		<p>Supports basic approach in 8.18 but would appreciate the landscape impact assessment being referenced as a footnote and being available to the public. With reference to 8.23, development within or affecting an AONB should be of high design quality and in keeping with the surrounding landscape character. Suggests that area of AONB shown on Fig 8.1 should be hatch rather than solid colour so details below can be seen.</p>		

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403	Rohan Torkildsen	English Heritage		4574		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>It is a concern that paragraph 8.11/page 184 states that the key spatial aspects of the towns sustainable development strategy include 'accommodating growth within environmental constraints notably two AONBs; the flood plain of the River Stour; and the towns by pass.' There is no reference here to an equal consideration of Blandford as one of the finest Georgian towns in the country and the contribution of its setting to that significance; a critical matter emphasised in statute and national policy.</p> <p>There appears a primary emphasis on the protection of the AONBs. The conservation of AONBs is no more important than the conservation of designated heritage assets and their settings. Can the local authority demonstrate that equal weight has been applied to both in the site selection process?</p> <p>Paragraph 8.24 states that the preferred locations for development have been made on the basis of relative accessibility (centrally located) and landscape impact. No reference is made to the equal importance of the impact on designated heritage assets, as required by the NPPF. The Market Towns: Site Selection Background Paper is referred to as providing the greater detailed explanation to which, I in turn, refer.</p> <p>At page 6 the relevant national policy considerations are set out. No reference is made to the relevance of considering the protection of the historic environment in the delivery of sustainable development, a core principle in the NPPF. Paragraph 3.14 reinforces the predisposition of focussing on landscape and accessibility matters.</p> <p>The selection of sites for development needs to be informed by the evidence base ensuring the Plan avoids allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how that harm might be reduced and any residual harm mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed, or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm. Whilst such a reduction and mitigation appears to be proposed the justification and evidence to explain the rationale for this is not provided.</p>	<p>In view of the above it appears that the Local Plan is UNSOUND because it is not based on adequate, up-to-date and relevant evidence about the historic environment; does not identify the land where development would be inappropriate because of its historic significance; and as a consequence fails to provide a positive and clear strategy for the conservation, enhancement, improvements and enjoyment of the historic environment.</p>	<p>No reference to Blandford's status as one of the finest Georgian towns in England and the contribution of its setting to that status. Must give equal weight to status of AONBs and the conservation of designated heritage assets. Preferred locations for development have been made primarily on accessibility and landscape impact - no reference is made to the equal importance of impact on heritage assets. Where adverse impacts are unavoidable the Plan needs to consider how harm can be mitigated.</p>

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								<p>At paragraph 5.18 the Market Town Study states that should development be “limited” to the urban fringe the impact on the Crown Meadows would also be “limited”. However, there is no evidence or justification associated with this important statement in the Market Towns Study, the Local Plan, or Sustainability Appraisal.</p> <p>There is no indication as to how the development site contributes to the historic significance of Crown Meadow and other heritage assets and how that significance will be affected (the degree of harm) by the quantum of 150 homes and form of development.</p> <p>What does limited mean in terms of the harm that would be caused to the significance of affected heritage assets - the terms used in the NPPF and Policy 5 of the Local Plan. The relevant tests for assessing harm are in section 12 of the NPPF (paragraphs 132- 134) and the industry standard assessment methodology is provided by The Setting of Heritage Assets (English Heritage 2011). These appear not to have been applied.</p> <p>Reference is made at paragraph 5.37 to Crown Estates (Crown Meadows owner) heritage study. Unfortunately this does not form part of the Local Plan’s evidence base and is not in the public domain.</p> <p>Reference is made at paragraph 5.40 to the Extensive Urban Survey of Blandford but again the Market Towns Study fails to set out the relevance of this evidence; what it says about the significance of the Crown Meadows, and when applied what this evidence says about the impact of the proposed allocation on that significance?</p> <p>Likewise the Conservation Area Character Appraisal is not referred to as a key source of evidence to inform the principle of development.</p> <p>Understandably the Landscape Impact Assessment (8 July 2010) of the potential housing sites does not provide a thorough technical historic environment assessment. Nevertheless it establishes that the Crown Meadows site has a ‘high value’ due to its Conservation Area designation and contribution to the historic context and setting of the town. It recommends development is limited to a small area adjacent the built up area (within a dashed blue line). This small area does not however appear to have the capacity to accommodate 150 new homes. Therefore one presumes that development is more extensive than recommended in the Landscape Impact Assessment potentially causing substantial harm to the significance of</p>		

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								affected heritage assets. Whilst paragraph 5.47 of the Market Towns Paper provides the assurance that “the historic environment will be protected and enhanced and development accommodated within environmental constraints” there is no justification or explanation why this is the case and how that conclusion has been reached.		
404	Michael Holm	Environment Agency		4221		Yes		The comment we recommend to Policy 16 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.	Please add the words 'flooding and' before the words 'climate change' in the sentence directly below the 'Environment and Climate Change' heading. In the next sentence down (criterion (d) change the word to 'flooding' rather than the current 'looding'	
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4250		No	It is not consistent with national policy	Whilst I appreciate that the Blandford Inset Map is diagrammatic, the extent of the AONB within the area enclosed by the bypass is significantly less than it should be to the north and to the east.	amend boundary	AONB incorrectly delineated on Figure 8.1
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4463		Yes		Hall & Woodhouse strongly support Policy 16 in terms of its overall strategy and the recognition of the role of the Blandford Brewery site to the future sustainable development of the town. The site benefits from permission for a mixed use regeneration for a new brewery, employment and residential development and that permission has been implemented with the construction of the new brewery. The construction of the new brewery starts to free up large parts of the site to bring forward the wider mixed use regeneration. The site is sustainably located in relation to the town centre and as previously developed land where much of the site is or will become redundant for its former use, a mixed use regeneration remains an appropriate way forward.		Brewery site sustainable location for regeneration.
864	M.J. Le Bas			4068				Concerned that development on Crown Meadows would obscure views of WW2 anti-tank defences.		Development on Crown Meadows would obscure WW2 defences.

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873	Christopher Gale			4018		No	It is not justified	Site to the west of Blandford St Mary is in AONB, SSSI and Conservation Area. Still outstanding questions over safe pedestrian access to town	Abandon site to the west of Blandford St Mary for development.	Outstanding issues regarding pedestrian access to town centre form the site to the west of Blandford St Mary..
956	G J Trevett			4646		No	It has not been positively prepared, It is not justified, It is not effective	Opposed to any development of Crown Meadows as concerned about flooding of properties and exacerbation of existing flooding problem. There would also be a serious impact on traffic congestion - town centre now at pre-bypass congestion levels and additional 1000 vehicle movements a day would paralyse town centre.		Crown Meadows flooding and impact on town centre traffic congestion.
1031	Julie Byngam			4438		No	It has not been positively prepared, It is not justified, It is not effective	Against any development at Crown Meadows. Unsatisfactory access and additional traffic would clog up town centre. Also on floodplain. Alternative site available at Blandford St Mary.		Crown Meadows flooding and impact on town centre traffic congestion. Alternative site available at Blandford St Mary.
1033	Peter Miller			4533		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Plan is not sound because included Crown Meadows proposal. Alternative site west of Blandford ST Mary ignored by Council. Traffic assessment for site significantly flawed - development would significantly increase town centre traffic. Crown Meadows is historic deer park and part of historic setting for Blandford as well as including 2WW heritage defences which would be spoiled. High ground water levels ignored on flood assessment and proper allowance not made for global warming. Flora and fauna would suffer if land developed.	Para 8.24 should omit mention of land west of Blandford Forum. Policy 16 should be amended to omit this site.	Crown Meadows site unacceptable because of traffic impact, impact on historic setting, flooding from groundwater and impact on flora and fauna.
1034	Janet Miller			4014	8.24	No	It has not been positively prepared	Development of "Crown Meadows" is unacceptable. The proposals are contrary to the wishes of local residents and visitors to the town	Reference to "Land West of Blandford Forum" in paragraph 8.24 should be omitted	Crown Meadows proposal unacceptable and against residents' wishes.
1034	Janet Miller			4015		No	It is not justified	Development of Crown Meadows is unacceptable and unnecessary whilst there is a viable alternative site at St Mary's Hill. The site is within a conservation Sub-Area. It is of historic importance owing to its association with the Portman family and the anti-tank defences. Development would damage the setting of the town.	4071 4071	Crown Meadows proposal unacceptable - impact on historic setting, Conservation Area and alternative site available.

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1034	Janet Miller			4016	8.24	No	It is not justified	The Crown Meadows site is unimproved grassland and feeding ground for Greater Horseshoe Bats	Reference to "Land West of Blandford Forum" in paragraph 8.24 should be omitted	Opposes Crown Meadows because of bats.
1034	Janet Miller			4017	8.24	No	It is not justified	The development of the Crown Meadows would result in significant increase in traffic and result in further congestion of the town centre. Congestion is already excessive and unacceptable.	Reference to "Land West of Blandford Forum" in paragraph 8.24 should be omitted	Crown Meadows proposal would increase traffic congestion in town centre.
1042	S Gillies			4531		No	It has not been positively prepared, It is not justified, It is not effective	Does not agree with building at Blandford St Mary. Better to develop land outside bypass where land can drain into River Stour. Also impact on wildlife. Blandford St Mary should be kept as separate from Blandford Forum. Traffic problems would develop at 'pinch point' by entrance to Bryanston School.		Object to housing west of Blandford St Mary. Should develop outside bypass to keep traffic out of town and avoid impact on wildlife.
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4112		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	This representation objects to the omission of the Blandford Forum town centre from Policy 16 in the text of Local Plan Part 1 Pre-submission Document and objects to the omission from Figure 8.1 of this area, as the area for town centre regeneration although it is referenced as such in the Local Plan. It is requested that the importance of the town centre be properly recognised in a form similar to that in "The New Plan for North Dorset" (March 2010) ("the Draft Plan"). The Local Plan confirms (as did the Draft Plan) that the land around the existing Co-op store is not a town centre site but is edge-of-centre (for example at paragraph 8.37), and in that case the sequential and other tests will apply (see for example paragraphs 6.47, 6.54 and 6.79). Therefore the Blandford town centre area for regeneration/extension identified in the Local Plan is limited to the southern side of Market Place/East Street in the text. But this is now omitted from the policy. 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-	Reword the text after criterion (o) in Policy 16 to read" The main focus for town centre regeneration, which may include additional retail floorspace and residential development, will be in, and to the south of, East Street and the Market Place. Appropriate development on land on the edge of the centre, south-east of East Street, including land around the existing Co-op store may also be permitted if it does not prejudice the regeneration of the town centre". Amend the text after criterion (v) to read "A network of green infrastructure will be developed in and around Blandford, focussing on linking existing sites (such as the Milldown and Stour Meadows) and providing new sites and links with the town centre to serve the residents of both the new and existing developments in the town." In relation to Figure 8.1, the designation of the area for regeneration in the town centre should be added to Figure 8.1 in the same form as shown at Figure 2.8.1 of the Draft Plan.	Policy should promote town centre regeneration in Blandford. Any GI network should link into the town centre.

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								<p>centre sites. The Local Plan omits support for mixed use development in Blandford town centre. The Local Plan reaffirms the policy commitment to the continued improvement of town centres as the main focus for retail, leisure and other commercial activities (for example in Policies 11 and 12) and how this supports other objectives of the Plan. It is somewhat confusing that the support in the text for the town centre regeneration in the Local Plan, the Draft Plan and the Background Papers is not retained in the wording of Policy 16. Although Paragraph 6.71 of the Plan, identifying the southern side of Market Place/East Street, states that Policy 16 will outline that proposal; in fact it does not and proposes instead what is identified as an edge-of-centre site as “the main focus for town centre regeneration.” When two out-of-town retail developments (for Asda and Tesco) have recently been approved it is somewhat perverse that the Local Plan should positively support further retail development on the edge of town that will prejudice the already fragile vitality of Blandford Forum town centre. By positively deleting support for the town centre that was found in the Adopted Local Plan, the Draft Plan, and the Background Papers and disregarding national advice (such as NPPF paragraph 23) the Local Plan gives a clear message to residents and investors that it has no interest in the future sustainability and vitality of Blandford Forum town centre. It is therefore requested that the focus for regeneration be returned to the primary retail frontages centred around Market Place, and the potential for the extension to the rear of a range of premises on the southern side of Market Place/East Street is reinstated in the Policy and the importance of enhancing the town centre as a destination is recognised in Policy 16 and throughout the Local Plan.</p>	<p>Bullet point 12 (Retail regeneration land to south of East Street) should be deleted from Figure 8.1.</p>	
1527	Sue Nisbet			4078		No	It is not justified	<p>Does not consider the proposed housing allocation to the west of Blandford St Mary to be the most appropriate strategy. The site has transport, landscape, wildlife and flooding issues. The most appropriate location for housing growth would be opposite Tesco. This will have less impact on the landscape, the developer is keen to build and the housing would not disrupt existing residents of Blandford St Mary. Also Blandford St Mary is a village not part of Blandford town and should be considered separately. Finally, the representor strongly objects to the housing application from Crown Meadows being reallocated to the Tesco site instead.</p>		<p>Object to site west of Blandford St Mary due to transport, landscape, wildlife and flooding issues. Site opposite Tesco is appropriate location for housing growth.</p>

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1596	Malcolm Brown	Sibbett Gregory	Mrs Linley Abbott	4277	8.22,8.25	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Plan is not sound as LPA failed to engage with respondents despite their indication of willingness to bring site forward throughout development of the Plan. Plan needs to make more provision for housing in Plan period and beyond. Respondent's land has capacity for 350 dwellings and would deliver 140 affordable homes. Site is accessible, not of high landscape value, would have no climate change impact, served by public transport and within walking distance of town. Site is remote from floodplain and well drained. Development would not generate significant traffic in the town. Development would contribute towards improved educational facilities and community facilities, with the possibility of a health facility on the site.	Policy 16B should be amended to include land south of Blandford St Mary.	Policy 16B should be amended to include land south of Blandford St Mary.
1596	Malcolm Brown	Sibbett Gregory	Mrs Linley Abbott	4382		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Inset map show significant area of land bounded by A354 and A340. Paragraph 8.23 indicates capacity for 200 dwellings whereas could provide 350. Highways Authority indicated to transport consultants that new junction on A354 could include future Spetisbury by-pass and relieve pressure on existing junction. Trailway could be enhanced as part of development scheme. Council's approach flawed as site at Crown Meadow would increase traffic pressures on town centre.	Figure 8.1 should be redrawn to show inclusion of site bounded by A354 and A340 capable of development and provision of 350 dwellings.	Crown Meadows proposal would increase town centre traffic congestion. A354/A350 site could provide up to 300 dwellings.
1598	Malcolm Brown	Sibbett Gregory	Mr Michael Taylor	4406		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Plan is unsound because evidence base (Workplace Strategy) unsound. Work which agent carried out shows discrepancies in figures on land availability in Blandford. Inaccurate figures used in respect of ASDA site and others.	Policy 16 needs to be completely rewritten in terms of supporting economic development. Items j,k,l and m should be omitted, reference to the Brewery omitted. Item k could be replaced with reference to remaining land at Shaftesbury Lane, M could remain if not limited to B1 use. In addition, 12 ha of land adjoining Sunrise Business Park should be allocated.	Plan unsound because based on inaccurate workplace data and land availability data. Land adjacent to Sunrise Business Park should be allocated for employment use.
1730	C Woodcock			4123		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national	Plan is unsound because Crown Meadows proposal is unsound. Poor access and increased traffic congestion in town centre will result. Will also impact on wildlife. Should develop A350/A354 site.	Should change policy to replace Crown Meadows site with A350/A354 site.	Should develop A350/A354 site as Crown Meadows would increase traffic in town centre and affect wildlife.

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							policy			
1769	Diana Garner			4633		No	It has not been positively prepared, It is not justified, It is not effective	Blandford has a history of flooding and the proposed development area already floods. With EA's calculation of 5%-10% increase in flooding over the next 25 years and taking account of surface water flooding, seems unreasonable to pursue the Crown Meadows site when an alternative site is available. It is beyond the bypass but the bypass was never meant to be a barrier to development. The new homes will be uninsurable. Housing needs in Blandford are not high end and this is what will be built. Developers will look for maximum profit and it will be impossible to achieve any affordable housing and even that is not properly affordable as Housing Associations can charge up 80% of market rents. Crown Meadows has been protected up to now and nothing has changed with it. Wildlife will be affected and light pollution will spoil the sky at night. Previous consultation did not ask the right questions -should have got opinions on whether people wanted development or not rather than how much development. Councillors have a duty to their electorate - monetary gain for the government should be set aside - the people of Blandford have made their wishes known.		Given flooding on site is unreasonable to pursue Crown Meadows when alternative site available. Crown Meadow development will affect wildlife and cause light pollution.
1800	John Cook	Bryanston Park Preservation Group		4626	8.11 8.13-15 8.19 8.22-24 8.47 8.49	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The overwhelming majority of residents oppose the development at Crown Meadows because all traffic generated will be forced into the already heavily congested one way system through the Town Centre. The development would also severely negatively impact on Blandford's iconic heritage setting. The Crown Meadows have been preserved in previous Local Plans under Policy BL7 -there is no reason to abandon this policy. There is an alternative site to the South which has none of the negatives attached to the development of the Crown Meadows. This is the preferred option of Blandford's residents. The allocation therefore is in conflict with the aims of the Localism Act and is therefore not justified. It is also in conflict with Policy 16 para 8.3. It should be designated as a Local Green Space under Policy 4 para 4.105 in the Blandford Community Plan which is now under preparation in conformity with Policy 16 para 8.4 and 8.13. The Draft Core Strategy approved for consultation in March 2010 was deliberately obscure in the case of the Crown Meadows. The site was described as "land West of Blandford" in order to conceal from	Policy 16 paragraph 8.24 is based on the Market Towns: Site Selection Background Paper which relies upon the deeply flawed ASA and ignores the recommendations of the DCC Landscape Impact Assessment. It should be amended to read: Policy 16 - 8.24 The Council's preferred approach is to develop land south of Blandford at St Mary's Hill and west of Blandford St Mary. Development in these locations would be convenient for all facilities and services and would have less impact on the landscape than the other options as indicated in the DCC Landscape Impact Assessment. The sites have good road access and do not require traffic to	Oppose Crown Meadows development as it would increase traffic congestion, impact on heritage setting and Conservation Area and be in a flood risk area. Should develop site at A350/A354 junction (opposite Tesco)

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								<p>Councillors the true location. Because of their single minded support of the Crown Estate Team, Planners have not engaged or supported the Landowners, Blandford St. Mary Homes Ltd (BSMH), in bringing forward the site St. Mary's Hill (SMH). This situation has forced BSMH to carry out a public consultation exercise and to submit a request for pre-application advice to the local planning authority. Planning objections to the Council's preferred growth option can be summarised as (i) Adverse landscape impact - loss of Intrinsic rural character - harm to the quality and appearance of the Blandford Conservation Area and the historic setting of the town - harm to the setting of the Dorset AONB. (ii) Impact of extra traffic on local highway network - town centre congestion. (iii) Flood risk - It is claimed that the site of the proposed development is not at risk of flooding, yet the District Council's own Strategic Flood Risk Assessment carried out In February 2008 shows the 1979 flood event "overlapping" at least 50% of the site. (iv) Impact on biodiversity - no guarantee that proposed mitigation measures will be successful, especially with regard to Greater Horseshoe bats. (v) Heritage assets - the boundary of the proposed development site forms part of the World War II AntiTank Defences and has been Grade II listed by English Heritage. In just 2 months during July and August 2012, BPPG collected 5,756 signatures from local people who opposed the Crown Meadows development. The continued inclusion of the site in the new plan is clearly not sound and certainly unjustified. In respect of the 2013/2014 consultation BPPG produced and distributed leaflets asking residents in simple terms where they would prefer to see the necessary houses built. Almost 1,300 completed leaflets were returned and delivered to NDDC. Over 98% of respondents preferred the St Mary's Hill site.</p>	<p>enter the heavily congested one way system in the town centre. Further, the proposed developments have the overwhelming support of local people.</p>	

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1823	G K Gibbs			4632		No		Local plans should be based on primary achieving best of long term aspirations for all. Proposal for Crown Meadows objectionable on many grounds - fails to uphold overwhelming local democratic aspirations; fails to take account of strong objections from elected civic groups; is a perverse selection of preferred development site; exposes NDDC to legal protest actions; ruins compact old deer park; destroys local aspirations for tourism; results in loss of ambience and old meadows with abundant wildlife; contravenes EU Directive regarding protected species (Greater Horseshoe bat); development of Blandford on A350/A354 site will require large area of greenspace which Crown Meadows provides; development will add to congestion and pollution in town centre; claimed benefits of additional cycling and walking will not appear; will have adverse impact on local mental health; would compromise protected water zone, would affect views from Blandford Bridge and AONB; underground services of new houses would not be more than 1 metre above water table; Crown Meadows would provide greenspace for future developments elsewhere in Blandford.		Oppose development of Crown Meadows due to landscaping, wildlife, heritage and transport issues.
1832	Tony & Andrea Jones			4436	8.24			Concerned that development west of Blandford St Mary will adversely affect businesses at Lower Bryanston Farm(livery yard and Bed and Breakfast).		Oppose development west of Blandford St Mary due to impact on adjoining businesses.
1983	Roger & Jane Summers			4437		No	It is not justified, it is not effective, It is not consistent with national policy			
2457	Diane Woodcock			4126		No		The Local Plan ignores the strong feeling of local people against development on Crown Meadows.	Crown Meadows should be replaced by site at A350/354 which would avoid impact on wildlife and problems with flooding and traffic.	Oppose development at Crown Meadows due to wildlife, landscape and transport issues. Support A350/A354 junction site.
2559	Margaret Gray			4002		No	It has not been positively prepared	Despite a petition of around 6000 signatures against the development of Crown Meadows, it remains in the plan	Take note of the petition against the development and remove all development and access proposals relating to the Crown Meadows from the plan	Object to Crown Meadows site.
2559	Margaret Gray			4005		No	It has not been positively	Consultation material described the site as "West of Blandford Forum". This was too vague to enable residents to identify the site to be developed. Only in 2012 was the		

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							prepared	site identified as Crown Meadows.		
2559	Margaret Gray			4006		No	It has not been positively prepared	Residents suggested alternative sites as being more suitable. The plan has not taken these alternatives into consideration.		
2559	Margaret Gray			4007		No	It is not justified	The site of the proposed development in Crown meadows flooded on 22/11/2012. The surrounding land flood frequently and with climate change, will flood more often. If properties are pile driven into the site, this will reduce the capacity to absorb flood water. Development will result in water runoff. The result will be further flooding downstream especially in combination it the development of "The Land to the South of East Street"	Protect the Floodplain from development by removing development from Crown Meadows	Object to Crown Meadows site due to flooding.
2559	Margaret Gray			4008		No	It is not justified	The site is a refuge for wildlife away from walkers and their dogs. Opening the site up as informal open space will have an impact on wildlife.	Protect the wildlife by removing development from Crown Meadows	Oppose to development at Crown Meadows due to impact on wildlife.
2560	Margaret Oliver			4034	10	No		No proper consideration of traffic issues. Extra vehicular movements will cause chaos in Blandford. Visual quality of Crown Meadows will be ruined by development. Should not ignore petition signed by thousands of people.	Should build on Blandford St Mary site with pedestrian footbridge across main road, the Brewery site and infill sites.	Oppose Crown Meadows. Support A350/A354 junction site and infill sites within Blandford.
2704	Robert Jones			4657		No	It is not justified, It is not effective	Objects putting 220 homes on land west of Blandford ST Mary. If Council intends development to go ahead then should exclude upper part of land west of Dorchester Hill. This would protect landscape. Land south of A350/A354 would make up for loss of houses. Supports development of Crown Meadows.		Object to development on land to the west of Blandford St Mary. If land is to be developed then should remove upper part of site.

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2783	Gill Smith	Dorset County Council		4166	8.45 and IDP	No	It has not been positively prepared	Due to increasing numbers of children generated by proposed developments and current birth rate trends, a new 2 form entry primary school should be added to the provision at Blandford as an alternative to extending the Milldown School. Discussions are on-going with North Dorset District Council about a location.	Amend text at para 8.45 to read “Feasibility work has shown that this can be achieved through careful use of the existing capacity within the school pyramid and by extending the existing Archbishop Wake Primary School and either extending the Milldown Primary School or providing one new 2FE primary school in the town.” Amend Policy 16 to read: “(u) the extension of Archbishop Wake and either extension of the Milldown or provision of a new 2FE primary school;” (iii) Amend the Infrastructure Delivery Plan para 3.35 by adding a final sentence to read: “In Blandford the anticipated growth in pupil numbers may also require a new 2FE primary school as an alternative to an extension of the Milldown School.” Also amend Appendix B of the IDP to reflect this change	New 2 form entry primary school should be added to Blandford provision as alternative to expanding Milldown school.
2783	Gill Smith	Dorset County Council		4170		Yes		Queries if the policy should specify the name of the supermarket (ASDA). If an alternative provider came along would this be a policy departure.		Policy should not name store operator as use by other operator would become a departure.
2823	Clive Browne			4071		No	It is not justified	Does not consider Crown Meadows (West of Blandford Forum) as the most appropriate strategy due to issues of flooding, heritage impact, landscape setting, impact on town centre infrastructure.		Object to Crown Meadows due to flooding, heritage, landscape and infrastructure issues.

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2986	Neil Hall	AMEC	Crown Estate	4451		Yes		<p>Policy 16 is considered to be sound (although there are issues of soundness with other policies) and this policy would require consequential amendments to reflect the soundness issues raised elsewhere.</p> <p>Policy 16 sets out the strategy for Blandford Forum and identifies two sites owned by The Crown Estate to assist in meeting development needs of the town; West Blandford and West Blandford St Mary. The Crown Estate supports the allocation of these two sites. These provide highly sustainable and deliverable locations for development which can play an important role in delivering new high quality development in the town. They both present logical and sustainable locations for new housing provision and meet the tests of soundness set out in NPPF. In particular, the sites are available now, they offer suitable locations for development and are achievable with a realistic prospect that housing will be delivered on the sites within five years. AMEC has prepared an evidence base of technical reports to demonstrate the suitability, availability and deliverability of the two sites in line with guidance in the NPPF. These include transport, landscape, biodiversity and drainage/flood risk assessments. They have previously been shared with the Council and demonstrate that the sites are deliverable and can provide a number of benefits through development. The response summarises the sustainable development merits of the two sites in terms of: flood risk; sustainability and access; ecology; landscape and amenity; and heritage.</p> <p>The Crown Estate supports the provision of an informal area of open space at Crown Meadows (as part of a development scheme at West Blandford). We are proposing access to the Crown Meadows, where no public access exists at present. This has been a long standing policy aspiration of the Council as set out in the Local Plan and more recently articulated in early versions of the emerging Draft Core Strategy policies for Blandford. The Crown Estate is therefore willing to put this extensive area (around 17 hectares) of land forward for community use as part of a development scheme on the West Blandford site. The Crown Estate is fully supportive of this proposal and feels that it could deliver a number of recreational and ecological benefits.</p> <p>The West Blandford site was initially identified in the early stages of the Plan as being suitable for a development of 200 homes but was subsequently reduced to 150. Whilst</p>	<p>Suggested amendment to Policy 16</p> <p>Amend wording of the 'Meeting Housing Needs' section to read:</p> <p>At least 1,160 homes will be provided at Blandford Forum and Blandford St Mary during the period 2011 - 2029. In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through the following allocated sites:</p> <ul style="list-style-type: none"> g mixed use regeneration of the Brewery site; and around 500 homes on the following Greenfield sites; h the development of land to the west of Blandford Forum; and i the development of land to the west of Blandford St Mary. 	<p>Crown Meadows site and land West of Blandford St Mary are highly sustainable sites.</p> <p>Allocation of dwellings on Crown Meadows should be increased to 175.</p>

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								The Crown Estate supports the allocation of this site it does not agree with the reduction from 200 to 150 homes. It is not clear that this reduction is based on an informed technical analysis and may not make the most efficient use of this important site. Based on detailed assessments, further analysis of site constraints, and applying appropriate densities it is considered that the site could deliver around 175 new homes (at around 32dph). The allocation on this site should be increased to ensure that efficient use is made of this well located and highly sustainable site. The number of dwellings to be allocated on Greenfield sites at west Blandford and west Blandford St Mary should be added to the policy text in order to provide a positive growth strategy (paragraph 8.23 states that these sites have capacity for about 500 dwellings). This would remove any ambiguity and would be consistent with guidance in paragraph 17 of NPPF. In order to be consistent with the wording of Policy 6 and provide continuity through the Plan, it is considered that references to housing targets should be amended from 'about' to 'at least'.		
3031	Andrew Roberts	Highways Agency		4149	8.11			Suggest amendment to para 1.17. Mention is made of five designated neighbourhood area within the District, but only four appear to be named.		
3043	Rodney Baldwin			4001		Yes		Considers Crown Meadows and West Blandford St Mary to be sound and sustainable. Appalled at suggestion of St Mary's Hill, Traffic Congestion and bad Visual Impact. No good for town centre sustainability.		Support Crown Meadows and land West of Blandford St Mary. Oppose St Mary's Hill site.
3050	Malcolm Albery	Blandford St Mary Parish Council		4039		No	It has not been positively prepared, It is not justified, It is not effective	Blandford St Mary Parish Council shares the views of Blandford+ (representation ref. 3051) with some exceptions - it adds that there is a lack of information on the potential of the A350 housing site but omits reference to the Lower Bryanston Farm site.	Blandford St Mary Parish Council presents the same suggested change as Blandford+ except for the suggestion that AONB boundaries be reviewed and that completed housing schemes should be taken out of the 960 dwellings proposed over the plan period in Blandford.	
3051	Linda Scott-Giles	Blandford+		4040		No		Blandford + does not consider that the Local Plan is sound and view the plan as unjust in several areas. Blandford + has concerns that there are conflicts, and inconsistencies, in fact, approach or interpretation	Up to date data and projections should be used. The community's wishes should be respected and the Crown	Out of date information used. No evidence that highway infrastructure could cope with 150

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								<p>particularly in relation to Dorset County Council reductions. Please see below why Blandford + consider part of the plan to be unsound: Positively Prepared – Blandford + does not consider that the plan has been based on strategy which seeks to meet objectively assessed development and infrastructure requirements because:</p> <ul style="list-style-type: none"> - The data used is not current and projections are weakened by using out of date information which can be seen by reviewing the publication dates of NDDC's Local Plan Evidence Base; - There is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows). The Market Towns Site Selection Background Paper prepared by NDDC refers to several transport studies. These studies identify Crown Meadows as accessible, but it does not measure the impact the development will have on the local highway network. A recent planning application, that would have needed to use the same road that is proposed for access to the development on Crown Meadows, was refused (2/2012/0849/PLNG). One of the reasons being the increased use onto the B3082 would be likely to cause additional danger to road users. The application was only for one dwelling. No evidence has been provided that would mitigate the impact of the proposed 150 homes on the highway network in Blandford Forum; - Paragraph 8.24 in the Local Plan states that the Council's preferred approach is to develop land west of Blandford Forum and west of Blandford St Mary. This is not the community's preferred approach, which has been made clear to NDDC by the submission of a petition of approximately 5000 signatures. The community supports development and growth within their local area, and have suggested a alternative sites (Land to the North-East of Blandford Forum and Land adjacent A350/A354 Junction Blandford St Mary). Blandford + are also hoping to review Land North of the bypass as a further potential alternative site which may be suitable for housing or employment. It is considered, and the message from Central Government is, that Local Authorities should set the number of housing and employment land required for the area, and Neighbourhood Plans should be able to set the area in 	<p>Meadows site be removed as an allocation for development. The Local Plan should be amended so as to be factually correct. AONB boundaries should be reviewed to be realistic. Completed development should be removed from the allocated 960 dwellings for Blandford to reflect realistic growth though the plan period.</p>	<p>houses on Crown Meadows. Community preference is for land on A354/A350 junction. Not sufficient services for current population - if new services are provided will not be in time to serve expanded population. No evidence regarding mitigation of traffic impacts. Neighbourhood plan will be looking at and to north of Blandford for housing/employment.</p>

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								<p>which the local community wants development. A precedent has also been set by Thame Town Council, who's Local Authority had to remove their preferred approach from the Local Plan, following an examination by the Planning Inspectorate, to give the local community their voice and Blandford + requests that its local community is given its voice;</p> <ul style="list-style-type: none"> - With regards to the site marked as 4 (Lower Bryanston Farm) on the potential development map, concerns were raised about the density/proposed numbers. There is currently an inadequate road system and parking has recently become a huge problem due to the introduction of car parking changes within Blandford Forum. Any development should therefore take the current issues and any future new issues into consideration. - There were no objections to the sites marked as 5 and 6 (Dorchester Hill and Lower Blandford St Mary) on the plan given that the road networks can be provided. The existing road system is inadequate for the number of houses proposed in the space allocated. The site marked 5 on the map (Dorchester Hill) should be considered together with site 6 in Lower Blandford St Mary for development they should not be in isolation and firm proposals and agreement for infrastructure support should be in place prior to approval of housing development. - Policy 16.x states that new sports pitches and associated facilities is to be provided within the built up area of Blandford Forum. This This is not accurate as no new sports pitches are being provided. The proposals referred to in the Local Plan is a refurbishment of existing sports pitches, not the provision of new pitches; - Paragraph 7.71 of the Local Plan states that NDDC have worked with other authorities and providers to assess the quality and capacity of existing social infrastructure. It is not clear how the high number of our aging population and other vulnerable adults is being cared for or even how applications for care facilities will be dealt with should they come forward; - Paragraph 5.18 of the North and North East Dorset Transport Study, which is part of NDDC's Evidence Base for the Local Plan states that Blandford St Mary School can serve the development to the west of Blandford St Mary. It is unclear where the school will extend to, as the existing site cannot sustain an extension. This highlights a further inconsistency in use of data. 		

