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North Dorset Local Plan – 2011 to 2026 Part 1

Pre-submission Focused Changes Consultation

1 August to 12 September 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 as amended by focused changes, 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/focusedchangesconsultation/north

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/NorthDorsetLocalPlanFocusedChangesConsultation

Deadline: 11 : 59 p m on 12 September 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 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	Peter	
Last Name	Dutton	
Job Title (where relevant)	Planner	
Organisation (where relevant)	Gladman Developments	
Address		
Postcode		
Tel. No.		
Email Address		

Part B – Representation

The Focused Changes to 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 as amended by focused changes, complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which the focused changes 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 focused changes it is likely that your comments or objections relate to the **soundness** of the plan 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 the consultation exhibition in Blandford Forum on 14 August 2014 or call 01258 484201.

1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1: Pre- Submission Focused Changes (please complete Questions 2 to 9)
- Supplement to the Sustainability Appraisal Report (please complete Questions 2 and 10)

2. Please state to which pre-submission focused change you are commenting on:

Change Reference:	Section reference:
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3. Do you consider the Local Plan as amended by focused changes, 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 as amended by focused changes, to be 'sound'?

- Yes No

5. If you consider the Local Plan as amended by focused changes, 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 as amended by focused changes, 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 separate submissions document

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 separate submissions document

Continue on a separate sheet if necessary

8. If your representation is seeking a change to the Local Plan as amended by the focused changes, 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.

Please see separate submissions document

10. Please outline your comments on the Supplement to the Sustainability Appraisal or Addendum to the 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, as amended by the Focused Changes, 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: 12-Sep-14

If submitting the form electronically, no signature is required.

Submit Form

This button should attach your form to a pre-addressed email, if it does not, please save the form and send it to planningpolicy@north-dorset.gov.uk

Gladman Developments Ltd

**Representations on
North Dorset Local Plan
Pre-Submission Focused Changes**



September 2014

1 INTRODUCTION

- 1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments' representations on North Dorset Council's Local Plan Pre-Submission Focussed Changes consultation. These follow our previous representations on the Council's Pre-Submission Local Plan consultation, made in January this year.
- 1.1.2 In the first instance Gladman have taken the opportunity to comment on the current Focused Changes consultation to remind the Council that they are continuing to progress a housing requirement that may be too low to the district's housing needs, and has not be founded on a robust evidence base. Whilst welcoming the increase in the housing requirements for the district resulting from the modification to the Local Plan now proposed, this level of housing is still too low compared to past targets and completions, whilst the Plan retains an end date of 2026. The Council's housing requirement is founded on the authority's 2011 Strategic Housing Market Assessment, however this does not take account of the full range of requirements that must be considered when objectively assessing housing needs. Taking these issues into account, we submit that the Council should be seeking to plan for higher level of homes in the district, and must reassess its housing needs.
- 1.1.3 Gladman are generally supportive of the Councils' decision to direct the majority of housing growth to the district's four main towns, however it should not overlook the need for further growth in lower order sustainable settlements. We particularly support the identification of Blandford (Forum and St. Mary) as a location for further housing development. As one of the district's four main towns, Blandford acts as the main service centre for the southern part of district and benefits from a good range of services and facilities, employment opportunities, and public transport links to surrounding and wider areas. We welcome the recognition that the town has the potential to support further sustainable growth.
- 1.1.4 The Local Plan Pre-Submission Focussed Changes now specifically seeks views on the Council's decision to delete the proposed Crown Meadows site (Land West of Blandford Forum) as a broad location for growth, and to identify the land south east of the A350/A354, Blandford St. Mary (the St. Mary's Hill site) as an alternative location for further growth. Gladman welcome this change in policy direction, and submit that land to the south east of Blandford St. Mary represents an appropriate location to provide further sustainable development in the town and to meet the housing needs of the district. To recognise the full development potential of this area, we submit that the Council should be

planning to direct further housing growth to this location, commensurate with a broad location that extends to a boundary with Ward's Drove.

2 NATIONAL PLANNING POLICY

2.1.1 The National Planning Policy Framework (The Framework) has been with us now for over two years and the industry is starting to get to grips with its application and some fundamental changes to the way the planning system functions. The Framework sets out the Government's goal to 'significantly boost the supply of housing' and how this should be reflected through the preparation of Local Plans. In this regard it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

"To boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area*
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements..."*
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15" (Paragraph 47)*

2.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the Framework, which requires Local Planning authorities to prepare a Strategic Housing Market Assessment (SHMA), working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).

