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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](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	Craig	
Last Name	Barnes	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Tel. No.		
Email Address		

## 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:
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### 3. Do you consider the Local Plan to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

- Yes                       No

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

- 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 letter

*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 letter

*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.

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: Craig Barnes

Date: 22/01/2014

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



Planning Policy  
North Dorset District Council  
Nordon  
Salisbury Road  
Blandford  
DT11 7LL

(Representations submitted by email to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk))

24<sup>th</sup> January 2014

**Re: North Dorset Local Plan Pre-Submission Draft Consultation**

Introduction

Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the Council are currently inviting comments on the Pre-submission consultation of the Draft North Dorset Local Plan. This letter is in response to the above consultation and provides Gladman Developments' representations.

The North Dorset Local Plan sets out the district wide strategic policies as well as providing a suite of development management policies that will direct development within the authority to 2026. Gladman note that the key objectives of the Local Plan include; ensuring the vitality of market towns, supporting sustainable rural communities, meeting the districts housing needs, improving the quality of life, conserving and enhancing the historical and natural environment and meeting the challenge of climate change.

In this representation Gladman will focus its comments related to the soundness of the;

- Plan period; the adequacy of the plan period against the requirements of the Framework.
- Housing requirement and supporting evidence; analysing its suitability in meeting the full objective needs of North Dorset and the wider HMA, as well as the compatibility of the supporting evidence base with the requirements of the Framework,
- And finally the spatial strategy; particularly in respect of its approach to development in the countryside.

### Plan Period

Gladman believe that the plan period should be extended to 2031. Gladman make this submission for two reasons. Firstly, §157 of the Framework states that plans should be produced preferably to a 15 year time horizon, currently should the Council achieve its target to adopt the Local Plan (Part 1) in December of this year, just over 11 years of the plan period would remain. Secondly, a 2031 end date would see the plan align to the period used by the household and employment projections used to underpin its evidence base. The issue of the necessity to plan for at least 15 years has been raised by inspectors at examinations in East Devon and South Staffordshire requiring modifications as a result.

### Housing Requirement

The Draft Local Plan proposes an overall housing requirement of 4,200 dwellings (280 dwellings per year - dpa). The figure is rounded upwards from the findings of the 2008 based household projections that estimate household growth between 2011 and 2031 to be 273 dpa. The level of housing proposed by the plan is higher than the findings of the more recent 2011 based interim household projections but significantly lower than the draft RSS (350 dpa) and the former Structure Plan requirement (336 dpa).

Gladman consider that the proposed housing requirement will artificially suppress housing land supply as a result of an incomplete assessment of housing needs, and as a result is not based on a full objective assessment of housing need, and is therefore unsound. Though the proposed requirement appears to be representative of the latest demographic projections, Gladman believe it does not take sufficient account of existing housing needs and affordability as required by §47 and 159 of the Framework.

The Government are clear in setting out the role that projections have in determining the housing requirement. The National Planning Practice Guidance (NPPG) states that projections may be used to form a starting point in determining housing requirement, with §159 listing the considerations necessary upon which to determine the objectively assessed housing need.

The prominence of the SHMA in determining objectively assessed housing need is clearly established by §47 and 159 of the Framework. Despite this, the Council appear to have taken no account of the SHMA's findings in arriving at the proposed housing requirement. Though Gladman consider the findings of the 2012 SHMA to be largely incomplete to be considered as being in full compliance with the Framework (as it does not assess market need, lacks consideration given to concealed households and does not consider the influence of the South Somerset HMA - which may all combine to result in an underestimation of needs), the quantum of affordable need reported by its findings, suggests that the plan requirement should be higher than that currently proposed.

Gladman accept that it would be unrealistic to expect an authority as rural and environmentally constrained as North Dorset to deliver the level of growth required that would see affordability needs addressed in its entirety. However consideration of the findings contained within the 2011 SHLAA (the identification of a potential land supply of 13,000 dwellings), the 2010 Sustainability Appraisal (identifying that the RSS proposed requirement of 350 was deliverable against sustainability objectives) and as well as the historic delivery rates achieved in the authority (annual net completion rates have averaged 350 in the last 10 years – including complete economic cycle of boom and bust) would suggest that the District is capable of delivering a level of growth that is higher than that currently proposed.

Gladman believe that there is a need for North Dorset to re-examine its full evidence base, and adopt a housing requirement that is representative of a fair reflection of the needs and capacity of the district, paying especially close attention given to the requirements of §14, 47, 152 and 159 of the Framework.

#### Development Strategy

North Dorset propose to deliver 94% of its identified housing requirement in four market towns with the remaining 6% accommodated elsewhere. The Council reason that the countryside has seen a disproportionate level of development in recent years, and as a result the Council has sought to limit the amount of development in this area in the plan period. The percentage of the housing requirement apportioned to be delivered within the countryside is therefore not a reflection of needs, but rather a residual that the Council has determined cannot be met within the market towns. Gladman find this approach to be in conflict with the both Framework and the objective of the plan to support the sustainability of rural settlements, and therefore is unsound. Gladman do not contend that development should be focussed towards the more sustainable settlements, however the Council must ensure that the proportion of growth allocated for settlements outside these main settlements is sufficient to account for the evidenced needs of the these area, to address affordability and ensure that the sustainability/viability of rural services is not threatened.

#### Conclusion

What is clear from the Framework, and from the Government's agenda to **boost significantly** the supply of housing, is that the premise of the whole process is the assessment and delivery of the full, objectively assessed needs for housing in an area unless there are adverse impacts that would **significantly and demonstrably** outweigh the benefits. If the process set out in the Framework and highlighted above is not followed then the Local Plan cannot be found compliant with the Framework.

Gladman have raised significant concerns in relation to the 'soundness' of the Local Plan (with reference to tests of soundness outlined in paragraph 182 of the Framework). The Local Plan does not provide a positive policy approach and in a number of cases is not consistent with national policy. Key areas where Gladman raise concerns are summarised as follows:

- Plan Period – If adopted in December 2014, the plan will have an 11 year plan period. This is unsound against §157 of the Framework.
- Housing requirement – We are concerned that the proposed housing requirement is based on an incomplete assessment of housing needs. Both the findings of the SHMA and market signals point to a higher level of need than is proposed to be delivered. Both the SHLAA and the Sustainability Appraisal establish that there is a greater capacity to deliver a higher level of housing than currently proposed by the plan. Historic delivery rates also suggest that the completion of a higher amount of dwellings is economically viable.
- Spatial Strategy – The proportion of growth allocated towards the areas outside of the four market towns is not a representation of need but rather a figure plucked out of thin air. Gladman believe that this is unsound, and an allocation should reflect local needs and capacity.

I hope you have found these representations constructive, if you require any further information or wish to meet with one of the Gladman team then please do not hesitate to contact me.

I thank North Dorset District Council for the opportunity to comment on this consultation.

Yours Sincerely

Craig Barnes  
Strategic Land Team  
Gladman Developments