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NORTH DORSET LOCAL PLAN REVIEW

Issues and Options Consultation

27 November 2017 to 22 January 2018

Response Form

As part of the Local Plan Review (LPR), North Dorset District Council has prepared an Issues and Options Document for consultation. The Issues and Options Document, the Sustainability Appraisal and associated documents can be viewed online via:

<https://www.dorsetforyou.gov.uk/planning/north-dorset/planning-policy>

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy (North Dorset), South Walks House, South Walks Road, Dorchester, DT1 1UZ

Deadline: 5pm on 22 January 2018. Representations received after this time may not be accepted.

Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose. Personal details will not be visible on our website, although they will be shown on paper copies that will be available for inspection by members of the public and other interested parties.

*If an agent is appointed, please complete only the Title, Name, Job Title and Organisation boxes in the personal details but complete the full contact details of the agent including email address. All correspondence will be sent to the agent.

Personal Details*		Agent's Details (if applicable)*
Title	Mr	
First Name	Barry	
Last Name	Pliskin	
Job Title (where relevant)		
Organisation (where relevant)	Clemdell Limited	
Address	[REDACTED] [REDACTED] [REDACTED]	
Postcode	[REDACTED]	
Tel. No.	[REDACTED]	
Email Address	[REDACTED]	

Part B – Representations

Please answer as many questions or as few questions as you wish. There is a box at the end of the form where you can provide any comments that you may have.

Housing

1. Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset? If not, please set out what you consider to be an appropriate figure and provide reasons for this.

Yes

No

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

Yes with caveats.

Please see attached comments

Employment

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

Yes

No

3. Do you consider that there is a need to allocate additional employment land in any other part(s) of the District?

Yes

No

Spatial Strategy

4. Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?

Yes

No

5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.

Yes

No

If you have answered 'Yes' please set out your alternative spatial strategy and provide reasoning to support it.

Please see attached comments

Blandford (Forum and St Mary)

6. Do you agree with the conclusions regarding the areas of search identified at Blandford?

Yes

No

7. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

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

Please see attached comments

8. What are the additional infrastructure requirements that are likely to result from potential future development at Blandford?

Please set out what you see as the additional infrastructure requirements.

Please see attached comments

Gillingham

9. Do you agree with the conclusions regarding the areas of search identified at Gillingham?

Yes

No

10. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

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

11. What are the additional infrastructure requirements that are likely to result from potential future development at Gillingham?

Please set out what you see as the additional infrastructure requirements.

Shaftesbury

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

Yes

No

13. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

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

14. What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?

Please set out what you see as the additional infrastructure requirements.

Sturminster Newton

15. Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton?

Yes

No

16. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

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

17. What are the additional infrastructure requirements that are likely to result from potential future development at Sturminster Newton?

Please set out what you see as the additional infrastructure requirements.

Stalbridge

18. Do you agree with the conclusions regarding the areas of search identified at Stalbridge?

Yes

No

19. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

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

20. What are the most important infrastructure requirements that are likely to result from potential future development at Stalbridge?

Please set out what you see as the additional infrastructure requirements.

The Villages

21. Do you agree with the Council's proposed approach in relation to future development at the eighteen larger villages within the District or do you think that the Council should consider an alternative approach?

Yes

No

If you have answered 'No' please set out your alternative approach and information/reasoning behind this.

Please see attached comments

Affordable Housing

22. Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?

Yes

No

23. Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?

Yes

No

24. Do you consider that the Council should continue with its existing policy approach, which allows for a small number of market homes on rural exception sites?

Yes

No

Self-Build and Custom-Build Housing

25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?

Yes

No

a. Allowing serviced plots to come forward under the current development plan policies.

Yes

No

b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing.

Yes

No

c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site.

Yes

No

d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties).

Yes

No

e. Identifying land in public ownership which would be sold only for self-build development.

Yes

No

f. The use of Local Development Orders to facilitate self-build development.

Yes

No

26. Are there any other approaches that could be used to meet the demand for self-build housing?

Yes

No

If you have answered 'Yes' please outline the other approaches which the Council could pursue.

Ensuring the Vitality and Viability of Town Centres

27. Do you consider that the existing hierarchy and network of centres, as set out in LPP1, should be amended to include Stalbridge as a 'local centre'?

Yes

No

Important Open or Wooded Areas (IOWAs)

28. Do you agree that those IOWAs, which are protected from development by other planning policies or legislation, should be deleted?

