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Representation# _____	

North Dorset Local Plan Part1

Pre-submission Consultation 29 November 2013 to 24 January 2014

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012)

Response Form

For each representation you wish to make a separate response form will need to be completed.

This is a formal consultation on the legal compliance and soundness of the Local Plan before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form, please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at www.dorsetforyou.com/planning/north-dorset/planning-policy

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT117LL

Alternatively you can submit your comments online at: www.surveymonkey.com/s/NorthDorsetLocalPlan

Deadline: 5pm on 24 January 2014. 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**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form on the pre-submission North Dorset Local Plan Part1 you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our website, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

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

PersonalDetails(ifapplicable)*	Agent'sDetails(ifapplicable)*
Title	Mrs
FirstName	Linda
LastName	Scott-Giles
Job Title(where relevant)	Town Clerk
Organisation (where relevant)	
Address	
Postcode	
Tel. No.	
EmailAddress	

Part B– Representation

The North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representations to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which documents have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the documents it is likely that your comments or objections relate to the **soundness** of the plans and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at one of the consultation exhibitions or call 01258484201.

1. Please select which document you are commenting on:

North Dorset Local Plan 2011 to 2026 Part1 (please complete Questions 2 to 9)

2. Please state the part of that document you are commenting on:

Paragraph number:	Policy/site: 4, 6, 7, 14, 16	Policies map:
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3. Do you consider the Local Plan to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

Yes

No

4. Do you consider the Local Plan to be 'sound'?

No

5. If you consider the Local Plan to be unsound please specify your reason(s) by ticking the box(es) that apply below

Yes – It has not been positively prepared

Yes – It is not justified

Yes – It is not effective

6. Please give specific details of why you consider the Local Plan has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

Blandford Forum Town Council does not have the legal knowledge to challenge the legality and procedure of the Plan formally, however it does not consider that the Local Plan is sound and view the plan as unjust in several respects. Blandford Forum Town Council has concerns that there are inaccuracies initiated by using out of date and not current extant data. In addition, there are conflicts, and inconsistencies: in fact, approach, or interpretation particularly in relation to Dorset County Council reductions. Blandford Forum Town Council's response to the Plan is detailed below.

Positively Prepared - The Town Council does not consider that the plan has been based on strategy which seeks to meet objectively assessed development and infrastructure requirements:

- 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 has suggested alternative sites (Land to the North-East of Blandford Forum and Land adjacent A350/A354 Junction Blandford St Mary). Blandford +(the local Neighbourhood Planning Working Group comprising of the parishes of Blandford Forum, Blandford St Mary and Bryanston) are also hoping to review Land North of the bypass as a further potential alternative site which may be suitable for housing or employment. Guidelines from Central Government would appear to suggest 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 the Town Council requests that its local community is given its voice;

- 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 are 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 is being cared for or even how applications for care facilities will be dealt with should they come forward.

Effective - The 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:

- 960 homes is 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 has confirmed that these services face cuts, not improvements, which highlights further 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. Another inconsistency in the Local Plan and a further failure to engage in factual information with delivery partners.

Justified - The 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 supported by facts:

- 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 are 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 are 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 are outside this 'constraint';

- 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. For that reason, the Town Council considers that Local Plan Policy 4 should be reviewed. Where development is halted, for example on land outside of the bypass, there are already existing industrial estates.

- 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. The Town Council therefore, does not consider that a fair assessment is being given to the need for childcare facilities.

7. What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound? It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To address the concerns raised in question no. 6 above, Blandford Forum Town Council suggests that:

- Updated data and current projections are used;

- A highway study is carried out, to measure the impact increased traffic would have on the one way system in Blandford Forum, and particularly how one dwelling's usage of the B3082 would be likely to cause additional danger to road users, but how 150 dwellings' usage of this road is acceptable;

- The Local Plan is amended to reflect the community's wishes i.e. site allocation is removed;

- The Local Plan is amended to accurately reflect facts i.e. no new sports pitches are being provided, accurately reflecting Dorset County Council's current policy of cuts not growth in infrastructure, a community infrastructure facility rather than neighbourhood hall being provided in the northern part of the town, an accurate assessment of childcare facilities is produced, and a decision is made whether the river and bypass are a constraint to development then a more consistent approach is used when applying

this constraint;

- AONB Boundaries are reviewed and realistic;

- Development already completed is removed from the 960 allocated housing numbers to reflect a realistic period of growth throughout the plan period.

8. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes, I would like to participate in the oral examination.

9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary. Please note that the Inspector determines who is heard at the examination.

Historically, responses to consultations have been noted by NDDC, however it is not considered that the community's voice has been heard or listened to. A precedent has been set by Thame Town Council, as outlined in the answer to question 6, and Blandford Town Council considers that such an opportunity is also suitable in this case.

10. Please outline your comments on the Final Sustainability Appraisal Report or Habitats Regulations Assessment. Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

N/A

11. Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.

Yes – That the Local Plan Part 1 has been submitted for independent examination

Yes – The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1

Yes – The publication of the Local Plan Part 1

Signature: _____

If submitting the form electronically, no signature is required.

Date: 16th January 2014