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# 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](http://www.dorsetforyou.com/planning/north-dorset/planning-policy)

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto: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](http://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		Mr.
First Name		Roger
Last Name		Daniels
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	Lightwood Strategic	Pegasus Group
Address		First Floor, South Wing Equinox North, Great Park Road Almondsbury, Bristol
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## 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: Policy 2 (Core Spatial Strategy)	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

### 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

- 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 refer also to the attached statement on behalf of Lightwood Strategic Ltd)

1. The settlement strategy is included primarily in Policy 2 (Core Spatial Strategy) and Policy 6 (Housing Distribution). It comprises a concentration on the 'main towns' of Blandford, Gillingham, Shaftesbury and Sturminster Newton as the main focus for growth. Outside the four 'main towns', the remainder of the District, including Stalbridge and all the District's villages, will be subject to countryside policies where *'development will be strictly controlled unless it is required to enable essential rural needs to be met'*. This strategy is a radical change of approach from the 2003 Local Plan and the 2010 Core Strategy consultation on the New Plan for North Dorset and is not a sound approach; especially in relation to Stalbridge.
2. The *North Dorset District-Wide Local Plan to 2011 (1st Revision)*, adopted on 31<sup>st</sup> January 2003, included in Policy 2.3 (Distribution of Development) a statement that the approximate scale and rate of development in Stalbridge should be 170 (10 dwellings per year), towards an overall Dorset Structure Plan allocation for North Dorset of about 5,900 for the 17-year period of 1994 to 2011. Policy ST 1 stated that *'In accordance with the overall Local Plan Strategy, Stalbridge will act as a local centre and will receive limited housing and employment growth together with the development of local community services.'* Table 40.2 showed an estimate (in 2003) of 183 housing completions between 1994 and 2011.
3. The *Draft Core Strategy and Draft Development Management Policies Consultation Document* of March 2010 included Draft Core Policy 19 for Stalbridge and the larger villages:

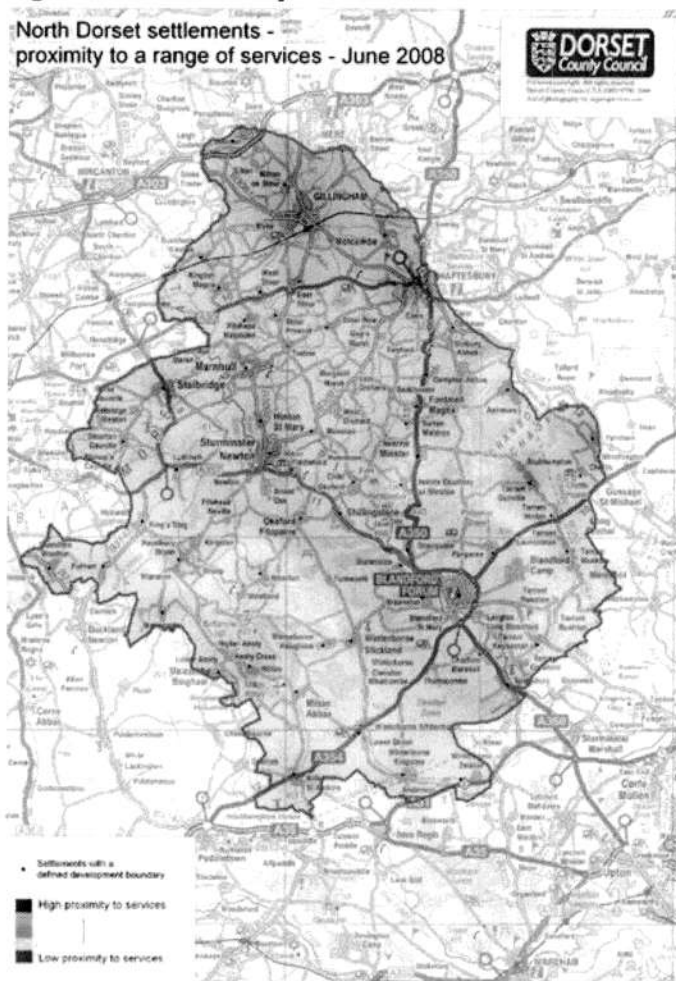
*'About 1,200 homes will be provided in the remaining RSS Development Policy C Settlements (excluding Sturminster Newton, but including Stalbridge and 18 of the larger villages in the District, as listed in draft Core Policy 3). About 600 homes will be built in the period up to 2016 with about 600 built thereafter.*

*In the period up to 2026 the housing needs of these settlements will be met through:*

  - *infilling and redevelopment within defined settlement boundaries; and*
  - *the development of additional housing sites identified in the Site Allocations DPD.'*
4. Following the *Consultation on Key Issues* from 29<sup>th</sup> October to 21<sup>st</sup> December 2012, the Council changed its approach to Stalbridge radically in the Pre-Submission Local Plan consultation. The 2012 consultation included Stalbridge with the District's larger villages (Options 1 and 2) or with all the District's villages (Option 3) and did not offer an option in which Stalbridge was recognised as a higher order settlement.