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								<p>Effective – Blandford + does not consider that the Local Plan, in its current form, is deliverable over its period, in terms of sound infrastructure delivery planning and in working with delivery partners to make the Local Plan deliverable and achievable because:</p> <ul style="list-style-type: none"> - 960 homes is not an appropriate number of housing for the area, considering that most of these proposed homes are either already built or have received planning permission and is due to be built in the near future. The Local Plan serves the area until 2026 and there is concern that this will result in NDDC refusing planning applications based on oversupply for the area within as little as two years; - As stated above there is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows); Policy 16.a states that development should be built where existing services are, but sufficient services are not being provided on an already strained service centre. Where services are being promised it is unlikely to be provided at the time of the proposed development for the area as most of the proposed development is already complete, taking place or will be taking place in the near future; - Policy 16.q states that grey infrastructure growth will include the provision and enhancement of public transport. Dorset County Council have confirmed that these services faces cuts not improvements, which highlights inconsistency in the Local Plan and failure to engage in factual information with delivery partners; - Policy 16.s highlights the provision of a neighbourhood hall for the northern part of the town. The terminology used for such a facility is not considered correct as it is hoped that this community facility could accommodate much needed infrastructure for the northern part of the town; - Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. A further inconsistency in the Local Plan and a further failure to engage in factual information with delivery partners. <p>Justified – Blandford + accepts that there may be evidence</p>		

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								<p>of participation of the local community who have a stake in the area, however considers that the term participation has been used loosely. It also considers that the research and fact finding, which resulted in the choices made in the Local Plan, is not backed up by facts because:</p> <ul style="list-style-type: none"> - A petition with approximately 5000 signatures, as mentioned above, was submitted to NDDC which has not resulted in any review or investigation into alternative sites that is preferred by the local community; - The local community are being told that the Crown Meadows development would result in recreational open space being provided to the community, however Paragraph 8.47 in the Local Plan implies that this open space will not be accessible to the public, but only serve the development proposed; - It is considered that the sites for development proposed in Policy 16 of the Local Plan is too restrictive and that NDDC have failed to listen to the local community; - Paragraph 8.45 refers to the Blandford School Pyramid, whereas this has long since been changed to the Blandford School Network; - An inconsistent approach in terming the river and the bypass as a constraint for development is used by NDDC, as three of the main areas for development proposed is outside this 'constraint'. It is also important to note that any development near the Stour River valley will impact on the Grater Horseshoe Bats feeding ground; - Paragraph 8.32 refers to Tesco Stores as out of town, but it is more accurately at the edge of the town, nor does it recognise Homebase as contributing to the area's retail floorspace; - As highlighted before, a further inconsistency in fact is found at Policy 16.x which is not accurate as no new sports pitches are being provided; - It is not considered that the use of the protection that an AONB enforces is being used appropriately by NDDC, and considers that these boundaries need to be reviewed. Therefore Blandford + considers that Local Plan Policy 4 should be reviewed. Where development is halted, for example on land outside of the bypass, existing industrial estates are operating from; - As before Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation 		

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								<p>of closure to these services by Dorset County Council. Blandford + therefore, does not consider that a fair assessment is being given to the need for childcare facilities.</p> <p>Paragraph 8.45 refers to the Blandford School Pyramid, whereas this has long since been changed to the Blandford School Network;</p> <ul style="list-style-type: none"> - An inconsistent approach in terming the river and the bypass as a constraint for development is used by NDDC, as three of the main areas for development proposed is outside this 'constraint'. It is also important to note that any development near the Stour River valley will impact on the Grater Horseshoe Bats feeding ground; - Paragraph 8.32 refers to Tesco Stores as out of town, but it is more accurately at the edge of the town, nor does it recognise Homebase as contributing to the area's retail floorspace; - As highlighted before, a further inconsistency in fact is found at Policy 16.x which is not accurate as no new sports pitches are being provided; - It is not considered that the use of the protection that an AONB enforces is being used appropriately by NDDC, and considers that these boundaries need to be reviewed. Therefore Blandford + considers that Local Plan Policy 4 should be reviewed. Where development is halted, for example on land outside of the bypass, existing industrial estates are operating from; - As before Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. Blandford + therefore, does not consider that a fair assessment is being given to the need for childcare facilities. 		
3052	James Atkins			4069	10	No	It has not been positively prepared	<p>Plan does not take sufficient notice of traffic passing through Market Place and into White Cliff Mill Street. Likely to be considerable in crease in traffic. Could create two way system along White Cliff Mill Street from junction with Milldown Road and Park Road down to Eagle House Gardens. With pinch points to slow traffic would be safer than current situation with narrow footways. Also concerned about impact on doctors' surgeries which already under pressure. Favours A350/A354 site.</p>		Concerned about impact from Crown Meadows site on town centre and health services. Favours A350/A354 junction site.

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3060	Paula Andrews			4199		No	It is not justified	<p>Inclusion of Crown Meadows, designated for development, is unsound as it flies in the face of local opinion as expressed in an petition signed by 6000 people stating that the Crown Meadows was an inappropriate development site (Blandford population approx 10,300 - 2011). Acknowledge that some of the signatories were probably from outside the Blandford conurbation but may have lived in the town or currently use it as their centre for shopping, doctors, leisure etc.</p> <p>My opinion that this site be removed is based on the following :</p> <p>a) The bridge over the River Stour and the views across the Meadows provides the ONLY attractive entrance to this Georgian town</p> <p>b) Traffic is currently directed to the town via this route</p> <p>c) The majority of traffic generated from this site would have to use the one-way streets through the centre of town (East St, Salisbury St, Whitecliff Mill St.) East Street is particularly well used, and most of the time traffic crawls through the town (at a speed far less than the designated 20mph) These streets are the main route to the two local surgeries which serve the whole town and surrounds, the local hospital, two of the three schools serving Blandford and surrounding villages.</p> <p>d) 150 houses could be expected to generate 200+ cars.</p> <p>E) Despite the Crown Estates digital manipulation of a photograph depicting the proposed development, it would of course be obvious from the entrance to the town.</p> <p>F) Climate change has caused major problems in North Dorset this year; major work would have to be done to ensure no flooding of any development.</p> <p>G) The plan disregards the fact that on the whole modern families do a weekly household shop in their cars. They will NOT walk to town to do their shopping, but possibly walk in for a haircut, odd shopping items or a coffee.</p>	<p>Blandford Inset Diagram Fig 8.1 Remove Site 5. West of Blandford Forum - The Crown Meadows.</p> <p>8.23 (p 186) First Bullet Point - omit "and west of Blandford Forum" Should read "Land around the west of Blandford St Mary largely outside the Dorset AONB....</p> <p>8.23 Bullet Point 2. REMOVE</p> <p>For the duration of this current plan there should be no development south of the A354.</p>	<p>Development on Crown Meadows flies in the face of public opinion and would increase traffic congestion, impact on heritage setting and Conservation Area, spoil view of town when entering from south, be in flood risk area, alternative site available, people do shopping by car.</p>
3063	Joe Hickish			4252		No	It has not been positively prepared, It is not justified, It is not effective	<p>Crown Meadows not an acceptable site for development. A350/A354 site is preferable and Crown Meadows site should be removed from the Plan. Development on this site would be at risk of flooding, would exacerbate already bad traffic situation in the town centre , would detrimentally affect flora and fauna on the land and would ruin the views on the approach to the town. Land at Blandford St Mary has ready access to the by-pass, would not affect views of the town and could cope with water issues.</p>	<p>Replace Crown Meadows site with site at A350/A354.</p>	<p>Replace Crown Meadows site with site at A350/A354.</p>

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3073	Suzanne Keene	CPRE North Dorset Branch		4441		No	It is not effective, It is not consistent with national policy	Policy should be more supportive of Blandford town centre. Strongly opposes development of Crown Meadows. Development would seriously damage setting of town and be contrary to statement in Policy 16 that distinctive natural and historic character of Blandford will be retained and enhanced. Thousands of residents oppose development.		Development of Crown Meadows would destroy setting of town.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4484	8.12	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Paragraph 8.12 of the Local Plan seeks to defer the development of greenfield sites until all existing allocated sites, and those with planning permission, have been built out. This approach is not sound; and is not in accordance with the NPPF. There is no guarantee that all existing sites will come forward for development immediately. Some may be delayed, whilst others may not be developed at all. Under these scenarios, new greenfield development would also be unnecessarily delayed. Given that the Local Plan, and its development allocations, is considered to meet sustainability objectives, there is no reason to defer any sustainable development that can be constructed pursuant to its policies. The NPPF, at Paragraph 15, requires development that is sustainable to be approved without delay. Paragraph 17 stresses the need to deliver homes; and Paragraph 47 requires local planning authorities to significantly boost the supply of housing. Paragraph 8.12 of the Local Plan arbitrarily introduces phasing that will have the opposite effect of what the NPPF is setting out to achieve.	Omit Paragraph 8.12 from the Local Plan.	Policy should not seek development of allocated sites/sites with permission before greenfield sites.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4486	8.13	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 8.13 of the Local Plan refers to the possibility of the Blandford based town and parish councils producing a Neighbourhood Plan. However the Sustainability Appraisal, at Paragraph E.14, makes it clear that even if a Neighbourhood Plan is prepared, it will deal with non-strategic local choices; i.e. it will not re-visit the housing target for Blandford – or the site allocations. For clarity, this statement should also appear in the Local Plan.	Add new sentence at the end of Paragraph 8.13 as follows: “This could deal with non-strategic matters to supplement the policies contained in this Local Plan.”	

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3079	Mike Pennock	Savills	Davis and Coats families	4659		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Housing provision only reflects one aspect of the 2011 SHMA Update, and does not take into account wider NPPF objectives of boosting substantially the supply of housing, and meeting the full, objectively assessed needs for market and affordable housing. The level of housing provision proposed for Blandford does not reflect the scale of the settlement or its role as the main service centre in the southern part of the District. The proposed revised distribution of housing does not reflect local housing needs or the availability of suitable land to support growth in a sustainable manner and the potential to improve self-containment at Blandford. The distribution of housing should therefore be amended to provide for approximately 2,000 dwellings at Blandford. Housing provision only reflects one aspect of the 2011 SHMA Update, and does not take into account wider NPPF objectives of boosting substantially the supply of housing, and meeting the full, objectively assessed needs for market and affordable housing. Consideration should be given to retaining the housing provision of 350 dwellings per annum identified in the Draft Core Strategy, and extending the time period of the Plan to 2031 in order to ensure longer term requirements are met. The level of housing provision proposed for Blandford does not reflect the scale of the settlement or its role as the main service centre in the southern part of the District. The proposed revised distribution of housing does not reflect local housing needs or the availability of suitable land to support growth in a sustainable manner and the potential to improve self-containment at Blandford. The distribution of housing should therefore be amended to provide for approximately 2,000 dwellings at Blandford. Land to the northeast of Blandford Forum beyond the by-pass but outside the AONB should be identified in the emerging Local Plan as one of the locations for meeting Blandford's housing needs.		2,000 new dwellings should be provided at Blandford. Land to north east of Blandford provides opportunity for sustainable mixed use development to help meet housing needs that have been underestimated.
3087	Mandy Rouse			4629		No	It is not effective	Development at Crown Meadows would exacerbate drainage issues in Blandford. Also would have additional pressure on doctors' and dentists' surgeries. Views of local existing residents should prevail.		Development of Crown Meadows would exacerbate drainage issues in Blandford and increase pressure on health facilities in town.

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3089	John Cowley			4634		Yes		Development of Crown Meadows site would enable occupiers to have short and direct access to services in town and so meets sustainability objectives. Disagrees with Bryanston Park Preservation Group in that feels development would not have significant landscape impact and existing views along river and towards Bryanston Woods would remain. If existing residents lose views then not a planning consideration. Crown Estates offered public access to remaining land. Site is isolated from Blandford and residents would therefore use cars to access schools and other services, thus increasing congestion and pollution in town centre. Suggested footbridge would be a landscape intrusion in itself. Site development would lead to intrusion into landscape - any trees planted would take 50 years to have an impact. Preservation Group suggests that development of A350/A354 site would help Bryanston St Mary overcome sense of isolation from Blandford Forum but many residents welcome sense of separateness and do not feel isolated. All development of A350/A354 site will do is start to fill gap between Blandford and Spetisbury and lead to suburbanisation of landscape.		Support Crown Meadows site as a sustainable location for housing. A350/A354 site will impact on landscape and have road safety implications.
3090	S Way			4635		Yes		Support development on Crown Meadows and oppose development at A350/A354. Crown Meadows within walking distance of services and amenities, development will not affect views from Stour bridge, would be safer for residents as not near major roads and backs onto land that already developed. A350/A354 site is at dangerous junction of two busy main roads, is very visible beyond bypass, number of houses is not in keeping with Blandford St Mary and distance from town centre means people will use cars more. Feel strongly that urban sprawl should be resisted and developing within bypass is more preferable option than moving further and further from town centre.		Crown Meadows is in a sustainable location and relates to land that already developed. A354/A350 site will impact on landscape and have road safety implications. Urban sprawl should be contained by bypass.
3091	George Trevett			4644		No	It has not been positively prepared, It is not justified, It is not effective	Opposed to any development of Crown Meadows as concerned about flooding of properties and exacerbation of existing flooding problem. There would also be a serious impact on traffic congestion - town centre now at pre-bypass congestion levels and additional 1000 vehicle movements a day would paralyse town centre.		Development of Crown Meadows would exacerbate flooding issues in Blandford and increase traffic congestion in town.

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

Policy 16– Blandford

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
9	John Turnbull	Howard, Shreeve & Turnbull		4636		No	It has not been positively prepared, It is not justified, It is not effective	Supports A350/A354 site as better from traffic point of view - people living in houses on this site would work away from Blandford and vehicles would have direct access to A350 and A354 without driving into town. Traffic from Crown Meadow would only have access to one-way system. Traffic in town centre is now probably at pre-bypass levels. Additional traffic would put historic environment at risk and increase pollution. Development of Crown Meadows would result in loss of historic habitats and damage to flora and fauna. NDDC has already accepted visual impact in the A35/A354 area by accepting the Bryanston Hills development which is visually apparent so it should accept the same impact from development on the A350/A354 land, which actually would fall in a slight valley. The Crown Meadow s site will be more susceptible to flooding from high water tables as it is formed of rich topsoil on gravel whereas the A350/A354 land is of thin soil on chalk which will drain much more effectively.		Supports A350/A354 site - traffic direct to bypass, no impact on one way system. Crown Meadows development results in loss of historic environment. No flood risk for land off A350/A354. Visual impact acceptable for development of A354/A350 site.

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278	Linda Scott-Giles	Blandford Forum Town Council		4070		No	It has not been positively prepared, It is not justified, It is not effective	<p>Blandford Town Council does not have the legal knowledge to challenge the legality of the Local Plan's preparation. The Town Council has concerns that there are inaccuracies initiated by using out of date information. There are also conflicts and inconsistencies in fact, approach or interpretation particularly in relation to Dorset County Council reductions. The Town Council's response to the Plan is as follows:</p> <p>Positively Prepared – Blandford Town Council does not consider that the plan has been based on strategy which seeks to meet objectively assessed development and infrastructure requirements because:</p> <ul style="list-style-type: none"> - The data used is not current and projections are weakened by using out of date information which can be seen by reviewing the publication dates of NDDC's Local Plan Evidence Base; - There is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows). The Market Towns Site Selection Background Paper prepared by NDDC refers to several transport studies. These studies identify Crown Meadows as accessible, but it does not measure the impact the development will have on the local highway network. A recent planning application, that would have needed to use the same road that is proposed for access to the development on Crown Meadows, was refused (2/2012/0849/PLNG). One of the reasons being the increased use onto the B3082 would be likely to cause additional danger to road users. The application was only for one dwelling. No evidence has been provided that would mitigate the impact of the proposed 150 homes on the highway network in Blandford Forum; - Paragraph 8.24 in the Local Plan states that the Council's preferred approach is to develop land west of Blandford Forum and west of Blandford St Mary. This is not the community's preferred approach, which has been made clear to NDDC by the submission of a petition of approximately 5000 signatures. The community supports development and growth within their local area, and have suggested a alternative sites (Land to the North-East of Blandford Forum and Land adjacent A350/A354 Junction Blandford St Mary). Blandford Town Council are also hoping to review Land North of the bypass as a further 	<p>Up to date data and projections should be used. Highway study to be carried out to measure impact of traffic on one way system in Blandford and how 150 dwellings' usage of road acceptable. The community's wishes should be respected and the Crown Meadows site be removed as an allocation for development. The Local Plan should be amended so as to be factually correct. AONB boundaries should be reviewed to be realistic. Completed development should be removed from the allocated 960 dwellings for Blandford to reflect realistic growth though the plan period.</p>	<p>Out of date information used. No evidence that highway infrastructure could cope with 150 houses on Crown Meadows. Community preference is for land at A354/A350 junction. Not sufficient services for current population - if new services are provided will not be in time to serve expanded population. No evidence regarding mitigation of traffic impacts. Neighbourhood plan will be looking at and to north of Blandford for housing/employment.</p>

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								<p>potential alternative site which may be suitable for housing or employment. It is considered, and the message from Central Government is, that Local Authorities should set the number of housing and employment land required for the area, and Neighbourhood Plans should be able to set the area in which the local community wants development. A precedent has also been set by Thame Town Council, who's Local Authority had to remove their preferred approach from the Local Plan, following an examination by the Planning Inspectorate, to give the local community their voice and Blandford Town Council requests that its local community is given its voice;</p> <ul style="list-style-type: none"> - Policy 16.x states that new sports pitches and associated facilities is to be provided within the built up area of Blandford Forum. This is not accurate as no new sports pitches are being provided. The proposals referred to in the Local Plan is a refurbishment of existing sports pitches, not the provision of new pitches; - Paragraph 7.71 of the Local Plan states that NDDC have worked with other authorities and providers to assess the quality and capacity of existing social infrastructure. It is not clear how the high number of our aging population and other vulnerable adults is being cared for or even how applications for care facilities will be dealt with should they come forward; - Paragraph 5.18 of the North and North East Dorset Transport Study, which is part of NDDC's Evidence Base for the Local Plan states that Blandford St Mary School can serve the development to the west of Blandford St Mary. It is unclear where the school will extend to, as the existing site cannot sustain an extension. This highlights a further inconsistency in use of data. <p>Effective – Blandford Town Council does not consider that the Local Plan, in its current form, is deliverable over its period, in terms of sound infrastructure delivery planning and in working with delivery partners to make the Local Plan deliverable and achievable because:</p> <ul style="list-style-type: none"> - 960 homes is not an appropriate number of housing for the area, considering that most of these proposed homes are either already built or have received planning permission and is due to be built in the near future. The Local Plan serves the area until 2026 and there is concern that this will result in NDDC refusing planning applications based on oversupply for the area within as little as two years; 		

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								<p>As stated above there is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows);</p> <ul style="list-style-type: none"> - Policy 16.a states that development should be built where existing services are, but sufficient services are not being provided on an already strained service centre. Where services are being promised it is unlikely to be provided at the time of the proposed development for the area as most of the proposed development is already complete, taking place or will be taking place in the near future; - Policy 16.q states that grey infrastructure growth will include the provision and enhancement of public transport. Dorset County Council have confirmed that these services faces cuts not improvements, which highlights inconsistency in the Local Plan and failure to engage in factual information with delivery partners; - Policy 16.s highlights the provision of a neighbourhood hall for the northern part of the town. The terminology used for such a facility is not considered correct as it is hoped that this community facility could accommodate much needed infrastructure for the northern part of the town; - Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. A further inconsistency in the Local Plan and a further failure to engage in factual information with delivery partners. Justified – Blandford Town Council accepts that there may be evidence of participation of the local community who have a stake in the area, however considers that the term participation has been used loosely. It also considers that the research and fact finding, which resulted in the choices made in the Local Plan, is not backed up by facts because: <ul style="list-style-type: none"> - A petition with approximately 5000 signatures, as mentioned above, was submitted to NDDC which has not resulted in any review or investigation into alternative sites that is preferred by the local community; - The local community are being told that the Crown Meadows development would result in recreational open space being provided to the community, however Paragraph 8.47 in the Local Plan implies that this open 		

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								<p>space will not be accessible to the public, but only serve the development proposed;</p> <ul style="list-style-type: none"> - It is considered that the sites for development proposed in Policy 16 of the Local Plan is too restrictive and that NDDC have failed to listen to the local community; - Paragraph 8.45 refers to the Blandford School Pyramid, whereas this has long since been changed to the Blandford School Network; - An inconsistent approach in terming the river and the bypass as a constraint for development is used by NDDC, as three of the main areas for development proposed is outside this 'constraint'. It is also important to note that any development near the Stour River valley will impact on the Grater Horseshoe Bats feeding ground; - Paragraph 8.32 refers to Tesco Stores as out of town, but it is more accurately at the edge of the town, nor does it recognise Homebase as contributing to the area's retail floorspace; - As highlighted before, a further inconsistency in fact is found at Policy 16.x which is not accurate as no new sports pitches are being provided; - It is not considered that the use of the protection that an AONB enforces is being used appropriately by NDDC, and considers that these boundaries need to be reviewed. Therefore Blandford Town Council considers that Local Plan Policy 4 should be reviewed. Where development is halted, for example on land outside of the bypass, existing industrial estates are operating from; - As before, Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. Blandford Town Council therefore, does not consider that a fair assessment is being given to the need for childcare facilities. 		
388	Tom Munro	Dorset AONB Partnership		4054	8.18,8.23	Yes		<p>Supports basic approach in 8.18 but would appreciate the landscape impact assessment being referenced as a footnote and being available to the public. With reference to 8.23, development within or affecting an AONB should be of high design quality and in keeping with the surrounding landscape character. Suggests that area of AONB shown on Fig 8.1 should be hatch rather than solid colour so details below can be seen.</p>		

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403	Rohan Torkildsen	English Heritage		4574		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>It is a concern that paragraph 8.11/page 184 states that the key spatial aspects of the towns sustainable development strategy include 'accommodating growth within environmental constraints notably two AONBs; the flood plain of the River Stour; and the towns by pass.' There is no reference here to an equal consideration of Blandford as one of the finest Georgian towns in the country and the contribution of its setting to that significance; a critical matter emphasised in statute and national policy.</p> <p>There appears a primary emphasis on the protection of the AONBs. The conservation of AONBs is no more important than the conservation of designated heritage assets and their settings. Can the local authority demonstrate that equal weight has been applied to both in the site selection process?</p> <p>Paragraph 8.24 states that the preferred locations for development have been made on the basis of relative accessibility (centrally located) and landscape impact. No reference is made to the equal importance of the impact on designated heritage assets, as required by the NPPF. The Market Towns: Site Selection Background Paper is referred to as providing the greater detailed explanation to which, I in turn, refer.</p> <p>At page 6 the relevant national policy considerations are set out. No reference is made to the relevance of considering the protection of the historic environment in the delivery of sustainable development, a core principle in the NPPF. Paragraph 3.14 reinforces the predisposition of focussing on landscape and accessibility matters.</p> <p>The selection of sites for development needs to be informed by the evidence base ensuring the Plan avoids allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how that harm might be reduced and any residual harm mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed, or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm. Whilst such a reduction and mitigation appears to be proposed the justification and evidence to explain the rationale for this is not provided.</p>	<p>In view of the above it appears that the Local Plan is UNSOUND because it is not based on adequate, up-to-date and relevant evidence about the historic environment; does not identify the land where development would be inappropriate because of its historic significance; and as a consequence fails to provide a positive and clear strategy for the conservation, enhancement, improvements and enjoyment of the historic environment.</p>	<p>No reference to Blandford's status as one of the finest Georgian towns in England and the contribution of its setting to that status. Must give equal weight to status of AONBs and the conservation of designated heritage assets. Preferred locations for development have been made primarily on accessibility and landscape impact - no reference is made to the equal importance of impact on heritage assets. Where adverse impacts are unavoidable the Plan needs to consider how harm can be mitigated.</p>

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								<p>At paragraph 5.18 the Market Town Study states that should development be “limited” to the urban fringe the impact on the Crown Meadows would also be “limited”. However, there is no evidence or justification associated with this important statement in the Market Towns Study, the Local Plan, or Sustainability Appraisal.</p> <p>There is no indication as to how the development site contributes to the historic significance of Crown Meadow and other heritage assets and how that significance will be affected (the degree of harm) by the quantum of 150 homes and form of development.</p> <p>What does limited mean in terms of the harm that would be caused to the significance of affected heritage assets - the terms used in the NPPF and Policy 5 of the Local Plan. The relevant tests for assessing harm are in section 12 of the NPPF (paragraphs 132- 134) and the industry standard assessment methodology is provided by The Setting of Heritage Assets (English Heritage 2011). These appear not to have been applied.</p> <p>Reference is made at paragraph 5.37 to Crown Estates (Crown Meadows owner) heritage study. Unfortunately this does not form part of the Local Plan’s evidence base and is not in the public domain.</p> <p>Reference is made at paragraph 5.40 to the Extensive Urban Survey of Blandford but again the Market Towns Study fails to set out the relevance of this evidence; what it says about the significance of the Crown Meadows, and when applied what this evidence says about the impact of the proposed allocation on that significance?</p> <p>Likewise the Conservation Area Character Appraisal is not referred to as a key source of evidence to inform the principle of development.</p> <p>Understandably the Landscape Impact Assessment (8 July 2010) of the potential housing sites does not provide a thorough technical historic environment assessment. Nevertheless it establishes that the Crown Meadows site has a ‘high value’ due to its Conservation Area designation and contribution to the historic context and setting of the town. It recommends development is limited to a small area adjacent the built up area (within a dashed blue line). This small area does not however appear to have the capacity to accommodate 150 new homes. Therefore one presumes that development is more extensive than recommended in the Landscape Impact Assessment potentially causing substantial harm to the significance of</p>		

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								affected heritage assets. Whilst paragraph 5.47 of the Market Towns Paper provides the assurance that “the historic environment will be protected and enhanced and development accommodated within environmental constraints” there is no justification or explanation why this is the case and how that conclusion has been reached.		
404	Michael Holm	Environment Agency		4221		Yes		The comment we recommend to Policy 16 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.	Please add the words 'flooding and' before the words 'climate change' in the sentence directly below the 'Environment and Climate Change' heading. In the next sentence down (criterion (d) change the word to 'flooding' rather than the current 'looding'	
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4250		No	It is not consistent with national policy	Whilst I appreciate that the Blandford Inset Map is diagrammatic, the extent of the AONB within the area enclosed by the bypass is significantly less than it should be to the north and to the east.	amend boundary	AONB incorrectly delineated on Figure 8.1
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4463		Yes		Hall & Woodhouse strongly support Policy 16 in terms of its overall strategy and the recognition of the role of the Blandford Brewery site to the future sustainable development of the town. The site benefits from permission for a mixed use regeneration for a new brewery, employment and residential development and that permission has been implemented with the construction of the new brewery. The construction of the new brewery starts to free up large parts of the site to bring forward the wider mixed use regeneration. The site is sustainably located in relation to the town centre and as previously developed land where much of the site is or will become redundant for its former use, a mixed use regeneration remains an appropriate way forward.		Brewery site sustainable location for regeneration.
864	M.J. Le Bas			4068				Concerned that development on Crown Meadows would obscure views of WW2 anti-tank defences.		Development on Crown Meadows would obscure WW2 defences.

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873	Christopher Gale			4018		No	It is not justified	Site to the west of Blandford St Mary is in AONB, SSSI and Conservation Area. Still outstanding questions over safe pedestrian access to town	Abandon site to the west of Blandford St Mary for development.	Outstanding issues regarding pedestrian access to town centre form the site to the west of Blandford St Mary..
956	G J Trevett			4646		No	It has not been positively prepared, It is not justified, It is not effective	Opposed to any development of Crown Meadows as concerned about flooding of properties and exacerbation of existing flooding problem. There would also be a serious impact on traffic congestion - town centre now at pre-bypass congestion levels and additional 1000 vehicle movements a day would paralyse town centre.		Crown Meadows flooding and impact on town centre traffic congestion.
1031	Julie Byngam			4438		No	It has not been positively prepared, It is not justified, It is not effective	Against any development at Crown Meadows. Unsatisfactory access and additional traffic would clog up town centre. Also on floodplain. Alternative site available at Blandford St Mary.		Crown Meadows flooding and impact on town centre traffic congestion. Alternative site available at Blandford St Mary.
1033	Peter Miller			4533		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Plan is not sound because included Crown Meadows proposal. Alternative site west of Blandford ST Mary ignored by Council. Traffic assessment for site significantly flawed - development would significantly increase town centre traffic. Crown Meadows is historic deer park and part of historic setting for Blandford as well as including 2WW heritage defences which would be spoiled. High ground water levels ignored on flood assessment and proper allowance not made for global warming. Flora and fauna would suffer if land developed.	Para 8.24 should omit mention of land west of Blandford Forum. Policy 16 should be amended to omit this site.	Crown Meadows site unacceptable because of traffic impact, impact on historic setting, flooding from groundwater and impact on flora and fauna.
1034	Janet Miller			4014	8.24	No	It has not been positively prepared	Development of "Crown Meadows" is unacceptable. The proposals are contrary to the wishes of local residents and visitors to the town	Reference to "Land West of Blandford Forum" in paragraph 8.24 should be omitted	Crown Meadows proposal unacceptable and against residents' wishes.
1034	Janet Miller			4015		No	It is not justified	Development of Crown Meadows is unacceptable and unnecessary whilst there is a viable alternative site at St Mary's Hill. The site is within a conservation Sub-Area. It is of historic importance owing to its association with the Portman family and the anti-tank defences. Development would damage the setting of the town.	4071 4071	Crown Meadows proposal unacceptable - impact on historic setting, Conservation Area and alternative site available.

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1034	Janet Miller			4016	8.24	No	It is not justified	The Crown Meadows site is unimproved grassland and feeding ground for Greater Horseshoe Bats	Reference to "Land West of Blandford Forum" in paragraph 8.24 should be omitted	Opposes Crown Meadows because of bats.
1034	Janet Miller			4017	8.24	No	It is not justified	The development of the Crown Meadows would result in significant increase in traffic and result in further congestion of the town centre. Congestion is already excessive and unacceptable.	Reference to "Land West of Blandford Forum" in paragraph 8.24 should be omitted	Crown Meadows proposal would increase traffic congestion in town centre.
1042	S Gillies			4531		No	It has not been positively prepared, It is not justified, It is not effective	Does not agree with building at Blandford St Mary. Better to develop land outside bypass where land can drain into River Stour. Also impact on wildlife. Blandford St Mary should be kept as separate from Blandford Forum. Traffic problems would develop at 'pinch point' by entrance to Bryanston School.		Object to housing west of Blandford St Mary. Should develop outside bypass to keep traffic out of town and avoid impact on wildlife.
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4112		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	This representation objects to the omission of the Blandford Forum town centre from Policy 16 in the text of Local Plan Part 1 Pre-submission Document and objects to the omission from Figure 8.1 of this area, as the area for town centre regeneration although it is referenced as such in the Local Plan. It is requested that the importance of the town centre be properly recognised in a form similar to that in "The New Plan for North Dorset" (March 2010) ("the Draft Plan"). The Local Plan confirms (as did the Draft Plan) that the land around the existing Co-op store is not a town centre site but is edge-of-centre (for example at paragraph 8.37), and in that case the sequential and other tests will apply (see for example paragraphs 6.47, 6.54 and 6.79). Therefore the Blandford town centre area for regeneration/extension identified in the Local Plan is limited to the southern side of Market Place/East Street in the text. But this is now omitted from the policy. 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-	Reword the text after criterion (o) in Policy 16 to read" The main focus for town centre regeneration, which may include additional retail floorspace and residential development, will be in, and to the south of, East Street and the Market Place. Appropriate development on land on the edge of the centre, south-east of East Street, including land around the existing Co-op store may also be permitted if it does not prejudice the regeneration of the town centre". Amend the text after criterion (v) to read "A network of green infrastructure will be developed in and around Blandford, focussing on linking existing sites (such as the Milldown and Stour Meadows) and providing new sites and links with the town centre to serve the residents of both the new and existing developments in the town." In relation to Figure 8.1, the designation of the area for regeneration in the town centre should be added to Figure 8.1 in the same form as shown at Figure 2.8.1 of the Draft Plan.	Policy should promote town centre regeneration in Blandford. Any GI network should link into the town centre.

