

For office use only	
Batch number: _____	Received: _____
Representor ID # _____	Ack: _____
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	Mr.
First Name	Roger
Last Name	Daniels
Job Title (where relevant)	Director
Organisation (where relevant)	Lightwood Strategic
Address	Pegasus Group
Postcode	First Floor, South Wing Equinox North, Great Park Road Almondsbury, Bristol
Tel. No.	BS32 4QL
Email Address	01454 454094
	roger.daniels@pegasuspg.co.uk

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 numbers: 5.7 to 5.29	Policy/site: Policy 6	Policies map:
-----------------------------------	--------------------------	---------------

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

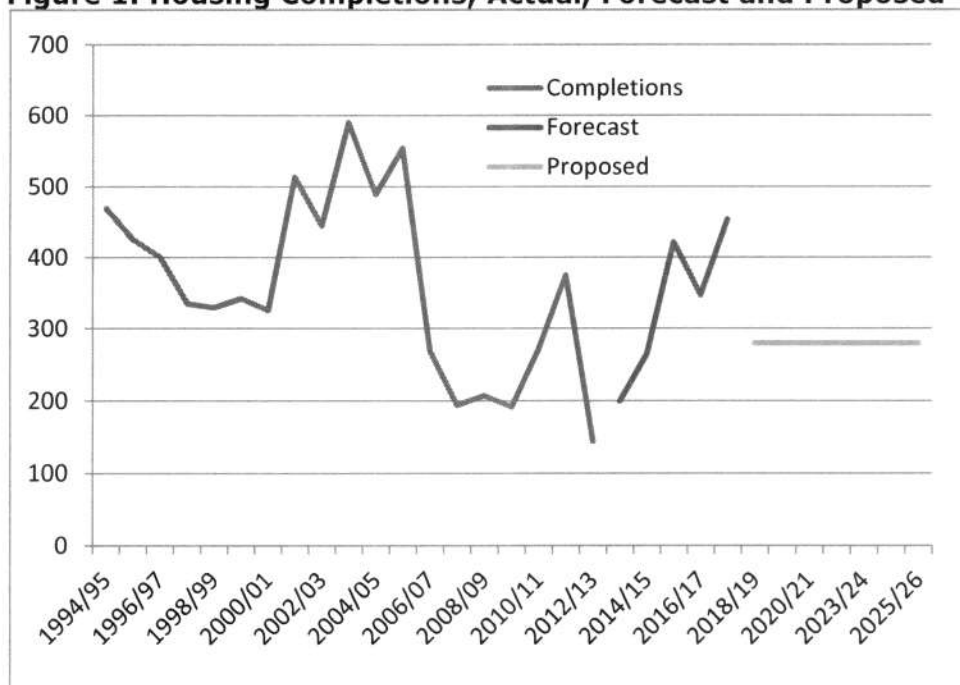
- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy

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. Policy 6 proposes the provision of 4,200 homes over the 15 years 2011 to 2025; a rate of 280 per annum, which is based on the Strategic Housing Market Area Assessment (SHMA) of 2008, updated in 2012. The SHMA advised that *'trend-based data suggests household growth of around 273 per annum for the period from 2011 to 2031 and so a housing delivery figure (on the basis of this figure) might be around 280 per annum (to take account of a small vacancy rate).'*
2. As the SHMA looked ahead to 2031, it is not clear why the Local Plan only looks forward to 2026, especially as paragraph 157 of the NPPF calls for local plans to be drawn up over an appropriate timescale, preferably a 15-year time horizon, and to take account of longer-term requirements. The Council does not expect adoption of the plan before winter 2014; by which time the plan's time horizon will be only just over 11 years and it will be more than 11 years since the previous Local Plan was adopted. A longer time horizon is necessary to give a more strategic perspective for development proposals and infrastructure requirements, and to allow time for the Council to undertake a review before the plan's time horizon has expired.
3. The target housing completion rate of 280 p.a. is compared with past completions and the Council's forecast 5-year housing supply trajectory in Figure 1 below.