Yes

No

The A350 Corridor

29. Do you consider that the land which is identified and safeguarded for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass should continue to be identified and safeguarded for such purposes?

Yes

No

Comments

If you have any comments about the Issues and Options Document or the Sustainability Appraisal please set them out in the box below. If your comments are in relation to a specific question or chapter of the Issues and Options Document then please state which question or chapter your comments relate to.

Please see attached comments

Continue on a separate sheet if necessary

Do you wish to be contacted about future consultations relating to the Local Plan Review?

Yes

No

Signature: Barry Pliskin

Date: 22 January 2018

If submitting the form electronically, no signature is required.

When completed please send form to planningpolicy@north-dorset.gov.uk

RESPONSE
TO
THE NORTH DORSET LOCAL PLAN REVIEW
ISSUES AND OPTIONS
AND
SUSTAINABILITY APPRAISAL

ON BEHALF OF
CLEMDSELL LIMITED

1.0 INTRODUCTION

- 1.1 Clemdell Limited (“Clemdell”) is a substantial investor in Blandford Forum Town Centre with a portfolio of shops, houses, flats, and land for residential and commercial development.
- 1.2 In making this response particular attention is given to comments in the recent reports from the Local Plan Inspector and the Blandford+ Examiner. Documents generated by NDDC, part of the Local Plan Examination Library or otherwise, are also relevant.
- 1.3 Clemdell’s response forms part of the Comments opportunity in the Response Form. The North Dorset Local Plan Review Issues and Options document is referred to as the **I&O** and the Sustainability Appraisal as the **SA** in this response.

2.0 HOUSING (Question 1)

- 2.1 The proposed figure of 366 at Question 1 is supported if deliverable in a sustainable manner. It would assist responses if it could clarified whether potential allocations in Wiltshire, such as Shaftesbury’s long term growth needs being met within Wiltshire, as referred to at I&O para 1.12, will alter the figure of 366 required for the District.
- 2.2 There is no discussion in the I&O of Agenda Item 4 of the NDDC Planning Policy Panel of 25 October 2017 which considered reasons for, and ways to mitigate, the lack of a five year housing supply. From those Minutes it is clear that without a more corporate response that situation may continue. The I&O document was an ideal opportunity to involve the widest range of stakeholders in ways and means of bridging the gap between allocations and delivery.
- 2.3 The allocation of sites within this review of the Local Plan is likely to confer “Planning in Principle” (“PiPs”) As consultation progresses the plan process should clearly identify the consequences of PiPs for the identified sites, and for bringing forward unidentified sites if PiPs do not progress to implementation. This should have regard to “deallocating land” referred to the Treasury Paper “Building The Homes The Country Needs” (attached) and how PiP’s will impact upon the local “Accelerating Home Building Programme” (I&O para 1.7)
- 2.4 The minimum size of sites to be identified in the Preferred Options Document should be clarified. There is no mention of brownfield land and the Brownfield

Register in land use allocations. This is considered below.

2.5 The above points affect whether the delivery of 366 units and the supporting infrastructure is achievable.

3.0 **EMPLOYMENT LAND AT BLANDFORD (Question 2)**

3.1 By reason, inter alia, of its decision on Lidl to approve the change of allocated employment land to retail use the Council has, in practice, already determined that additional employment land is not required in this Local Plan period.

3.2 Further, land formally owned by Tesco at Blandford St Mary for retail use has now been purchased for employment use.

3.3 However, if (and only if) the Council can evidence that its Lidl decision was incorrect then employment land should be considered at Blandford St Mary to be proximate to the current housing allocations (now coming to development) and to Blandford Town Centre. Employment land could be an appropriate use for land rejected for housing in the SHLAA.

3.4 The direction of travel of government policy is contrary to the suggestion of further employment land. For example the Treasury's "Building The Homes The Country Needs" identifies "*support conversion of commercial land and developments into housing*".

4.0 **SPATIAL STRATEGY (Questions 4 and 5)**

4.1 The Local Plan must consider the plan area as a whole. The Spatial Strategy treats each Market Town equally and separately without evidence. The SA ranks sites within each town in isolation from the other towns. The Spatial Strategy should be revised, upon additional SA work, to prioritise each town for its sustainability, and that assessment should include Stalbridge.