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								<p>centre sites. The Local Plan omits support for mixed use development in Blandford town centre. The Local Plan reaffirms the policy commitment to the continued improvement of town centres as the main focus for retail, leisure and other commercial activities (for example in Policies 11 and 12) and how this supports other objectives of the Plan. It is somewhat confusing that the support in the text for the town centre regeneration in the Local Plan, the Draft Plan and the Background Papers is not retained in the wording of Policy 16. Although Paragraph 6.71 of the Plan, identifying the southern side of Market Place/East Street, states that Policy 16 will outline that proposal; in fact it does not and proposes instead what is identified as an edge-of-centre site as “the main focus for town centre regeneration.” When two out-of-town retail developments (for Asda and Tesco) have recently been approved it is somewhat perverse that the Local Plan should positively support further retail development on the edge of town that will prejudice the already fragile vitality of Blandford Forum town centre. By positively deleting support for the town centre that was found in the Adopted Local Plan, the Draft Plan, and the Background Papers and disregarding national advice (such as NPPF paragraph 23) the Local Plan gives a clear message to residents and investors that it has no interest in the future sustainability and vitality of Blandford Forum town centre. It is therefore requested that the focus for regeneration be returned to the primary retail frontages centred around Market Place, and the potential for the extension to the rear of a range of premises on the southern side of Market Place/East Street is reinstated in the Policy and the importance of enhancing the town centre as a destination is recognised in Policy 16 and throughout the Local Plan.</p>	<p>Bullet point 12 (Retail regeneration land to south of East Street) should be deleted from Figure 8.1.</p>	
1527	Sue Nisbet			4078		No	It is not justified	<p>Does not consider the proposed housing allocation to the west of Blandford St Mary to be the most appropriate strategy. The site has transport, landscape, wildlife and flooding issues. The most appropriate location for housing growth would be opposite Tesco. This will have less impact on the landscape, the developer is keen to build and the housing would not disrupt existing residents of Blandford St Mary. Also Blandford St Mary is a village not part of Blandford town and should be considered separately. Finally, the representor strongly objects to the housing application from Crown Meadows being reallocated to the Tesco site instead.</p>		<p>Object to site west of Blandford St Mary due to transport, landscape, wildlife and flooding issues. Site opposite Tesco is appropriate location for housing growth.</p>

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1596	Malcolm Brown	Sibbett Gregory	Mrs Linley Abbott	4277	8.22,8.25	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Plan is not sound as LPA failed to engage with respondents despite their indication of willingness to bring site forward throughout development of the Plan. Plan needs to make more provision for housing in Plan period and beyond. Respondent's land has capacity for 350 dwellings and would deliver 140 affordable homes. Site is accessible, not of high landscape value, would have no climate change impact, served by public transport and within walking distance of town. Site is remote from floodplain and well drained. Development would not generate significant traffic in the town. Development would contribute towards improved educational facilities and community facilities, with the possibility of a health facility on the site.	Policy 16B should be amended to include land south of Blandford St Mary.	Policy 16B should be amended to include land south of Blandford St Mary.
1596	Malcolm Brown	Sibbett Gregory	Mrs Linley Abbott	4382		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Inset map show significant area of land bounded by A354 and A340. Paragraph 8.23 indicates capacity for 200 dwellings whereas could provide 350. Highways Authority indicated to transport consultants that new junction on A354 could include future Spetisbury by-pass and relieve pressure on existing junction. Trailway could be enhanced as part of development scheme. Council's approach flawed as site at Crown Meadow would increase traffic pressures on town centre.	Figure 8.1 should be redrawn to show inclusion of site bounded by A354 and A340 capable of development and provision of 350 dwellings.	Crown Meadows proposal would increase town centre traffic congestion. A354/A350 site could provide up to 300 dwellings.
1598	Malcolm Brown	Sibbett Gregory	Mr Michael Taylor	4406		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Plan is unsound because evidence base (Workplace Strategy) unsound. Work which agent carried out shows discrepancies in figures on land availability in Blandford. Inaccurate figures used in respect of ASDA site and others.	Policy 16 needs to be completely rewritten in terms of supporting economic development. Items j,k,l and m should be omitted, reference to the Brewery omitted. Item k could be replaced with reference to remaining land at Shaftesbury Lane, M could remain if not limited to B1 use. In addition, 12 ha of land adjoining Sunrise Business Park should be allocated.	Plan unsound because based on inaccurate workplace data and land availability data. Land adjacent to Sunrise Business Park should be allocated for employment use.
1730	C Woodcock			4123		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national	Plan is unsound because Crown Meadows proposal is unsound. Poor access and increased traffic congestion in town centre will result. Will also impact on wildlife. Should develop A350/A354 site.	Should change policy to replace Crown Meadows site with A350/A354 site.	Should develop A350/A354 site as Crown Meadows would increase traffic in town centre and affect wildlife.

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							policy			
1769	Diana Garner			4633		No	It has not been positively prepared, It is not justified, It is not effective	Blandford has a history of flooding and the proposed development area already floods. With EA's calculation of 5%-10% increase in flooding over the next 25 years and taking account of surface water flooding, seems unreasonable to pursue the Crown Meadows site when an alternative site is available. It is beyond the bypass but the bypass was never meant to be a barrier to development. The new homes will be uninsurable. Housing needs in Blandford are not high end and this is what will be built. Developers will look for maximum profit and it will be impossible to achieve any affordable housing and even that is not properly affordable as Housing Associations can charge up 80% of market rents. Crown Meadows has been protected up to now and nothing has changed with it. Wildlife will be affected and light pollution will spoil the sky at night. Previous consultation did not ask the right questions -should have got opinions on whether people wanted development or not rather than how much development. Councillors have a duty to their electorate - monetary gain for the government should be set aside - the people of Blandford have made their wishes known.		Given flooding on site is unreasonable to pursue Crown Meadows when alternative site available. Crown Meadow development will affect wildlife and cause light pollution.
1800	John Cook	Bryanston Park Preservation Group		4626	8.11 8.13-15 8.19 8.22-24 8.47 8.49	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The overwhelming majority of residents oppose the development at Crown Meadows because all traffic generated will be forced into the already heavily congested one way system through the Town Centre. The development would also severely negatively impact on Blandford's iconic heritage setting. The Crown Meadows have been preserved in previous Local Plans under Policy BL7 -there is no reason to abandon this policy. There is an alternative site to the South which has none of the negatives attached to the development of the Crown Meadows. This is the preferred option of Blandford's residents. The allocation therefore is in conflict with the aims of the Localism Act and is therefore not justified. It is also in conflict with Policy 16 para 8.3. It should be designated as a Local Green Space under Policy 4 para 4.105 in the Blandford Community Plan which is now under preparation in conformity with Policy 16 para 8.4 and 8.13. The Draft Core Strategy approved for consultation in March 2010 was deliberately obscure in the case of the Crown Meadows. The site was described as "land West of Blandford" in order to conceal from	Policy 16 paragraph 8.24 is based on the Market Towns: Site Selection Background Paper which relies upon the deeply flawed ASA and ignores the recommendations of the DCC Landscape Impact Assessment. It should be amended to read: Policy 16 - 8.24 The Council's preferred approach is to develop land south of Blandford at St Mary's Hill and west of Blandford St Mary. Development in these locations would be convenient for all facilities and services and would have less impact on the landscape than the other options as indicated in the DCC Landscape Impact Assessment. The sites have good road access and do not require traffic to	Oppose Crown Meadows development as it would increase traffic congestion, impact on heritage setting and Conservation Area and be in a flood risk area. Should develop site at A350/A354 junction (opposite Tesco)

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								<p>Councillors the true location. Because of their single minded support of the Crown Estate Team, Planners have not engaged or supported the Landowners, Blandford St. Mary Homes Ltd (BSMH), in bringing forward the site St. Mary's Hill (SMH). This situation has forced BSMH to carry out a public consultation exercise and to submit a request for pre-application advice to the local planning authority. Planning objections to the Council's preferred growth option can be summarised as (i) Adverse landscape impact - loss of Intrinsic rural character - harm to the quality and appearance of the Blandford Conservation Area and the historic setting of the town - harm to the setting of the Dorset AONB. (ii) Impact of extra traffic on local highway network - town centre congestion. (iii) Flood risk - It is claimed that the site of the proposed development is not at risk of flooding, yet the District Council's own Strategic Flood Risk Assessment carried out In February 2008 shows the 1979 flood event "overlapping" at least 50% of the site. (iv) Impact on biodiversity - no guarantee that proposed mitigation measures will be successful, especially with regard to Greater Horseshoe bats. (v) Heritage assets - the boundary of the proposed development site forms part of the World War II AntiTank Defences and has been Grade II listed by English Heritage. In just 2 months during July and August 2012, BPPG collected 5,756 signatures from local people who opposed the Crown Meadows development. The continued inclusion of the site in the new plan is clearly not sound and certainly unjustified. In respect of the 2013/2014 consultation BPPG produced and distributed leaflets asking residents in simple terms where they would prefer to see the necessary houses built. Almost 1,300 completed leaflets were returned and delivered to NDDC. Over 98% of respondents preferred the St Mary's Hill site.</p>	<p>enter the heavily congested one way system in the town centre. Further, the proposed developments have the overwhelming support of local people.</p>	

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1823	G K Gibbs			4632		No		Local plans should be based on primary achieving best of long term aspirations for all. Proposal for Crown Meadows objectionable on many grounds - fails to uphold overwhelming local democratic aspirations; fails to take account of strong objections from elected civic groups; is a perverse selection of preferred development site; exposes NDDC to legal protest actions; ruins compact old deer park; destroys local aspirations for tourism; results in loss of ambience and old meadows with abundant wildlife; contravenes EU Directive regarding protected species (Greater Horseshoe bat); development of Blandford on A350/A354 site will require large area of greenspace which Crown Meadows provides; development will add to congestion and pollution in town centre; claimed benefits of additional cycling and walking will not appear; will have adverse impact on local mental health; would compromise protected water zone, would affect views from Blandford Bridge and AONB; underground services of new houses would not be more than 1 metre above water table; Crown Meadows would provide greenspace for future developments elsewhere in Blandford.		Oppose development of Crown Meadows due to landscaping, wildlife, heritage and transport issues.
1832	Tony & Andrea Jones			4436	8.24			Concerned that development west of Blandford St Mary will adversely affect businesses at Lower Bryanston Farm(livery yard and Bed and Breakfast).		Oppose development west of Blandford St Mary due to impact on adjoining businesses.
1983	Roger & Jane Summers			4437		No	It is not justified, it is not effective, It is not consistent with national policy			
2457	Diane Woodcock			4126		No		The Local Plan ignores the strong feeling of local people against development on Crown Meadows.	Crown Meadows should be replaced by site at A350/354 which would avoid impact on wildlife and problems with flooding and traffic.	Oppose development at Crown Meadows due to wildlife, landscape and transport issues. Support A350/A354 junction site.
2559	Margaret Gray			4002		No	It has not been positively prepared	Despite a petition of around 6000 signatures against the development of Crown Meadows, it remains in the plan	Take note of the petition against the development and remove all development and access proposals relating to the Crown Meadows from the plan	Object to Crown Meadows site.
2559	Margaret Gray			4005		No	It has not been positively	Consultation material described the site as "West of Blandford Forum". This was too vague to enable residents to identify the site to be developed. Only in 2012 was the		

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							prepared	site identified as Crown Meadows.		
2559	Margaret Gray			4006		No	It has not been positively prepared	Residents suggested alternative sites as being more suitable. The plan has not taken these alternatives into consideration.		
2559	Margaret Gray			4007		No	It is not justified	The site of the proposed development in Crown meadows flooded on 22/11/2012. The surrounding land flood frequently and with climate change, will flood more often. If properties are pile driven into the site, this will reduce the capacity to absorb flood water. Development will result in water runoff. The result will be further flooding downstream especially in combination it the development of "The Land to the South of East Street"	Protect the Floodplain from development by removing development from Crown Meadows	Object to Crown Meadows site due to flooding.
2559	Margaret Gray			4008		No	It is not justified	The site is a refuge for wildlife away from walkers and their dogs. Opening the site up as informal open space will have an impact on wildlife.	Protect the wildlife by removing development from Crown Meadows	Oppose to development at Crown Meadows due to impact on wildlife.
2560	Margaret Oliver			4034	10	No		No proper consideration of traffic issues. Extra vehicular movements will cause chaos in Blandford. Visual quality of Crown Meadows will be ruined by development. Should not ignore petition signed by thousands of people.	Should build on Blandford St Mary site with pedestrian footbridge across main road, the Brewery site and infill sites.	Oppose Crown Meadows. Support A350/A354 junction site and infill sites within Blandford.
2704	Robert Jones			4657		No	It is not justified, It is not effective	Objects putting 220 homes on land west of Blandford ST Mary. If Council intends development to go ahead then should exclude upper part of land west of Dorchester Hill. This would protect landscape. Land south of A350/A354 would make up for loss of houses. Supports development of Crown Meadows.		Object to development on land to the west of Blandford St Mary. If land is to be developed then should remove upper part of site.

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2783	Gill Smith	Dorset County Council		4166	8.45 and IDP	No	It has not been positively prepared	Due to increasing numbers of children generated by proposed developments and current birth rate trends, a new 2 form entry primary school should be added to the provision at Blandford as an alternative to extending the Milldown School. Discussions are on-going with North Dorset District Council about a location.	Amend text at para 8.45 to read “Feasibility work has shown that this can be achieved through careful use of the existing capacity within the school pyramid and by extending the existing Archbishop Wake Primary School and either extending the Milldown Primary School or providing one new 2FE primary school in the town.” Amend Policy 16 to read: “(u) the extension of Archbishop Wake and either extension of the Milldown or provision of a new 2FE primary school;” (iii) Amend the Infrastructure Delivery Plan para 3.35 by adding a final sentence to read: “In Blandford the anticipated growth in pupil numbers may also require a new 2FE primary school as an alternative to an extension of the Milldown School.” Also amend Appendix B of the IDP to reflect this change	New 2 form entry primary school should be added to Blandford provision as alternative to expanding Milldown school.
2783	Gill Smith	Dorset County Council		4170		Yes		Queries if the policy should specify the name of the supermarket (ASDA). If an alternative provider came along would this be a policy departure.		Policy should not name store operator as use by other operator would become a departure.
2823	Clive Browne			4071		No	It is not justified	Does not consider Crown Meadows (West of Blandford Forum) as the most appropriate strategy due to issues of flooding, heritage impact, landscape setting, impact on town centre infrastructure.		Object to Crown Meadows due to flooding, heritage, landscape and infrastructure issues.

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2986	Neil Hall	AMEC	Crown Estate	4451		Yes		<p>Policy 16 is considered to be sound (although there are issues of soundness with other policies) and this policy would require consequential amendments to reflect the soundness issues raised elsewhere.</p> <p>Policy 16 sets out the strategy for Blandford Forum and identifies two sites owned by The Crown Estate to assist in meeting development needs of the town; West Blandford and West Blandford St Mary. The Crown Estate supports the allocation of these two sites. These provide highly sustainable and deliverable locations for development which can play an important role in delivering new high quality development in the town. They both present logical and sustainable locations for new housing provision and meet the tests of soundness set out in NPPF. In particular, the sites are available now, they offer suitable locations for development and are achievable with a realistic prospect that housing will be delivered on the sites within five years. AMEC has prepared an evidence base of technical reports to demonstrate the suitability, availability and deliverability of the two sites in line with guidance in the NPPF. These include transport, landscape, biodiversity and drainage/flood risk assessments. They have previously been shared with the Council and demonstrate that the sites are deliverable and can provide a number of benefits through development. The response summarises the sustainable development merits of the two sites in terms of: flood risk; sustainability and access; ecology; landscape and amenity; and heritage.</p> <p>The Crown Estate supports the provision of an informal area of open space at Crown Meadows (as part of a development scheme at West Blandford). We are proposing access to the Crown Meadows, where no public access exists at present. This has been a long standing policy aspiration of the Council as set out in the Local Plan and more recently articulated in early versions of the emerging Draft Core Strategy policies for Blandford. The Crown Estate is therefore willing to put this extensive area (around 17 hectares) of land forward for community use as part of a development scheme on the West Blandford site. The Crown Estate is fully supportive of this proposal and feels that it could deliver a number of recreational and ecological benefits.</p> <p>The West Blandford site was initially identified in the early stages of the Plan as being suitable for a development of 200 homes but was subsequently reduced to 150. Whilst</p>	<p>Suggested amendment to Policy 16</p> <p>Amend wording of the 'Meeting Housing Needs' section to read:</p> <p>At least 1,160 homes will be provided at Blandford Forum and Blandford St Mary during the period 2011 - 2029. In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through the following allocated sites:</p> <ul style="list-style-type: none"> g mixed use regeneration of the Brewery site; and around 500 homes on the following Greenfield sites; h the development of land to the west of Blandford Forum; and i the development of land to the west of Blandford St Mary. 	<p>Crown Meadows site and land West of Blandford St Mary are highly sustainable sites.</p> <p>Allocation of dwellings on Crown Meadows should be increased to 175.</p>

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								The Crown Estate supports the allocation of this site it does not agree with the reduction from 200 to 150 homes. It is not clear that this reduction is based on an informed technical analysis and may not make the most efficient use of this important site. Based on detailed assessments, further analysis of site constraints, and applying appropriate densities it is considered that the site could deliver around 175 new homes (at around 32dph). The allocation on this site should be increased to ensure that efficient use is made of this well located and highly sustainable site. The number of dwellings to be allocated on Greenfield sites at west Blandford and west Blandford St Mary should be added to the policy text in order to provide a positive growth strategy (paragraph 8.23 states that these sites have capacity for about 500 dwellings). This would remove any ambiguity and would be consistent with guidance in paragraph 17 of NPPF. in order to be consistent with the wording of Policy 6 and provide continuity through the Plan, it is considered that references to housing targets should be amended from 'about' to 'at least'.		
3031	Andrew Roberts	Highways Agency		4149	8.11			Suggest amendment to para 1.17. Mention is made of five designated neighbourhood area within the District, but only four appear to be named.		
3043	Rodney Baldwin			4001		Yes		Considers Crown Meadows and West Blandford St Mary to be sound and sustainable. Appalled at suggestion of St Mary's Hill, Traffic Congestion and bad Visual Impact. No good for town centre sustainability.		Support Crown Meadows and land West of Blandford St Mary. Oppose St Mary's Hill site.
3050	Malcolm Albery	Blandford St Mary Parish Council		4039		No	It has not been positively prepared, It is not justified, It is not effective	Blandford St Mary Parish Council shares the views of Blandford+ (representation ref. 3051) with some exceptions - it adds that there is a lack of information on the potential of the A350 housing site but omits reference to the Lower Bryanston Farm site.	Blandford St Mary Parish Council presents the same suggested change as Blandford+ except for the suggestion that AONB boundaries be reviewed and that completed housing schemes should be taken out of the 960 dwellings proposed over the plan period in Blandford.	
3051	Linda Scott-Giles	Blandford+		4040		No		Blandford + does not consider that the Local Plan is sound and view the plan as unjust in several areas. Blandford + has concerns that there are conflicts, and inconsistencies, in fact, approach or interpretation	Up to date data and projections should be used. The community's wishes should be respected and the Crown	Out of date information used. No evidence that highway infrastructure could cope with 150

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								<p>particularly in relation to Dorset County Council reductions. Please see below why Blandford + consider part of the plan to be unsound: Positively Prepared – Blandford + does not consider that the plan has been based on strategy which seeks to meet objectively assessed development and infrastructure requirements because:</p> <ul style="list-style-type: none"> - The data used is not current and projections are weakened by using out of date information which can be seen by reviewing the publication dates of NDDC's Local Plan Evidence Base; - There is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows). The Market Towns Site Selection Background Paper prepared by NDDC refers to several transport studies. These studies identify Crown Meadows as accessible, but it does not measure the impact the development will have on the local highway network. A recent planning application, that would have needed to use the same road that is proposed for access to the development on Crown Meadows, was refused (2/2012/0849/PLNG). One of the reasons being the increased use onto the B3082 would be likely to cause additional danger to road users. The application was only for one dwelling. No evidence has been provided that would mitigate the impact of the proposed 150 homes on the highway network in Blandford Forum; - Paragraph 8.24 in the Local Plan states that the Council's preferred approach is to develop land west of Blandford Forum and west of Blandford St Mary. This is not the community's preferred approach, which has been made clear to NDDC by the submission of a petition of approximately 5000 signatures. The community supports development and growth within their local area, and have suggested a alternative sites (Land to the North-East of Blandford Forum and Land adjacent A350/A354 Junction Blandford St Mary). Blandford + are also hoping to review Land North of the bypass as a further potential alternative site which may be suitable for housing or employment. It is considered, and the message from Central Government is, that Local Authorities should set the number of housing and employment land required for the area, and Neighbourhood Plans should be able to set the area in 	<p>Meadows site be removed as an allocation for development. The Local Plan should be amended so as to be factually correct. AONB boundaries should be reviewed to be realistic. Completed development should be removed from the allocated 960 dwellings for Blandford to reflect realistic growth though the plan period.</p>	<p>houses on Crown Meadows. Community preference is for land on A354/A350 junction. Not sufficient services for current population - if new services are provided will not be in time to serve expanded population. No evidence regarding mitigation of traffic impacts. Neighbourhood plan will be looking at and to north of Blandford for housing/employment.</p>

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								<p>which the local community wants development. A precedent has also been set by Thame Town Council, who's Local Authority had to remove their preferred approach from the Local Plan, following an examination by the Planning Inspectorate, to give the local community their voice and Blandford + requests that its local community is given its voice;</p> <ul style="list-style-type: none"> - With regards to the site marked as 4 (Lower Bryanston Farm) on the potential development map, concerns were raised about the density/proposed numbers. There is currently an inadequate road system and parking has recently become a huge problem due to the introduction of car parking changes within Blandford Forum. Any development should therefore take the current issues and any future new issues into consideration. - There were no objections to the sites marked as 5 and 6 (Dorchester Hill and Lower Blandford St Mary) on the plan given that the road networks can be provided. The existing road system is inadequate for the number of houses proposed in the space allocated. The site marked 5 on the map (Dorchester Hill) should be considered together with site 6 in Lower Blandford St Mary for development they should not be in isolation and firm proposals and agreement for infrastructure support should be in place prior to approval of housing development. - Policy 16.x states that new sports pitches and associated facilities is to be provided within the built up area of Blandford Forum. This This is not accurate as no new sports pitches are being provided. The proposals referred to in the Local Plan is a refurbishment of existing sports pitches, not the provision of new pitches; - Paragraph 7.71 of the Local Plan states that NDDC have worked with other authorities and providers to assess the quality and capacity of existing social infrastructure. It is not clear how the high number of our aging population and other vulnerable adults is being cared for or even how applications for care facilities will be dealt with should they come forward; - Paragraph 5.18 of the North and North East Dorset Transport Study, which is part of NDDC's Evidence Base for the Local Plan states that Blandford St Mary School can serve the development to the west of Blandford St Mary. It is unclear where the school will extend to, as the existing site cannot sustain an extension. This highlights a further inconsistency in use of data. 		

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								<p>Effective – Blandford + does not consider that the Local Plan, in its current form, is deliverable over its period, in terms of sound infrastructure delivery planning and in working with delivery partners to make the Local Plan deliverable and achievable because:</p> <ul style="list-style-type: none"> - 960 homes is not an appropriate number of housing for the area, considering that most of these proposed homes are either already built or have received planning permission and is due to be built in the near future. The Local Plan serves the area until 2026 and there is concern that this will result in NDDC refusing planning applications based on oversupply for the area within as little as two years; - As stated above there is no evidence to demonstrate that the highway infrastructure could cope with the existing one way system in Blandford Forum which will be serving the development at the west of Blandford Forum (locally known as Crown Meadows); Policy 16.a states that development should be built where existing services are, but sufficient services are not being provided on an already strained service centre. Where services are being promised it is unlikely to be provided at the time of the proposed development for the area as most of the proposed development is already complete, taking place or will be taking place in the near future; - Policy 16.q states that grey infrastructure growth will include the provision and enhancement of public transport. Dorset County Council have confirmed that these services faces cuts not improvements, which highlights inconsistency in the Local Plan and failure to engage in factual information with delivery partners; - Policy 16.s highlights the provision of a neighbourhood hall for the northern part of the town. The terminology used for such a facility is not considered correct as it is hoped that this community facility could accommodate much needed infrastructure for the northern part of the town; - Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. A further inconsistency in the Local Plan and a further failure to engage in factual information with delivery partners. <p>Justified – Blandford + accepts that there may be evidence</p>		

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								<p>of participation of the local community who have a stake in the area, however considers that the term participation has been used loosely. It also considers that the research and fact finding, which resulted in the choices made in the Local Plan, is not backed up by facts because:</p> <ul style="list-style-type: none"> - A petition with approximately 5000 signatures, as mentioned above, was submitted to NDDC which has not resulted in any review or investigation into alternative sites that is preferred by the local community; - The local community are being told that the Crown Meadows development would result in recreational open space being provided to the community, however Paragraph 8.47 in the Local Plan implies that this open space will not be accessible to the public, but only serve the development proposed; - It is considered that the sites for development proposed in Policy 16 of the Local Plan is too restrictive and that NDDC have failed to listen to the local community; - Paragraph 8.45 refers to the Blandford School Pyramid, whereas this has long since been changed to the Blandford School Network; - An inconsistent approach in terming the river and the bypass as a constraint for development is used by NDDC, as three of the main areas for development proposed is outside this 'constraint'. It is also important to note that any development near the Stour River valley will impact on the Grater Horseshoe Bats feeding ground; - Paragraph 8.32 refers to Tesco Stores as out of town, but it is more accurately at the edge of the town, nor does it recognise Homebase as contributing to the area's retail floorspace; - As highlighted before, a further inconsistency in fact is found at Policy 16.x which is not accurate as no new sports pitches are being provided; - It is not considered that the use of the protection that an AONB enforces is being used appropriately by NDDC, and considers that these boundaries need to be reviewed. Therefore Blandford + considers that Local Plan Policy 4 should be reviewed. Where development is halted, for example on land outside of the bypass, existing industrial estates are operating from; - As before Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation 		

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								<p>of closure to these services by Dorset County Council. Blandford + therefore, does not consider that a fair assessment is being given to the need for childcare facilities.</p> <p>Paragraph 8.45 refers to the Blandford School Pyramid, whereas this has long since been changed to the Blandford School Network;</p> <ul style="list-style-type: none"> - An inconsistent approach in terming the river and the bypass as a constraint for development is used by NDDC, as three of the main areas for development proposed is outside this 'constraint'. It is also important to note that any development near the Stour River valley will impact on the Grater Horseshoe Bats feeding ground; - Paragraph 8.32 refers to Tesco Stores as out of town, but it is more accurately at the edge of the town, nor does it recognise Homebase as contributing to the area's retail floorspace; - As highlighted before, a further inconsistency in fact is found at Policy 16.x which is not accurate as no new sports pitches are being provided; - It is not considered that the use of the protection that an AONB enforces is being used appropriately by NDDC, and considers that these boundaries need to be reviewed. Therefore Blandford + considers that Local Plan Policy 4 should be reviewed. Where development is halted, for example on land outside of the bypass, existing industrial estates are operating from; - As before Paragraph 7.76 states that an assessment had been carried out that showed that there are sufficient day nurseries and pre-school/play groups in the District, however this does not account for the recent confirmation of closure to these services by Dorset County Council. Blandford + therefore, does not consider that a fair assessment is being given to the need for childcare facilities. 		
3052	James Atkins			4069	10	No	It has not been positively prepared	<p>Plan does not take sufficient notice of traffic passing through Market Place and into White Cliff Mill Street. Likely to be considerable in crease in traffic. Could create two way system along White Cliff Mill Street from junction with Milldown Road and Park Road down to Eagle House Gardens. With pinch points to slow traffic would be safer than current situation with narrow footways. Also concerned about impact on doctors' surgeries which already under pressure. Favours A350/A354 site.</p>		Concerned about impact from Crown Meadows site on town centre and health services. Favours A350/A354 junction site.

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3060	Paula Andrews			4199		No	It is not justified	<p>Inclusion of Crown Meadows, designated for development, is unsound as it flies in the face of local opinion as expressed in an petition signed by 6000 people stating that the Crown Meadows was an inappropriate development site (Blandford population approx 10,300 - 2011). Acknowledge that some of the signatories were probably from outside the Blandford conurbation but may have lived in the town or currently use it as their centre for shopping, doctors, leisure etc.</p> <p>My opinion that this site be removed is based on the following :</p> <p>a) The bridge over the River Stour and the views across the Meadows provides the ONLY attractive entrance to this Georgian town</p> <p>b) Traffic is currently directed to the town via this route</p> <p>c) The majority of traffic generated from this site would have to use the one-way streets through the centre of town (East St, Salisbury St, Whitecliff Mill St.) East Street is particularly well used, and most of the time traffic crawls through the town (at a speed far less than the designated 20mph) These streets are the main route to the two local surgeries which serve the whole town and surrounds, the local hospital, two of the three schools serving Blandford and surrounding villages.</p> <p>d) 150 houses could be expected to generate 200+ cars.</p> <p>E) Despite the Crown Estates digital manipulation of a photograph depicting the proposed development, it would of course be obvious from the entrance to the town.</p> <p>F) Climate change has caused major problems in North Dorset this year; major work would have to be done to ensure no flooding of any development.</p> <p>G) The plan disregards the fact that on the whole modern families do a weekly household shop in their cars. They will NOT walk to town to do their shopping, but possibly walk in for a haircut, odd shopping items or a coffee.</p>	<p>Blandford Inset Diagram Fig 8.1 Remove Site 5. West of Blandford Forum - The Crown Meadows.</p> <p>8.23 (p 186) First Bullet Point - omit "and west of Blandford Forum" Should read "Land around the west of Blandford St Mary largely outside the Dorset AONB....</p> <p>8.23 Bullet Point 2. REMOVE</p> <p>For the duration of this current plan there should be no development south of the A354.</p>	<p>Development on Crown Meadows flies in the face of public opinion and would increase traffic congestion, impact on heritage setting and Conservation Area, spoil view of town when entering from south, be in flood risk area, alternative site available, people do shopping by car.</p>
3063	Joe Hickish			4252		No	It has not been positively prepared, It is not justified, It is not effective	<p>Crown Meadows not an acceptable site for development. A350/A354 site is preferable and Crown Meadows site should be removed from the Plan. Development on this site would be at risk of flooding, would exacerbate already bad traffic situation in the town centre , would detrimentally affect flora and fauna on the land and would ruin the views on the approach to the town. Land at Blandford St Mary has ready access to the by-pass, would not affect views of the town and could cope with water issues.</p>	<p>Replace Crown Meadows site with site at A350/A354.</p>	<p>Replace Crown Meadows site with site at A350/A354.</p>

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3073	Suzanne Keene	CPRE North Dorset Branch		4441		No	It is not effective, It is not consistent with national policy	Policy should be more supportive of Blandford town centre. Strongly opposes development of Crown Meadows. Development would seriously damage setting of town and be contrary to statement in Policy 16 that distinctive natural and historic character of Blandford will be retained and enhanced. Thousands of residents oppose development.		Development of Crown Meadows would destroy setting of town.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4484	8.12	No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Paragraph 8.12 of the Local Plan seeks to defer the development of greenfield sites until all existing allocated sites, and those with planning permission, have been built out. This approach is not sound; and is not in accordance with the NPPF. There is no guarantee that all existing sites will come forward for development immediately. Some may be delayed, whilst others may not be developed at all. Under these scenarios, new greenfield development would also be unnecessarily delayed. Given that the Local Plan, and its development allocations, is considered to meet sustainability objectives, there is no reason to defer any sustainable development that can be constructed pursuant to its policies. The NPPF, at Paragraph 15, requires development that is sustainable to be approved without delay. Paragraph 17 stresses the need to deliver homes; and Paragraph 47 requires local planning authorities to significantly boost the supply of housing. Paragraph 8.12 of the Local Plan arbitrarily introduces phasing that will have the opposite effect of what the NPPF is setting out to achieve.	Omit Paragraph 8.12 from the Local Plan.	Policy should not seek development of allocated sites/sites with permission before greenfield sites.
3077	Peter Atfield	Goadsby Planning & Environment	Charles Church Developments	4486	8.13	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 8.13 of the Local Plan refers to the possibility of the Blandford based town and parish councils producing a Neighbourhood Plan. However the Sustainability Appraisal, at Paragraph E.14, makes it clear that even if a Neighbourhood Plan is prepared, it will deal with non-strategic local choices; i.e. it will not re-visit the housing target for Blandford – or the site allocations. For clarity, this statement should also appear in the Local Plan.	Add new sentence at the end of Paragraph 8.13 as follows: “This could deal with non-strategic matters to supplement the policies contained in this Local Plan.”	

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3079	Mike Pennock	Savills	Davis and Coats families	4659		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Housing provision only reflects one aspect of the 2011 SHMA Update, and does not take into account wider NPPF objectives of boosting substantially the supply of housing, and meeting the full, objectively assessed needs for market and affordable housing. The level of housing provision proposed for Blandford does not reflect the scale of the settlement or its role as the main service centre in the southern part of the District. The proposed revised distribution of housing does not reflect local housing needs or the availability of suitable land to support growth in a sustainable manner and the potential to improve self-containment at Blandford. The distribution of housing should therefore be amended to provide for approximately 2,000 dwellings at Blandford. Housing provision only reflects one aspect of the 2011 SHMA Update, and does not take into account wider NPPF objectives of boosting substantially the supply of housing, and meeting the full, objectively assessed needs for market and affordable housing. Consideration should be given to retaining the housing provision of 350 dwellings per annum identified in the Draft Core Strategy, and extending the time period of the Plan to 2031 in order to ensure longer term requirements are met. The level of housing provision proposed for Blandford does not reflect the scale of the settlement or its role as the main service centre in the southern part of the District. The proposed revised distribution of housing does not reflect local housing needs or the availability of suitable land to support growth in a sustainable manner and the potential to improve self-containment at Blandford. The distribution of housing should therefore be amended to provide for approximately 2,000 dwellings at Blandford. Land to the northeast of Blandford Forum beyond the by-pass but outside the AONB should be identified in the emerging Local Plan as one of the locations for meeting Blandford's housing needs.		2,000 new dwellings should be provided at Blandford. Land to north east of Blandford provides opportunity for sustainable mixed use development to help meet housing needs that have been underestimated.
3087	Mandy Rouse			4629		No	It is not effective	Development at Crown Meadows would exacerbate drainage issues in Blandford. Also would have additional pressure on doctors' and dentists' surgeries. Views of local existing residents should prevail.		Development of Crown Meadows would exacerbate drainage issues in Blandford and increase pressure on health facilities in town.

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3089	John Cowley			4634		Yes		Development of Crown Meadows site would enable occupiers to have short and direct access to services in town and so meets sustainability objectives. Disagrees with Bryanston Park Preservation Group in that feels development would not have significant landscape impact and existing views along river and towards Bryanston Woods would remain. If existing residents lose views then not a planning consideration. Crown Estates offered public access to remaining land. Site is isolated from Blandford and residents would therefore use cars to access schools and other services, thus increasing congestion and pollution in town centre. Suggested footbridge would be a landscape intrusion in itself. Site development would lead to intrusion into landscape - any trees planted would take 50 years to have an impact. Preservation Group suggests that development of A350/A354 site would help Bryanston St Mary overcome sense of isolation from Blandford Forum but many residents welcome sense of separateness and do not feel isolated. All development of A350/A354 site will do is start to fill gap between Blandford and Spetisbury and lead to suburbanisation of landscape.		Support Crown Meadows site as a sustainable location for housing. A350/A354 site will impact on landscape and have road safety implications.
3090	S Way			4635		Yes		Support development on Crown Meadows and oppose development at A350/A354. Crown Meadows within walking distance of services and amenities, development will not affect views from Stour bridge, would be safer for residents as not near major roads and backs onto land that already developed. A350/A354 site is at dangerous junction of two busy main roads, is very visible beyond bypass, number of houses is not in keeping with Blandford St Mary and distance from town centre means people will use cars more. Feel strongly that urban sprawl should be resisted and developing within bypass is more preferable option than moving further and further from town centre.		Crown Meadows is in a sustainable location and relates to land that already developed. A354/A350 site will impact on landscape and have road safety implications. Urban sprawl should be contained by bypass.
3091	George Trevett			4644		No	It has not been positively prepared, It is not justified, It is not effective	Opposed to any development of Crown Meadows as concerned about flooding of properties and exacerbation of existing flooding problem. There would also be a serious impact on traffic congestion - town centre now at pre-bypass congestion levels and additional 1000 vehicle movements a day would paralyse town centre.		Development of Crown Meadows would exacerbate flooding issues in Blandford and increase traffic congestion in town.