Figure 1: Housing Completions; Actual, Forecast and Proposed

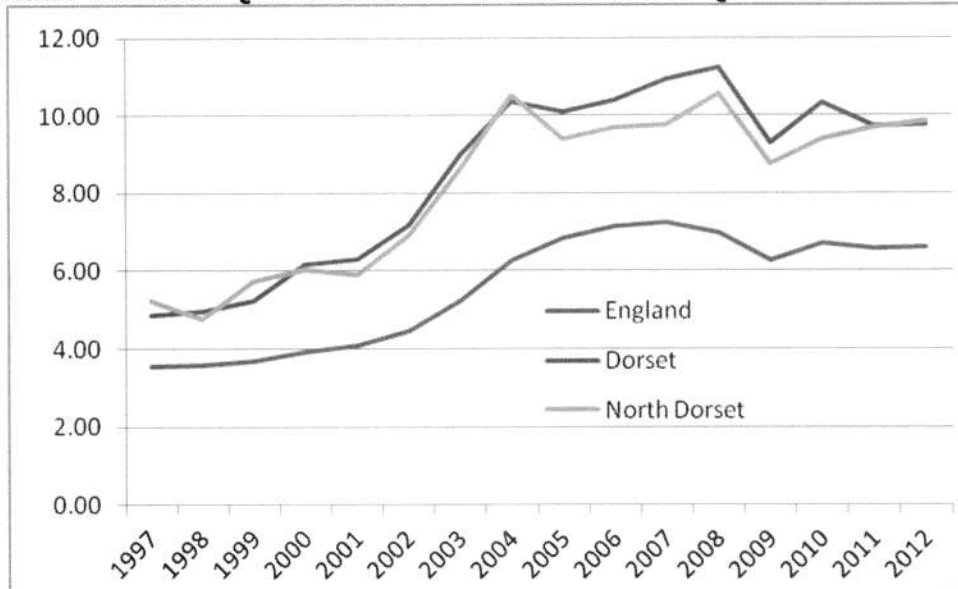


Sources: AMR 2009 and 2011

4. The target rate is low compared with past rates between 1994/5 and 2005/06 and compared with the Council's forecast recovery in housing completions from a low point of 144 completions in 2012/13. It implies a 40% drop in completions from the 2017/18 peak of 454.
5. Population and household projections on which the SHMA is based were undertaken by the County Council, '*linked to the 2008-based ONS/CLG population/ household projections*', and '*updated to a mid-2011 base*'. It is beyond the scope of these representations to review the SHMA in detail, but updating to a mid-2011 base may raise some issues that are also apparent in CLG's Interim 2011-based Household Projections, which project household growth in North Dorset of only 175 p.a. between 2011 and 2021, compared with 252 p.a. for the same period in the 2008-based projections.
6. Household formation from 2001 to 2011 was much lower than previously projected and it is generally agreed that the reasons include economic constraints on household formation and lower rates of household formation among migrants than among the indigenous population. In North Dorset, the steep fall in housing completions after 2005/6 will also have affected the migration trends that underlie the population projections.
7. It is interesting to note that the Inspector who is examining the West Dorset, Weymouth and Portland Local Plan has raised questions about the household projections in that case, which come from the same sources as the North Dorset SHMA. (Note of Inspector's Concerns dated 10 December 2013.) He has noted reasons for the recent downward trend in household formation, has asked for an explanation of why housing numbers have changed since studies for the draft Regional Strategy and has asked for an explanation of the components of household change in the Dorset districts. The Regional Strategy housing target for North Dorset was 350 dpa.
8. Similar doubts about the robustness of the SHMA apply in relation to North Dorset. As the SHMA for North Dorset was prepared as part of the SHMA for the Bournemouth/Poole Housing Market Area, there are also questions about whether it adequately reflects functional linkages with South Somerset and Wiltshire. There should be opportunities to update the SHMA, in the light of the 2011-based household projections and the release of further 2011 Census data, later this year.
9. The Housing Background Paper and the SHMA identified the affordability of housing as an important issue in North Dorset, where house price to income ratios are among the highest in the country. Figure 2 (below) shows the upward trend in the ratio of lower quartile house prices to lower quartile earnings from 1997: outpacing the national trend and rising above the Dorset County average in the past couple of years.
10. Between 1998 and 2008 only 12% of the 4,000 homes completed were affordable housing, compared with the planning target of 35%. In these circumstances, the SHMA and the Local Plan should address the scale of provision that is needed to improve both the overall affordability of market housing and the provision of '*affordable housing*'. The reduction in supply that is represented by a target housing completion rate of 280 dpa will not be sufficient to have the required impact on

affordability and access to housing.

**Figure 2: Housing Affordability
Ratio of Lower Quartile House Prices to Lower Quartile Incomes**



Source: CLG Live Table 576

11. In these circumstances, the planning strategy needs to take advantage of all sustainable opportunities for housing development without arbitrary restrictions on housing development in sustainable settlements.

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)

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: 23rd January 2014

If submitting the form electronically, no signature is required.