4.2 Failure to compile an initial sustainability ranking of the towns can readily result in site locations which (as assessed in the SA) rank lower within a particular town being rejected whilst less sustainable sites in another town are allocated

5.0 **BLANDFORD (FORUM AND ST MARY) (Questions 6 and 7)**

- 5.1 The Blandford+ Examiner's Report is part of the evolution of the Development Plan. The I&O should set out clearly the conclusions of the Examiner of the B+ Neighbourhood Plan as they affect the sustainability of the areas of search.
- 5.2 That Report details why the North East proposal (Area A in SA Fig 6.2) is an unsustainable location. Yet the I&O at para 6.5 and Map 6.1 does not even mention, inter alia, the national policy protection given to the best/most versatile agricultural land referred to in detail in the Report.
- 5.3 I&O para 6.17 states that "*Unsuitable areas have been discounted through an assessment exercise ...*" That assessment exercise has ignored the Examiner's Report (and the Local Plan Inspector's Report). Prima facie, the consultation documents give no reason for including Area A. Area A should be discounted ab initio.
- 5.4 The lack of transparency undermines the credibility of the I&O as a planning document and misleads stakeholders in their responses.
- 5.5 In assessing any future sustainable development in Blandford the Council's publications:
- should clearly identify the sustainability issues determined by the Independent Examiner,
 - show how the plan will focus upon and redress the sustainability issues identified in the Indices of Multiple Deprivation ("IMD") which designate Old Town Ward (primarily the Town Centre) as the most deprived.

6.0 **BLANDFORD INFRASTRUCTURE (Question 8)**

- 6.1 Para 6.12 of the I&O notes that: "*The Council is updating the existing Infrastructure Delivery Plan as part of the LPR to ensure that required infrastructure needs are identified.*"
- 6.2 Absent that updated Plan, requesting a stakeholder's "wish list" without a mechanism for delivery is unhelpful. If delivery cannot be evidenced within the plan period the infrastructure should not be included. The Examiner's comments on the delivery of infrastructure should be identified in future Council publications for the Local Plan review.

6.3 Sustainability considerations determine that achievable infrastructure delivery should be targeted at the most deprived area of Blandford. That area is identified by the IMD as Old Town Ward. Any publically funded infrastructure targeted at the least deprived area such as North East Blandford is unsustainable ab initio.

6.4 There should be clear disclosure how it is proposed that PIPs that may be conferred by the reviewed Local Plan can be tied to infrastructure funding and delivery. That, of course, applies to the plan area as a whole.

7.0 **THE VILLAGES & AFFORDABLE HOUSING (Questions 21 to 24)**

7.1 The review pre-empts the Needs Surveys which are a precondition for any substantive response to the Questions. The Council should commit to undertaking these surveys prior to the Preferred Options Document.

7.2 However, given the general shortfall in housing delivery any policy that will crystallise the delivery of additional affordable housing should be supported. Exception Sites greater than nine units are appropriate if local need is greater, cross subsidy is supported if that is required for viability, and sites proximate to the Market Towns are appropriate if they satisfy a balance of general planning principles.

8.0 **ENSURING THE VITALITY AND VIABILITY OF TOWN CENTRES (Question 27)**

8.1 In considering the vitality and viability of town centres the I&O is confined to the retail offer. In that narrow consideration, it fails to set out or justify the harm caused in this Local Plan period to Blandford Town Centre by the Council's approval of Lidl out-of-town. That harm is identified in its Agenda reports, and its retail reports that are in the Examination Library. However there is no indication that any lesson has been learned.

8.2 The I&O should have taken as its starting point the existing function of the town centres. That includes the recognition and assessment of the town centres as places for, inter alia:

- living,
- employment (not just retail employment),
- accessible community facilities,
- a transport hub.

8.3 A key factor in the health of a town centre is a land use policy for parking. Ensuring that public parking is in the right place at the right price is a nationally supported

policy that underpins the success of a town centre for retail, employment, community uses and multi-modal transport. This is especially the case in North Dorset where many car parks are in the ownership and/or control of the Council.

- 8.4 The review should ensure that the barriers to town centre regeneration projects are removed, artificial alternatives are not proposed, and the definitions of areas within the town centres have a factual base.

9.0 **THE SUSTAINABILITY APPRAISAL**

- 9.1 The SA should provide clear and transparent information on its scoring system so that it can be objectively validated. This will also allow for the comparison of sites between the towns so that the Preferred Options Document can identify the most sustainable housing sites in the Local Plan area as a whole and not on a town-by-town basis.