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

Policy 17 – Gillingham

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		4355		No	It is not justified	Policy 17 para b) the development of the SSA to the south of the town. This strategic allocation is misconceived in placing itself further from the A303 in lower areas more prone to flooding, on clay around the confluence of local rivers and placing the railway line and its single crossing between it and the town centre and the main area of the town. The area to the north and east is better placed to meet the long term growth of Gillingham and where there is a choice between the two junctions of the A303. it would be better placed for access to the doctors surgery at Peacemarsh and so there would be no need to build a new surgery.		Location for SSA not justified. Alternative at Peacemarsh suggested.
378	Simon Rutter	Proctor Watts Cole Rutter		4356		No	It is not justified	Policy 17 para q) a new link road between B3081 and B3092 through the SSA. This link road is largely to serve the needs of the proposed SSA and is therefore not properly described as infrastructure that will help the town.		Link road through SSA does not benefit the town as a whole.
378	Simon Rutter	Proctor Watts Cole Rutter		4357		No	It is not justified	Policy 17 para s) Transport network. No new transport infrastructure is proposed. As the town increases in size should a second crossing over the railway line not be secured as part of a new bypass for the town. This would be planning for now as well as the future of the town. This could also include a replacement railway station.		Policy should secure a second crossing of the railway and a replacement railway station.
404	Michael Holm	Environment Agency		4222		Yes		The comment we recommend to Policy 17 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.	Please add the words 'flooding and' before the words 'climate change' in the sentence directly below the 'Environment and Climate Change' heading.	EA Policy is sound.

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1039	Stephen Appleby			4104	8.50	No		Various issues need addressing in Gillingham: a) Road network needs improving, both into and within town. b) High street retailing needs improving with more national retailers represented. c) Town needs its own waste disposal site - Shaftesbury is too far to travel. d) School provision is not adequate and position of schools creates pedestrian/vehicular conflict. e) Gillingham has railway station but no bus station. f) Town needs overall regeneration not just housing development.		Policy does not address issues such as; the road network; poor retail offer in the town centre; the need for a waste disposal site; inadequate school provision; lack of a bus station; and the need for town centre regeneration.
1098	Chris O'Reilly			4037				Concerned about impact of development at Bay on Bay Fields as roads are not be able to take more traffic. Also, extra traffic will be impact on the High Street and one way system.		Concerned about resilience of highway infrastructure to development at Bay.
1185	Peter Maddock			4021	8.70	No	It has not been positively prepared, It is not consistent with national policy	Objects to development at Bay. Atkins Report said that development of land between Barnaby Mead and Bay Lane not prudent use of resources and contrary to environmental protection. Copy of previous representations attached. Essentially, argues that land previously designated as 'buffer zone' and also at odds with designation of area as one of Local Character. Corridor to Shreen Water would be closed off and have watercourse pollution. Would lose 'green lung' and important landscape gap.	Would conflict with green infrastructure aspirations and should be kept as amenity greenspace. Change policy to reflect.	Policy identification of Land at Bay for development not justified. Concerned about loss of landscape gap/greening.
1558	S J & A M Graham			4641		No	It is not justified	We are writing to strongly object to the proposed building on a green field between Bayfields and Bay Lane. We have seen too many green fields swallowed up by housing developments for the towns needs. The field between Bayfields and Bay Lane has always provided a buffer to separate the town from the Bay area with a footpath allowing pupils to walk to school avoiding the traffic. Views from the footpath would be blocked - Mere Downs, Castle Hill at Mere, Bowridge Hill, Shaftesbury and 5 churches, all of which would disappear should this land be built upon. There is already the new Bayfields Estate that have had 54 houses built on a green field, the proposed development is on a smaller field with flood plain and therefore the number seems ridiculously		Policy identification of Land at Bay for development not justified. Concerned about loss of views, flooding, loss of safe route to school and loss of green field/open space.

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								overestimated and poorly judged. The town really does lack green space at present and so this development will make matters worse. With so many new houses being built to the south of the town, is it necessary to build on a small green field? Is it the only buffer between Bay and the town that could provide a valuable open space that the public could continue to enjoy.		
1558	S J & A M Graham			4642		No	It is not justified	the High Street is very difficult to get onto from Barnaby Mead junction and should building go ahead, more vehicles going up and down the High Street and Barnaby Mead road will cause more congestion		Policy identification of Land at Bay for development not justified. Concerned about traffic congestion.
1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4284	1.7	No	It is not justified, It is not effective, It is not consistent with national policy	<p>It is noted that the Council remain intent to produce more than one document Local Plan Part 1 which addresses the overall housing provision and strategy and Part 2 which is in effect a Site Allocations DPD. There does not appear to be any justification for this approach. Persimmon Homes objects 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. This approach does not address the requirements in the NPPF in terms of Para 47 which states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing Including identifying key sites which are critical to the delivery of the housing strategy over the plan period.</p> <p>It is also noted that the Local Plan only allocates the urban extension to south of Gillingham, as other sites are to come forward through the site allocations DPD or the Neighbourhood Plan process. This would appear to be inconsistent with</p>	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. Furthermore if this approach is to be pursued consideration should be given to including other allocations in the Plan to provide certainty and clarity on the scale, form and quantum of development to meet housing needs in the plan period	Object to the 2 part local plan as this approach is not justified. Other allocations such as land at Windyridge Farm, should be included in the plan.

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								<p>the NPPF paras 47 and also para 157 which states that Local Plans should allocate sites to promote development and flexible use of land , bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate. (Attached a concept plan for the Land at Windyridge Farm proposal)</p>		
1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4314		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 principal of growth at Gillingham is supported, it is considered that the strategy should not rely on the development of one strategic urban extension to the south of the town to meet is future housing needs. An additional site, land at Windyridge Farm should be identified as an additional release of land in the short term to proposals for the southern extension to Gillingham. 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. One of the benefits that can be capitalised upon through growth at Gillingham is realised is that it is the only town in the district which has direct access to the rail network. Given the unconstrained nature of the town and its good public transport links and its potential to accommodate additional growth, Gillingham was considered likely to be able to experience a high level of growth over the plan period. After 2016 the intention was that the development rate would be increased to deliver growth to the town but this would need to be matched with employment and infrastructure development in order to increase the self-containment of the town. The preferred approach to the town is the extension to the south and south east. Land to the south of Bay Road should have been assessed separately from the wider Bowridge area. The SA assessment should not have been</p>	<p>An additional allocation on land at Windyridge Farm should be included in the Plan in order to meet housing needs and ensure a 5 year housing land supply. It is noted that the Council are not adverse to higher levels of growth in the four main towns, as stated in the Background Paper Sustainable Development Strategy at para 7.6. If neighbourhood plans are prepared they cannot promote less development than is identified in the Local Plan Part 1, but they can allow greater levels of growth (by allocating additional sites for development) or include specific polices or guidance on how new development should be designed. However, it is considered that in order to ensure a 5 year housing land supply and to provide greater choice and flexibility an additional strategic allocation should be included in the Local Plan Part 1. Such an allocation at Land at Windyridge Farm is consistent with the strategy of the Plan.</p>	<p>The principle of growth at Gillingham is supported. However, Gillingham has the capacity to grow further, according to the evidence set out in the Atkins report, and this should also be accommodated in the plan. Additional site suggested at Windyridge.</p>

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								<p>confined to assessing locations of a similar scale to the proposed southern extension. All sites should have been assessed in the SA. The conclusions in the SA are flawed as they are predicated on a larger site.</p> <p>The site is considered to be well positioned in terms of local facilities with good connections to the High Street and the retail and employment opportunities it offers, together with the school and leisure centre located to the south west of the site. It should also be noted that there is a higher density of jobs in the town centre location as opposed to the designated employment sites on the periphery which tend to be B8 and lower density.</p> <p>The SA assessment shows here is very little difference between the Preferred Option and Land to the North East. There are only differences on 5 of the Objectives: SA2 - Persimmon considers that their site has a positive impact given its proximity to the town centre, local schools and leisure, sports and recreation opportunities; SA10 - Land at Windyridge Farm can be developed whilst respecting the Royal Forest Project Area and development would not have an adverse impact on the river valley area; SA12 - The preferred option is assessed as having a neutral or no impact where as land to the north east is assessed as having a negative impact; SA13 - The land south of Bay Road is within the closest proximity to the Town Centre of any strategic growth option considered for the town, and would therefore be best placed to deliver the corresponding objectives within the Plan to support the regeneration of the Town Centre; SA14 - development on land at Windyridge Farm would have a positive impact; it is close to schools, leisure facilities and the High Street.</p> <p>The Sustainability Appraisal states that there are additional issues of flooding from from neighbouring rivers and landscape constraints due to topography of the site. The Proposed development will be complementary to the Gillingham Royal Forest Project Area and can also provide an opportunity for new or relocated</p>		

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								sports pitch provision, a new community park as well as providing land for the required expansion of Gillingham High School. The SA states that the potential of the area is reported as less than that proposed for the town as a whole and hence would necessitate further development elsewhere in the town or at an alternative settlement. This is not a sound reason for dismissing a potential development site.		
1771	H J Kelliher			4431		No		The Plan is addressing stated national need for more houses to be built in the UK. It is not addressing just why a town like Gillingham would need more houses. The report has stated that houses should be built in the Station Road area which if sustained by growth in local business and commerce would be a sensible solution. However building any houses on the field in Bay would not. As the town will inevitably expand in future years preserving what few open spaces we have left within the town's confines will be of great importance. The town plan does not address this issue	The town Plan needs to preserve the field at Bay. This is a unique open space within the town of Gillingham	The proposed level of housing does not reflect solely local needs and is therefore unjustified. Land at Bay should be retained as a valuable greenspace.
1777	Simon J Kidner			4111		No	It is not justified, It is not effective	There is a need to deliver supporting infrastructure, including retail and community facilities, alongside housing. Infrastructure is planned for the SSA but there is a need for the remainder to be delivered within the town as a priority. All other developments within the town should contribute to tackling a broader , more local range of issues than solely the national housing shortage. Priority should be given to the implementation of the Station Road Regeneration Area.	The Sustainable Development Strategy (page 206) should be re-worded to make it clear that the priority for development in Gillingham is for the mixed-use regeneration of the Station Road area and that house building as part of this scheme should be implemented before any other housing sites within the town are built.	The policy lacks identification of levels of infrastructure required for the development of the town. Regeneration in the Station Road area should have priority.
1777	Simon J Kidner			4113	8.68	No	It is not justified, It is not effective	Proposals for the development of the land at Bay would risk a number of objectives of the policy not being met: Land at Bay has been identified in Gillingham Landscape and Open Spaces Assessment as being an important open space/an important part of the Green Infrastrucure of the the town, especially in relation to the Shreen Water corridor; Flooding including surface water flooding affects part of the site, an site level flood risk assessment will need to be undertaken to tackle the issue and to reduce the risk of subsidence in the area; Development at Bay would	Para 8.68 should qualify that the development of Bay should be low priority and should only be developed if the supply of housing land elsewhere in the district cannot meet the demand.	The Policy identification of Land at Bay for development is not justified for a variety of reasons, incl: open space value; flooding; landscape value.

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								not be in accordance with the TDS as it would damage the landscape setting, views and the transition between the countryside and the town. Currently important and valued views exist from the area to the Wiltshire Downs and these would be lost through development; development would erode local character through the loss of the open space between the town centre and Bay; development would cause traffic problems to the existing built up areas which surround the site. There is an opportunity to make use of this land in a way which would deliver benefits to the town and at the same time mitigate the potential damage that development of the site would cause.		
1808	David Ramsay	Vail Williams LLP	Neals Yard Remedies	4601		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Para 8.78 given that the identified land at Neal's Yard Remedies in Peacemarsh is vacant, it is unreasonable to allocate it for employment uses and thus prevent other more valuable uses being located on site. Due to the oversupply of employment land in Gillingham and North Dorset as a whole, it is unnecessary to restrict the uses of the site to employment. Notwithstanding this, Neal's Yard Remedies will remain on site, and are planning to expand. Policy 17 is considered unsound as it does not allow flexibility to alter housing levels in Gillingham should the Urban Extension not deliver houses as quickly as it was planned, particularly given that at the time of these representations, the Council has not agreed a detailed delivery plan for this major site. Restricting development of a previously developed site for employment uses which are neither viable or necessary is considered unsound.	The reference to Neal's Yard Remedies in paragraph 8.78 should be removed or the types of uses widened to include residential, whilst maintaining employment uses on the site. Policy 17 criteria 'm' should be amended to say "An element of employment development shall be retained at Neal's Yard Remedies, however should any part of the site remain vacant, other alternative uses (including residential) may be justified ..."	The retention of vacant land as an employment allocation at Neal's Year Remedies is not justified and not flexible enough to allow alternative non-employment uses, including residential development.
1985	Lois Wardle			4023		No	It has not been positively prepared, It is not justified, It is not effective	Concerned that sufficient attention not been paid to flooding issues, impact of development on wildlife and traffic impact. Also queries need for scale of development proposed and need for a community hall away from the town centre when Hardings Lane site is available.	No response	Policy not justified in mitigation proposals for flooding, traffic, wildlife, and community hall.

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2431	Penelope Joyce			4075		No	It is not justified	Does not consider that all other options for growth in Gillingham have been adequately assessed. Growth to the north of the town would be a more sustainable option as this is not in a flood plain.		Policy not justified as has not sufficiently assessed all other location options for growth.
2920	Matthew Kendrick	Grass Roots Planning Ltd	Hopkins Developments Ltd	4140		No	It is not effective	The Policy describes that retail expansion in the town will be confined to the Station Rd Regeneration Area and local shops to serve the Southern Extension, which will be accommodated within the local centre. This approach is not underpinned by any evidence and will not address the significant problems that the town centre and Gillingham as a whole experiences. It is widely recognised that the retail offer in Gillingham needs to be improved and we would question how, given the constraints identified, this will be achieved.	We think further thought needs to be given to alternative scenarios that will be needed if the envisaged redevelopment of the Station Rd area does not come forward as anticipated or fails to accommodate all of the retail uses that are required in the town. We consider that an alternative or complementary option would be to allow further retail development as part of the new local centre proposed for the south of the town. A3 and A4 uses should also be appropriate at this location	The Policy approach to regeneration of the Station Road Area is not justified. Further retail development should be allowed as part of the new local centre for the SSA.
2922	Belinda Ridout			4079		No	It has not been positively prepared	The plan for Gillingham does not seek to meet the need for a new burial ground in the town. The current site has less than 5 years of burial land left.	The identification of a burial site should be an essential part of the forward plan for the town and parishes.	The Policy infrastructure requirements lack identification of a burial ground.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4492				Support, subject to clarifications Key issues we raise with this policy and supporting text are that: · Planned growth targets should be expressed as minimum levels to accord with the NPPF; · The evidence base for employment allocations in Gillingham is lacking; · The policy requires a new school to be sited as part of the new local centre. This may not be necessary or practical and it is unclear on what basis this requirement has come about. The location of the school should be formalised through the masterplanning exercise set out in Policy 21. Alternative wording to enable this is set out. · The need for contributions towards the facilities at RiversMeet and the provision of a new community centre is questioned because it is 'unlikely' to meet the needs of the growing	Make the following amendments to the text of policy 17: · "At least 1,490 homes will be provided at Gillingham over the Plan period, with additional provision at the SSA extending beyond the plan period." · Amend criterion (v): "A new local centre to be provided as part of the SSA to the south of the town to include community and health facilities as required to support the new population" · Amend criterion (w) to read: "provision of new primary school capacity within the Gillingham SSA and/or expansion of the St Virgin Mary Primary School and extension of the existing secondary school"	Support Policy. However, specific infrastructure requirements have not been justified, i.e.: allocation of employment land; location of new school at Local Centre; contributions to off-site community hall; nursery school; allotments; and, other elements of grey and social infrastructure.

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								<p>community. The most appropriate solution may in fact be on-site / alternative provision once need has been established;</p> <ul style="list-style-type: none"> · Likewise the need for a nursery school has not been objectively assessed. The Childcare Sufficiency Assessment did not identify any gaps in existing provision (see para 7.78) and did not comment on the need for further facilities to meet nursery needs · No objective assessment of demand appears to have been carried out in relation to allotments. · The requirements for Grey Infrastructure at paragraphs 8.85-8.87 and social infrastructure at paragraphs 8.89 - 8.91 are not evidenced. · It is unclear what is meant by "enhancement" at paragraph 8.91. 	<ul style="list-style-type: none"> · Amend criterion (z) to remove reference to new allotments. · Amend paragraph 8.55 <p>“The key spatial aspects of this strategy will be:</p> <ul style="list-style-type: none"> • a strategic site allocation (SSA) to the south of the town delivering the majority of the town’s growth along with supporting infrastructure. <p>Proposals for the SSA are set out in more detail in Policy 21 – Gillingham Strategic Site Allocation”</p> <ul style="list-style-type: none"> · Amend paragraph 8.64: Policy 2 - Core Spatial Strategy identifies Gillingham as one of the four main towns at which the vast majority of growth will be delivered. Policy 6 – Housing Distribution sets out that the four main towns will deliver housing to meet the district wide need, and that Gillingham will deliver at least 1,490 dwellings over the plan period. It also identifies Gillingham SSA as a key strategic delivery mechanism to deliver housing up to 2026 and beyond. · Amend last sentence of para 8.89: ‘Following an assessment of viability and demand, the need for improved facilities, developers will be expected to make reasonable and proportionate contributions to the further improvement and/or expansion of the existing facilities at RiversMeet and the provision of a new community hall · Amend para 8.90 to read: ‘The scale of development to the south of the town will require a new local centre to be provided. This might include new primary school accommodation and a doctor’s surgery for about 2.5 full time equivalent General Practitioners. 	

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									The local centre should also include other essential local facilities such as a community hall, local shops and a pre-school nursery “Assessment should be undertaken of the needs for a doctor’s surgery and other local facilities such as a community hall, local shops and pre-school nursery. These facilities should be provided as necessary”	
2988	Paul Smith			4532				Gillingham needs appropriate infrastructure to grow successfully but Plan does not propose this. Many traffic problems in need of urgent resolution. Main problem facing town is poor communication links. Consequently, no firms want to come to Gillingham and there are no jobs. Very difficult when competing with Blandford and Shaftesbury as well as Yeovil and Salisbury. Makes no sense to make Gillingham bigger. Regional road and railway systems need to be greatly improved before Gillingham can successfully grow.		Growth at Gillingham should not be proposed without improvements to transport infrastructure.
3053	Beth Littlewood			4074		No	It is not justified	Does not consider the employment/retail strategy for Gillingham to be the most appropriate. It will create a donut effect drawing people away from the town centre and leading to decline on of the high street that is already struggling.		Policy retail strategy not justified. It is not the most appropriate strategy as it will draw retail out of the town centre.
3054	Peter Malson			4076		No	It is not effective	Does not consider the Gillingham policy is deliverable due to poor infrastructure in the town, in particular the doctors and public transport. The current primary schools do not have the capacity for growth and road infrastructure is not sufficient for the scale of housing growth proposed.	Growth in Gillingham needs to be through a comprehensive plan for the town as a whole	Policy not positively prepared in the light of existing deficit of infrastructure requirements in the town, especially roads, health and education.
3056	Anna Pullen			4085		No	It is not effective	Concerned about the traffic implications of 77 new homes at Bay on existing residents. On street parking is already an issue and additional new homes will only compound the issue.		Policy identification of Land at Bay for Development not justified, particularly in terms of traffic.

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3067	P Lawford			4282		Yes	It is not justified	Land at Bay is not considered the most appropriate strategy to be identified to accommodate 50 dwellings in the light of the limited access to the site, that the site includes some floodplain, and the potential harm caused by increase in traffic generation from the proposed development.		Policy identification of Land at Bay for Development not justified, particularly in terms of traffic and flooding.
3071	Debra Ward			4317		No	It has not been positively prepared	The proposed development of 50 houses at Bay has not taken into consideration the traffic implications of the proposal. Access and congestion would be problematic.		Policy identification of Land at Bay for Development not justified, particularly in terms of traffic.
3081	Tony Brimble	Brimble, Lea & Partners	The P G Ridgley Will Trust	4528		Yes		Support in particular Policy 17 in Gillingham which proposes about 1490 homes to be provided in Gillingham during the period 2011 to 2026. In particular we support Policy 17 (i) "the development of the land to the south and south west of Bay". Gillingham is the main service centre in the north of the District and the strategy for the town will require the bringing forward of major new greenfield sites. The proposed allocation contributes to the soundness of the plan and demonstrates that the Plan has been positively planned and will assist North Dorset District Council to meet the objectively assessed need for new homes in Gillingham, The site is suitable, available and achievable and capable of delivering about 50 houses in the immediate future. The site is within a short walking distance of the town centre and the host of services provided in the town. The following detailed assessments have been submitted in support: - Flood Risk Review; - Appraisal of the Highways and Access; - Baseline Ecological Assessment; - Landscape and Visual Impact Assessment; - Archaeological Evaluation.		Support Policy and identification of Land at Bay for development.
3082	Tim Wood	Gillingham Medical Practice		4529	8.90			Concerned about proposal to include new medical surgery in SSA. Present practice has capacity to absorb new development. Consequently, would be no finance available from present surgery for new surgery and Health Authority would probably support this view. Also, in future looking to bigger surgeries to obtain benefits of scale so would not be looking to increase number of smaller surgeries.	Remove reference to provision of 2½ additional doctors in Gillingham.	Policy lacks justification for a new GP surgery.

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3085	David Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	4599		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Due to low levels of growth in the recent past at Gillingham, and difficulties envisaged in delivery of the Strategic Site Allocation which would affect five year housing land supply, it is proposed that the Council need to allocate additional smaller, deliverable sites if housing needs (higher figure, see rep. 4596) are going to be met.	Land South of Chantry Fields is available for development. The site is suitable for residential development, the land is available and, given that the site lies within the ownership of just two parties who are cooperating with each other, development will be achievable within the time frame of the plan period. Unlike the Strategic Site Allocation within the draft Plan, the land South of Chantry Fields has the potential to deliver a significant number of dwellings within a five year period, contributing to the Council's housing land supply, particularly the much needed housing requirement at Gillingham, the principal settlement.	The Policy is not justified to bring forward sufficient housing in an appropriate timescale. Chantry Fields site suggested as an additional site.
3088	P Bridge			4630		No	It is not justified	Object to development between Bayfields and Bay Road as need to hold on to remaining open space within Gillingham. In just the nine- years I have been a resident, so much has been built on.		Policy identification of Land at Bay for Development not justified, particularly in terms of open space.
3088	P Bridge			4631		No	It is not justified	Object to the building of 50 homes between Bayfields and Bay Road as Barnaby Mead is a small residential road and is not suitable for further traffic, especially as this would be the only access to the development.		Policy identification of Land at Bay for Development not justified, particularly in terms of traffic.
3092	Frank Heels			4649		No	It is not justified	Should include maintenance of river flows.		Should include maintenance of river flows.

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

Policy 18 – Shaftesbury

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		4095		No	It is not justified	Policy 18 is not the most appropriate strategy for Shaftesbury as it focuses growth to the east of the town with little infilling.		Further growth on land to the East of Shaftesbury is not the most appropriate strategy
404	Michael Holm	Environment Agency		4223		Yes		The comment we recommend to Policy 18 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.	Please add the words 'flooding and' before the words 'climate change' in the sentence directly below the 'Environment and Climate Change' heading.	
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4251		No	It is not consistent with national policy	Whilst I appreciate that the Shaftesbury Inset Map is diagramatic, the extent of the AONB is significantly less than it should be.	Amend boundary	AONB boundary should be shown correctly on Figure 8.3
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4278	8.106	No	It is not effective	Paragraph 8.106 should refer to the AONB in the list of designations		
1830	Rachel Caldwell			4072		Yes		Supports the plan and makes some general comments regarding regeneration and agrees with the infrastructure proposed but asks the question - where and when? Does not agree with the statement that Shaftesbury supports Gillingham and continues to have some concerns about housing to the west of A350 (issues distance from the town, poor public transport, AONB). Would like infrastructure delivered before the housing growth.		Infrastructure to be brought forward before housing growth.

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2783	Gill Smith	Dorset County Council		4177				<p>It appears, from comparing Figure 8.3 - Shaftesbury Inset Diagram of the North Dorset Local Plan with the Mineral Safeguarding Area (MSA) of the Bournemouth, Dorset and Poole Minerals Strategy (designated in Policy SG1 and shown on Figure 25 of the Strategy), that Housing Growth areas 8 and 9 are in conflict with the mineral safeguarding designation. No boundaries for the Housing Growth areas are shown so it is not possible to be more definitive at this stage.</p> <p>Although not yet adopted, the Minerals Strategy has been found sound following Examination and the MSA cannot be further amended to accommodate North Dorset's development aspirations. However, the Mineral Planning Authority is mindful of the delay that prior extraction of minerals can lead to and the impact this can have on built development proposals. Should these Housing Growth areas be progressed further, North Dorset will be consulting again with Dorset County Council as Mineral Planning Authority. At that stage it will be possible to consider the proposed development in more detail and determine the most appropriate course of action</p>	The Plan should acknowledge the existence of the Mineral Safeguarding Area of the Bournemouth, Dorset and Poole Minerals Strategy that lies adjacent to Shaftesbury. North Dorset should liaise with Dorset County Council as Mineral Planning Authority on the details of any proposed developments within the MSA	Possible conflict with the Mineral Safeguarding Area of the Minerals Strategy, with areas proposed for housing growth to the north of the town.
2991	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes South Coast	4387		Yes		<p>Persimmon Homes South Coast supports the approach to Shaftesbury, focusing housing largely on the flat plateau land to the east of the towns and north of A30 where planning permission has already been granted for 679 dwellings. Persimmon are already building on the allocated 2003 Local Plan site guided by the Development Brief. Para 8.110 acknowledges increased densities and opportunities on land previously reserved for a first school. Persimmon support para 8.111 re increased capacity on the overall site to the north.</p>		Supports growth on land to the east of Shaftesbury.
2991	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes South Coast	4388	8.114	Yes		<p>Persimmon Homes supports paragraph 8.114 which indicates that there is potential for the Council to adopt a more flexible approach towards employment sites, particularly in relation to other uses that provide employment, but do not fall within B-class use definitions. This approach is justified on the basis that the level of supply is in excess of the projected need. Persimmon Homes support this more flexible approach to non B-Class uses on employment sites which could help support business</p>		Supports flexible approach to employment site south of the A30.

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								and would be applicable to the Persimmon employment land at Shaftesbury. Persimmon note that this site will be taken forward in the Local Plan Part 2 as a strategic employment site and that additional sites could also be added through the neighbourhood planning process.		
3064	John Lewer	Shaftesbury Town Council		4262				Shaftesbury inset maps does not identify Wiltshire.		
3064	John Lewer	Shaftesbury Town Council		4267	8.100	No	It is not justified	2nd bullet point of the paragraph should include options of college and budget-type hotel on the employment land. 4th bullet point referring to regeneration on land between town centre and Christy's Lane should give priority to leisure and community facilities with housing and retail not specifically mentioned.		Greater flexibility in land uses required on land south of A30. Land between the town centre and Christy's Lane should be used just for leisure and community facilities.
3064	John Lewer	Shaftesbury Town Council		4257	8.97	No	It is not justified	Object to Shaftesbury "supporting" Gillingham in Para 8.97. The two towns "compliment" one another.	Para 8.97 Change "supports" to "compliments"	
3064	John Lewer	Shaftesbury Town Council		4260		No	It is not justified	Strategy proposed for land east of Shaftesbury makes no allowance for mistakes currently being made. Further expansion to the east is not sustainable as i) no infrastructure has been provided (school/health) ii) the proportion of affordable housing delivered is too great iii) employment growth south of A30 has failed to be delivered iv) land to east is severed by A350.	Amend policy to enable school to be delivered on land to the east where further housing growth has been suggested, amend employment uses to include college or budget hotel, ensure the area to the east does not become isolated from the town.	Further growth on land to the East of Shaftesbury is not sustainable. A school should be provided on site and a college/budget hotel should be allowed on land south of the A30.
3064	John Lewer	Shaftesbury Town Council		4268		Yes		Supports neighbourhood plan deciding shopping frontages and parking.		

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3066	Rosie Baker	Terence O'Rourke Limited	Mr Matthew Richardson	4287		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 broad identification of land to the west of the A350, known as Littledown, at Shaftesbury, as a location for growth to accommodate new homes to help meet the Council's identified housing need. The site is in a sustainable location, is not subject to any particular technical constraints that would prevent housing delivery and can be master planned and landscaped so that the impact on the AONB is acceptable. Further , significant net benefits, in terms of social, economic and environmental benefits could be derived from the comprehensive development of the site, not least the provision of significant areas of publically accessible open space alongside family housing development. This approach, which create a new garden neighbourhood for Shaftesbury, fully accords with the principles of the NPPF and the presumption in favour of sustainable development. The land at Littledown abuts the north western edge of the town, which will enable new residents to make the best use of the existing opportunities this key settlement in the district has to offer. In addition, this greenfield site will compliment development and regeneration of the town centre area, as both are likely to offer a different type of residential accommodation. Gleeson Strategic Land Limited has a significant interest in the land and included with this representation is a delivery statement to provide the Council with confidence that the site can deliver housing and should be allocated now. In taking an allocation forward it will be necessary to fully understand the capacity of the site and Gleeson would be willing to work with the Council to develop the master plan, which would facilitate an allocation and revised settlement boundary. Whilst Gleeson Strategic Land Limited supports the identification of the general location for growth in the plan, given that at the time of writing we are already three years into the plan period, there is concern in regard to the lack of detail in regard to boundaries of the site and number of homes to be accommodated on each of the three site identified in Shaftesbury. The Local Plan should provide further clarity and greater definition of the site boundaries to provide certainty</p>	<p>The Local Plan should allocated housing sites that are central to the delivery of the plan (i.e. at the main settlements) and redefine settlement boundaries so that those sites could be counted as deliverable (under the terms of Paragraph 47 of the NPPF) and planning applications can be positively progressed with the Council under the plan led approach. Included with this response is a delivery statement for the land to the west of the A350. 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 areas of new green infrastructure that will benefit both new and existing residents. In taking an allocation forward it will be necessary to fully understand the capacity of the site and Gleeson would be willing to work with the Council to develop the master plan, which would facilitate an allocation and robust revision to the settlement boundary.</p>	<p>Supports growth area to West of A350. The allocation of the site and re-drawing of the settlement boundary are required to provide certainty and enable early delivery. Settlement boundary needs to be amended in Part 1.</p>

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								and enable early delivery. The NPPF, Paragraph 17m sets out the core principles of the planning system and this includes setting out a "clear strategy for allocating sufficient land which is suitable for development". The plan does not demonstrate how the housing requirement identified in the plan will be met, including clear delivery of a 5 year housing land supply, as it fails to redefine settlement boundaries by identifying the boundaries of the housing sites that are relied upon to meeting this housing need. This can only be achieved through site allocations. Without allocating sites the plan is ineffective and lacks a positive approach, further it is difficult to see how it can be justified, given that there is no clear evidence or clear allocation of the capacity that the growth locations are expected to accommodate.		
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4321	8.100	No	It is not justified	Key Spatial Aspects: This approach is prescriptive and should be driven by the impact of a sound and flexible 'Socially Sustainable' approach . The policy should be more specific in dealing with impacts i.e. conserving resources, low impact development, response to local conditions, local distinctiveness, recycling etc.		Policy should be based on the 'socially sustainable' approach.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4322	8.101	No	It is not justified	8.101 - This statement requires re drafting as Shaftesbury does not recognise the statement in terms of what has already been approved for the area. NDDC has further impacted the 'infrastructure and community facilities' by ad hoc planning applications to deal with non-compliance with planning conditions. The current status can therefore not be described as part of 'plan' but disintegration of plan.	It would be disingenuous to try and remedy the current situation without looking at the overall planning statement, impacts, social sustainability impacts etc. It is recommended that this statement is more clearly re drafted.	

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3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4323	8.107-8.109	No	It is not justified	8.107, 8.108, 8.109 - It is not deemed appropriate to address historical / conservation / and appreciation under this heading. The factors addressed under the listed headings require stating under a different heading and not lumped together under the Environment and Climate Change approach. This will create better recognition and understanding. A better understanding of the national and international importance of the historic assets of historic town centres (Shaftesbury) and open spaces are required & to be stated.		The heritage assets of Shaftesbury need to be discussed under a separate heading not lumped together with climate change.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4324	8.110	No	It has not been positively prepared	8.110 - The plan now admits to the increase in the density of the approved development, which has been publicly denied. This has a direct impact on education, density, open space, community services and facilities. If a sound and flexible 'Socially Sustainable' approach had been in place then it would be easier to address the current problems being faced by Shaftesbury. The policy now needs to be addressed following a proper socially sustainable plan being formulated which will take the lead in addressing how the created problems can be creatively addressed and resolved. This needs to be addressed in this statement.	Evidence – due to the failures in the provision & delivery it is necessary to re-evaluate what and how further development is proposed. Evidence based & socially sustainable.	Policy should be based on the 'socially sustainable' approach. Policy fails to address existing problems relating to education, open spaces and community facilities in the town.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4325	8.115	No	It is not justified	8.115 - Industrial estates are fully occupied – so provision for expansion needs to be addressed. The current plan looks at 'historical' way of doing business and does not incorporate the changes in commerce and how to accommodate the small entrepreneur and growth of business. This will have a restrictive impact.	The plan needs to address the new demographic in creativity, retail and innovation, and the potential and the impact of the internet.	Additional areas for employment growth required.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4326	8.120	No	It is not justified	Shaftesbury does not recognise the need for the plan for a 'street' in Christy's Lane.	The design can be addressed more creatively and does not require this change.	
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4327		No	It has not been positively prepared	A proper informed review is required for the 'by-pass'.		By-pass corridor should be reviewed.

