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Representation # _____

North Dorset Local Plan Part 1

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 DT11 7LL

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 Part 1 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 web site, 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.

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title	c/o Agent	Pro Vision
First Name		
Last Name		
Job Title(<i>where relevant</i>)		
Organisation (<i>where relevant</i>)	Charborough Estate	Pro Vision Planning and Design
Address		Grosvenor Court, Winchester Road, Ampfield, Winchester, Hants
Postcode		SO51 9BD
Tel. No.		01794368 698
Email Address		l.cox@pvprojects.com

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 01258 484201.

1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1 (please complete Questions 2 to 9)
- Final Sustainability Appraisal Report (please complete Questions 2 and 10)
- Habitats Regulations Assessment (please complete Questions 2 and 10)

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

Paragraph number:	Policy/site:	Policies map:
	2. 4. 6. 11. 20 .22. 30 & 31	

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'?

- Yes No

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

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy

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.

PLEASE SEE ATTACHED REPRESENTATIONS.

Continue on a separate sheet if necessary

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.

PLEASE SEE ATTACHED REPRESENTATIONS.

Continue on a separate sheet if necessary

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

No, I do not wish to participate in the oral 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.

THE CHARBOROUGH ESTATE WISHES TO BE REPRESENTED AT EXAMINATION TO ENSURE THAT THE LOCAL PLAN PART 1 PROMOTES SUSTAINABLE GROWTH IN RURAL AREAS.

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.

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.

- That the Local Plan Part 1 has been submitted for independent examination
- The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1
- The adoption of the Local Plan Part 1.

Signature:  _____

Date: 24/01/2014

If submitting the form electronically, no signature is required.



Our ref: LC/JC/1272

24 January 2014

Trevor Warwick
Planning Policy Manager
North Dorset District Council
Nordon
Salisbury Road
Blandford Forum
Dorset
DT11 7LL

Dear Mr Warwick

REPRESENTATIONS TO THE NORTH DORSET LOCAL PLAN PART 1 PRE SUBMISSION DOCUMENT

Pro Vision Planning and Design has been instructed by the Charborough Estate to submit representations to the North Dorset Local Plan Part 1 Pre Submission Document. The Charborough Estate has a particular interest in North Dorset District Council's approach to promoting sustainable growth in the rural areas.

The representations promote the sustainable redevelopment of land at Abbot's Court Farm, Marsh Farm and Anderson Manor Farm, to the east of Winterbourne Kingston. These previously developed sites include a number of redundant farm buildings, both traditional and modern. Redevelopment of Abbot's Court Farm, Marsh Farm and Anderson Manor Farm would help to support the rural economy, meet local housing need and provide opportunities for environmental enhancement.

These representations should be considered together with the representations made by Pro Vision Planning and Design on behalf of the Charborough Estate to the Draft Core Strategy and Development Management Policies Development Plan Document, May 2010 and to the New Plan for North Dorset Key Issues, December 2012.

Representations

Policies 11 and 30 The Economy and Economic Development

The Charborough Estate 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.

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

The Estate supports the positive aspects of Policy 29 in relation to encouraging and enabling the reuse of existing buildings in the countryside. In particular, the Estate 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.

Policy 29 is consistent with paragraph 17 of the NPPF, which establishes the core planning principle of supporting thriving rural communities in the countryside. Paragraph 28 identifies that Local Planning Authorities should support economic growth in rural areas by taking a positive approach to sustainable new development. Paragraph 55 states that housing development is appropriate in the countryside where development reuses redundant or disused buildings and enhances the immediate setting.

Policy 4 The Natural Environment

The Charborough Estate objects to the overall and suggested approach to addressing the impacts from development within 5km of the Dorset heathlands, set out in Policy 4. Other factors should be considered in addition to the distance from the Dorset heathlands when assessing the likely impact. For example, the residential development of a site with a direct footpath to protected heathland would undoubtedly have a greater impact from recreation and cat predation than the development of a closer site which is physically separated by a road or river.