- 9.2 In considering which unsuitable areas to discount (per I&O para 6.17) the Blandford+ Examiner's Report on the sustainably constraints of Blandford's Area A in SA Fig 6.2 should be clearly set out for consultation.

- 9.3 The conflation of Grade 2 and Grade 3 agricultural land is contrary to national policy. The SA should clearly identify the percentage of Grade 2 land in the District and identify each area of search that contains Grade 2 land as a "show stopper" – the term used elsewhere by the Council to exclude Crown Meadows. Application of national policy should exclude Blandford's Area A ab initio.

- 9.4 The Blandford+ Examiner was clearly concerned that an SA should be an objective planning exercise. The marking of Blandford Areas A and H is, prima facie, a political assessment which calls into question the SA as a whole.

10.0 **BROWNFIELD LAND**

- 10.1 The Council has published a draft Part 1 Brownfield Register. Enquiry identifies that there is no proposal to adopt a Part 2 Register which would confer PiPs. Therefore additional sites cannot be delivered by reason of this government policy.

- 10.2 Absent a Part 2 Register, brownfield sites will need to be brought forward through Local Plan allocations. That will delay identification and delivery of such sites. Yet "brownfield" is not referred to in the I&O or the SA.

10.3 Recognising government policies on brownfield land in the review documents will facilitate stakeholder responses. If the review going forward identifies and accepts government policy that will encourage landowners to bring forward sites which meet that government policy. Stalling or disregarding the government policies on brownfield land means landowners see no purpose in engaging in the review process or registering sites.

11.0 **SMEs**

11.1 The Treasury's "Building The Homes The Country Needs" reinforces other policy documents that identify government policy moving to "*requiring local authorities to bring forward 20% of their housing supply as faster-building small sites* "

11.2 The local "Accelerating Home Building Programme" (I&O para 1.7) appears to focus on larger developers and developments. The Local Plan review should include, for consultation, pro-active proposals to encourage the identification and development of small sites (particularly brownfield) well suited to SMEs.

12.0 **NEIGHBOURHOOD PLANS**

12.1 At I&O para 6.9 it is said that "*NDDC will take into account those policies within the made NP as it advances with its Local Plan Review*" ie Shillingstone only. But I&O para 1.20 states "*In producing this Issues and Options Consultation Document, NDDC has taken into account the neighbourhood plan that has been 'made' and those which are being progressed.*" and at I&O para 13.8 it says three unmade neighbourhood plans "*have been taken into account in the production of this chapter*" (Blandford+ is one of the three).

12.2 By reason of Blandford Town Council Minute 144.1.4 the Qualifying Body for the Blandford+ Plan has resolved that the current Neighbourhood Plan is withdrawn and that the process will re-start from the Pre-Submission Stage.

12.3 Therefore there is a conflict within the I&O as to what plans have been taken into account. In any event no weight can be placed upon the withdrawn Blandford+ Plan.

12.4 The Local Plan review has the opportunity to determine policies for Blandford upon factual and evidenced based planning policy. However it has failed, inter alia, to set out for consultation the reasoning for the Examiner's rejection of Area A .

12.5 Without any justification the SA accepts the flawed sustainability assessment in the withdrawn Blandford+ Plan that was rejected by the Examiner, objected to by the Council for a site whose SA was not endorsed by the Local Plan Inspector.

12.6 In any event, the review process should set out fully, for consultation, the relevant correspondence between the DCLG and the District Council with the Qualifying Body and/or the Blandford+ Steering Group.

13.0 **CONCLUSION**

13.1 There are three take away points from the North Dorset Local Plan Review Issues and Options document and the Sustainability Appraisal:

13.1.1 As to Blandford, it appears that the Council seek to by pass the Examiner's Report on the Blandford+ Plan.

13.1.2 There are omissions of policies to implement national policy such as for the identification and protection of the best/most versatile agricultural land and the reuse of brownfield land. Nor are these given due weight in the SA.

13.1.3 There is not a comprehensive vision for the regeneration of town centres taking account of the full range of values that make the vitality and viability of town centres a key to sustainability. Addressing the deprivation around town centres, identified by the national government, is ignored. The value of town centres is not given due weight in the SA.