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3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4328		No	It is not justified	Links between the new eastern development and town centre are an essential part of the integration of the new development with the town.	The document needs to address this current oversight and seeming impossibility of the envisaged links from the eastern development with the rest of town to the west.	Policy needs to address links between the town and new development to the east.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4329	8.124	No	It has not been positively prepared	Community Hall – it is the group’s view that a new community hall could be handled via the ‘social sustainability’ approach which would shed far better insights into how the community needs and future use are assessed. The current statement is too prescriptive although the assertion that other sites may be reviewed is a better approach and could be accommodated by the Neighbourhood Plan	Generally the document would be better presented if the Infrastructure part is presented under headings which will lead to a better understanding of the topic – disparate concepts are combined together which can only lead to a detrimental result. This whole section of the document requires addressing and rewriting and presented in a more creative and understandable manner. The impact of demographic and social sustainability is sorely lacking and needs to be addressed. This will lead to a better demarcation of ideas and better outcomes. Possible main headings could be Grey, Social, Green etc.	Policy should be based on the 'socially sustainable' approach.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4330	8.126	No	It has not been positively prepared	8.126 - Allocation of primary school and other services to be brought forward to be socially sustainable.		Infrastructure to be brought forward to be socially sustainable.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4331		No	It is not effective	There is general support for the protection of green spaces and AONB. However the plan lacks in understanding of the economic need of the protected areas, and also how commerce works with and impacts on these areas. Level areas adjacent to the proposed eastern development bypass, which are currently lumped as a grey area, i.e. Wiltshire, are the ideal areas for community green space / corridor which incorporates facilities like the football pitch.	This type of boundary situation needs to be reviewed and included, and not treated as though they do not exist in the plan. If ignored this will have a detrimental impact on the sustainability of ‘cross over’ areas such as this. The above comments need to be addressed and reviewed in the summary document .	Policy should not be restricted by county boundaries in relation to open spaces.

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	4375		No	It is not justified	<p>The identification of Shaftesbury as a market town for further growth is supported. Shaftesbury is a substantial settlement with a comprehensive range of services and facilities and a significant need for market and affordable housing. Planned growth targets for Shaftesbury should be expressed as minimum levels, as set out in our comments on Policy 6.</p> <p>The identification of the land to the south east of Wincombe Business Park (criterion h of Policy 18) as one of the main greenfield sites for development at Shaftesbury is fully supported. The site is in the control of Barratt David Wilson Homes, a major national house builder, and is identified in the SHLAA as suitable, available and achievable for development with potential for 200 dwellings (ref: 2/45/0463).</p> <p>The site comprises approximately 7.83ha of flat grass farmland of a regular rectangular shape located to the south of Wincombe Business Park and immediately west of Wincombe Lane. The site is bordered by a hedgerow to the north and west and bordered by suburban two storey semi detached and detached houses to the south and east of the site. This northern boundary hedge forms the county boundary as well as the parish boundary.</p> <p>This site benefits from a sustainable location with a range of services, jobs and facilities within easy walking distance. The site is in single ownership, is relatively flat and is well contained in the wider landscape. Barratt David Wilson Homes have undertaken a range of technical studies to confirm the suitability and deliverability of the site. It is not subject to any nature conservation designations and there are no constraints to development that cannot be dealt with by mitigation measures incorporated into the design of the site. Access would be via Wincombe Lane, subject to improvements.</p> <p>In order to provide a supply of specific, deliverable sites for development, Policy 18 should go beyond simply identifying the site for development and provide a formal allocation for housing development. The settlement boundary on the Proposals Map should be extended to include the site, and the site should be designated for housing in line with</p>	<p>Delete the Environment and Climate Change section of Policy 18 as this is covered elsewhere in the plan. Make the following amendments to the Meeting Housing Needs section Policy 18: 'At least 1,140 homes will be provided at Shaftesbury..... together with the development of the following greenfield sites, which are allocated for housing development as shown on the Proposals Maps:'</p> <p>Delete the following text from Policy 18: The route of the Shaftesbury Outer Eastern By-pass will continue to be protected from development that would prejudice its implementation in the longer term.</p> <p>Delete criterion q from Policy 18.</p> <p>Add a new paragraph under the Meeting Housing Needs section of Policy 18 to set out a framework for joint working with Wiltshire Council to meet the growth needs of Shaftesbury: The district council will work with Wiltshire Council to bring forward land for housing development adjoining the site identified for development south east of Wincombe Business Park in order to meet the longer term growth needs of Shaftesbury.</p> <p>Amend paragraph 8.1110 as follows: It is anticipated that at least 1,140 dwellings will be built in Shaftesbury between 2011 and 2026.</p> <p>Amend the second sentence of paragraph 8.111 as follows: 'Two further extensions have also been identified ...'</p>	<p>Supports growth area to south east of Wincombe Business Park. Possible expansion of the site into Wiltshire. Further clarity and greater definition of the site boundary is required to provide certainty and enable early delivery. Settlement boundary needs to be amended in Part 1.</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>paragraph 157 of the NPPF. Policy 18 states that the route of the Shaftesbury Outer Eastern By-pass will continue to be protected from development that would prejudice its development in the longer term. This proposal is a long standing aspiration but there are no current plans for its implementation due to funding. The safeguarded route is set out in Policy SB18 of the adopted Local Plan, but is based on previous plans dating back approximately 15-20 years. The ongoing justification for the safeguarding of this route is questioned given the lack of certainty over delivery. It is noted at paragraph 8.89 that there are a limited number of potentially developable sites for the further expansion of Shaftesbury. Further opportunities to extend the land identified for development south east of Wincombe Business Park to include the adjoining field to the north, which lies within the administrative boundary of Wiltshire Council, should be explored through joint working with Wiltshire Council. The adjoining land is similar character to the area identified for development, and is in the same ownership. Its development potential should not be overlooked simply due to the County boundary.</p>		
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4378		No	It is not justified	As set out in our response to Policy 18, land to the south east Wincombe Business Park (criterion h of Policy 18) should be included within the settlement boundary for Shaftesbury and designated for housing development.	Amend proposals maps	Settlement boundary needs to be amended in Part 1 to include land south east of Wincombe Business Park.
3092	Frank Heels			4652	8.122	No	It is not justified	Disagrees with the location of the proposed link road between B3081 and A30. In his experience the right hand bend at Motcombe Road slows traffic and reduces accidents. Rather than a new (and costly link road) to solve this problem he suggests that Lox Lane is upgraded instead. This road already exists and is used as an access to A30. By simply providing a turning lane on B3081 the cost of a link road would be greatly reduced.		Alternative route for B3081 and A30 link road is suggested using Lox Lane.

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

Policy 19 – Sturminster Newton

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	4237	8.147	Yes				
404	Michael Holm	Environment Agency		4224		Yes		The comment we recommend to Policy 19 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.	Please add the words 'flooding and' before the words 'climate change' in the sentence directly below the 'Environment and Climate Change' heading.	strengthen wording in relation to flooding
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4464		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Hall & Woodhouse support the identification of Sturminster Newton as one of the main towns within the District where development is to be directed. However, the Sustainable Development Strategy should prioritise that development and redevelopment will first be directed to within the existing settlement area, before necessitating small scale green field extensions to the settlement boundary. Consequently statement e) under Meeting Housing Needs should provide for infilling, development and redevelopment within the settlement boundary to ensure that all opportunities within the existing settlement boundary are prioritised. This approach would safeguard countryside beyond the existing settlement boundaries and ensure that priority is given to strengthening the existing settlement within its defined boundary. The proposed amendments would ensure that the policy was justified and effective and in accordance with national guidance.	Under Sustainable Development Strategy amend (a) to read: a) Development and redevelopment within the existing settlement boundary Under Meeting Housing Needs, replace: e) infilling and redevelopment within the settlement boundary, including.... with e) infilling, development and redevelopment within the settlement boundary, including.... Consideration should be given to rewording to make clear that development within the settlement boundaries should take priority over greenfield development beyond the settlement limits.	Development within the settlement boundary should be considered in preference to greenfield extensions

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	4197					As set out in our response to Policy 19, land to the east of the former Creamery site (criterion h of Policy 10) should be included within the settlement boundary for Sturminster Newton and designated for housing in line with the illustrative development plan submitted in support of our previous representations on this matter.	The settlement boundary should be amended at this stage to include all sites proposed for housing growth including the site at Elm Close.
769	Tim Hoskinson	Savills	Taylor Wimpey	4194	8.146, 8.168	No	It is not justified	<p>The continued identification of the land to the east of the former Creamery site as one of the main greenfield sites for development at Sturminster Newton is fully supported. This site benefits from a sustainable location with good connectivity to the town centre and a range of services, jobs and facilities within easy walking distance. The site is in single ownership, is relatively flat and is well contained in the wider landscape. It is not subject to any nature conservation designations and there are no constraints to development that cannot be dealt with by mitigation measures incorporated into the design of the site.</p> <p>The site is in the control of Taylor Wimpey, a major national house builder, and is available and deliverable now. In view of the site's sustainability credentials, including its proximity to the town centre compared to other alternative sites, and the lack of any significant constraints to development, Policy 19 should go beyond simply identifying the site for development to provide a formal allocation for housing development. The settlement boundary on the Proposals Map should be extended to include the site and designated for housing in line with the illustrative development plan submitted in support of our previous representations on this matter.</p> <p>The landowner has previously indicated a willingness to provide allotments on nearby land at Elm Close Farm also within their ownership, however the requirement at paragraph 8.168 and criterion r of Policy 19 for allotments to be located on land at the end of Elm Close, between Elm Close and the Trailway</p>	<p>Delete the Environment and Climate Change section of Policy 19 as this is covered elsewhere in the plan.</p> <p>Make the following amendments to the Meeting Housing Needs section Policy 19: 'At least 380 homes will be provided at Sturminster Newton..... together with the development of the following greenfield sites, which are allocated for housing development as shown on the Proposals Maps:</p> <p>Amend criterion r of Policy 19 as follows: additional allotments will be provided in or on the edge of the town, including consideration of land at Elm Close Farm.</p> <p>Amend paragraph 8.146 as follows: It is anticipated that at least 380 dwellings will be build in Sturminster Newton between 2011 and 2026.</p> <p>Delete the last sentence of paragraph 8.168</p>	The site at Elm Close should be allocated for development in Local Plan Part 1. The requirements to provide allotments on the Elm Close site should be removed.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested change	Summary of Main Issues
								would impact on the developable area of the site and is not justified. Planned growth targets for Sturminster Newton should be expressed as minimum levels, as set out in our comments on Policy 6.		
3062	Valerie Bridge			4241				William Barnes School is full to bursting point. When local builders yard is built and library and police station are demolished with flats and houses built, there will be a number of new residents with more children. The proposed development of 90 dwellings would be a huge extra burden. The proposed relocation of William Barnes School to an area adjacent to the High School is not ideal as it would be difficult to access and there would be traffic problems	Relocation of the school is therefore of prime importance. Suggest that the development site (North of the Livestock Market) would provide an excellent opportunity as it is close to young families. Older children could continue to use the permissive paths, safe from main roads. The open field would be ideal for a school field with easy access to a wildlife study area protected for great crested newts	William Barnes School is at capacity and needs to be relocated. Land to the north of the livestock market is a suggested location.
3062	Valerie Bridge			4242				Any added dwellings in this area would bring lots of extra residents who will need to use the roads, park their cars, travel to work daily, find jobs... Where?		Traffic in the town as a result of new development on land north of the livestock market.
3062	Valerie Bridge			4243				The fields presently drain the local land around the site already built on effectively; dense building here could pose extra pressure, with possibility of flooding, given extreme and wetter winters are being predicted		Flood risk especially surface water flooding as a result of developing land north of the livestock market.
3062	Valerie Bridge			4244				The local small Co-op would need to be replaced, rebuilt, re sited again, with more parking provided. The library building will need to be replaced, as well as access to a police service in some building . GP access would need to be increased.		Need for expanded retail. need for expanded GP. need for expanded parking as a result of developing land north of the livestock market.
3062	Valerie Bridge			4245				The badgers identified as active and monitored on site cannot be relocated if the site is built on for obvious reasons; the Badger Protection Act of 1994 makes very clear that the use of machinery of any sort near any setts is strictly defined and controlled by law.		Concerned about impact on badges from developing land north of the livestock market.

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

Policy 20 – The Countryside

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		4120		Yes		The countryside policy appears acceptable but would like to see the wording made clearer to ensure that the future interpretation, once adopted, ensures pragmatism and a more balanced view to be adopted, in line with the wider NPPF guidance.		
349	Mike Burt	Okeford Fitzpaine Parish Council and DAPTC		4656		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	Policy 20 is too restrictive to allow villages to meet their own needs.	Policy 20 needs to be made more flexible and cater for those who wish to have development and those who choose not to.	Policy is too restrictive and does not allow villages to meet their own needs
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4462		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Objection is raised to this policy given the fundamental objection which has already been raised to Policy 2 and the Development Strategy as well as Policy 6 on Housing Distribution. A strong objection is raised 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 and taken forward to Policy 20 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	Change: Development in the countryside (including Stalbridge and the villages) outside the defined settlement boundaries of Blandford, Gillingham, Shaftesbury and Sturminster Newton will only be permitted if..... To: Development in the countryside outside the defined settlement boundaries will only be permitted if..... This amendment relates to the objections to policies 2 and 6 and the proposed deletion of settlement boundaries. This suggested amendment reflects the objections to those policies, which seek the retention of all settlement boundaries.	Policy is too restrictive and will does not support thriving rural communities. It will not deliver a wide choice of homes where population live and will result in a moratorium on development in a very large area of the District until the parishes decide if their want to prepare a neighbourhood plan or 'opt in' to Part 2 site allocations. Suggest that existing settlement boundaries are retained and that they are formally reviewed in Part 2 or through the neighbourhood planning process.

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>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. 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> <p>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. 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. This policy should therefore only relate to the genuine countryside and not to any existing settlement which currently has a settlement boundary in the existing Local Plan 2003. The proposed word changing would not preclude subsequent changes to settlement boundaries in the next stage of the Local Plan or in a Neighbourhood Plan but would allow a more positive approach to the development and redevelopment within existing villages in the interim period. This would make the policy more positive and effective and in line with government policy.</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	4214		No	It is not consistent with national policy	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 Section 5 of his letter of 2 December 2013, copy enclosed.	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.	Policy is too restrictive and will not deliver the homes that are needed in rural areas. Approach will lead to a long period of uncertainty as parishes decide what approach they wish to take. Suggest that existing settlement boundaries are retained and that they are formally reviewed in Part 2 or through the neighbourhood planning process.
1594	Diccon Carpendale	Brimble Lea & Partners		4201	8.170 to 8.194	No	It is not consistent with national policy	The approach proposed for the countryside is reflected in the preceding text and policy 20 seeks to prevent further development in the countryside other than in exceptional circumstances. In particular it sees housing development only being brought forward through the Neighbourhood Plan or Opt-In processes. This runs counter to the NPPF and in particular the Core Planning Principles in para 17, advice on supporting a prosperous rural economy in para 28 and delivering a wide choice of high quality homes including within the countryside in para 55.	The policy should be rewritten. The existing settlement boundaries should be retained and development allowed within them. These boundaries can be reviewed through the Neighbourhood Plan process or by a subsequent Site Allocations Development Plan Document which can consider whether it would be appropriate to allow additional development beyond current settlement boundaries (and to redraw such boundaries).	Policy is too restrictive and does not support a prosperous rural economy or deliver a wide choice of high quality homes in the countryside in line with national policy. Suggest that existing settlement boundaries are retained and that they are formally reviewed in Part 2 or through the neighbourhood planning process.

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)	4539		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	there is no mention of development to meet 'local needs'. It appears to be restricted to 'essential rural needs' or 'overriding needs', which differ from local needs.		Policy is unclear in terms of 'local needs'
2989	Sarah Hamilton-Foyn	Pegasus Planning Group	Messrs Drake	4552		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 policy, in particular the definition of the countryside which is defined as all land outside the settlement boundaries of the District's four main towns. (It is also noted that the settlement boundaries around Stalbridge and the district's larger villages i.e. that were in the adopted District Plan of 2003 will no longer apply for development management purposes). An objection is made to the application of countryside policies to these settlements.</p> <p>The policy as proposed restricts development in Stalbridge and the larger villages and is reliant on a "fine grained" assessment of the needs of Stalbridge and the villages to be made by local communities which can then be addressed through neighbourhood planning. However, it is not clear how this will be delivered during the plan period. Whilst it is acknowledged that in order to achieve sustainable development the majority of housing growth will take place in the more sustainable settlements, it is nevertheless considered that the plan needs to facilitate development in the larger villages with a range of facilities and services. An objection is therefore made to the "blanket approach" of restraint, this is considered to be inconsistent with para 55 of the NPPF.</p> <p>It is noted in para 8.175 that the plan states that although the emphasis in the countryside is on restraint, the Council will permit some forms of development to support the rural economy and meet essential rural needs. This is to be achieved by identifying those types of development that may be appropriate in the countryside and establishing the test of "overriding need." The type of development that may be appropriate in the countryside is given in Figure 8.5 and in terms of meeting housing needs:- includes rural exceptions schemes, occupational dwellings, and the re-use of redundant buildings. It is</p>	<p>It is considered that the approach to development in the larger villages is too restrictive and not consistent with the NPPF which states in para 55 that to promote development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and where there are groups of smaller settlements, development in one village may support services in a village nearby.</p> <p>The approach set out in the draft Core Strategy focusing a proportion of development towards Stalbridge and 18 of the districts larger villages of which Child Okeford is identified, should be reconsidered albeit not to accommodate a significant proportion of strategic housing growth, but to accommodate growth to meet local housing needs.</p> <p>There should be a policy framework for the larger villages, to provide the context for local housing needs and also neighbourhood planning. The ambitions 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. The NPPF states that to facilitate this, local planning authorities should set out clearly their strategic</p>	Policy is too restrictive and not consistent with national policy. The larger more sustainable villages need a policy framework to provide a context for local housing needs so neighbourhood plans can be in general conformity with the strategic needs and priorities of the the Local Plan.

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>noted that para 8.180 states that where a local need for rural exception affordable housing can be demonstrated, new affordable housing may be allowed (Policy 9) and that the policy also includes criteria setting out when small numbers of market housing may be permitted in rural exception schemes.</p> <p>Whilst the Council's approach to permit small sites for rural exception affordable housing within or on the edge of the existing built up areas of Stalbridge or the districts villages is supported, this is only to meet strictly local needs. The Council may also allow a small number of market homes as an integrated part of a rural exception schemes, but only as a last resort to contribute towards a funding gap for the provision of the rural exception affordable housing on the site and provided that any market housing is similar or smaller in size and type to the rural exception affordable homes being proposed.</p>	<p>policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them.</p> <p>As currently proposed it is considered that the Local Plans approach is too restrictive and does not provide a framework for Neighbourhood Plans or enable local housing needs to be met which will enhance or maintain the vitality of rural communities.</p>	
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4333		No		<p>Development boundaries for small towns/ village have been removed and now fall within 'countryside'. This is more restrictive in terms of development. These places don't have the funds, expertise and will to develop Neighbourhood Plans, leaving them at a distinctive disadvantage.</p>	<p>Provision must be made to facilitate development beyond settlements to facilitate sustainable communities, growth, job creation and provision of housing.</p>	Policy is too restrictive
3073	Suzanne Keene	CPRE North Dorset Branch		4391		No	It is not effective	<p>Policy 20 - CPRE welcome the commitment to confine development to the four main towns in North Dorset within policy constraints. Para 8.186 Rural exceptions - Isolated dwellings of exceptional quality or innovative design" should be truly exceptional. They are just as intrusive and destructive of the landscape as any other development and the same arguments about non-sustainability due to lack of services and non-car transport apply as to any other dwelling in the countryside.</p>	<p>Re-word Policy 20 and para 8.186 to make it clear that such dwellings will be truly exceptional and that availability of services, public transport etc will be taken into account.</p>	<p>Further guidance is required on 'exceptional quality or innovative design' of isolated houses in terms of sustainability of locations.</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
3083	Edward Dyke	Symonds and Sampson	Mr Michael Miller	4542		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	<p>The NPPF directs Local Planning Authorities to support the thriving rural communities, the NDLP fails to do this in a number of respects as identified in this representation. We feel the NDDC is shunning it’s responsibility to the rural community, the removal of the settlement boundaries by Policy 2 affectively removes their responsibility for development.</p> <ul style="list-style-type: none"> • NDDC’s intention to remove the settlement boundaries around the district’s villages will have far reaching implications on the rural economy and we do not believe NDDC has properly considered these. This is in conflict with the Core Spatial Strategy which states the rural economy will be supported. • The organic growth of the villages and rural communities at a relatively slow pace in comparison to the larger towns supports a variety of smaller business’ that have developed to meet this need – for example small architects, planning consultants and builders/developers. We fear that these types of business’ will become largely redundant if sustainable development of the rural villages and communities halts as a result of the policies and proposals set out in the draft NDLP. In addition the equity released by small scale development such as these is reinvested into the rural economy. 	We suggest that the blanket removal of settlement boundaries need to be removed and the boundaries retained where appropriate.	Policy is too restrictive and does not support a prosperous rural economy in line with national policy. Suggest that existing settlement boundaries are retained.

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

Policy 21 – Gillingham Strategic Site Allocation

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4121		No	It is not justified	The policy does not consider the wider reaching impact on the already inadequate transport and road network infrastructure. Sufficient enhancement of the commuting road network to the east (Shaftesbury) and south of Gillingham have not been considered. This large scale additional development needs investment in the surrounding roads and transport links as the impact on neighbouring towns and development will be substantial.		Policy needs to consider wider impacts on the transportation network
378	Simon Rutter	Proctor Watts Cole Rutter		4358		No	It has not been positively prepared	There is no infrastructure planned to assist Gillingham town to become a more functional and successful town in managing the distribution of its development and improvement of its town centre exposing a lack of vision in this policy.		Policy does not consider town centre infrastructure and improvements.
403	Rohan Torkildsen	English Heritage		4575		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Is the local authority able to clarify what technical historic environment evidence has been gathered and applied to inform the appropriate location of development within the setting of the Kings Court Palace Scheduled Monument adjacent to the Gillingham Southern Extension (Policy 21)?		The policy does not refer to technical environmental evidence or clarify whether the development would cause harm to the setting of an Ancient Monument.
404	Michael Holm	Environment Agency		4225		Yes		The comment we recommend to Policy 21 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.	Please add the words 'flooding and' before the words 'climate change' in the sentence directly below the 'Climate Change' heading.	EA Policy is sound.
409	Andy Foyne	South Somerset District Council		4013				South Somerset District Council have no objection to Policy 21: Gillingham Strategic Site Allocation and no other comments to make regarding the remainder of the proposals as set out in the Pre-submission Local Plan		No objection to Policy 21.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
1578	Sarah Hamilton-Foyn	Pegasus Planning Group	Persimmon Homes (Shaun Pettitt), Mr & Mrs Hookings & Mr Sweeney	4309		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Whilst Persimmon supports the principle of growth to Gillingham, being one of the main towns in the district, concerns are raised about the strategy for the town and the district being reliant on one strategic allocation in the Plan. Indeed the southern extension is the largest and most significant development proposed for North Dorset in the Local Plan Part 1. It is noted that the proposed allocation requires improved transport links and enhanced green infrastructure network and that these are indicated in the IDP to come forward after 2016. However, as part of the Master Plan Framework, a phasing plan and associated implementation strategy is required. This is to include the developer’s proposal regarding the funding and delivery of the master plan components and should set out the proposals for securing appropriate financial contributions from all the southern extension development towards all relevant infrastructure. As currently proposed it is not clear what the trajectory is for the development of the southern extension. There is a particular issue with New Road (B3092)/Shaftesbury Road (B3081) junction and the itegration of this junction with the Le Neubourg Way /Newbury mini roundabout. These junctions are very close to the bridge that provides the only vehicular crossing point over the railway into the town. The Plan states that the upgrading of the New Road (B3092)/Shaftesbury Road (B3081) junctions and the Le Neubourg Way/Newbury mini roundabout to increase capacity should be secured through the Master Plan Framework and subsequent planning application. The Plan anticipates that improvements to other junctions in the Shaftesbury Road / Le Neubourg Way corridor to increase the capacity of the main north/south route through the town will be secured, but there does not appear to be evidence of any viability work having been undertaken to support the allocation and infrastructure requirements. Given the importance of this strategic urban extension to the strategy for Gillingham and the district Plan it is surprising that no detailed work has been undertaken to illustrate how the infrastructure requirements will be met as a result of 1,800 dwellings. The IDP states that the expansion of</p>	<p>An additional policy should be included in the plan to allocate land at Windyridge Farm for a first phase of 150 dwellings to provide flexibility and choice as set out in the NPPF and provide land to facilitate the required expansion of Gillingham High School (which adjoins the site), with the balance of the site allocated as a reserve site to meet housing needs in the plan period</p>	<p>The policy describes a development heavily dependent on infrastructure provision. Allocating additional land at Windyridge Farm could provide land that it is assumed could assist in delivery of one part of that infrastructure i.e. the expansion of the High School.</p>

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								<p>Gillingham High School will be after 2016 at a cost of £5,400,000 and the main source of funding will be developer contributions. The new 2FE primary school is also anticipated after 2016 at a cost of £4,965,000 and will be funded by the Basic Need Programme and Developer contributions. In terms of highways infrastructure the development is expected to contribute towards the provision of a new link road between the B3081 and the A30 at Enmore Green. Other off site requirements set out in Policy 21 are improvements to increase the capacity of the New Road (B3092) and Shaftesbury Road (B3081) junction, improvements in the Shaftesbury Road / Le Neubourg Way corridor, other off site measures include the enhancement of Gillingham Railway Station and the completion of gaps in the cycle and pedestrian route networks between the town and the southern urban extension and measures to support the use of public transport.</p>		
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4606		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 SSA will be implemented over a 20 year period. It is essential therefore that development can respond to changing needs. Whilst it is important to identify strategic objectives for the SSA, the level of prescription in the draft policy can only serve to frustrate delivery by affording opportunities for challenge. Matters of specific detail should be left for determination at the application stage, which of course the Council retains full control over. Policy 21 – Gillingham Strategic Site Allocation (SSA) reads as an inflexible policy with numerous duplicated prescriptive requirements. Lack of flexibility in the wording of the policy includes, for example:</p> <ul style="list-style-type: none"> · The inclusion of a detailed concept plan at P.245 and ‘southern extension proposals map’ (p.261) limits innovation and flexibility in the masterplanning process where the detailed positioning of uses, roadways, open space will be carefully assessed to respond flexibly to site conditions and changing circumstances; · Specific space requirements for uses (e.g. recreation spaces – Policy 21 (cc) – (dd)) limit the ability to respond flexibly to changing requirements over time; 	<p>It is our view that, being a strategic policy, Policy 21 should simply set out clearly the aspirational and strategic requirements (i.e. the ‘overarching vision’) for the Gillingham SSA and, in accordance with the presumption in favour of sustainable development, allow for a greater amount of flexibility to come forward through the master plan framework process and thereafter the application process. It is this layering effect which the plan, as currently drafted, fails to recognise. In removing the inflexible requirements from Policy 21, the site’s developers and the Council will be able to adapt quickly and responsively to any change in circumstances which might arise at a later stage through the masterplanning and planning application stages of the development. Where detailed policy is required on the form of</p>	<p>The policy should be more flexible and less prescriptive, leaving matters of detail to the application stage.</p>

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								<ul style="list-style-type: none"> · Requirements to meet the ‘Government’s Zero Carbon Buildings policy’ potentially limits the flexibility in delivering housing on the site; · The requirements for infrastructure delivery and location are inflexible. For example, the requirement for the local centre to be positioned at Kingsmead Business Park and a new school should be positioned within it; · Detailed highways requirements set out at Policy (s) to (x) do not allow for flexible adaptation and response to changing circumstances. 	development generally this should be set out in the detailed Development Management Policies, although even at this stage recognition of site specific circumstances is required.	
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4609		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	A lack of flexibility in the policy requirements for the Gillingham SSA could potentially have significant impacts upon scheme viability. The NPPF sets out that ‘pursuing sustainable development required careful attention to viability and costs in plan-making and decision taking. Plans should be deliverable’. Inflexible requirements which do not allow adaptation, and might ultimately place additional financial burdens upon the development, can impact significantly upon scheme viability. The consequence of this might be the inability to deliver on certain aspects of the development, such as affordable housing, given the need to ensure the strategic infrastructure required to mitigate impacts arising from the scheme must be delivered (e.g. education).	Policies should be simplified to allow flexibility and adaptability whilst setting out the strategic and aspirational spatial vision for the District. This particularly includes Policy 21.	The policy should be simplified to allow flexibility and adaptability.
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4612		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	In Policy 21, requirements found elsewhere within the plan (e.g. Policy 3 – Climate Change, Policy 8 – Affordable Housing and the infrastructure policies 13,14 and 15), are repeated. Their duplication is wholly unnecessary.	For clarity, Policy 21 should be revised to remove duplicate policy requirements. In consideration of planning application(s) for the SSA, the Council would in any case have to have regard to these other policies forming part of the Development Plan.	The policy should not repeat or duplicate requirements set out elsewhere in the Plan.

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1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4613		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>Policy 21 is unclear in respect of the role and function of the Master Plan Framework. The policy gives no certainty to the site developers in respect of the role, purpose and status of the master plan exercise to be submitted to the Council. The SSA can only be developed effectively with a co-ordinated approach based upon high-level strategic priorities and the need for a clear and phased subsequent master plan process is supported by our client. The master plan consultation exercises already carried out have been valuable and will be built upon in the master planning exercise. However, we raise concern over the lack of clarity in the policy over the master planning requirements; firstly, over the flexibility available in the master planning exercise as a result of an overly prescriptive policy and secondly, over the lack of procedural clarity pertaining to the status of the master plan framework once agreed with the Council.</p> <p>In respect of the first point, as currently drafted Policy 21 includes an unnecessarily high level of detail in relation to the layout of the SSA (in particular maps at p.261 and p.245) and details such as highway infrastructure and open space requirements. To ensure flexibility, we suggest that such detailed matters would be better left to the master planning process which will be used to comprehensively consider the most desirable use and form of land across the SSA area and take on board local consultation. The policy reduces the flexibility available in the master planning process at present and could limit the best viable option coming forward. The Plan does not provide clarity as to whether a more appropriate (physical) form of development might be considered by the Council. For example, the master planning exercise might result in a more appropriate location for the proposed local centre and the position of any new school to meet currently anticipated needs. Paragraph 157 of the NPPF requires no more from the Local Plan than to allocate land with flexibility in the uses of land ‘and provide detail on form, scale, access and quantum of development where appropriate’ (underlined for emphasis). There is no requirement therefore within the NPPF to provide</p>		The Policy gives too detailed prescription and the status of the Master Plan Framework is unclear. An early phase of development at Ham Farm is proposed to fund transport infrastructure requirements required early in the development.

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								<p>the amount of prescription included within Policy 21 as matters of urban form, open space and infrastructure can be agreed through the master planning exercise.</p> <p>What is important is that policy should give clear direction on strategic matters for the SSA implementation. For example key strategic infrastructure such as improvements to key highway junctions are essential to be brought forward in a timely manner to unlock development capacity. To cover the cost of this an early phase of development at Ham Farm is proposed (as identified in the revised policy wording in the Consortium Representations). Failure to do so could create investor uncertainty which can only serve to frustrate delivery.</p> <p>In relation to the second point, the policy does not make it clear what status the masterplan framework would carry and therefore what weight it would hold at planning application stage. The only requirement is for the masterplan to be 'agreed' by the Council. This implies then that it could only be treated as an informal document and, assuming development plan compliance, subsequent planning applications could presumably vary from its contents. The lack of clarity here in the role of the masterplan raises uncertainties in the decision making process.</p>		

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1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4614		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>In relation to Policy 21 and the Gillingham SSA, paragraph 9.23 of the Local Plan indicates that: “In so far as it is relevant, the Council will look to secure financial contributions through its charging schedule produced for the purposes of the Community Infrastructure Levy (CIL)”</p> <p>We understand that the Council is currently in the process of preparing its Draft Community Infrastructure Levy Charging Schedule.</p> <p>In our experience, for a large strategic allocation such as this where a large number of specific phased infrastructure requirements are generated over the course of the plan, there are advantages in exempting SSA development from CIL as a zero rated development with all types of infrastructure then secured through s.106.</p> <p>The advantages of this approach to the Council and the local community would be:</p> <ul style="list-style-type: none"> · Increased certainty of delivery – the specific objectively assessed infrastructure requirements will be identified and delivery phased during construction of the SSA; · Clear triggers for delivery – the timing of infrastructure delivery can be properly assessed so that infrastructure is delivered at the point that it is required with certainty. This allows for a phased approach to delivery of infrastructure throughout the SSA delivery over the Plan period; and · Impact on SSA viability – certainty over the delivery of infrastructure throughout the life of the development allows for better development cost planning and reduces risk to site viability over the whole plan period. 	The SSA development should be exempted from CIL as a zero rated development.	The Policy should exempt the SSA from CIL.
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4615		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	As a general point Policy 21 should treat the delivery of housing as a priority and set this out from the outset. The primary purpose of the allocation is to meet the District’s identified housing needs.		The Policy does not set out its primary purpose as being to meet the identified housing need.