Alternative accessible recreation space should reflect the ecosystems services approach. For instance, subject to careful management provisions, commercial woodland can provide public access to an attractive natural experience, whilst continuing to contribute to a prosperous rural economy through forestry activity. Farmland could be used to provide alternative accessible recreation space via designated routes across privately owned land which might also be grazed or cropped.

The amendments to Policy 4 are necessary to ensure that the Local Plan is effective, and flexible enough to respond to the range of circumstances in which the provision of alternative accessible recreation space may be required. The policy should be changed to secure consistency with national policy, as paragraph 109 of the NPPF states that the planning system should recognise the wider benefits of ecosystems services.

Policies 2, 6 and 20 Spatial Strategy

The Charborough Estate objects to Policies 2, 6 and 20, which identify Blandford, Gillingham, Shaftesbury and Sturminster Newton as the main focus for growth and severely limit development in the rural areas. Policies 2, 6 and 20 should seek to meet objectively assessed development and infrastructure requirements in the rural areas, to ensure that the Local Plan is positively prepared. The application of a policy of restraint to the rural areas will prevent the delivery of sustainable development.

Policies 2, 6 and 20 are not justified, as insufficient evidence is provided to demonstrate that housing need in North Dorset is focused on the four main towns. Housing should be planned to meet identified need throughout the District, including within the rural areas. Much of the growth in Gillingham is due to the substantial increase in commuting to London from the town. Therefore it is unlikely that housing development in Gillingham will meet local need or be sustainable.

Winterbourne Kingston is a sustainable location with a population of over 800, a village hall, a church, a public house, a bakery and local employment. The settlement contains a primary school and there is a regular bus service to Dorchester and Poole. Market housing would help to improve the sustainability of Winterbourne Kingston, provided development was part of a package of housing, employment and a village shop. The settlement and the adjacent brownfield sites should be inset from the countryside designation. The Estate wishes to work with the Local Planning Authority on the promotion of a suitable development consisting of market and affordable housing, employment and related environmental benefits.

The amendments to Policies 2, 6 and 20 are required to secure consistency with Paragraphs 54 and 55 of the National Planning Policy Framework (NPPF) which promote sustainable development in rural areas. Paragraph 54 states that Local Planning Authorities should plan housing development to meet local need in rural areas, whilst paragraph 55 recognises that housing should be located where it will enhance or maintain the vitality of rural communities. Paragraph 55 acknowledges that housing development is appropriate in the countryside where it would re-use redundant or disused buildings and enhance the immediate setting.

Policy 22 Renewable and Low Carbon Energy

Policy 22 should be amended to present a positive strategy for the promotion of renewable energy in North Dorset. 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. The amendment to Policy 22 is required to secure consistency with national policy.

Policy 31 Tourist Accommodation in the Countryside

The Charborough Estate 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 should be amended so that the Local Plan is justified.

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.

Conclusion

The North Dorset Local Plan Part 1 Pre Submission Document is supported by the Charborough Estate, subject to the above amendments. The following changes are required to ensure that the Local Plan Part 1 is sound.

- Policies 2, 6 and 20 should seek to meet identified housing and other development needs throughout the District, including within the rural areas;
- Winterbourne Kingston and the adjacent previously developed sites should be inset from the countryside designation established by Policy 20;
- Policy 4 should consider other factors in addition to the simplistic criteria of the distance of a development from the Dorset heathlands when assessing the likely impact and should ensure that alternative accessible recreation space reflects the ecosystems services approach;
- Policies 11 and 30 should support well-designed new buildings which provide employment in the rural areas;
- Policy 22 should set out a positive strategy to promote renewable and low carbon energy development;
- Policy 31 should be permissive of appropriate, well-designed new tourism accommodation in the countryside.

We would be grateful for acknowledgement of receipt of these representations. Please do not hesitate to contact us if you have any queries relating to the above or the enclosed.

Yours sincerely



LAURA COX
ASSOCIATE DIRECTOR
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Enc.