2.1.3 Once a Council had identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).

2.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

3 NORTH DORSET'S HOUSING REQUIREMENTS

3.1.1 In the first instance Gladman would like to take the opportunity to comment on the Council's Local Plan Pre-Submission Focused Changes to reiterate our previous concerns

over the adequacy of the Council's proposed housing requirement and how this has been assessed.

- 3.1.2 As a consequence of the Council's Pre-Submission Focused Changes, Policy 6 of the North Dorset Local Plan now sets out a revised housing requirement of 4,350 dwellings for the period 2011-2026, equating to 290 dpa. This represents an overall increase of 150 dwellings compared to the authority's previous Plan requirement, and reflects the decision to now direct growth to land south east of the A350/A354, Blandford St. Mary, as opposed to the former proposed direction of growth on Land West of Blandford Forum.
- 3.1.3 Whilst welcoming the increase in the overall housing requirements for the district, this level of housing remains significantly lower than the 350 dpa proposed for the authority in the South West Regional Spatial Strategy, with the level of homes delivered in the district over the period 2001-2011 averaging 372 dpa, whilst 375 dwellings were completed in 2011/12. Taking these higher housing figures into account, we question how the Council's proposed housing requirement can be considered to be boosting the supply of housing, as required by paragraph 47 of the Framework.
- 3.1.4 Although the Council's housing requirement has its basis in the findings of the Council's 2011 SHMA, this is based on the findings of demographic and household projection alone. The SHMA fails to test whether this level of housing would be sufficient to support future economic growth in the district, or whether market signals of housing needs and demand would justify an uplift to the level of housing that should be provided in the authority. There has been a failure to meet the requirements of the Framework and the PPG on Housing and Economic Developments Needs Assessments when objectively assessing the authority's housing needs.
- 3.1.5 Gladman note that the Council's SHMA follows the same methodology to assess North Dorset's housing needs as that previously relied on by neighbouring West Dorset, and found to be inadequate by the Inspector appointed to examine the West Dorset, Weymouth and Portland Local Plan. In his 3rd February 2014 letter to the Council, the Local Plan inspector particularly notes that:

"The (SHMA) updates in 2011 were carried out in compliance with the 2007 DCLG practice guidance, but before the release of the NPPF. I do not consider the evidence is consistent with the requirements of the NPPF for local planning authorities to identify the full, objectively assessed needs for market and affordable housing and to significantly boost the supply of housing"

- 3.1.6 The West Dorset, Weymouth and Portland Local Plan Inspector’s Exploratory Meeting conclusions raise further issues that are relevant to setting an appropriate housing requirement in North Dorset. His findings suggest that the Council have not properly assessed their housing needs, and bring into question the adequacy of the Council’s proposed housing requirement.
- 3.1.7 Paragraph 157 of the Framework sets out that *Local Plans should...be drawn up over an appropriate time scale, preferably a 15-year time horizon*¹. In this regard we note that the North Dorset Local Plan is only likely to cover a post-adoption timeframe of 11 years. To meet the requirements of the Framework we therefore submit that the Council should be seeking to plan for at least a further two years, and to provide additional housing for this period. We remind the Council that there have now been a number of instances where Inspectors have requested local authorities to extend their Plan periods in similar circumstances.
- 3.1.8 Taking the above issues into account, Gladman submit that there is now a need for the Council to undertake further work to assess its objectively assessed needs, whilst it should be seeking to provide for a higher level of homes than currently sought in the district. In light of our concerns we reserve the right to undertake an independent objective assessment of the Council’s housing needs.