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1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4616		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The primary purpose of the allocation is to meet the District’s identified housing needs and with this in mind, we question whether there is a need to include the proposed employment growth area to the south of Brickfields as being part of this SSA at all. The delivery of housing here is not, and should not, be aligned in anyway to further development at Brickfields. The two areas are physically separated by the B3092 New Road and it would be in the interests of proper planning to separate these areas as two separate allocations to give better certainty and clarity over the delivery of housing within the SSA.	It would be in the interests of proper planning to separate these areas as two separate allocations to give better certainty and clarity over the delivery of housing within the SSA.	The housing and employment elements of the SSA should be the subject of two separate allocations.
1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4617		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 21(k) requires the masterplan ‘to show how the site will be developed with about 1,800 homes in total’ and Policy 21(l) requires it to: “show how the delivery of housing will be phased over time making provision for about 1,240 homes to be delivered on the SSA in the period up to 2026, unless a different figure for the provision of housing within the plan period can be justified and agreed with the Council.” We support the flexibility in housing delivery alluded to in this part of the policy, but suggest that it is reworded to provide certainty that 1,240 homes is not a cap on the number of homes to be brought forward within the plan period and that ‘about 1,800 homes’ should not be read as an overall cap on the SSA. To ‘boost significantly the supply of housing’ within the District there should be no implied cap on housing that can be delivered either within or beyond the Plan period.		The numbers of houses set out in the Policy should not be seen as a cap, either in the period up to 2026 or overall.

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1601	Will Edmonds	Montagu Evans LLP	Welbeck Strategic Land Ltd	4618		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	The NPPF requires the plan to meet ‘objectively assessed development and infrastructure requirements’; infrastructure requirements must be supported by an objective evidence base. The Draft Local Plan suffers in this respect in relation to some of the infrastructure requirements identified in Policies 13, 14, 15 and particularly Policy 21. In relation to Policy 21 these deficiencies in the evidence base include for example: <ul style="list-style-type: none"> · Climate Change – 21(e) – there is no objective evidence in support of a ‘district heating scheme’; · Transportation – 21(v) - there is a lack of objective evidence to support the need for contributions towards junction improvements between the B3081 and the A30 in Shaftesbury, some distance from the site. There is no objective evidence to support the railway station upgrade requirement; · Other Grey Infrastructure – 21(y) – lack of objective evidence to support requirements for sewage and sewer works, utilities and telecommunications networks. These needs should be identified as part of the detailed assessment of proposals on the SSA; · Social Infrastructure – The need for social infrastructure has not been objectively assessed (including the need for a 2 form entry school, nursery health facilities, community and sports facilities, allotments, fire station upgrade and extra care provision. 	Evidence should be presented by the Council to demonstrate that all infrastructure requirements identified in the plan have been objectively assessed, otherwise they should be removed.	The Policy doesn't substantiate the infrastructure requirements by identification of the objective evidence.
2784	Alison Appleby	Natural England		4570	9.45	Yes		With regards to the Gillingham Strategic Site Allocation we welcome 9.45 which refers to the habitats and species which will require specific consideration at this site.		Policy is sound and reference to habitats and species is welcomed.
2920	Matthew Kendrick	Grass Roots Planning Ltd	Hopkins Developments Ltd	4145		No	It is not justified, It is not effective	We do not object to any of the social/community facilities proposed subject to the master plan proposals for the southern extension including phasing arrangements for these facilities that allow for a land equalisation agreement between HDL and the housing developers. We do however strongly object to the reference that only small convenience stores should be accommodated at Kingsmead Business Park. The restriction mentioned in the supporting text is not based on any objectively assessed evidence. Therefore such a restriction is unfounded, unnecessary, anticompetitive and	Policy 21 should be amended to remove reference to small convenience shops and the associated floor space restrictions mentioned in the supporting text, should include reference to the potential to accommodate appropriate comparison good shops, A3 and A4 establishments and other uses that demonstrate synergies with existing and anticipated users of the local centre and adjacent land.	Support the Policy proposal for location and uses at the Local Centre. However, the Policy does not identify large enough retail floorspace at the Local Centre to make it viable.

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								<p>accordingly unsound. A restriction would severely restrict the range of potential operators that could be accommodated within the neighbourhood centre and therefore the viability of the centre as a whole. We do not see the rationale behind this restriction and strongly consider that it would severely curtail the range of operators that would be interested in locating here, thereby affecting the viability of this centre which is the corenerstone of the wider southern extension. Demand for convenience floor space generated by the new housing in the town alone will equate to close to 10,000 sqft. Given that nearly all of this housing will be located in the south of the town, which is a considerable distance from the existing town centre, and given the constrained nature of the town centre itself, we consider that any convenience store located in the neighbourhood centre be at least 10000 sqft in size. This would allow the option for other essential facilities such as a post office or pharmacy to be accommodated within such a facility. Also consider that comparison floor space may be appropriate in this location and the fact that bulky comparison goods may be better accommodated in an out of town location given the constrained nature of the existing town centre. The existing useage of Kingsmead Business Park should not simply be abandoned and if further demand for employment space occurs, it should be permitted as long as it is not at the expense of essential community facilities. Such an approach will continue to foster successful businesses in this part of the town, which will provide employment opportunities close to new residents. Ham area is poorly served in terms of access to convenience shops, with most facilities being a considerable walk from existing properties which leads to an over reliance on the private motor car.</p>	(exact wording suggestion on page 12 of representation)	

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2920	Matthew Kendrick	Grass Roots Planning Ltd	Hopkins Developments Ltd	4151		No	It is not effective	We fully support the Council's intention to ensure that development of the Southern Extension of Gillingham does not proceed until a master plan framework has been put in place and the confirmation that this should include a robust mechanism to ensure that this development is delivered in a coordinated manner. If housing development was to come forward without the required retail, social and community facilities located within this centre then an unacceptable burden would be placed on existing infrastructure and the development itself would be unsustainable because new residents would be overly reliant on the private car to access such facilities elsewhere in the town and beyond. HDL owns the majority of the land that has been identified to accommodate the local centre. The range of uses to be accommodated within the local centre have extremely low commercial values and any developer would be unlikely to release land for such uses, without a land agreement being in place with the developers of the housing. Alternatively S106 contributions need to be secured from the new housing to take into account the cost of purchasing land at Kingsmead based on current allocation for business uses.	We consider that a land equalisation agreement represents the best approach to tackle this issue to allow the local centre to come forward in a more logical and well planned manner. The policy should be amended to include reference to land equalisation or increased S106 contributions to ensure that the local centre is delivered as housing development comes forward.	Full support of the policy proposal to have a MPF in place to ensure co-ordinated development.
2920	Matthew Kendrick	Grass Roots Planning Ltd	Hopkins Developments Ltd	4153		No	It is not justified	In connection with the access proposals, we generally support the policy proposals put forward. The one exception to this relates to the reference under criterion t which refers to "Links from the southern extension into the existing built-up area of the town should be primarily for pedestrians and cycles". We agree that traffic entering existing residential areas from future development parcels should be controlled, there is concern that in some parts of the Southern Extension, restricting all of the access points to pedestrians and cycles could be detrimental to the goal of creating permeable new development areas. Main concern relates to the land allocated for residential development adjacent to Lodden lakes.	Main access is likely to be proposed south of the lakes themselves however some form of vehicular access should be provided to the north via Meadowcroft or The Meadows to avoid this part of the southern extension becoming a cul-de-sac. Additionally, these access points should be provided for emergency access.	Policy proposals for access generally supported, however the restriction of access points being used for mainly walking and cycling is too restrictive, particularly at Lodden Lakes.

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2922	Belinda Ridout			4080	9.60 - 9.71	No	It has not been positively prepared	Does not agree with the objectively assessed infrastructure requirements. Concerned that the principal street through SSA will become increasingly busy with high volumes of traffic and large numbers of HGV vehicles trying to avoid congestion at the New Road/Shafesbury Road Junction. Para 9.71 recognises the capacity issues with the junction and proposes improvements, but further down the road between the junction and the entrance of Brickfields Industrial Estate there are further safety and congestion issues. This are not considered in the plan.	The vehicular use of New Road, from Brickfields to the New Road/Shafesbury junction needs to be restricted to vehicles up to 7.5ton as is the centre of town. This would help to alleviate the problems of congestion caused by HGVs trying to pass each other at the sharp bend and on the approach to the junction.	Policy does not specifically address existing and potential future traffic issues between Brickfields and the junction of the B3092 and B3081.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4465		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	These representations are submitted on behalf of CG Fry & Son, Welbeck Land, Taylor Wimpey, and the landowners at Newhouse Farm. Together the land owners and developers control approximately 95 hectares of land to the south of Gillingham, comprising 80% of the total site area within the proposed strategic allocation for the southern extension of Gillingham. These four parties are working together as a consortium to ensure a co-ordinated approach to the delivery of the Gillingham Strategic Site Allocation (SSA). These representations have been prepared jointly by the professional advisors of these companies and landowners The consortium welcomes the significant progress on the plan which has been made since the publication of the draft New Plan for North Dorset in March 2010 and the Key Issues consultation in October 2012. In particular, we support the Council’s continued commitment to an urban extension to the south of Gillingham, which we agree represents the most sustainable option for the future growth of the town. In parallel to the emerging policy formulation significant progress is being made by the consortium to progress detailed proposals for the site. The consortium has been and will continue to remain pro-actively involved in the Plan making process. A range of technical studies have been undertaken by the consortium to inform their emerging master plan proposals for the SSA which we have been sharing with the Council. This work helps demonstrate the suitability and delivery of the site and its associated infrastructure requirements. In parallel with this	Where concerns over soundness have been identified, we consider that these can be satisfactorily addressed by the changes that we have proposed. The suggested changes would in our opinion improve the clarity, flexibility and deliverability of the plan. The consortium members welcome the opportunity to participate at the examination, either jointly or individually. At over 400 pages, the Local Plan Part 1 is an unnecessarily lengthy document, with a separate Site Allocations document to follow. Having reviewed the draft Plan in detail, there is a lot of unnecessary 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 address this in order to make it a more concise and user friendly document.	Support for sustainable location of SSA, and generally supportive of the SSA Policy principles. Concerns over soundness could be overcome by proposed changes to improve clarity, flexibility and deliverability of the Plan. The plan is unnecessarily lengthy and should be revised to be more concise.

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								policy formulation process the Consortium are engaging with the Council on the Master Plan Framework and associated strategic infrastructure delivery as required by emerging policy. This will allow early pursuit of planning applications for first phases of development which in turn gives the Council comfort on the deliverability of this SSA. The consortium is generally supportive of the policy principles within the emerging Plan insofar as they relate to the Gillingham SSA and look forward to continuing to work closely with the Council to develop the proposals for the site to ensure that this critical component of the new plan is sustainable and deliverable. For ease of reference our representations are presented in the order they appear in the Plan.		
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4494	9.7	No	It is not justified, It is not effective	The reference to the Gillingham Neighbourhood Plan is welcomed, however paragraph 9.7 would benefit from further clarification of the different roles and remits of the Local Plan and the neighbourhood plan in respect to the Gillingham Strategic Site Allocation. In particular this should confirm the primacy of the Local Plan polices relating to the Strategic Site Allocation over any neighbourhood plan for the wider area.	Add the following text to paragraph 9.7: The Gillingham Strategic Site Allocation is of critical importance to the delivery of the vision and objectives of the Local Plan. The requirements for the development of the site are set out in the strategic policies of the Local Plan, which has primacy over any neighbourhood plan for the wider area.	Support Policy reference to Neighbourhood Plan, however concerned Policy does not describe the relative status and primacy of Local Plan.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4495	9.9	No	It is not justified, It is not effective	Paragraph 9.8 should clarify that the Town Design Statement is a document adopted by NDDC as an evidence base study, not as part of the development plan.	Amend the final sentence of paragraph 9.8 to read as follows: The TDS is not part of the development plan for the purposes of decision making, but has been used to inform the proposals for the southern extension ...	Policy has not described TDS as an evidence based study and clarified it is not part of the Development Plan.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4496	9.9	No	It is not justified, It is not effective	The allocation is primarily for the delivery of new housing as part of a mixed use development. The residential led nature of the allocation should be emphasised.	Amend the first of paragraph 9.9 to read as follows: The southern extension of Gillingham will take the form of a sustainable residential led mixed-use development ...	The Policy does not emphasise the housing led nature of the development.

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2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4497	9.11	No	It is not justified, It is not effective	As set out elsewhere in our representations, the requirement to include the new school in the local centre has not been justified. This paragraph should be re-worded in order to retain flexibility over school provision. It should also be clarified that health facilities are to be provided to meet the needs of the additional population on an objectively assessed basis.	Amend final sentence of paragraph 9.11 to read as follows: ...and Shaftesbury Road (B3081), additional primary school provision and a local centre including small local convenience shops, health facilities, a community hall and other facilities and services adequate to meet the needs of the SSA population.	The Policy does not clarify that health facilities are to be provided to meet the needs of the additional population by objectively assessed needs. The location for the school at the Local Centre has not been justified.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4498	9.19	No	It is not justified, It is not effective	As set out in our comments on Policy 21, the 'brief' for a Master Plan Framework should be provided in the supporting text or as a separate document. The policy should focus on the strategic requirements for the site allocation and form the basis for decision making on subsequent planning applications. The Master Plan Framework will provide additional information to support decision making.	Amend the first sentence of paragraph 9.19 to read as follows: The Council expects Policy 21, supported by the Master plan Framework, to provide Amend the second sentence of paragraph 9.19 to read as follows: The Master Plan Framework should respond positively to the 'brief' set out by the Council	The MPF should not appear in the policy but in the supporting text.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4499		No	It is not justified, It is not effective	Paragraph 9.20 states that the Council will expect the Master Plan Framework to be subject to a Habitats Regulations Assessment. This is considered unnecessary; the Local Plan policies allocate the site for development and are therefore the appropriate level at which HRA should be undertaken. The Habitats Regulations Assessment of the North Dorset Local Plan (Part 1) does not provide adequate explanation of the likely significant effects associated with Policy 21 to justify HRA for the Master Plan Framework. The Master Plan Framework does not form part of the development plan. Subsequent planning applications will be screened for HRA and this would be the appropriate stage at which the requirement for any further HRA should be considered. It is considered unduly onerous to require the Master Plan Framework to include separate plans for climate change, sustainable transport, and green infrastructure.	Amend paragraph 9.20 to read as follows: The Council will expect the Master Plan Framework to identify how it expects strategic Local Plan policy is to be met in respect of: ... · climate change ... sustainable transport · green infrastructure	The Policy is too restrictive in requiring the MPF be subject to HRA. Screening is more appropriate requirement. The Policy requirement for the MPF to include separate plans for climate change, sustainable transport, and green infrastructure, is unduly onerous.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4500	9.21	No	It is not justified, It is not effective	Paragraph 9.21 is considered unnecessary and inflexible. The SSA covers a large area, and whilst the consortium are working together to prepare a Master Plan Framework, there may be circumstances under which planning applications for developments within the SSA come forward in advance of the completion of the Master Plan Framework. The process of agreement of the Masterplan Framework with the Council is also unclear.	Delete paragraph 9.21	The Policy is too inflexible by requiring the MPF to be produced prior to the Council supporting the submission of applications, and the process of agreement of the MPF with the Council is also unclear.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4501	9.22	No	It is not justified, It is not effective	As set out in our comments on Policy 21, the 'brief' for a masterplan should be provided in the supporting text or as a separate document. The policy should focus on the strategic requirements for the site allocation.	Amend the first sentence of paragraph 9.22 as follows: developers are best placed to respond to the 'brief' set out by the Council.	The MPF should not appear in the policy but in the supporting text. As above representation made by same representor.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4502	9.23	No	It is not justified, It is not effective	Paragraph 9.23 states that the Council will look to secure financial contributions through its charging schedule proposed for the purposes of the Community Infrastructure Levy (CIL). It is essential for the relationship between section 106 agreements and Community Infrastructure Levy to be co-ordinated and clearly set out in the Local Plan and the supporting Infrastructure Delivery Plan. We note that work on CIL is currently in abeyance and there is currently no clear indication of proposed rates or prioritisation for spending. Given the substantial infrastructure requirements for the Gillingham Strategic Site Allocation that are set out in the Local Plan, and without the necessary evidence base to demonstrate how the infrastructure requirements for the Gillingham Strategic Site Allocation will be delivered through CIL, we consider that the most appropriate mechanism for securing infrastructure delivery for the SSA is through section 106 agreements. Consideration should therefore be given to setting the CIL charge rate for the SSA to zero.	Delete paragraph 9.23 and replace with the following: Infrastructure delivery and financial contributions related to the Gillingham Strategic Site Allocation will be provided through section 106 agreements.	The Policy is too restrictive in its mention of securing financial contributions via CIL "in so far as it is relevant".

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4503	9.29	No	It is not justified, It is not effective	The 'Concept Statement' (CS) duplicates many of the requirements of other policies of the plan, including: <ul style="list-style-type: none"> · General design quality (Policy 24) · Climate change and sustainable construction (Policy 3) · Housing mix and standards (Policy 7) · Infrastructure Delivery (Policies 13, 14 and 15) 	The 'Concept Statement' should be simplified to refer only to site-specific issues. There is no evidence to justify the suggestion in Figure 9.3 and the legend that Cole Street Lane should become a green route. Flexibility should be maintained to allow changes through the Master Plan Framework and subsequent planning applications where justified.	The Concept Statement duplicates requirements of other policies in the Plan. The proposal to make Cole Street Lane a green route is not justified by evidence.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4504	9.33	No	It is not justified, It is not effective	The 'Design Principles' largely duplicate the Design Principles set out at Policy 24 (pp 18-25). If Policy 24 is retained in its current form, the design and layout of the SSA could adequately be considered against Policy 24.	The design principles should be simplified to refer only to site-specific issues, with reference back to Policy 24 for generic design principles.	Policy 21 Design Principles duplicate the same set out in Policy 24 Design.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4505	9.36, 9.37, 9.39, 9.41, 9.42	No	It is not justified, It is not effective	These requirements in relation to climate change are duplicated elsewhere in policy (Policy 3, 24) and in the Concept Statement and Design Principles. The requirement to consider a district heating system is not based on any evidence. Paras 9.41 and 9.42 These requirements in relation to flood risk are set out in Policy 3.	Delete paragraphs 9.37 and 9.38 to avoid unnecessary duplication. Delete paragraph 9.39. Delete paragraphs 9.41 and 9.42 to avoid unnecessary duplication.	Duplication of climate change and flood risk requirements set out in other policies in the Plan. The requirement to consider a district heating system is not justified.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4506	9.43, 9.44	No	It is not justified, It is not effective	Para 9.43 These requirements are covered in Policy 4. Paragraph 9.44 repeats the information provided at paragraph 9.32 on design principles.	Delete paragraphs 9.43 to avoid unnecessary duplication. Delete paragraph 9.44 to avoid unnecessary duplication.	Duplication of requirements in Policy 4.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4507	9.51	No	It is not justified, It is not effective	The second sentence of 9.51 is covered in Policy 8.	Delete the second sentence of paragraph 9.51 to avoid unnecessary duplication.	Duplication of Policy 8.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4508	9.57	No	It is not justified	The evidence base does not require additional employment land.	Delete final sentence of paragraph 9.57 or require the developer to justify alternative development proposals.	The retention of Kingsmead Business Park as employment land, in the absence of development of a Local Centre, is not justified.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4509	9.59	No	It is not justified, It is not effective	Requirements to demonstrate how off-site proposals can be secured, improved and funded are too detailed for a masterplan.	Delete the third sentence of paragraph 9.59	Policy requirements to demonstrate how off-site proposals can be secured, improved and funded are too detailed for a masterplan.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4510	9.60	No	It is not justified, It is not effective	We do not consider that it is appropriate or justified to require the principal street to be the main access serving Brickfields Business Park. The principal street can provide an alternative route (particularly for journeys to the south) but it should not be designed to serve as the main access road to the employment area and vehicles accessing Brickfields Business Park from the north (which is the significant majority of movements) should continue to use the New Road / Shaftesbury Road junction.	The principal street should be designed primarily to provide the main means of vehicular access to the land south of Ham. It should also provide an alternative link to the employment areas on New Road, with vehicular access to the extended employment area to/from north to continue to be via an improved New Road / Shaftesbury Road junction in order to minimise overall vehicle kilometres and to minimise the impact on future residents within the Ham Farm parcel and on existing residents along Shaftesbury Road	The Policy requirement for the Principal Street to be the main access to Brickfields Business Park is not justified.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4511	9.61, 9.64	No	It is not justified, It is not effective	The design principles referred to in paragraphs 9.61 and 9.64 are covered elsewhere.	Delete paragraphs 9.61 and 9.64 to avoid unnecessary duplication	Duplication of Design Principles covered elsewhere.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4512	9.63, 9.69, 9.70	No	It is not justified, It is not effective	There is no evidence to support the requirement that access to Cole Street Lane should be restricted and that it should become a green lane.	Justification should be provided or these references should be deleted.	The Policy requirement that access to Cole Street Lane should be restricted to become a green lane is not justified.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4513	9.68	No	It is not justified	Pedestrian and cycle routes crossing the river will depend on engineering and other technical considerations.	Add "...subject to engineering and other technical considerations." to para 9.68	Policy does not set out that the provision of river crossings will be subject to engineering and technical considerations.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4514	9.72	No	It is not justified	The requirement for contributions to the enhancement of Gillingham railway station are not adequately justified. It is unclear whether there are any Network Rail proposals and additional funding in place for this, and delivery mechanisms are not set out. There is no requirement in Policy 17 for a contribution to these improvements, so it should not be included in the supporting text. There is a risk that an absolute requirement to deliver these improvements will undermine the viability of other strategic infrastructure to the detriment of the SSA.	Delete the first sentence of paragraph 9.72.	The Policy requirement for contributions towards enhancement of Gillingham Railway Station is not justified.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4515	9.73	No	It is not justified	The contribution towards the Enmore Green Link Road should be proportionate to the impact of the SSA, this would have to be ascertained through modelling so that any contribution is reasonably related in scale to the impact of the development	Amend last sentence of 9.74 to read as follows: Developers of the southern extension will be expected to contribute towards the provision of the link road at Enmore Green. The level of the contribution would be reasonably related to the impact of the development upon this junction as determined by modelling.	The Policy does not specify that contributions towards the Enmore Green Link Road should be proportionate.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4516	9.74	No	It is not justified, It is not effective	The requirements for grey infrastructure provision are covered in Policy 13.	Delete paragraph 9.74 to avoid unnecessary duplication.	Duplication of the requirements for Grey Infrastructure as set out in Policy 13.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4517	9.76, 9.80	No	It is not justified, It is not effective	The justification for the requirements listed in paragraph 9.76 is unclear. Flexibility the scale and location of health, education and community hall provision set out in the first three bullet points should be retained. It is unclear how the floor areas in the fourth bullet point have been arrived at, there does not appear to have been an assessment included of retail needs in the SSA, this would be best dealt with as a masterplanning consideration. The justification and evidence for the contributions listed in paragraph 9.80 is unclear. For example, the need for contributions towards 'improvement of expansion of the existing facilities at RiversMeet [sport centre] and the provision of a new community centre' is sought because it is 'unlikely' to meet the needs of the growing community. It is not clear on what objective basis this has been concluded. The 'most appropriate' solution may in fact be on-site / alternative provision.	Add the following text to the first bullet of paragraph 9.76 as follows: may be included in the local centre, although the location will be confirmed through the Master Plan Framework. Replace the second bullet of paragraph 9.76 as follows: new health facilities to a nature and scale 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 Replace the fourth bullet point as follows: small local convenience shops to meet the day-to-day needs of	The Policy does not justify the requirements for the Local Centre and for town centre infrastructure contributions.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
								Similarly, the need to extend the fire station does not appear to result from an objective assessment of capacity	residents. Amend paragraph 9.80 to: Following further assessment, these might include: the further...	
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4518	9.83-9.86, 9.88	No	It is not justified, It is not effective	The justification and evidence for the areas referred to in paragraphs 9.83 to 9.86 is unclear.	Further justification and evidence in support of these requirement should be provided.	The Policy does not set out the justification for the formal sports pitch provision and informal open space requirements.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4519		No	It is not justified, It is not effective	The areas identified for housing growth in figure 9.5 and the Gillingham Southern Extension Proposals Map are supported, however In order to provide greater flexibility in relation to the location of the proposed Local Centre, the Shaftesbury Road corridor should be extended to include the Orchard Park Garden Centre. This would allow established and allocated employment areas to remain, as proposed elsewhere in the Local Plan.	Extend Shaftesbury Road Corridor (Local Centre) to include the Orchard Park Garden Centre.	The Policy does not allow for an alternative site for the Local Centre in order to support the current employment land remaining as such.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4520		No	It is not justified, It is not effective, It is not consistent with national policy	The allocation for a sustainable urban extension is fully supported. The site is well located and provides good linkages to the existing town. The consortium has been proactively engaged in emerging planning policy. In summary, the consortium considers that the proposed Gillingham Strategic Site Allocation represents a highly sustainable, well located and deliverable opportunity for a mixed use urban extension and its allocation is supported in principle as a logical site to select through the local plan process for the delivery of housing in a sustainable manner. However, we have some concerns in relation to the detailed wording of Policy 21 and in order to be more effective and soundly justified the policy should be amended as detailed below. In line with our comments on the rest of the plan, there is scope to make the policy more precise by avoiding unnecessary duplication of matters covered elsewhere in the plan. Consideration should be given to including the Gillingham SSA policy and supporting text within the Gillingham section of Chapter 8 as this would help make the plan more coherent and avoid repetition.		The allocation for the Southern Extension is fully supported by the consortium. However, the detailed wording is not always effective and justified and often duplicates other policy requirements.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4523		No	It is not justified, It is not effective, It is not consistent with national policy	Policy 21 as currently worded is focused on providing a development brief for the Master Plan Framework, but the policy status of the Master Plan Framework and process of agreeing it with the Council is unclear. The statement that the Council will not support proposals for development within the southern extension prior to the production of the Master Plan Framework is considered unnecessary and inflexible. The SSA covers a large area, and whilst the consortium are working together to prepare a Master Plan Framework, there may be circumstances under which planning applications for developments within the SSA come forward in advance of the completion of the Master Plan Framework. Policy 21 would be more effective if it is re-worded to focus on the key requirements for the site allocation. Duplication of issues covered in other sections of the plan should be avoided, and the brief for the Master Plan Framework should be provided as part of the supporting text. An alternative policy wording for the Gillingham SSA has been proposed by the consortium and is set out below as an alternative option to re-wording Policy 21.	Either amend Policy 21 as follows: Delete the first, second and fourth paragraphs of the policy and insert the following text at the start of the third paragraph: A Master Plan Framework will be prepared to support Policy 21 as the basis for determining future planning applications for development on the site. Or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567.	The Policy requirement that the Council will not support proposals for development prior to the consultation and agreement of the MPF is inflexible and unnecessary.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4560		No	It is not justified, It is not effective, It is not consistent with national policy	Criteria (c) largely repeats Policy 3. Criteria (d) and renewable and low carbon energy is also covered at Policy 22. The requirement to 'meet the requirements of the Government's Zero Carbon Buildings policy' is not specific and does not give certainty to the decision maker. The Government's policy on this matter is emerging and evolving and sets a future target date for zero-carbon building standards. It is unclear whether carbon neutrality would have to be achieved before then. In any case, the primary route for this will be through the building regulations. The Policy should not duplicate other legislation. Criteria (d) is similarly unclear in terms of current and future requirements. Sustainable construction requirements should be clearly set out in Policy 3. Criteria (f) repeats the requirements of requirement (g) of Policy 3. Criteria (g) repeats the requirements of requirement (gg)	Either amend Policy 21 as follows: Delete criteria a – g relating to climate change as these are unnecessary and covered in other sections of the plan. Or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567	The Policy criteria for Climate Change repeats requirements set out elsewhere, and the requirement to meet requirements of the Govts Zero Carbon Buildings Policy does not give certainty to the decision maker.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4561		No	It is not justified, It is not effective, It is not consistent with national policy	Criteria (i) repeats the requirements of Policy 4	Either amend Policy 21 as follows: Delete environment criterion i as this are unnecessary and covered in other sections of the plan. Or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567	Criterion i repeats the requirements of Policy 4 and should be deleted.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4562		No	It is not justified, It is not effective, It is not consistent with national policy	Criteria o requires a minimum of 35% affordable housing provision. This is covered in Policy 8 and should be reviewed on the basis of up an up to date assessment of the overall viability of the plan, with the affordable housing provision expressed as a target. Criteria l indicates that 1,240 homes will be delivered in the plan period to 2026. It is important that that the policy also confirms that in the longer term the SSA will deliver at least 1,800 units.	Either amend Policy 21 as follows: Amend criteria l to recognise that delivery of the Strategic Site Allocation at Gillingham will continue beyond the plan period. Review criteria o on the basis of an up to date assessment of the overall viability of the plan, and express affordable housing provision as a target rather than a minimum. Or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567	Criterion o affordable housing is duplicated in Policy 8 and requires up to date viability assessment. Criterion l does not specify that the SSA will deliver 1,800 dwellings beyond the plan period.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4563		No	It is not justified, It is not effective, It is not consistent with national policy	As set out in our comments on the Proposals Map, the Shaftesbury Road corridor should be extended to include the Orchard Park Garden Centre as an alternative location for the local centre. This would allow existing employment land to be retained.	Either amend Policy 21 as follows: Amend criteria r to provide for the retention of existing employment land, with the extension of the Shaftesbury Road corridor to include land at Orchard Park Garden Centre, allowing greater flexibility for the location of the local centre. Or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567	The Policy does not allow for an alternative site for the Local Centre in order to support the current employment land remaining as such.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4564		No	It is not justified, It is not effective, It is not consistent with national policy	The justification for criteria w is unclear, as set out in our response to paragraph 9.72. The justification for criteria x is unclear, as set out in our response to paragraph 9.73. The justification for criteria u (closure of Cole Street Lane) is unclear, as set out in our response to figure 9.3 Criteria y duplicates the requirements of Policy 13	Either amend Policy 21 as follows: Delete criterion u (closure of Cole Street Lane) Amend criterion w, 2nd sentence to: As necessary, such improvement may include... Amend criterion x to : proportionate contributions towards the provision... Delete criterion y or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567	Justification for criteria w, x, and u is unclear. Criterion y duplicates Policy 13.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4565		No	It is not justified, It is not effective, It is not consistent with national policy	Criteria z duplicates Policy 17 requirements. Also, flexibility regarding the location of school provision is required as set out in our comment in relation to paragraph 9.11. The justification for criteria bb is unclear, as set out in our comments on paragraph 9.80.	Either amend Policy 21 as follows: Criteria z to bb relating to social infrastructure are covered in other sections of the plan, and should be removed or amended as follows: criterion aa: A new local centre to serve local needs, to include small shops, a community and health facilities as required to support the new population. New primary school provision will be provided within the SSA to serve identified needs. criterion cc: Following an assessment of likely demand and impact, developers will be expected to make reasonable and proportionate contributions to the further improvement or expansion of the existing facilities at RiversMeet, the provision of a new community hall, Gillingham Town Library and Gillingham Fire Station or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567	Criterion z duplicates Policy 17 and is insufficiently flexible on the location of the development. Justification for criterion bb is unclear.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4566		No	It is not justified, It is not effective, It is not consistent with national policy	Criteria cc and dd are overly prescriptive and leave little flexibility for the Master Plan Framework Criterion hh is considered unnecessary if the green infrastructure needs of the new population are to be provided on-site. There is no justification towards further off-site green infrastructure contributions.	Either amend Policy 21 as follows: Amend criterion cc and dd to: cc Public open space, including sports pitches, children’s play spaces, allotments and community orchards. dd Informal public open space primarily along the river corridor. Delete criterion hh or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: see representation number 4567	Criteria cc and dd are insufficiently felxible. Criterion hh is not justified.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4567		No	It is not justified, It is not effective, It is not consistent with national policy	Either amend Policy 21 as suggested (see representation numbers 4520 - 4566) Or	Or replace policy 21 with the following Gillingham SSA policy as proposed by the south Gillingham consortium: ALTERNATIVE POLICY 21: GILLINGHAM STRATEGIC SITE ALLOCATION Land to the South of Gillingham, as defined on the Proposals Map as Site [*****], is allocated for a sustainable urban extension comprising housing, employment provision, education facilities, a local service centre and associated infrastructure. Proposals for development will be supported where they provide up to 1,800 net residential units, around [*****]sq.m (net) B1, floorspace and primary school provision. A new local centre shall be provided within the broad area shown on the proposals map and may include a local convenience store, a doctors surgery, community facilities and other local services. The urban extension will be brought forward in a series of phases progressing south and eastwards. A first phase of residential development will comprise up to 200 dwellings within the broad area shown on the proposals map. The next phases of development will be	Alternative Policy wording suggested to reduce repetition, duplication and add clarity.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
									<p>accompanied by highway junction improvements at the B3081 Shaftesbury Road/B3092 New Road junction . A new vehicular link connecting Shaftesbury Road and New Road will be completed as part of the final phase of development. Employment provision will be in the form of an extension southwards on the Brickfields Business Park, the rate and phasing of employment development will reflect market conditions.</p> <p>The development should include a range of densities, house types, styles and sizes across the site to achieve a comprehensive neighbourhood area, but achieve on average around [25] dwellings per hectare. The exact mix of dwelling types will be subject to discussion with the local planning authority on a phase by phase basis.</p> <p>The proposals for new housing development will require, subject to viability, the provision of 35% affordable housing units on site. The affordable dwellings should provide for a mix of dwelling types in accordance with local housing needs. Proposals for development shall have regard to the following principles in order to achieve a sustainable form of development:</p> <p>a) Highway improvements will be implemented as required to support the development, including improvements to the junction of Shaftesbury Road and New Road and the provision of a new vehicular link connecting Shaftesbury Road and New Road. The new vehicular link will be phased to progress in line with the residential development and will be connected as the scheme</p>	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
									<p>is completed.</p> <p>b) Education provision on site shall be located in an area which maximises access to new and existing properties in the vicinity, in consultation with the Local Education Authority;</p> <p>c) Employment provision shall be principally situated to the south of Brickfields Business Park in the area shown on the proposals map. The local centre may also contain some employment uses subject to addressing identified needs.</p> <p>d) Appropriate planting should be provided along Cole Street Lane to screen views into and out of the site and mitigate the visual impact of the development from the south.</p> <p>e) Those parts of the site identified to be at risk from flooding should be managed to maximise value for flood storage, improve the diversity and function of habitats and contribute to a net gain in biodiversity. Where possible, linear boundary features including ditches and hedgerows should be protected, retained and enhanced through incorporation into the development.</p> <p>f) Create new pedestrian/cycle links to/from the town centre and residential areas including opportunities along the River Lodden.</p> <p>g) The development shall include public open space and formal and informal leisure and recreation provision that maximises opportunities for access to the River Lodden. It shall also provide children’s equipped play areas to relevant standards. The development shall provide allotments and community orchards</p>	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
									as part of the overall open space provision. h) Implementation of a Travel Plan	
3031	Andrew Roberts	Highways Agency		4150	Fig 9.3	Yes		The Highways Agency welcomes the proposed broad indicative route of the principal street through the Gillingham SSA as this would allow good access for the majority of residents to any bus services provided on this route. The key linkages for pedestrians and cyclists indicated on the plan also appear sound and comprehensive.		Policy is sound and indicative route of Principal Street and comprehensive key linkages for pedestrians and cyclists are well covered..
3031	Andrew Roberts	Highways Agency		4152	9.59-9.74	Yes		Highways Agency broadly support the SSA grey infrastructure provision. However, they will expect planning applicants for the SSA to submit evidence alongside their applications which enables it to understand the impact of the development on the operation of relevant junctions on the A303(T) in line with the methodology set out in the GTA and the Dft Circular 02/2013.		Policy is sound and the Highways Agency will expect to have sight of further detailed work on impacts on the Strategic Road Network.
3038	Richard Moore	R Moore Contractors		4009		No	It has not been positively prepared	Previous representations made suggesting the amendment of the Gillingham Southern Extension boundary to follow the natural line of Cole Street Lane however the area in question is currently drawn outside of the boundary.	Amend boundary to follow Cole Street Lane as indicated on attached plan	Additional land north of Cole Street Lane (west of the Threshold Centre) should be included within the SSA.
3053	Beth Littlewood			4073		No	It is not justified	Does not consider the SSA to be the most appropriate strategy for Gillingham due to current poor infrastructure provision in the town.		Policy not justified due to the current under provision of infrastructure in the town.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4334		No	It is not effective	This policy does not take cognisance of the inadequate and restrictive road network infrastructure. This policy needs to address overlapping with neighbouring towns and cross border Councils need to be brought into this process.		Policy not justified or effective due to the current inadequate provision of highway infrastructure in the town.
3075	David G White			4401		No	It has not been positively prepared	Plan has not been positively prepared as it does not seek to meet objectively assessed housing needs. There is no local need in North Dorset.		Policy not positively prepared as objectively assessed housing needs does not consider solely local need.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
3075	David G White			4402		No	It is not justified	SSA is not justified as it is not the most appropriate site. There are issues of environmental damage, poor drainage and flash flooding on the proposed site. It is not the most appropriate use of a greenfield site and it will result in the loss of valuable agricultural land. There are many brownfield sites closer to town that are more sustainable and would enable regeneration of the town centre. Traffic is also an issue in the town and there are concerns that the current sewage treatment plant will not be adequate for the proposed growth and that the train station may not be able to cope with the increase in population. Gillingham needs more burial land and this should be included in the SSA.		The policy is not justified due to a list of perceived issues, including: flooding; environmental damage; loss of agricultural land; traffic; foul drainage capacity; and a deficit of burial ground.
3080	Tim Hoskinson	Savills	Taylor Wimpey	4445		No	It is not justified, It is not effective	Taylor Wimpey welcome the identification of land to the East of Lodden Lakes for development as part of the Gillingham Strategic Site Allocation. The site represents a highly sustainable location for development, it is well related to the town centre and railway station, with a range of existing employment opportunities, community services and facilities available within walking distance of the site. The site is suitable and available for housing development, and can deliver circa 250 dwellings as part of the planned future growth of Gillingham.		Full support of Land to the East of Lodden Lakes allocated as part of the wider SSA.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
3080	Tim Hoskinson	Savills	Taylor Wimpey	4447		No	It is not justified, It is not effective	The northern part of the site east of Lodden Lakes is allocated in the North Dorset Local Plan (adopted 2003) under saved policy 2.4 (allocation reference H/15/2) and policy GH4 (site E) for housing development. The policies identify the site as 'South of The Meadows', with an area of 3 hectares and potential to accommodate a minimum of 90 dwellings in the period after 2006, subject to criteria relating to play area provision, landscaping, and access. The site forms an important part of North Dorset's five year land supply. We are concerned that the second paragraph of Policy 21 is unduly restrictive and would unreasonably prejudice the opportunity for Taylor Wimpey to bring the currently allocated part of the site forward as an early phase of development in line with adopted policy and as required if the Council are to demonstrate a 5 year supply of specific, deliverable sites. Such an approach could be delivered in a manner entirely compatible with the wider aspirations for the Gillingham Strategic Site Allocation.	The second paragraph of Policy 21 is unsound and should be deleted.	The Policy requirement to have a consulted and agreed MPF in place prior to submission of applications is too restrictive for a previously allocated site. This may prejudice the bringing forward of the 'land south of the Meadows' site, which is allocated in the 2003 Local Plan.
3080	Tim Hoskinson	Savills	Taylor Wimpey	4448		No	It is not justified, It is not effective	Figure 9.3 illustrates a number of key streets shown as light grey dotted lines on the plan, as well as potential access points shown as blue dotted arrows which are identified in the legend as 'key linkage to be established and/or retained....'. In order to provide permeability and connectivity, the key street within the Lodden Lakes site should be extended to connect to Addison Close in the north western corner of the site.	In order to provide permeability and connectivity, the key street within the Lodden Lakes site should be extended to connect to Addison Close in the north western corner of the site.	The Concept Plan does not show the key street within the Lodden Lakes site as connecting to the road network at Addison Close.
3080	Tim Hoskinson	Savills	Taylor Wimpey	4452		No	It is not justified, It is not effective	Figure 9.3 illustrates a number of key streets shown as light grey dotted lines on the plan, as well as potential access points shown as blue dotted arrows which are identified in the legend as 'key linkage to be established and/or retained....'. The key link shown on the north eastern edge of the site linking into The Meadows is unnecessary as better connectivity is provided by the key link into Addison Close.	In order to provide improved pedestrian links into the wider footpath and open space network, the key linkage currently shown connecting in to The Meadows should be moved westwards to connect into the green corridor along the river valley.	The non vehicular access at The Meadows on the Lodden Lakes site is unnecessary.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
3084	Tony Brimble	Brimble, Lea & Partners	Lagan Farms Ltd	4588	9.57, 9.11, 9.67, 9.78	No	It is not justified, It is not effective	<p>Mixed use Local Centre - The landowner welcomes the flexibility in the text to Policy 21 at paragraph 9.57 relating to the location of the mixed-use local centre. At the present time, the precise location of the local centre cannot be established for a number of reasons. Accordingly, the landowner seeks flexibility clearly identified both in Policy 21 and the accompanying text as well as on Figure 9.1 – Four Main Areas Proposed for Development, Figure 9.3 - Concept Plan for Gillingham Strategic Site Allocation and Figure 9.5 - Gillingham Southern Extension Proposals Map for the local centre to be situated on the Shaftesbury Road corridor, albeit within, astride or immediately adjoining the SSA boundary identified by Figures 9.1 and 9.3.</p> <p>However, the landowner objects to the requirement in paragraph 9.57 for the site identified for the local centre by the concept plan to be used for employment purposes in the event that an alternative site is identified. This takes no account of the location of the site and the uses proposed around it. Furthermore, the Council’s evidence base indicates that no further employment land allocations are required in Gillingham or the District as a whole.</p>	<p>Paragraph 9.11: The southern extension should be accommodated within these boundaries on the Shaftesbury Road corridor unless it can be demonstrated that modification or areas of departure are justified in accordance with paragraph 9.19 and.....</p> <p>Paragraph 9.57: In the event that this site does not come forward as part of the mixed-use local centre, the Master Plan Framework should identify appropriate alternative use(s) for it that reflect the location of the site and are compatible with proposed uses around it.</p> <p>Paragraph 9.76: A mixed-use local centre will be provided as part of the southern extension....</p> <p>Paragraph 9.78: The Master Plan Framework should show land in the Shaftesbury Road corridor (as indicated on the concept plan), as the preferred location for the local centre, unless a suitable alternative location can be identified within or immediately adjoining the SSA boundary.</p> <p>Policy 21 (Cont'd) r - set out how the remaining undeveloped land at Kingsmead Business Park should be developed as part of a local centre in the Shaftesbury Road corridor to support the southern extension. In the event that the local centre does not include the remaining undeveloped land at Kingsmead Business Park, the Master Plan Framework (and any relevant subsequent planning applications), should show</p>	<p>Full support to the location of the Local Centre and the flexibility to retain it within the Shaftesbury Road corridor. However, to require the land, if not used to be retained as employment land is too inflexible.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
									<p>how the site will be developed with appropriate use or uses</p> <p>Any other consequential amendments as may be required to address the comment.</p>	
3085	David Seaton	PCL Planning Ltd	Sherborne School and Cancer Research UK	4600		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 delivery of housing on this strategic site allocation is not likely to come forward in a timely manner and it is inappropriate to rely so heavily on the delivery of a strategic site allocation which cannot be realistically delivered within the plan period. The strategic site allocation includes an historic site allocation adjacent to Lodden Lakes which was already formally identified within the adopted Local Plan and still remains undeveloped, an indicator in itself of complexities in the delivery of housing on the site. Further, the supporting text for Draft Policy 21 relating to the Gillingham Strategic Site Allocation, states that a Master Plan Framework is expected to be produced. Given that agreement between all parties will not necessarily be automatic and timely, this casts severe doubts over the projected time frames for housing delivery on this strategic site which is proposed to achieve the majority of the settlement’s housing allocation. There are numerous problems with the likely delivery of this large site which, in summary, are:</p> <ul style="list-style-type: none"> · The site is severed from the town centre by the rail line therefore access from the site, to the town, is restricted and difficult to improve. · There are likely to be ransoms in place at the proposed points of access into the site. Even if not, then existing residents are likely to strongly oppose further development being served from these points of access. · Access to residential development via an industrial estate is unlikely to work in practice. If it were to be considered it would significantly reduce the value (and therefore be likely to have a detrimental effect on the deliverability of the site). · Large parts of the site are located within the flood plain and are not developable. 	<p>The Council, therefore, need to allocate additional smaller, deliverable sites if housing needs are going to be met. Land South of Chantry Fields is available for development. The site is suitable for residential development, the land is available and, given that the site lies within the ownership of just two parties who are cooperating with each other, development will be achievable within the time frame of the plan period. Unlike the Strategic Site Allocation within the draft Plan, the land South of Chantry Fields has the potential to deliver a significant number of dwellings within a five year period, contributing to the Council’s housing land supply, particularly the much needed housing requirement at Gillingham, the principal settlement.</p>	<p>The Policy is unlikely to deliver housing in a timely manner due to perceived site issues, infrastructure burdens, and time taken to complete a MPF. Land south of Chantry Fields should also be allocated for housing growth.</p>