Lightwood Strategic Ltd: Land at Barrow Hill and Thornhill Road, Stalbridge, North Dorset

Notes for Representations on the North Dorset Local Plan (2011 to 2026), Pre-Submission Consultation, 29 November 2013 to 24 January 2014

The Soundness of the Plan:

1. These representations do not challenge the legal compliance of the plan, but do challenge its soundness, on the following grounds:
 - The plan has not been positively prepared as it fails to meet objectively assessed needs for housing in the District overall or in specific settlements including Stalbridge;
 - The plan is not adequately justified because of shortcomings in the Strategic Housing Market Assessment and in the settlement strategy;
 - The effectiveness of the Plan is undermined by its relatively short timescale (to 2026, which means that it will not have a 15-year time horizon at adoption); its settlement strategy, which places significant settlements such as Stalbridge within the countryside where various restrictive development management policies apply, with no settlement boundaries; and its reliance on neighbourhood plans and local communities to 'sign up' to provide new housing development through Part 2 of the Local Plan (a site allocations document);
 - The plan does not comply with national policy (the NPPF) because of these shortcomings. In particular, it fails to comply with the following paragraphs of the NPPF:
 - 14: seeking opportunities to meet the objectively assessed development needs of the area with sufficient flexibility to adapt to rapid change;
 - 17: supporting thriving rural communities;
 - 47: boosting significantly the supply of housing and ensuring that the Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, consistent with other policies;
 - 55: promoting sustainable development in rural areas, with housing located to enhance or maintain the vitality of rural communities;

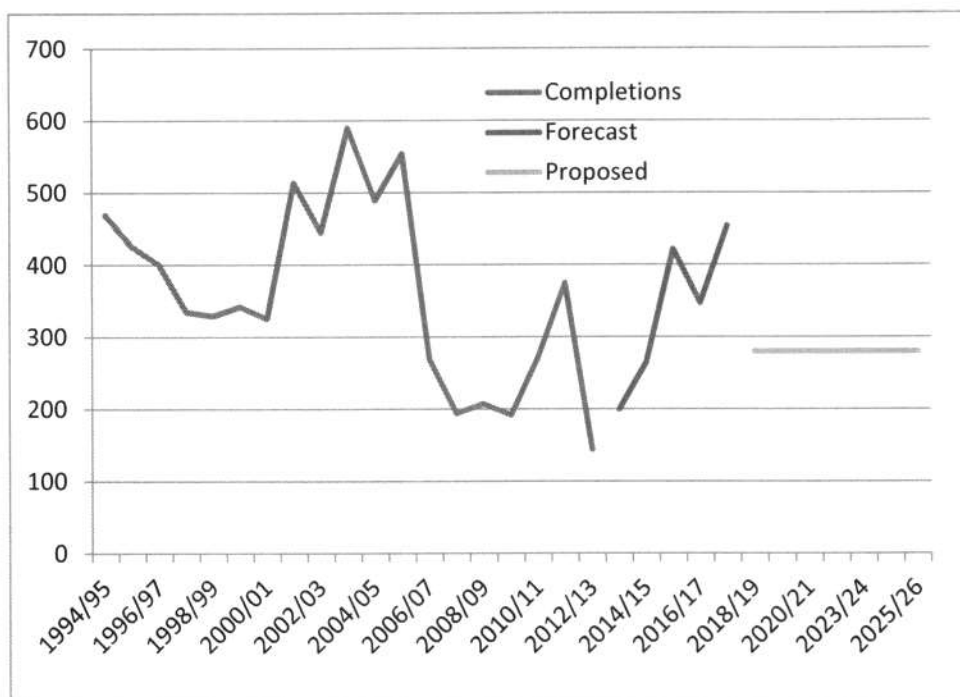
- 151 consistency of Local Plans with the objective of contributing to sustainable development and other policies of the Framework;
- 153 relying on additional development plan documents only where clearly justified;
- 157 drawing up plans for an appropriate timescale, preferably a 15-year time horizon, and taking account of longer term requirements; and
- 158/9 having an adequate, up-to-date and relevant evidence base, including a Strategic Housing Market Assessment that assesses the full housing needs of the area.

