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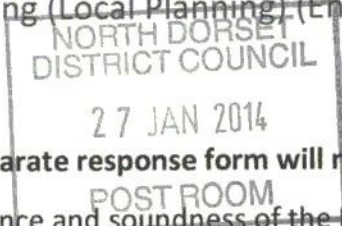
Batch number: _____ Received: _____
Representor ID # _____ Ack: _____
Representation # _____

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	MR
First Name	VERNON	MALCOLM
Last Name	KNAPPER	BROWN
Job Title (where relevant)		PLANNING DIRECTOR
Organisation (where relevant)		SIBBETT GREGORY
Address		3 WINCHESTER PLACE NORTH STREET POOLE, DORSET
Postcode		BH15 1NX
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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: Para.3.46	Policy/site: Policy 2	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.

This Policy is not sustainable and it is not sound

The policy is unsound, because the Local Planning Authority failed to comply with the requirement of Paragraph 47 of the National Planning Policy Framework, in that the housing land requirement is inconsistent with paragraph 47 to “**boost significantly**” the supply of housing. The Local Planning Authority have failed to use their evidence base to ensure that the Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. It fails to take into account Paragraph 158 of the Framework, which requires that Local Planning Authorities should ensure that their assessment of the strategies for housing, employment and other uses are integrated and that they take full account of relevant market and economic signals.

We object to the spatial distribution of the proposed housing. Whilst it is correct that there should be concentration of development on the four main towns, it is a flawed argument to suggest that development of other settlements is not sustainable. Without growth small settlements can stagnate. Often services including both commercial and social facilities are operating at the margins of viability. Often have we seen closure of the village school, village shops, the village pub and even Churches. Today very few villages even have a garage. It is irresponsible not to provide for some growth in many settlements.

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.

Policy 2 should be amended to enable the provision of a greater choice of location and to assist in maintaining /enhancing the sustainability of all communities. That requires the plan to identify a hierarchy of settlements where some growth is desirable. I suggest the 19 settlements listed in the 2010 SHLAA

Continue on a separate sheet if necessary

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

- No, I do not wish to participate in the oral examination
- Yes, I would like to participate in the oral examination

9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary. Please note that the Inspector determines who is heard at the examination.

The respondent is of the opinion that the planning authority has not provided adequate reasons for departing from its previous policy and wishes to question those reasons in public.

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.

The Sustainability Appraisal is clearly flawed. It recognizes the potential for a negative impact on smaller settlements (Some of substantial size). It makes no provision to deal with that negative impact. It relies instead on the possibility of some development coming forward through Neighbourhood Plans without any Local plan framework in which to prepare such Plans. This is a total abrogation of responsibility. It talks about sustainable transport measures to offset the negative impact without considering journey lengths and ignoring County Council cut backs in subsidies for rural bus services. This is a recipe for aging communities with failing services. How on earth can that be considered sustainable!

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: 23/01/2014

If submitting the form electronically, no signature is required.

QUESTION 6 Continued

Policy 2 is inconsistent with paragraphs 54 and 55 of the NPPF.

Paragraph 55 recognises that in rural areas housing should be located where it will enhance or maintain the vitality of rural communities. Paragraph 54 urges local authorities to consider whether allowing market housing would facilitate the provision of significant additional housing to meet local needs.

The local plan takes no account of the size of settlements or the range of facilities/services available.

The previous policy of identifying a hierarchy of settlements was significantly more sustainable and provided a wider choice of high quality homes in places where people want to live.