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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	Richard	
Last Name	Bagnall	
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: Policy 2. Policy 7	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

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

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:  _____

Date: 24/1/14

If submitting the form electronically, no signature is required.

1. Even though Policy 2 removes the Settlement Boundaries around all villages, Policy 7 nevertheless permits infill development in any village if a Neighbourhood Plan is prepared and a new Settlement Boundary established. By implication infilling must, as a matter of principle, be “sustainable” and there is a stated presumption in favour of it (Policy 1). However, if Neighbourhood Plans are not prepared, for whatever reasons, infilling in those villages will not be allowed regardless of the presumption in favour. That is irrational. It could bring about a situation whereby infilling is not allowed in a village with a relatively good range of services and facilities because there is no Neighbourhood Plan, but is allowed in a village with far worse access to services and facilities where a Neighbourhood Plan has been prepared. That is illogical. Settlement Boundaries should be retained in all villages with a reasonable range of services and facilities (based on up-to-date appraisal) with Neighbourhood Plans then used to guide and manage specific proposals. If a particular community wishes to oppose any subsequent infill proposal within the Settlement Boundary and can justify that opposition for relevant planning reasons, then the existing Development Management process is available and sufficient.

2 Infilling can deliver substantial local benefits:

- More efficient use of land to provide a new home
- Widening housing choice for the local community.
- Provision of smaller, and therefore more affordable market dwellings
- Replacement of an eyesore or “non-conforming” use/development
- Improvement of environmental performance of housing stock
- Enhancement of local character through sensitive, high quality or locally distinctive development.
- Added support for local services and facilities
- Stimulation of local economy, employment opportunities and local trades and suppliers.
- And more.

If these benefits can only be exploited if and when the local community prepares a Neighbourhood Plan, it is inevitable that worthwhile and beneficial development opportunities will be lost or delayed unnecessarily. Retention of Settlement Boundaries while Neighbourhood Plans are in preparation will maintain continuity and avoid delay.

3 It is not known if, when or how many local communities will produce a Neighbourhood Plan. Those that have expressed the intention may or may not deliver. Those that do not currently intend to produce a Neighbourhood Plan may yet do so. This will create uncertainty and delay. If it takes two years to produce a Neighbourhood Plan, then sustainable infill development that could be allowed now will be delayed for two or more years. That does not accord with the NPPF “presumption in favour”.

4 Community consultation with parishes is said to have highlighted local concerns, based on past development rates, to avoid excessive rates of village development over the period of the new Plan. It is patently clear that past development rates will never be achieved again, as potential infill sites have already been developed, unless Settlement Boundaries are extended. If Settlement Boundaries are retained as they are currently, the potential supply of infill sites will be far less than in the 2003 Plan but could still allow selective infilling and windfall opportunities to deliver modest new housing development with some or all of the above benefits. If a particular community wishes to enable a greater scale of development it can do so by extending the Settlement Boundary.

5 There is no definition of “infilling” in the ND Local Plan. Is it to be limited to the very narrow definition of “filling of a vacant gap in an otherwise built up frontage” or is it to be interpreted more flexibly? What about “windfall” development that is not strictly infilling – such as the replacement of a large, eco-unfriendly bungalow with two or more small cottages? If definition is left to individual Neighbourhood Plans, there will inevitably be inconsistency and confusion. The ND Local Plan should define “infilling” and enable “windfall” development opportunities as well.