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
								It is plain that this site is unlikely to be able to deliver the level of new homes that are required to be accommodated at Gillingham over the plan period in a timely manner, particularly having regard to the existing backlog and the Framework’s aim to “boost significantly the supply of housing” (paragraph 47). The Council, therefore, need to allocate additional smaller, deliverable sites if housing needs are going to be met.		
3086	Simon Coles	WYG	David Lohfink	4621	9.32, 9.36, 9.37	No	It has not been positively prepared, It is not justified, It is not effective	<p>Energy efficiency at paragraph 9.32, Design Principles on page 249 and Policy 3 - Climate Change: In summary, these requirements are considered to lack clarity and are not properly justified as follows. Paragraph 4.8, fourth bullet-point: Incorporating the highest standards of construction into development proposals: There is no indication as to how this will be measured, who is the arbiter or what these are. Policy 3 part c: In Policy 3 c), there is no indication what the national targets referred to are or evidence to justify why they should be exceeded. Paragraph 9.32, fifth bullet-point: There is no indication of what a "...high level of energy performance..." is, how it is to be assessed or by whom?</p> <p>Design principles, page 249 (Energy Efficiency and Design Performance): There is no justification as to why the solutions should exceed statutory minima or any indication as to how the Council will promote such solutions.</p> <p>Paragraph 9.36, first bullet-point: There is no indication as to what reductions will be sought, how they will be promoted and measured, by whom and how these reductions are justified</p> <p>Paragraph 9.37: There is no justification why solar panels and ground source heat pumps are likely to be needed to meet Zero Carbon Policy.</p>	Delete reference to exceeding statutory minima. Require the SSA development to meet relevant building regulations and codes in place at the time. Remove statements that lack clarity. Remove statements/requirements that are not properly evidenced.	The Policy is insufficiently clear and justified, particularly in relation to requirements of: energy efficiency and Design Principles.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
3086	Simon Coles	WYG	David Lohfink	4622	9.72	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 9.72: Completing the gaps in pedestrian/cycle routes within land controlled by the developer is a realistic objective. While it is recognised that the Council could seek a contribution from a developer to complete linkages across third party land - such as the link referred to over Fern Brook - it is unreasonable to require developers to engage in the process. This is a matter for the Council to pursue using relevant powers and other means as necessary.	Amend the final sentence of paragraph 9.72 to read: Where appropriate, contributions may be sought from developers towards the physical works associated with completing pedestrian and cycle linkages to the town centre where such works are required on land outside their control.	The Policy approach requiring developers to engage in the process of completing existing gaps in the pedestrian and cycle routes, is unreasonable.
3086	Simon Coles	WYG	David Lohfink	4623		No	It has not been positively prepared, It is not justified, It is not effective	Policy 21 parts q and r: These sites are outside the control of the consortium and the relevant landowners have yet to establish their intentions. It would therefore be inappropriate and unreasonable for the consortium to meet the requirements of q and r.	Delete parts q and r.	The Policy approach towards economic development is unreasonable to the consortium of housing interests as they have no control over the strategic employment site.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7Suggested Change	Summary of Main Issues
3086	Simon Coles	WYG	David Lohfink	4624	9.11, 9.57, 9.76, 9.78	No	It has not been positively prepared, It is not justified, It is not effective	<p>We welcome the flexibility in the text to Policy 21 at paragraph 9.57 relating to the location of the mixed-use local centre. At the present time, the precise location of the local centre cannot be established for a number of reasons. Accordingly, the landowner seeks flexibility clearly identified both in Policy 21 and the accompanying text as well as on Figure 9.1 – Four Main Areas Proposed for Development, Figure 9.3 - Concept Plan for Gillingham Strategic Site Allocation and Figure 9.5 -</p> <p>Gillingham Southern Extension Proposals Map for the local centre to be situated on the Shaftesbury Road corridor, albeit within, astride or immediately adjoining the SSA boundary identified by Figures 9.1 and 9.3.</p> <p>However, it is considered that the land identified as the Shaftesbury Road Corridor (Local Centre) – Policy 21 on Figure 9.5 represents an approach that is overly rigid and prescriptive and does not provide sufficient flexibility to enable the developers to respond to issues that may arise during the preparation of the Master Plan Framework and subsequent planning applications. Furthermore, we object to the requirement in paragraph 9.57 for the site identified for the local centre by the concept plan to be used for employment purposes in the event that an alternative site is identified. This takes no account of the location of the site and the uses proposed around it.</p> <p>Furthermore, the Council’s evidence base indicates that no further employment land allocations are required in Gillingham or the District as a whole.</p>	<p>Paragraph 9.11: The southern extension will should be accommodated within these boundaries on the Shaftesbury Road corridor unless it can be demonstrated that modification or areas of departure are justified in accordance with paragraph 9.19 and..... Paragraph 9.57: In the event that this site does not come forward as part of the mixed-use local centre, the Master Plan Framework should show it as protected employment land where development will be permitted in accordance with Policy 11 – The Economy. identify appropriate alternative use(s) for it that reflect the location of the site and the proposed uses around it. Paragraph 9.76: A mixed-use local centre will be provided within as part of the southern extension.... Paragraph 9.78: The Master Plan Framework should show land in the Shaftesbury Road corridor (as indicated on the concept plan), including land on Kingsmead Business Park, as the preferred location for the local centre, unless a suitable alternative location can be identified within or immediately adjoining the SSA boundary can be identified and agreed with the Council. Policy 21 part r: Delete "...a range of employment..." from final sentence and replace with "...appropriate use or...." Any other consequential amendments to the Plan as may be required to address the comment.</p>	<p>Full support to the location of the Local Centre and the flexibility to retain it within the Shaftesbury Road corridor. However, to require the land, if not used to be retained as employment land is too inflexible.</p>

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

Policy 22 – Renewable and Low Carbon Energy

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		4055		Yes		Suggests inclusion of the need for developers assess alternative sites and alternative ways of achieving the outputs of the proposed development if harm to the landscape has been identified as possible. In 10.18 could add 'AONB landscape character assessment' as another example of more detailed characterisation. In terms of mitigation would like to see inclusion in Policy22 of an assessment of alternative sites and alternative methods where possible harm to the landscape has been identified.		Refer to alternative sites and methods of meeting objectives if harm to landscape has been identified.
641	Laura Cox	Pro Vision Planning and Design	Charborough Estate	4526		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Plan does not have a positive strategy for the promotion of renewable energy. To ensure that the Local Plan is positively prepared, Policy 22 should be based on a strategy which seeks to meet objectively assessed energy infrastructure requirements. Paragraph 97 of the NPPF states that Local Planning Authorities should design policies to maximise renewable and low carbon energy development. Paragraph 98 identifies that Local Planning Authorities should recognise that even small scale projects provide a valuable contribution to cutting greenhouse gas emissions.	Amendment to Policy 22 is required to secure consistency with national policy.	Policy should contain a positive strategy to promote renewable energy. Should seek to meet objectively assessed energy infrastructure requirements.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4576		No	It is not justified, It is not effective	Policy 22 could be improved by removing the text under the subheadings and including this information within the supporting text. Whilst this is useful information, it is unnecessary to include this information within the policy wording itself.	Remove the text under the subheadings Impacts, Mitigation and Benefits from Policy 22 and include it in the supporting text.	Policy could be improved by moving some parts into the supporting text.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
3046	Sharon Newman			4025		No	It is not consistent with national policy		Policy 22 should include the wording 'Proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration'. Windfarm developers will tend to look to the high ridges which means significant visual impact on and around the AONBs. Government guidance does not impose quotas for low carbon energy development so local considerations can be properly taken into account. Proximity to the National Grid is an important factor as pylons will be needed to make connections and these would also have a visual impact.	Need to consider landscape impact and impact on AONB in relation to renewables. Grid connectivity is an important factor as new infrastructure may be required.
3073	Suzanne Keene	CPRE North Dorset Branch		4426	10.6, 10.17	No	It is not effective	Whether wind or solar, these industrial installations are highly intrusive to North Dorset’s intimate, small scale landscapes. Fuller account should be taken of Landscape Character Assessments. Many of the approved installations have generated little or no local opposition but some larger ones have elicited major local objection and this should be respected. We are concerned that assessments of benefits versus impacts should be thorough, independent and of the highest standard. We have observed in recent applications, for example: - Inadequate attention to AONB Management Plans and Landscape Character Assessments - Agricultural land classification assessments made with no soil testing on the basis only of a walk across selected areas The Council should undertake an appraisal of any assessments such as LVIA’s and agricultural land classification that are provided by the applicants, and require further reports if those supplied are not adequate. In view of the number of applications, the Council should compile a register of suitable consultants to draw on for its own assessments and not rely solely on a small number of persons or practices. Para. 10.17 We note that the Council intends to produce a sensitivity assessment of all the landscape character areas in North Dorset with	10.6: Add bullet point (for clarification)"the target for Dorset of at least 7.5% of energy requirements to be generated from renewable sources by 2020" Under Impacts: "Add agricultural land value" Generally: "Add suitable wording to reflect the issues described above"	Landscape and Visual Impact Assessments (LVIA) needed. Attention paid to AONB management plans. Attention paid to Agricultural Land Classification. Update policy in relation to Landscape Sensitivity Assessment

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
								regard to renewable energy developments. We hope that this will be undertaken without delay.		
3092	Frank Heels			4648	10.27	No	It is not justified	Additional detail required	Add "the effect on wildlife/bio diversity"	

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

Policy 23 – Parking

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		4067				This policy is flawed in that whilst using guidance developed by DCC it does not mirror life and how people live. The standard draws on assumptions that people are robotic and will park as in a theoretical modelled manner. Local car ownership in the countryside is far different from the urban situation where public transport is better provided. Recent reductions in bus service subsidies reflect a change of service provision that is available to the rural population . This reduced service will lead to increased car use and ownership and this should be reflect in the parking standard for Dorset. Has a separate study been carried out on the Countryside to see if there is a true relationship between urban and countryside dwellings?		Rising rural car usage should be reflected in parking standards.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4122		No	It is not justified	The parking policy is not the most appropriate strategy as consideration should first be given to car park management before more parking is provided.		Parking management should be addressed before parking standards are developed.
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4272		No	It is not effective	The AONB Management Plan contains a policy for the provision of parking to encourage the use of public transport through the provision of park and ride facilities adjacent to main bus routes to enable the dispersed population to make the short journey along the valley, park up and then catch the bus to either Blandford or Salisbury as appropriate rather than using their cars.	Recommends that section 10, Policy 23 be amended to cover these situations.	Policy should reflect AONB Management Plan in seeking provision of park and ride facilities.

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	4114	C1, C6, C27	No	It is not effective, It is not consistent with national policy	This representation makes objection to some aspects of Policy 23 and Appendix C, which both refer to parking. The Local Plan statement, at paragraph 10.45, regarding parking standards that “some flexibility is needed, nevertheless, to allow a different level of provision on individual sites where there is sound justification based on local circumstances” is welcome. Therefore Table C6 is surprising applying, as it does, the same parking standards to town centre flats as to out-of town-houses. That is not supporting sustainability. Also surprisingly, the County-wide calculator (referenced at footnote 373 of the Local Plan) does not recognise any distinction for town-centre residential development in North Dorset. This is in contradistinction to the Local Plan which identifies that the four main towns, at least, each have an identifiable town centre. The County-wide calculator applies lower towncentre parking standards for smaller towns with smaller centres in other Districts in the County. Albeit that the Local Plan does not at present set out policies to encourage town centre residential development that omission is contrary to the NPPF paragraph 23 and the subject of separate submissions. Town-centre regeneration, supported as a vision and objective in the Local Plan, will involve the creation of additional dwellings, for example by conversion within heritage assets, to support the vitality of the town-centres and the viability of “heritage-led regeneration, particularly in the four main towns”. (paragraph 4.163). Applying out-of-town parking standards to sensitive town-centre regeneration sites is inappropriate. Reduced and appropriate town-centre levels of additional parking should be reflected in Policy and not left to subjective flexibility.		Should have reduced parking standards specifically for town centre redevelopment sites.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4335		No	It has not been positively prepared	Shaftesbury is addressing parking through its neighbourhood plan, with central parking and longer stay peripheral parking. Parking provision at transport nodes need to be addressed – i.e. Gillingham Station, including the poor road structure link to this station.		Should address parking requirements at transport nodes.

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	4488	10.46	No	It has not been positively prepared, It is not justified, It is not effective	Paragraph 10.46 states that garages should be constructed with dimensions larger than 6 metres x 3 metres. This is not considered to be appropriate as large, single garages with proportions greater than this amount, may adversely impact on other usable space within residential building plots (i.e. the dwelling itself, garden area etc.). Single garages should be limited to 6 metre x 3 metre dimensions; and no larger.	Omit the words 'larger than' from the 4th line of Paragraph 10.46.	Single garages should be limited to a maximum of 6 metres x 3 metres.
2783	Gill Smith	Dorset County Council		4171	10.47	Yes		Incorrect title - not Highways Development Control Engineers	Correct title - Transport Development Management Engineers	Should correctly identify DCC contacts.

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

Policy 24 – Design

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		4056		Yes		Supports the policy.		
769	Tim Hoskinson	Savills	Taylor Wimpey	4195		No	It has not been positively prepared, It is not justified, It is not effective	Policy 24 is unclear and does not give a clear indication as to how a decision maker should react to a proposal. This section should be re-worded to describe how development proposals should respond to local context. The approach to contemporary design set out in the third paragraph is not justified and is contrary to paragraph 60 of the NPPF. The fourth paragraph relates to amenity, which is covered in Policy 25. Paragraph 5 should be amended to encourage engagement and for developers to take into account consultation feedback as far as is practicable and reasonable. The reference in paragraph 6 to cycle parking is unnecessary as this is covered in Policy 23.	Amend Policy 24 to remove the cross reference to design principles, and explain clearly how development proposals should respond to local context. Delete the second, third and fourth paragraphs of Policy 24. Amend the fifth paragraph to encourage developers to engage with the local community.	Contemporary design requirements are contrary to NPPF. Engagement should be encouraged rather than required.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4577	10.54	No	It is not justified, It is not effective	The 'design principles' set out in figure 10.1 duplicate 'By Design'. It is considered unnecessary to repeat large sections of this document in the Local Plan and this figure should be replaced by a reference to the design principles set out in 'By Design'.	Delete figure 10.1 and amend paragraph 10.53 as follows: 10.53 The CABE and DETR publication 'By Design' breaks down key elements of design into a systematic set of principles which can be applied to development sites to establish a clear mechanism for good design which reflects the local area.	refer to By Design and delete design principles from policy
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4578	10.54	No	It is not justified, It is not effective	The 'aspects of development form' set out in figure 10.2 duplicate 'By Design'. It is considered unnecessary to repeat large sections of this document in the Local Plan and this figure should be replaced by a reference to the design principles set out in 'By Design'.	10.54 Any built development and its surrounding spaces are made up of a number of different aspects of built and un-built form. A summary of these aspects can be found within 'By Design'. The development form influences how the space functions, its appearance and how people use it for their everyday activities.	refer to By Design and delete aspects of development from policy

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	4579	10.55	No	It is not justified, It is not effective	The requirement for cycle parking space is covered under Policy 23 and its supporting text. The reference at paragraph 10.55 is considered an unnecessary duplication and should be deleted. The inclusion of standards for the length of clothes drying line in figure 10.3 is considered over prescriptive and should be deleted.	Delete first bullet of paragraph 10.55. Delete Figure 10.3.	reference to cycle parking space duplicates policy 23. Length of clothes drying space is too prescriptive
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4580	10.56	No	It is not justified, It is not effective	Paragraph 10.56 is an unnecessary duplication of the non-residential cycle parking standards covered under Policy 23.	Delete paragraph 10.56	reference to cycle parking space duplicates policy 23.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4581	10.59	No	It is not justified, It is not effective	The impact on neighbouring properties is best dealt with under Policy 25: Amenity	Delete paragraph 10.59	
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4582	10.60, 10.61	No	It is not justified, It is not effective	This section of the plan would benefit from clarification of the status of Town and Village Design Statements . Where adopted, they are adopted as SPD and as such are material considerations, not part of the development plan.	Add the following text at the end of 10.55: Where adopted, Town and Village Design Statements are guidance documents to be given weight as a material consideration. They do not otherwise form part of the development plan for the purpose of decision making. Amend the first sentence of 10.56 as follows: "Where a town or village design statement has been produced, development proposals should seek to reflect any design principles or guidance that are relevant where it is appropriate and viable to do so."	clarify the role of T/VDS
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4583	10.66	No	It is not justified, It is not effective	Paragraph 10.66 should recognise that it may not always be possible or desirable to incorporate all landscape vegetation into the public domain.	Replace the first part of paragraph 10.66 as follows: (Delete: All landscape vegetation, whether new or existing retained vegetation,) Add: Where viable, landscape features should be incorporated into the public domain	not always possible or desirable for all landscaping to be in public domain

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	4584	10.67, 10.68, 10.69, 10.70	No	It is not justified, It is not effective	Paragraphs 10.67, 10.68, and 10.69 appear to replicate information that would usually be set out in a Design and Access statement, which is a statutory requirement. The need for a further Design Quality Assessment is considered unnecessarily onerous. Paragraph 10.70 includes an unjustified requirement for the application of ‘Building for Life’ standards. It is unclear in what circumstances a design review process would be required, or why this should be at the developer’s expense. Paragraphs 10.67 to 10.70 should therefore be deleted	Delete paragraphs 10.67, 10.68, 10.69 and 10.70	Design Quality Assessment repeats statutory Design and Access Statement. Design review process unclear.
2984	Tim Hoskinson	Savills	Gillingham Southern Extension	4585		No	It has not been positively prepared, It is not justified, It is not effective	The first two paragraphs of Policy 24 are unclear and do not give a clear indication as to how a decision maker should react to a proposal. The design principles and standards are not clearly set out or referenced. This section should be re-worded to describe how development proposals should respond to local context. The approach to contemporary design set out in the third paragraph is not justified and is contrary to paragraph 60 of the NPPF. The fourth paragraph relates to amenity, which is covered in Policy 25. Paragraph 5 should be amended to encourage engagement and for developers to take into account consultation feedback as far as is practicable and reasonable. The reference in paragraph 6 to cycle parking is unnecessary as this is covered in Policy 23.	Amend Policy 24 as follows: (delete text in brackets) Development should be designed to improve the character and quality of the area within which it is located. Proposals for development will be encouraged (permitted) to ensure (where) the layout, siting, alignment, design, scale, mass and materials used complements and respects the character of the surrounding area or would actively improve the legibility or reinforce the sense of place. (required to justify how the relevant aspects of development form address the relevant design principles and standards set out in this policy and how the design responds to the local context.) (Developments will be permitted provided that the relevant aspects of development have been designed to reflect the relevant design principles and have satisfactorily addressed the relevant standards. A proposal that uses development forms which do not reflect the relevant design principles and standards, or which otherwise conflict with the design principles, will not be permitted. In certain circumstances, an exceptionally well-designed ‘contemporary’ or ‘modern’ scheme may be acceptable. Development proposals that are of an	Contemporary design requirements are contrary to NPPF. Engagement should be encouraged rather than required. Policy should only require development proposals to respond to local 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
									<p>overbearing nature or where the enjoyment of the existing properties is significantly diminished will be refused.) Developers will be (required) encouraged to engage with the local community and (offer realistic opportunities for local people to influence development proposals) demonstrate that feedback has been taken into account as far as it is practicable and reasonable to do so. Where (existing)relevant local guidelines have been established, these should be (reflected)taken into consideration in development proposals. Developments will be required to provide adequate space for (cycle parking), storage for bins and recyclables and in addition in the case of residential developments, laundry drying. Developments will be expected to incorporate existing mature trees and hedgerows and other landscape features into the (public realm of the development) layout and provide sufficient additional landscape planting to integrate the development into its surroundings.</p>	
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4376		No	It has not been positively prepared, It is not justified, It is not effective	Policy 24 is unclear and does not give a clear indication as to how a decision maker should react to a proposal. This section should be re-worded to describe how development proposals should respond to local context. The approach to contemporary design set out in the third paragraph is not justified and is contrary to paragraph 60 of the NPPF. The fourth paragraph relates to amenity, which is covered in Policy 25. Paragraph 5 should be amended to encourage engagement and for developers to take into account consultation feedback as far as is practicable and reasonable. The reference in paragraph 6 to cycle parking is unnecessary as this is covered in Policy 23.	Amend Policy 24 to remove the cross reference to design principles, and explain clearly how development proposals should respond to local context. Delete the second, third and fourth paragraphs of Policy 24. Amend the fifth paragraph to encourage developers to engage with the local community.	Contemporary design requirements are contrary to NPPF. Engagement should be encouraged rather than required. Policy should only require development proposals to respond to local context.

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

Policy 25 – Amenity

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4279	10.84			The plan could make reference to the AONB's position statement on light pollution		
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4127	10.72	No	It is not justified	Not the most appropriate strategy as Para 10.72 should also refer to impact of large scale development on the surrounding areas		
769	Tim Hoskinson	Savills	Taylor Wimpey	4196		No		Policy 25 is considered unnecessarily long and should be replaced by a criteria based policy. The requirement for noise and/or vibration impact assessments should be covered in the supporting text.	Delete Policy 25 and replace with a concise criteria based policy	Should have criteria based policy.

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	4586		No	It has not been positively prepared, It is not justified, It is not effective	The reference in paragraph 10.75 to 'unwanted social contact' is unclear. Policy 25 is considered unnecessarily long and should be replaced by a criteria based policy as set out below. The requirement for noise and/or vibration impact assessments should be covered in the supporting text.	Delete the third sentence of paragraph 10.75 as follows: (Poorly designed public spaces and routes can also lead to unwanted social contact.) Delete Policy 25 and replace with a concise criteria based policy as follows: POLICY 25 AMENITY Development will be permitted provided that: - It is designed to protect the privacy of its occupants and those of neighbouring properties; - Gardens or communal open spaces are provided as appropriate to the needs of the intended occupants; - It does not result in inadequate levels of daylight or excessive overshadowing; - External lighting is designed to control light direction and intensity in order to minimise potential pollution from light scatter, spillage, or glare; - It does not generate significant noise, vibration or unpleasant emissions unless it can be demonstrated that the impact on the amenity of local residents will be made acceptable through appropriate mitigation and control measures; and - Development which is sensitive to noise or unpleasant odour emissions will not be permitted in close proximity to existing sources where it would have an unacceptable impact on the amenity of future occupants.	Should have criteria based policy.

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		4336		No	It is not justified	All developments should have an impact assessment on the infrastructure and this must include capacity of medical provision, education provision, local employment, road infrastructure and open space provision. This must be informed by Social Sustainability surveys or data. Evidence - lack of facilities for Shaftesbury eastern development, and the impact on existing local provision.		
3072	Tim Hoskinson	Savills	Barratt David Wilson Homes	4377		No	It is not justified	Policy 25 is considered unnecessarily long and should be replaced by a criteria based policy. The requirement for noise and/or vibration impact assessments should be covered in the supporting text.	Delete Policy 25 and replace with a concise criteria based policy.	Should have criteria based policy.
388	Tom Munro	Dorset AONB Partnership		4057		Yes		Supports the policy and points out that dark skies are one of the Dorset AONB's special qualities, easily eroded by insensitive lighting schemes even those implemented some distance from the designated area itself.		