5. Stalbridge, which is described as one of the 'market towns' in the north of the District (with Gillingham, Shaftesbury and Sturminster Newton) in paragraph 3.37 of the Pre Submission Local Plan, is now proposed to be included with the District's villages as 'countryside' without a settlement boundary and subject to countryside polices.
6. This downgrading of Stalbridge is not justified by the evidence base of the plan. Stalbridge had a population of 2,698 in 2011 which made it the fifth largest settlement in the District after the four 'main towns'; ahead of Marnhull with its population of 1,998 and nine other settlements with populations of more than 1,000. The *Sustainable Development Strategy Background Paper* of November 2013 (paragraph 5.21) shows Stalbridge in the second category of settlement by size of population (2,000 to 3,500), with Sturminster Newton and Marnhull.
7. The *Sustainable Development Strategy Background Paper* (paragraph 5.26, supported by Figure 3) also shows Stalbridge to have proximity to a relatively high level of services: '*relative proximity to services is high around the three main towns, but it is also high in the north-western part of the District where Sturminster Newton, Stalbridge and Marnhull (the District's largest village) are clustered together.*'

**Figure 3: Proximity to Services**



Source: Figure 3 of the Sustainable Development Strategy Background Paper



8. Stalbridge is a small town with a supermarket a number of other shops and other services in its small High Street, including bank, post office, pharmacy, electrical goods retailer, butcher, convenience store, take-away meal outlets, two inns and professional services including dental surgery. The town has a 7-class primary school and separate pre-school facilities. There are local employment areas to the east of the town, which is also only 7 or 8 miles from Sturminster Newton, Sherborne and Wincanton, and 11 or 12 miles from Shaftesbury or Yeovil with their wider ranges of employment, shopping and other facilities. Railway services are three miles away at Templecombe. There are regular bus services to Sherborne and Yeovil with additional services to other towns in the area.
9. The effects of downgrading Stalbridge with all the District's villages to the status of 'countryside' are to reduce the scope for it to remain a sustainable settlement in the future by developing sufficient housing to maintain or expand its population and retain local services. The justification for this approach is explained in the *Sustainable Development Strategy Background Paper* in the following terms: *'the abolition of regional planning means that there is no longer a requirement for Stalbridge and the District' villages to be categorised according to RSS Development Policies B and C, as the draft Core Strategy attempted to do.'*
10. The new approach relies on neighbourhood plans or on local communities 'opting-in' to Part 2 of the Local Plan. This approach is not consistent with paragraph 55 of the NPPF, which states: *'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.'* It is not clear how the Council's proposed approach can account for the interdependence of settlements within the District – or across District boundaries.
11. The Background Paper notes that *'Local communities also require sufficient strategic direction to guide future development.'* The proposed inclusion of Stalbridge in the draft Local Plan with all the District's village and open 'countryside' does not provide sufficient strategic direction for the future of Stalbridge as a small market town, especially as the objective (described in Objective 4, paragraph 2.52) is *'focusing on local (rather than strategic needs) in Stalbridge...'*
12. The Background paper also says that local communities are concerned that if housing is allocated on the basis of existing local facilities, the proposed housing may no longer be justified if facilities close. There is no mention of the increased risk of facilities closing with declining population as a result of falling household sizes and ageing populations, when there is no new housebuilding in a settlement.
13. It is not appropriate to make a settlement as significant as Stalbridge subject to countryside policies, as proposed in Policy 2 (Core Spatial Strategy), based on 'essential rural need' and 'local needs', subject to neighbourhood planning or 'opting in' to site allocations in Part 2 of the Local Plan. Nor is it appropriate for there to be no settlement boundary, as is also proposed in Policy 2, so that

countryside policies apply within the built-up area of the town.