14.0 **SUGGESTED FURTHER ISSUES**

14.1 Consultation on the following Issues & Options would enhance the sustainability of the Local Plan review process:

- the weight to be given to Grade 2 agricultural land,
- the vision for the comprehensive function of town centres,
- the weight to be given to Needs Surveys (to be produced by the Council) in determining policy on village exception sites,
- the process and effect of PiPs through Development Plans and the Brownfield Register.



Autumn Budget 2017

Building the homes the country needs

- Together with the reforms announced in the Housing White Paper, the Budget puts us on track to raise housing supply to 300,000 per year, on average, by the mid-2020s.
1. The Budget makes available over £15 billion of new financial support for house building over the next five years, bringing total support for housing to at least £44 billion over this period. It introduces planning reforms to ensure more land is available for housing and that the country is maximising the potential of its towns and cities to build new homes.

Housing investment

Summary of new financial support for house building announced in the Budget

Measure	Investment
Home Building Fund – loans to SMEs to build homes	£1.5 billion
Small Sites: infrastructure and remediation – grants for remediation and infrastructure to accelerate the building of homes on small and stalled sites	£630 million
Local Authority house building: additional investment – more borrowing for Councils to build new council homes	£1 billion
Housing Infrastructure Fund: extend – grants to local authorities for strategic infrastructure that unlocks new housing	£2.7 billion
Land Assembly Fund – assembling fragmented pieces of land into ready to go sites for developers to build homes on	£1.1 billion
Estate Regeneration – transform run-down estates and provide more housing	£400 million
New financial guarantees – to support private sector house building	£8 billion
TOTAL financial support	£15.3 billion

2. Alongside the financial support set out above, the Budget confirms:
 - the additional £10 billion for the Help to Buy Equity loan announced in October to help 135,000 more people buy new build homes
 - the further £2 billion of funding for affordable housing announced in October
 - the government is proceeding with a Right to Buy pilot for housing association tenants
 - £28 million of support for community recovery for victims of the Grenfell tragedy
3. To ensure this investment is well targeted and helps grow the economy, the government will support more strategic and zonal planning approaches through housing deals. It will also bring together public and private capital to build five new Garden Towns.

Planning for more homes

4. The planning system needs reform. Whilst protecting the **Green Belt**, the government must address the lack of availability of land in the right places for new homes and ensure the UK makes better use of underused land in towns and cities.
5. To improve land availability for development, the government has begun considering intervention in 15 areas where there is not an up-to-date plan and will activate powers that enable it to direct local authorities to produce joint statutory plans.
6. To ensure permissioned land is put to the best use, the government will consult on:
 - deallocating land where there is no prospect of a planning application being made
 - expecting local authorities to grant permission for development of land outside their existing plan if the homes are offered at a discount for sale or rent
 - strengthening the Housing Delivery Test with tougher consequences where planned homes are not built
 - requiring local authorities to bring forward 20% of their housing supply as faster-building small sites
 - how to get developer get under way site more quickly
7. To ensure urban land is used efficiently, the government will consult on introducing minimum densities for housing development in city centres and around transport hubs and measures to support conversion of commercial land and developments into housing. It will also launch:
 - a consultation on reform of the system of developer contributions towards affordable housing and local infrastructure
 - an independent review into the gap between homes completed and land allocated or permissioned for housing

Home ownership

8. The government will continue to support those looking to buy homes now, through Stamp Duty Land Tax and the Help to Buy Equity Loan. It will run a competition to develop innovative solutions that help first time buyers ensure their rental payments are recognised in their mortgage applications. The government will also allow local authorities to increase the council tax premium on empty homes to 100% to make sure homes are kept in use.

Homelessness

9. The government is committed to halving rough sleeping by 2022, and eliminating it by 2027. We are launching the Homelessness Reduction Taskforce to develop a government strategy. As a first step, the Budget introduces three Housing First Pilots in Manchester, Liverpool and the West Midlands to support rough sleepers with the most complex needs to turn their lives around. The government will also provide £20m of funding for schemes to support people at risk of homelessness to access and sustain tenancies in the private rented sector.

Support for renters

10. To support Housing Benefit and Universal Credit claimants living in areas where private rents have been rising fastest, the government will increase some Local Housing Allowance rates by increasing Targeted Affordability Funding by £40m in 2018-19 and £85m in 2019-20. The government will also consult on the barriers to landlords offering more secure tenancies to those tenants who want them.