4 SPATIAL DISTRIBUTION

- 4.1.1 Policy 6 of the Council’s submission Local Plan sets out the proposed distribution of housing across the North Dorset authority area. As submitted it outlined that the vast majority of housing growth, 94% of the overall housing requirement for the authority, will be concentrated on the district’s four main towns of Blandford (Forum and St. Mary), Gillingham, Shaftesbury and Sturminster Newton. As a consequence of Major Changes MAJ/16/1 and MAJ/16/2, now put forward through the current consultation, the proposed level of housing directed to these towns has now been modified to represent 95% of the overall level of housing growth sought through the Plan.
- 4.1.2 Gladman are generally supportive of the Council’s decision to direct the majority of housing growth to district’s four main towns. Growth should be distributed to sustainable settlements that benefit from access to a good range of services and facilities, however this should not be at the expense of bringing forward further development in lower order, but still sustainable settlements, that could also help to sustain existing services and facilities. The Council should recognise that each of the districts settlements, whether large or small, will have development needs that should be met. Recognising the potential need to provide

further housing in the district, the housing targets for each of the district's towns should be stated as a minimum.

- 4.1.3 Gladman particularly support the identification of Blandford (Forum and St. Mary) as a focus for development through the Local Plan. As one of the district's four main towns, Blandford acts as the main service centre for the southern part of district and benefits from a good range of services and facilities, employment opportunities, and public transport links to surrounding and wider areas. We welcome the recognition that the town has the potential to support further sustainable growth.
- 4.1.4 Gladman note that the Local Plan directs a large proportion of housing growth, 1,240 homes over the Plan period, to the Gillingham Strategic Site Allocation. Whilst supporting the general principle and sustainability benefits of large sites such as this, these often require significant masterplanning and infrastructure to be provided before housing can come forward, or fail to provide the level of housing originally planned. To account for these issues, the Council should ensure that it can identify sufficient contingency sites, which can forward to maintain a continuous and five-year supply of housing over the Plan period, and account for any delays to delivery or housing shortfalls that arise. The Council should recognise that in some circumstances this objective may be best achieved through sites that do not benefit from a formal Plan allocation, in accordance with the Presumption in Favour of Sustainable Development.

5 BLANDFORD (FORUM AND ST. MARY)

- 5.1.1 Major Changes MAJ/16/1 and MAJ/16/2 set out the Council's decision to delete the proposed Crown Meadows site (Land West of Blandford Forum) as a broad location for growth and to identify the land south east of the A350/A354, Blandford St. Mary (the St. Mary's Hill site) as an alternative location for further growth.
- 5.1.2 The change in policy direction for the Blandford follows representations made by English Heritage and local residents in response to the Local Plan Pre-Submission consultation, and further work to assess the historic environment impacts of the two sites. Endorsing the findings of the Council's subsequent heritage assessments, English Heritage concurred that the development of the Crown Meadows site would be inappropriate due to heritage impacts, whilst submitting the historic environment assessment of the St. Mary's Hill site demonstrated a more suitable option, and one that English Heritage would not challenge.
- 5.1.3 Gladman welcome the Council's decision to now identify land to the south east of Blandford St. Mary as broad location for growth. We submit that this area represents an appropriate

location to provide further sustainable development in the town and to meet the housing needs of the district. In this regard, and to recognise the full development potential of this area, we submit that the Council should be planning to direct further housing growth to this location, commensurate with a broad location that extends to a boundary with Ward's Drove. The land in question is shown in Figure 1 below.



Figure 1 Land South East of Blandford St. Mary

- 5.1.4 Gladman and the site owners are committed to bringing forward a high quality development on this site and would welcome further discussions with the Council regarding this.

6 CONCLUSIONS

- 6.1.1 Through this submission Gladman have taken the opportunity to remind the Council that they are continuing to progress a housing requirement that may be too low to meet North Dorset's housing needs. Whilst welcoming the increase in the overall housing requirements for the district that is now proposed, work should be undertaken to objectively assess the housing needs of the district in accordance with the requirements of the Framework and the PPG on Housing and Economic Development Needs Assessments. We submit that the Council should be planning for a higher level of homes in the district, to ensure that it can demonstrate a continuous and five-year supply of housing land over the Plan period, and to maintain a five-year housing land supply. The Council should be planning to identify further housing supply to cover a minimum plan period of 15 years post-adoption, as required by the Framework.

- 6.1.2 Gladman welcome the identification of Blandford (Forum and St. Mary) as a location for further sustainable development, and the decision to now propose land to the south east of Blandford St. Mary as a broad location for growth. We submit that this represents an appropriate location to provide further sustainable development in the town and to meet the housing needs of the district. To recognise the full development potential of this area, we submit that the Council should be planning to direct further housing growth to this location, commensurate with a broad location that extends to a boundary with Ward's Drove.