14. Policy 6 (Housing Distribution) is also inappropriate. Stalbridge should be identified in the policy as a fifth 'main town' with its own allocation of housing, rather than treated as part of the countryside and sharing an allocation of 230 dwellings for 2011 to 2026 (about 15 per year) as one of 50 or more settlements.
15. By comparison with Sturminster Newton, which had a population of 4,292 in 2011 and where Policy 6 proposed an allocation of 380 homes, an allocation for Stalbridge of 240 homes would be proportionate, in conjunction with new and improved community facilities. The allocation would entail defining a new settlement boundary for the town to allow its expansion, whilst allowing for infill development on appropriate sites within the town. The new settlement boundary may also involve amending the Conservation Area boundary.
16. A new policy and inset diagram should be included for Stalbridge as a '*main town*': similar to Policies 16 to 19 for the other four '*main towns*'. The new policy should state (inter alia) that:

'Stalbridge will continue to function as an important service centre, in conjunction with other settlements in the north west of the District through:

- a. development and redevelopment within the existing built-up area;
- b. greenfield extensions to the south and west of the town as defined in Part 2 of the Local Plan; and
- c. other opportunities identified by neighbourhood planning

About 240 new homes will be provided at Stalbridge during the period 2011-2026. Housing needs will be met through... (the above locations).

Employment needs will be met at the Station Road employment area and the Gibbs Marsh Trading Estate.

The vitality and viability of Stalbridge as a local shopping centre will be maintained and promoted. Additional retail and service uses (A1, A2 and A3) will be permitted and changes of use of existing retail and service uses will not be permitted unless there is evidence that the existing uses are no longer viable.

17. Consequential modifications should also be made to Policies 2 and 6 and other related text in the draft Local Plan; including commitments to define a new settlement boundary for Stalbridge in Part 2 of the Local Plan and to review the Conservation Area boundary.

*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 refer also to the attached statement on behalf of Lightwood Strategic Ltd)

### **Development Opportunities at Stalbridge:**

18. Potential 'areas for expansion' are identified to the south and west of Stalbridge on the attached plan. Both areas are subject to further investigations, consultations and community engagement (including neighbourhood planning) to define sites and development opportunities more precisely. Both areas are identified in the *Strategic Housing Land Availability Assessment (SHLAA)* of March 2012.
19. The southern area is within SHLAA Site 2/49/0004: Land off Thornhill Road. It is outside the settlement boundary of the current local plan and is appraised as suitable and available but not achievable because of local plan policies.
20. The western areas are within SHLAA Site 2/49/0008: Land off Grosvenor Road. They are outside the settlement boundary of the current local plan. The northern area is within part of the Stalbridge Conservation Area that is associated with the setting of the town, although it is contained within existing buildings on the corner of Barrow Hill and Wood Lane. The southern part, adjoining Waterlake and Thornhill Road, is outside the Conservation Area.
21. These areas could accommodate up to 200 homes: most of the housing allocation that we believe is appropriate for Stalbridge, whilst allowing for continuing infill development on appropriate sites within the town and other opportunities identified by neighbourhood planning.



**Changes Sought to the Plan:**

22. To make the plan sound, the following modifications are proposed:

- Modifications to Policy 2 to include Stalbridge as a fifth 'main town' and one of the District's service centres; to delete Stalbridge from references that include it with the District's villages and countryside in policy terms; and to include a commitment to define a revised settlement boundary in Part 2 of the Local Plan.
- Modifications to Policy 6 to include Stalbridge with an allocation for about 240 homes.
- Modifications to Policy 20 to exclude Stalbridge from the countryside and to include reference to a defined settlement boundary for Stalbridge.
- A new policy and inset diagram for Stalbridge, as outlined in paragraph 18 above; similar in form to Policies 16 to 19 including policy commitments to define a revised settlement boundary in Part 2 of the Local Plan and to review the Conservation Area boundary (under Section 69(2) of the Planning (Listed Building and Conservation Areas) Act 1990).
- Consequential modifications to Policies 2, 6, 9, 20 and other text in the Plan to add references to Stalbridge as a settlement with a defined boundary and to delete references that associate Stalbridge in policy terms with the District's villages and countryside.
- Overall housing requirements should be re-assessed with the aim of improving access to housing and affordability.
- The plan period should be extended to 2031.

*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.

Lightwood Strategic and Pegasus Group will be able to assist the Inspector with his examination by providing additional information and responding to the questions of the Inspector and other participants.

**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: 23<sup>rd</sup> January 2014

*If submitting the form electronically, no signature is required.*