Overall housing provision:

2. Objective 5 (Meeting the District's Housing Needs) aims *'to deliver more housing, including more affordable housing that better meets the needs of the District...'* with the *'vast majority of needs'* met in the District's four main towns and provision elsewhere focused on meeting local housing needs.
3. This objective does not commit the Council *'to boost significantly the supply of housing'* (and) *'to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area'*, which is the requirement of national policy (NPPF paragraph 47).
4. Policy 6 proposes the provision of 4,200 homes over the 15 years 2011 to 2025; a rate of 280 per annum, which is based on the Strategic Housing Market Area Assessment (SHMA) of 2008, updated in 2012. The SHMA advised that *'trend-based data suggests household growth of around 273 per annum for the period from 2011 to 2031 and so a housing delivery figure (on the basis of this figure) might be around 280 per annum (to take account of a small vacancy rate).'*
5. As the SHMA looked ahead to 2031, it is not clear why the Local Plan only looks forward to 2026, especially as paragraph 157 of the NPPF calls for local plans to be drawn up over an appropriate timescale, preferably a 15-year time horizon, and to take account of longer-term requirements. The Council does not expect adoption of the plan before winter 2014; by which time the plan's time horizon will be only just over 11 years and it will be more than 11 years since the previous Local Plan was adopted. A longer time horizon is necessary to give a more strategic perspective for development proposals and infrastructure requirements, and to allow time for the Council to undertake a review before the plan's time horizon has expired.

- The target housing completion rate of 280 p.a. is compared with past completions and the Council's forecast 5-year housing supply trajectory in Figure 1 below.

Figure 1: Housing Completions; Actual, Forecast and Proposed



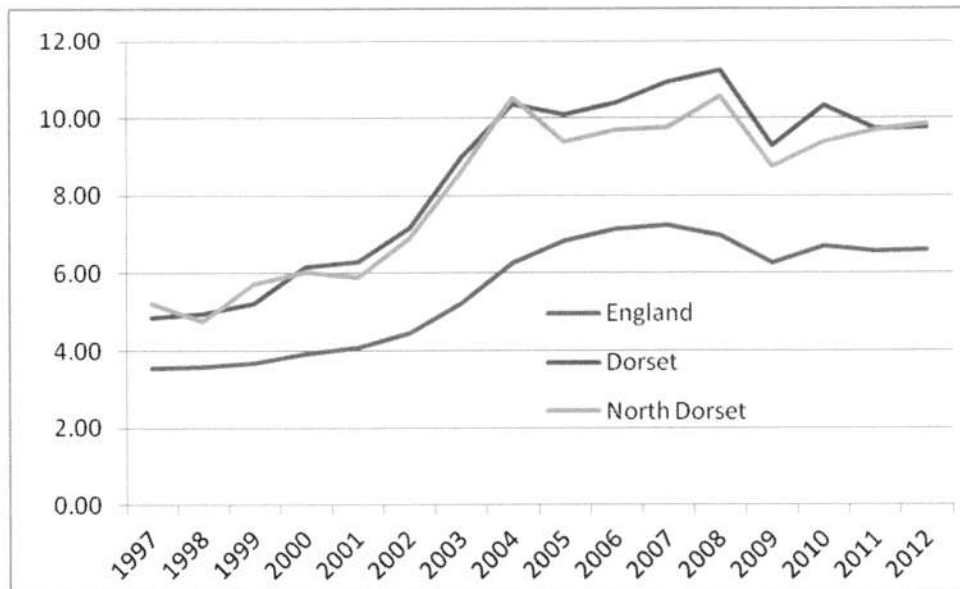
Sources: AMR 2009 and 2011

- The target rate is low compared with past rates between 1994/5 and 2005/06 and compared with the Council's forecast recovery in housing completions from a low point of 144 completions in 2012/13. It implies a 40% drop in completions from the 2017/18 peak of 454.
- Population and household projections on which the SHMA is based were undertaken by the County Council, 'linked to the 2008-based ONS/CLG population/ household projections', and 'updated to a mid-2011 base'. It is beyond the scope of these representations to review the SHMA in detail, but updating to a mid-2011 base may raise some issues that are also apparent in CLG's Interim 2011-based Household Projections, which project household growth in North Dorset of only 175 p.a. between 2011 and 2021, compared with 252 p.a. for the same period in the 2008-based projections.
- Household formation from 2001 to 2011 was much lower than previously projected and it is generally agreed that the reasons include economic constraints on household formation and lower rates of household formation among migrants than among the indigenous population. In North Dorset, the steep fall in housing

completions after 2005/6 will also have affected the migration trends that underlie the population projections.