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Policy 26 – Sites for 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
404	Michael Holm	Environment Agency		4226		Yes		The comment we recommend to Policy 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.	Please include reference to the development (sites for Gypsies, Travellers and Travelling Showpeople) not being located in an area at risk of flooding as the National Planning Policy Framework Technical Guidance Note may consider that some types of development under this policy may be highly vulnerable.	No reference to not developing gypsy sites in flood risk areas.

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

Policy 27 – Retention of Community Facilities

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		4129		No	It is not justified	Not the most appropriate strategy as it is unduly onerous. The policy is unreasonable as it requires applicants to demonstrate need and redundancy.		The policy is unduly onerous and unreasonable as it requires applicants to demonstrate need and redundancy.
604	Rose Freeman	The Theatres Trust	The Theatres Trust	4033		Yes			Need to define exactly what is meant by 'community facility'. Suggest that use this description: 'Community facilities provide for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community'. Could then say: 'Social infrastructure specifically provides venues for museums, libraries, art galleries, theatres, cinema, sports and recreational halls, public art, snooker halls, nightclubs, concert venues, casinos, bingo halls, swimming pools, leisure centres and parks'.	Policy needs to provide greater clarity on what is a 'community facility'

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	4466		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>Hall & Woodhouse support the positive support set out under Policy 27 to proposals which seek to extend or diversify local community facilities to ensure their retention and improved viability. In the case of existing pubs this could require varied solutions, for example increased facilities for the pub; improved landlord accommodation and new facilities such as tourist related uses. However, there is a concern that this policy objective could conflict with the Policy 31, for example, on Tourist Accommodation which states that proposals for new built tourist accommodation in the countryside will only be permitted if re-using an existing building. Representations have been submitted in respect of Policy 31 to seek its amendment to be in line with Policy 27.</p> <p>It is considered that a different approach should be given to the loss of a community facility within the four towns to the smaller settlements. Taking pubs as an example, the four main towns each have a wide choice of pubs and the loss of one pub, which is no longer considered viable, and its redevelopment or re-use for a more beneficial use should not be frustrated by the requirement for a period of some 12 months of marketing. The policy should therefore only apply outside of the four main towns where there may only be one such facility in a smaller settlement.</p> <p>The final part of the policy which indicates that for all applications for development, the Council will take into account the importance of the facility to the local community is considered ambiguous and it is not clear what is meant and how this is to be judged. As a result it should be deleted. The criteria to be applied as set out under 10.128 are clear and no additional criteria are therefore required.</p>	<p>Paragraph 2 should be amended from: 'Development (including the change of use of an existing premises).....' To 'Development outside of the four main settlements (including the change of use of an existing premises).....'</p>	<p>A more flexible policy approach is required in the towns compared to the villages where facilities are generally more limited. Policy is unclear in how it will take into account the importance of the facility to the local community and the area it serves.</p>

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

Policy 28 – Existing Dwellings in the Countryside

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		4130		No	It is not consistent with national policy	NPPF encourages flexibility for sustainable living. This policy is negative, includes hurdles and restrictions.		Policy is negative and restrictive
378	Simon Rutter	Proctor Watts Cole Rutter		4359		No	It is not justified	Policy 28 para h) is unnecessary as change of use to a separate dwelling requires planning permission in any case and unduly restricts legitimate design approaches.		Policy is restrictive
378	Simon Rutter	Proctor Watts Cole Rutter		4360		No	It is not justified	Policy 28 para k) there is no design or aesthetic reason why an extension or alternation need to be subservient or designed to be in character and ignores opportunities for enhancement.		Policy is too restrictive as extensions do not need to be subservient or to be in character
378	Simon Rutter	Proctor Watts Cole Rutter		4361		No	It is not justified	Policy 28 para m) use as a separate dwelling would require planning permission and unduly restricts where buildings could otherwise be reasonably located. Para n) is unnecessary as this is already within the control of the Council under law without need of a policy.		The criteria requiring annexes to be ancillary rather than separate dwellings is unnecessary
388	Tom Munro	Dorset AONB Partnership		4058		Yes		Supports the policy.		

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested change	Summary of Main Issues
1594	Diccon Carpendale	Brimble Lea & Partners		4202	10.134 to 10.149	No	It is not consistent with national policy	Policy 28: Existing Dwellings in the Countryside and the preceding text advises that: (d) there is no extension of the existing residential curtilage. Such an approach is entirely inconsistent with advice in Part 11 of the NPPF. Adjoining Local Authorities are permissive of extension of residential curtilages in the countryside subject to certain safeguarding criteria. WDDC has a specific policy permitting this. SSDC takes a permissive approach subject to safeguarding landscape character. (h) This sub-section contradicts the part later in the policy on ancillary domestic buildings within residential curtilages in the countryside - in other words a detached annexe as permitted under Parts l - q is excluded under part (h). (i) See comments made with respect to (d) above. (j) This is unclear and unnecessary. (k) There is an assumption that all extensions or alterations must be subservient in scale to the existing dwelling. In certain instances this is not appropriate. This sub-section of the policy is too prescriptive and is unnecessary. (q) This sub-section is unnecessary and too prescriptive.	Delete sub-section (d), policy 28. Reword sub-sections (h) and (l) - (q) to be consistent. Delete sub-section (i). Delete sub-section (j). Reword sub-section (k).	Policy is too restrictive as it should permit the extension of residential curtilages. Parts of policy relating to extensions and ancillary buildings are inconsistent. Some criteria, such as extensions do not need to be subservient or to be in character, are unnecessary.
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4337		No	It is not consistent with national policy	This policy runs contrary to the positive and encouraging wording of the National Plan document which promotes flexibility and sustainable living.		Policy is negative and restrictive
3073	Suzanne Keene	CPRE North Dorset Branch		4424	10.44	No	It is not effective	We welcome Para. 10.144, that high quality contemporary designed buildings will be encouraged. It should be reflected in Policy 28.	Re-word Policy 28: Point f) The replacement dwelling whether traditional or contemporary, is of a size and design that is no more visually intrusive ...	High quality contemporary designed buildings are encouraged, but this is not in the policy text

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Policy 29 – The Re-use of Existing Buildings in the Countryside

ID Number	Name	Company	Representing	Repr Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
10	Edward Dyke	Symonds & Sampson		4535		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	Policy 29- Reuse of existing buildings in the countryside 10.169- Para 28 of the NPPF states that the Local Plan should support the rural economy "through [the] conversion of existing buildings", NDDC state that they will not support the retention and reuse of agricultural buildings over 500m2; this is not in line with para 28. There is no logical reason for this artificial restriction and each case should be taken on it's own merits. A large number of both traditional and modern farm buildings are over 500m2 in size and there should be no restriction on alternative economically viable uses.	Policy 29 - removal of point e "the existing building merits retention and re-use"	Policy does not reflect national policy and imposes artificial restrictions on the merits of retention and re-use.
22	P Dance	Paul Dance Limited		4003		No	It is not justified, It is not consistent with national policy	The NPPF does not contain a sequential process in relation to the reuse of buildings in the countryside. The approach is totally unjustified and not needed particularly as the new "General Development Order" permits the conversion of redundant and disused buildings	Assessment Criteria L within the policy should be removed. The Sequential Process should be removed.	Policy does not reflect national policy with a sequential approach
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4131		No	It is not consistent with national policy	This policy runs contrary to the positive and encouraging wording of the NPPF. It is restrictive and will not help people live their lives in a more sustainable fashion. It will not ensure the vitality of rural communities and local businesses will struggle to survive.		Policy is restrictive and does not reflect national policy
404	Michael Holm	Environment Agency		4227		Yes		The comment we recommend to Policy 29 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.	This policy should acknowledge flood risk issues as the introduction of more vulnerable development, especially for caravan and camping uses have inherent risks, principally due to unfamiliarity with the location. These types of development will need to be support by detailed flood risk information including evacuation plans.	Policy fails to acknowledge flood risk issues.

ID Number	Name	Company	Representing	Repr Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
641	Laura Cox	Pro Vision Planning and Design	Charborough Estate	4522		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Supports the positive aspects of Policy 29 in relation to encouraging and enabling the reuse of existing buildings in the countryside. In particular, welcomes the consideration given to non-occupational residential reuse of existing buildings. The reuse of existing buildings in the countryside for economic development, community or residential purposes will support North Dorset District Council in meeting development needs in the countryside.		Supports policy as it will help meet the development needs in the countryside
1594	Diccon Carpendale	Brimble Lea & Partners		4203	10.150 to 10.185	No	It is not consistent with national policy	The policy and preceding text is long winded and confusing. It attempt to repeat aspects of paras 28 and 55 of the NPPF. However, it is unclear and fails to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency (para 17 of the NPPF). Subsection (d) is similarly confusing suggesting that certain types of use will be permitted in certain locations, but not others. This is clearly contrary to Part 3 of the NPPF - Supporting a Prosperous Rural Economy, which does not suggest such a locational restriction. The principle of re-use should be acceptable irrespective of the location in the countryside. This will provide consistency with the residential conversion schemes permitted by para 55(b) of the NPPF (in any countryside location). Reference to the building's existing status is confusing. In relation to sub-section c) there is no reason why an unsuitable agricultural building still used for such purposes should not be brought into an alternative use even if this necessitates the erection of an appropriate modern agricultural building. In many instances the provision of such a building would be permitted development in any event. In relation to subsection e), the NPPF supports the conversion of existing buildings. There is nothing to say that these must merit retention. In relation to subsection (j) there is no reason for preventing an extension of the curtilage of a building provided that any additional land provided (e.g. as a garden to serve a dwelling) can be done in a way that safeguards the character and appearance of the countryside.	The policy should be simplified and not repeat paras 28 and 55 of the NPPF. As referred to in Q6 above, elements of the policy should be removed or reworded to provide greater clarity and to accord with advice in the NPPF.	Policy does not reflect national policy as the principle of re-use is acceptable irrespective of the location in the countryside (para d) or its condition (para e). Policy is unfounded in relation to replacement buildings (para c) and curtilage extension (para j).

ID Number	Name	Company	Representing	Repr 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		4338		No	It is not consistent with national policy	This policy runs contrary to the positive and encouraging wording of the National Plan which promotes flexibility and sustainable living.		Policy does not reflect national policy
3073	Suzanne Keene	CPRE North Dorset Branch		4390		No	It is not effective	The policy and explanations do not fully reflect the Council's intention to protect the amenity and nature of the countryside; industrial uses of redundant farmyards can have highly deleterious effects.	10.70 Add new para: Industrial uses of redundant farmyards can have adverse effects on the amenity of countryside and villages. Such uses will not be permitted. Para 10.185 "should be avoided" This is vague and unenforceable. Substitute: will not be permitted. Policy 29 Point k) - reword: Such as open storage, that would be intrusive visually or create noise, fumes or increased traffic.	Policy fails to consider the impact on amenity and nature of industrial uses on redundant farmyards.

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

Policy 30 – Existing Employment Sites in the Countryside

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
35	Cliff Lane	F P D Savills	Taymix Transport Ltd	4444		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	<p>For proposals to extend the existing industrial site onto land to the south of Pimperne to the east of A354, Policy 1 espouses the very supportive policies of the NPPF and Policy 11 which specifically supports the small scale expansion of existing employment sites. However, the other most relevant policy, Policy 30: EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE is overly restrictive and does not sufficiently reflect the sentiments of the NPPF or the policy support given in Policy 11. Whilst Policy 30 is supportive of the extension of an existing building, the construction of a new building or the redevelopment of buildings or the site as a whole. This support, however, only refers to ‘within existing employment sites’ and is then subject to six criteria, some of which we maintain are also overly restrictive and are contrary to the spirit of the NPPF and Policy 11. Policy 30 and its criteria do not reflect the much more positive guidance contained in the NPPF or Policy 11.</p> <p>Policy 30 should be redrafted to allow for extensions to established business parks and industrial estates in order to provide opportunities for existing businesses to expand, without the need to relocate, and possibly to cater for other businesses looking to locate to the area. This would help to ensure a flexible approach to employment land provision to meet varying business needs over the plan period.</p> <p>Whilst Pimperne is obviously not one of the four main towns that Policy 2: Core Spatial Strategy attempts to focus development on, it is very close to one of the main towns, Blandford, and is situated on one of the main distributor roads in North Dorset the A354 and is close to the A350 trunk road. As such, an extended industrial site, adjacent to the built form of the existing village, in this very accessible location has many benefits.</p>	<p>Suggests revised Policy 30: For existing employment sites in the countryside, appropriately scaled expansion of the site, the extension of existing buildings, the construction of new buildings, the redevelopment of buildings or the site as a whole will be permitted provided that:</p> <ul style="list-style-type: none"> a) the existing development and use is lawful; and b) the development would not include or give rise to ancillary uses with it, such as open storage, that would be visually intrusive, or would not give rise to ancillary uses that could not be accommodated within the site; and c) the development is of a size, scale and design that is not more visually intrusive in the landscape and respects the immediate setting of the site and its wider surroundings; and d) in the case of an extension to an existing building or site, or a new buildings, it is of a size that is not disproportionate to the existing building or buildings or site. Any extension of building(s) or site should be designed to be in character with the existing building, (or buildings) or site and should not detract from the character of the area; and e) where redevelopment is proposed, a specific need for the scheme has been identified, the scheme deals comprehensively with the site as a whole, and a significant environmental benefit will be achieved. 	<p>The positive wording of Policy 11 (para e) is not reflected in Policy 30. Small scale expansion of existing employment sites in the countryside should be permitted.</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
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4133		No	It is not consistent with national policy	This policy is restrictive and written negatively and does not reflect the sentiment of the NPPF which is written positively and encourages development unless there is a very good reason to say no.		Policy is restrictive
641	Laura Cox	Pro Vision Planning and Design	Charborough Estate	4521		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Supports the provisions for economic development in the countryside set out in Policies 11 and 30. However, the policies should be permissive of well-designed new buildings which provide employment in the rural areas, in addition to extensions to existing sites. Redevelopment of Abbot’s Court Farm, Marsh Farm and Anderson Manor Farm could increase the sustainability of Winterbourne Kingston by providing further employment, through a mixed scheme of open market and affordable housing, and some appropriate, small-scale, employment provision.	Policies 11 and 30 should be changed to ensure that the Local Plan is positively prepared. The policy should be based on a strategy which seeks to meet objectively assessed rural employment development requirements. Paragraph 28 of the NPPF states that Local Plans should support the sustainable growth of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings. The changes would secure consistency with national policy.	The policy is too restrictive and should include new buildings in addition to the extension of existing sites in line with national policy (NPPF para 28)
1594	Diccon Carpendale	Brimble Lea & Partners		4204	10.186 to 10.200	No	It is not consistent with national policy	Policy 30: Existing Employment Sites in the Countryside (b) advises that employment sites will not be allowed to be enlarged in the countryside. This runs counter to para 28 of the NPPF. In order for many businesses to expand and grow in rural areas it will be necessary for the site to be enlarged. This can be properly controlled through other policies to ensure that it is done in a way that safeguards amenity and countryside character. (d) Arguably, any enlargement/extension of premises in the countryside could be more visually intrusive than the existing development. The wording of the policy should be amended to provide greater certainty.	Sub-section (b) should be deleted. Sub-section (d) should be amended to refer to any development having an acceptable visual impact in the landscape and respecting the setting of the site and its wider surroundings.	Existing employment sites in the countryside should be allowed to expand in line with national policy (NPPF para 28) and the impact on amenity and countryside character controlled through policy (para d)

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		4339		No	It is not consistent with national policy	This policy is restrictive and written in a manner which does not reflect the intention of the National Plan. Adopting the National Plan wording and approach will provide a positive approach unless there is good reason not to. The National Plan is well worded and states “Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new ones”. The concept of diversification, which is required for sustainability, needs to be understood and incorporated so that employment can be created and supported through sustainable affordable occupational dwellings and business premises and countryside employment diversification. The assumed limited growth outside settlement boundaries will have a negative impact on countryside living.		The policy is too restrictive and should include new buildings in addition to the extension of existing sites in line with national policy (NPPF para 28).
404	Michael Holm	Environment Agency		4228		Yes		The comment we recommend to Policy 30 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.	Please add the words 'flooding and' before the words 'climate change' in the sentence directly below the 'Climate Change' heading.	
784	Shaun Travers	Boon Brown Architects	Mr Steve Lyons	4107	10.200	No	It is not consistent with national policy	Para 10.200 is considered contrary to para 22 of the NPPF. Para 10.200 fails to recognise the flexibility required to properly assess the site specific merits of mixed use or residential redevelopment schemes. It appears to be contrary to part f of the policy. The policy fails to encourage the effective use of pdl contrary to paras 17 and 111 of the NPPF Redundant employment sites in the countryside can be detrimental to the visual amenity of the area and by virtue of their often isolated and or contained locations attract and encourage anti-social behaviour, In requiring a specific need for a redevelopment scheme the policy is unduly restrictive and unable to properly consider the merits of a speculative redevelopment proposal.	Suggests rewording Para 10.200 to say: "All existing employment sites in the countryside are located outside defined settlement boundaries where residential development is strictly controlled. Consequently, mixed use schemes or individual residential units on existing employment sites in the countryside will only be permitted where it has been established that there is no reasonable prospect of the site being required for continued employment use." Within Policy 30, criteria f should also be amended	The policy is too restrictive and should allow for other uses on employment land where there is no reasonable prospect of the site being required for employment uses. Contrary to para 22 of 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
3079	Mike Pennock	Savills	Davis and Coats families	44658		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Policy 30 should be redrafted to allow for extensions to established business parks and industrial estates in order to provide opportunities for existing businesses to expand, without the need to relocate, and possibly to cater for other businesses looking to locate to the area. This would help to ensure a flexible approach to employment land provision to meet varying business needs over the plan period. Blandford is identified as a main town where sustainable development is to be focussed. As such, an extended industrial site for mixed use, adjacent to the built form of the existing industrial estate to the north of the town, in a very accessible location, would have many benefits. It has good road links, is on the route of a bus service, it is close to population centres and it has the ability to service a wide area in terms of customers.		The policy is too restrictive and should allow existing business parks in such as Sunrise Business Park at Blandford to expand if there is demand. Such extensions could be mixed use to make them more sustainable.

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Policy 31 – Tourist Accommodation in the Countryside

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Issues Raised
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4134		No	It is not consistent with national policy	This policy is restrictive and written negatively and does not reflect the sentiment of the NPPF which is written positively and encourages development unless there is a very good reason to say no.		Policy is restrictive and negatively worded.
378	Simon Rutter	Proctor Watts Cole Rutter		4362		No	It is not justified	Policy 31 para a). One of the key requirements of most tourist accommodation, camping and caravan touring sites is that they are in the countryside remote from other settlements and is their 'raison d'etre'. This policy as worded ignores the reasons for many of these sites and so severely restricts opportunities for tourism.		Policy is restrictive as sites in the countryside are what tourist want.
388	Tom Munro	Dorset AONB Partnership		4059		Yes		Supports the policy.		
641	Laura Cox	Pro Vision Planning and Design	Charborough Estate	4527		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Objects to Policy 31, which limits the development of tourist accommodation in the countryside to the reuse of existing buildings. Policy 31 should support the development of new tourist accommodation in the countryside where appropriate. A combination of the reuse of existing buildings and the development of new tourist accommodation would be the most appropriate strategy to respond to tourism demand. Policy 31 is inconsistent with paragraph 28 of the NPPF, which supports the conversion of existing buildings and well-designed new buildings to promote sustainable growth in rural areas. Local Planning Authorities should encourage sustainable rural tourist and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities.	Policy 31 should be amended so that the Local Plan is justified.	Policy is unnecessarily restrictive and inconsistent with para 28 of NPPF and should support well-designed new buildings to promote sustainable growth in rural areas.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Issues Raised
748	Lynne Evans	Southern Planning Practice	Hall & Woodhouse Ltd	4453		No	It has not been positively prepared, It is not justified, It is not effective, It is not consistent with national policy	Hall & Woodhouse object to this policy as it is too restrictive and potentially conflicts with the support being given under Policy 27 for the retention of community facilities which may involve additional development to support their retention and future viability, which could include tourist related facilities in addition to the existing community facility. The policy should therefore at the very least be qualified to cross refer to Policy 27. This amendment is necessary to remove the ambiguity from the policy and to ensure that the policy and the Plan objectives are effective and justified and consistent with national policy.	The first sentence of Policy 31 should be re-worded to include an additional criterion, which would then read: Proposals for new built tourist accommodation in the countryside will only be permitted if: a) part of a proposal to improve the viability or to ensure the continued use of a community facility in accordance with Policy 27: Retention of Community Facilities or b) re-using an existing building....	Policy is restrictive and conflicts with Policy 27 that seeks to retain community facilities. New build tourist accommodation should be permitted in the countryside to improve viability or ensure the continued use of a community facility.
1594	Diccon Carpendale	Brimble Lea & Partners		4205	10.201 to 10.219	No	It is not consistent with national policy	Policy 31 and the preceding text is too restrictive. It advises that new built tourist accommodation in the countryside will only be permitted if reusing an existing building in line with policy 29. This runs counter to Part 3 of the NPPF and would preclude, for instance, the erection of certain types of chalet or other new build accommodation that may be acceptable and in compliance with National Policy. Sub-section (a) is overly restrictive restricting tourist accommodation to those locations which can be accessed by means other than the car. This is entirely inappropriate within a wholly rural area and would severely curtail the potential for tourist accommodation in the countryside. It should be noted that para 29 of the NPPF recognises that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The NPPF is extremely supportive of all forms of sustainable growth and expansion of business and enterprise in the countryside both through conversion of existing buildings and well designed new buildings. At (b) it is suggested that the only forms of farm diversification permissible will be small in scale – this runs counter to advice in Part 3 of the NPPF.		Policy is restrictive and inconsistent with: national policy as new build is not allowed; overly restricts tourist accommodation to those locations that are more sustainable and accessible by car and contrary to national policy by restricting farm diversification to small scale developments.

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Issues Raised
3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4340		No	It is not consistent with national policy	This policy is restrictive and written in a manner which does not reflect the intention of the National Plan. Adopting the National Plan wording and approach will provide a positive approach unless there is good reason not to. The National Plan is well worded and states “Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new ones”. The concept of diversification, which is required for sustainability, needs to be understood and incorporated so that employment can be created and supported through sustainable affordable occupational dwellings and business premises and countryside employment diversification. The assumed limited growth outside settlement boundaries will have a negative impact on countryside living.		Policy is restrictive and inconsistent with national policy. It should support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new ones

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Policy 32 – Equine-related Developments in the Countryside

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		4135		No	It is not consistent with national policy	This policy is restrictive and written negatively and does not reflect the sentiment of the NPPF which is written positively and encourages development unless there is a very good reason to say no.		Policy is restrictive and negatively written which is contrary to national policy.
388	Tom Munro	Dorset AONB Partnership		4060		Yes		General criteria should include a bullet with reference to any proposed development being in keeping with landscape character in terms of situation, scale and materials.		Policy not just text should consider the cumulative impact of development on the character of the countryside.
1594	Diccon Carpendale	Brimble Lea & Partners		4206	10.220 to 10.243	No	It is not consistent with national policy	Sub-section (f) of policy 32 is unreasonable. There is no justification for stables having to be solely of timber. Very often such buildings will be of block construction faced with timber. With respect to commercial equestrian use sub-sections (h) and (i) suggest that new buildings for commercial equestrian use will generally be resisted. Whilst it is acknowledged that use should be made (where appropriate) of existing buildings, the suggested wording runs counter to Part 3 of the NPPF (Supporting a Prosperous Rural Economy). This states, specifically, that plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas both through conversion of existing buildings and well designed new buildings. Furthermore, it advises that plans should promote the development and diversification of agricultural and other land-based rural businesses.	The policy should be reworded to permit the erection of well designed new buildings where it is not possible/practicable to make use of existing buildings.	Policy is restrictive and should include well designed new buildings to be in keeping with national policy.

3068	Richard Tippins	Shaftesbury Neighbourhood Plan Group		4341		No	It is not consistent with national policy	<p>This policy is restrictive and written in a manner which does not reflect the intention of the National Plan. Adopting the National Plan wording and approach will provide a positive approach unless there is good reason not to. The National Plan is well worded and states “Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new ones”. The concept of diversification, which is required for sustainability, needs to be understood and incorporated so that employment can be created and supported through sustainable affordable occupational dwellings and business premises and countryside employment diversification. The assumed limited growth outside settlement boundaries will have a negative impact on countryside living.</p>		<p>Policy is restrictive and should include well designed new buildings to be in keeping with national policy.</p>
3073	Suzanne Keene	CPRE North Dorset Branch		4425		No	It is not effective	<p>Not all of the material points in the explanatory paragraphs are embodied in the Policy. The policy should be clarified to better reflect the requirements of Policies 4 and 20. Para. 10.221 acknowledges that equine developments can have considerable adverse environmental effects, e.g. through replacing natural grassland with monoculture grass; intrusive fencing and hedge removal; laying hard surface tracks; large, unsightly buildings. This can affect public amenity and leisure of others, eg walkers. We welcome the caveat in Para. 10.221 relating to this but it should be properly reflected in Policy 32 itself. Similarly, Para. 10.239 – “The Council will also consider the cumulative impact of such developments on the character of the countryside” – Equine businesses are also liable to generate traffic – especially large vehicles such as horse boxes which are unsuitable for country lanes. This could give rise to unsightly widening. These points should be reflected in the Policy itself, as in the suggested re-wording.</p>	<p>Policy 32 - 1st paragraph Re-word (see Para. 10.221 and 10.239): Equine-related developments in the countryside will be permitted provided that they do not adversely affect environmental quality and the rural character of the District. The cumulative impact of such developments will be taken into account, and where excessive, permission will be refused. Add to Point c) ... in a safe manner and will not require the improvement or widening or provision of intrusive passing places in countryside roads and lanes. Add further Point d) (see 10.233): ... will not generate an unacceptable increase in traffic over countryside roads and lanes</p>	<p>Policy not just text should consider the cumulative impact of development on the character of the countryside.</p>

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Policy 33 – Occupational Dwellings in the Countryside

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
10	Edward Dyke	Symonds & Sampson		4534		No	It has not been positively prepared, It is not effective, It is not consistent with national policy	Policy 33 - Occupational Dwellings in the Countryside 10.247 - Para 55 of the NPPF directs that occupational dwellings can serve "rural workers" this policy only allows temporary dwellings for agricultural business', the opportunity to apply for a temporary dwelling should also be available to forestry and other rural business'.	Policy 33 - "A new temporary dwelling for a rural worker will only be permitted...."	The opportunity to apply for a temporary dwelling should also be available to forestry and other rural business in line with national policy.
299	Anne Kaile	Melbury Abbas and Cann Group Parish Council		4136		No	It is not consistent with national policy	This policy is restrictive and written negatively and does not reflect the sentiment of the NPPF which is written positively and encourages development unless there is a very good reason to say no. New government guidance on permitted development re-emphasises that planning constraints and red tape should be reduced to help stimulate the economy. This policy places too much emphasis on what was a conventional agricultural worker. The world has moved on and agricultural workers live and work in diversified businesses.		Policy is restrictive and negatively written. Rural workers are not limited to agriculture.
1594	Diccon Carpendale	Brimble Lea & Partners		4207	10.244 to 10.278	No	It is not consistent with national policy	Para 10.248 suggests the use of planning obligations to control occupancy. This should be dealt with solely by condition. At para 10.271 it is suggested that "non-fragmentation" agreements may be necessary. This runs counter to established Practice and Case Law. Even within PPS 7 (which is still generally used in the determination of applications for agricultural workers dwellings) there is no requirement for these type of legal agreements. In terms of the policy, sub-section (e) suggests that a dwelling should be of the minimum size. This does not reflect advice within PPS 7 or the NPPF. The dwelling should be of a size that is commensurate with the functional requirement and not unreasonably restricted.	Policy 33 should be amended by the removal of the offending wording.	Policy is restrictive in terms of dwelling size.

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		4342		No	It is not consistent with national policy	This policy is restrictive and written in a manner which does not reflect the intention of the National Plan. Adopting the National Plan wording and approach will provide a positive approach unless there is good reason not to. The National Plan is well worded and states “Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new ones”. The concept of diversification, which is required for sustainability, needs to be understood and incorporated so that employment can be created and supported through sustainable affordable occupational dwellings and business premises and countryside employment diversification. The assumed limited growth outside settlement boundaries will have a negative impact on countryside living.		Policy is negatively written and does not support sustainable growth.
3073	Suzanne Keene	CPRE North Dorset Branch		4389		No	It is not effective	The wording of Para 10.248 and Policy 33 need to be made clearer so that the policy is enforceable, by adding tests for the conditions for removal of occupancy conditions and control of occupancy. This is important because there may be applications for occupational dwellings where the intention is to get the occupational condition lifted and sell them on.	Policy 33 - removal of occupancy conditions. Suggested changes. Point m) specify a test that could be used to establish lack of need. Point o) Specify a test that could be used to establish lack of need. Para 10.248 - The Council will control the occupancy of any occupational dwelling by condition or planning obligation and will seek to secure the retention of such dwellings for occupational purposes to support the rural economy unless it can be demonstrated that an essential need no longer exists. Specify the test for this.	Policy needs to be tightened in relation to removal of occupancy conditions.

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Implementation

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		4061		Yes		Supports monitoring targets, especially with reference to AONBs.		
404	Michael Holm	Environment Agency		4229	Fig 11.1	Yes		The comment we recommend to Figure 11.1 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. Under the intended outcomes it states 'Fewer flooding incidents' which is misleading. This outcome is implying that the local plan will develop schemes to reduce the existing risk to the existing population. However, the indicator relates to new development that we may have offer advice on through the development management process.	You may wish to change the 'intended outcome' to preventing new development from being located in fluvial flood risk. You could use our objection to any such proposals as an indicator but also the number of properties that have failed the Sequential Test which your Development Management team could keep a record of.	Intended outcome for indicator 'Number of planning applications approved contrary to Environment Agency advice' should be amended to mention preventing flood risk on new developments to better reflect indicator.
1543	Jan Wardell	Ramblers North Dorset Group		4117		Yes		Fully support many of the Objectives in the Plan. Renewable energy proposals have to be balanced with the protection of landscape and natural heritage assets, some form of monitoring of the density of renewable energy production developments sites should be incorporated in the plan. Pleased to support the inclusion of an objective to improve sustainable transport links, including the North Dorset Trailway. There are many potential links between market towns and villages utilising the existing public rights of way network. A more pro-active approach to this is needed. Use of existing rights of way and open access land is essential to provide a balance between the built environment and the countryside.	Suggests the monitoring of the density of renewable energy installations	Density of renewable energy installations should be monitored.
2783	Gill Smith	Dorset County Council		4172	11.13	Yes		Footnote 369 incorrect.	Footnote 369 should read "as amended by the 1991 NRSW Act"	

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation Comment	Q7 Suggested Change	Summary of Main Issues
2784	Alison Appleby	Natural England		4568	Figure 11.1	No	It is not effective	<p>Monitoring framework Figure 11.1 for objective 2 (conserve and enhance the environment of North Dorset)</p> <p>This currently refers only to changes in areas of biodiversity importance (loss and addition of sites).</p> <p>Consideration should also be given to the monitoring changes in the quality of those sites of biodiversity importance, as well as the populations of those priority species which may inhabit the site.</p> <p>Policy 4 states under the Species heading that ‘Where there is likely to be an impact on nationally protected or locally rare or scarce species, an assessment of the impact on these species should be submitted to accompany development proposals. This should be appropriate to the scale of development and be informed initially through consultation with the local environmental records centre’.</p> <p>Therefore we are proposing a change to the monitoring framework for Objective 2 in order for it to measure the success of policy 4.</p>	<p>Consideration should also be given to the monitoring changes in the quality of those sites of biodiversity importance, as well as the populations of those priority species which may inhabit the site.</p>	<p>Should monitor the quality of biodiversity sites & species in addition to monitoring site losses and additions.</p>

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Appendix

ID Number	Name	Company	Representing	Rep Number	Para	Q4 Sound	Q5 Element of Soundness	Q6 Representation comment	Q7 Suggested change	Summary of Main Issues
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4253		No	It is not consistent with national policy	Policy Map 9 Compton Abbas: Whilst the majority of the 2003 Local Plan settlement is actually within the AONB, it is shown as not included	To avoid any potential misunderstanding the factual inaccuracy should be corrected.	AONB boundary incorrectly shown in 2003 Local Plan.
616	Richard Burden	Cranborne Chase and West Wiltshire Downs AONB		4254		No	It is not consistent with national policy	Policy Map 22 Iwerne Minster: Whilst the majority of the 2003 Local Plan settlement is actually within the AONB, it is shown as not included	To avoid any potential misunderstanding the factual inaccuracy should be corrected.	AONB boundary incorrectly shown in 2003 Local Plan.
1191	Jonathan Kamm	Jonathan Kamm Consultancy	Clemdell Ltd	4182	D.2	No	It has not been positively prepared, It is not effective	The term "Regeneration" is used frequently throughout the Plan and yet is not defined in the Glossary at Appendix D. Given the key role of "Regeneration" in the achievement of the Plan's stated objectives this is a considerable omission.	An appropriate definition of Regeneration is included in the Government publication "Regeneration to enable growth: A toolkit supporting community-led regeneration" (DCLG January 2012): "At its core, regeneration is about concerted action to address the challenges and problems faced by the community of a particular place. It's about widening opportunities, growing the local economy, and improving people's lives. But beyond that high-level definition, it is not for Government to define what regeneration is, what it should look like, or what measures should be used to drive it. That will depend on the place – the local characteristics, challenges and opportunities."	The term regeneration is not defined in the glossary
3086	Simon Coles	WYG	David Lohfink	4625	C.12	No	It has not been positively prepared, It is not justified, It is not effective	Figure A2 at paragraph C.12 is unclear and inconsistent.	Re-draft Figure A2 or provide suitable explanation.	Requirements for cycle parking provision are unclear