10. It is interesting to note that the Inspector who is examining the West Dorset, Weymouth and Portland Local Plan has raised questions about the household projections in that case, which come from the same sources as the North Dorset SHMA. (Note of Inspector's Concerns dated 10 December 2013.) He has noted reasons for the recent downward trend in household formation, has asked for an explanation of why housing numbers have changed since studies for the draft Regional Strategy and has asked for an explanation of the components of household change in the Dorset districts. The Regional Strategy housing target for North Dorset was 350 dpa.
11. Similar doubts about the robustness of the SHMA apply in relation to North Dorset. As the SHMA for North Dorset was prepared as part of the SHMA for the Bournemouth/Poole Housing Market Area, there are also questions about whether it adequately reflects functional linkages with South Somerset and Wiltshire. There should be opportunities to update the SHMA, in the light of the 2011-based household projections and the release of further 2011 Census data, later this year.
12. The Housing Background Paper and the SHMA identified the affordability of housing as an important issue in North Dorset, where house price to income ratios are among the highest in the country. Figure 2 (below) shows the upward trend in the ratio of lower quartile house prices to lower quartile earnings from 1997: outpacing the national trend and rising above the Dorset County average in the past couple of years.
13. Between 1998 and 2008 only 12% of the 4,000 homes completed were affordable housing, compared with the planning target of 35%. In these circumstances, the SHMA and the Local Plan should address the scale of provision that is needed to improve both the overall affordability of market housing and the provision of 'affordable housing'. The reduction in supply that is represented by a target housing completion rate of 280 dpa will not be sufficient to have the required impact on affordability and access to housing.

**Figure 2: Housing Affordability
Ratio of Lower Quartile House Prices to Lower Quartile Incomes**



Source: CLG Live Table 576

14. In these circumstances, the planning strategy needs to take advantage of all sustainable opportunities for housing development without arbitrary restrictions on housing development in sustainable settlements.

The Settlement Strategy

15. 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.

16. The *North Dorset District-Wide Local Plan to 2011 (1st Revision)*, adopted on 31st 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.

17. 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.'*

18. Following the *Consultation on Key Issues* from 29th October to 21st 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.

19. 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 policies.

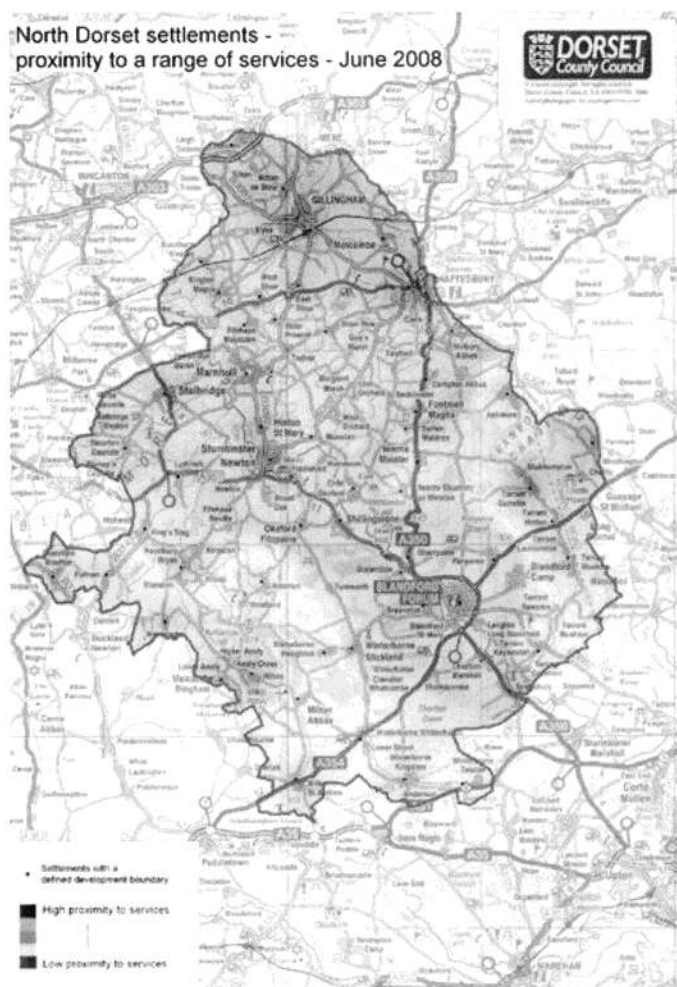
20. This downgrading of Stalbridge is not justified by the evidence base of the plan. Stalbridge had a population of 2,698 in 2011 which made it the fifth largest settlement in the District after the four '*main towns*'; ahead of Marnhull with its population of 1,998 and nine other settlements with populations 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.

21. 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.'

22. 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.

Figure 3: Proximity to Services



Source: Figure 3 of the Sustainable Development Strategy Background Paper

23. 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.*'
24. 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.
25. 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...*'
26. 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.
27. 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.
28. 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.

29. 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.

30. 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.

31. 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.

Development Opportunities at Stalbridge:

32. 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.
33. 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.
34. 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.
35. 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:

36. 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.