



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

Date: 24 January 2014

Our Ref: EB/CB M5/0108-07

**By email only:**  
**[planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)**

Dear Sir or Madam

**RE: CONSULTATION ON THE PRE-SUBMISSION NORTH DORSET LOCAL PLAN 2011-2026  
PART 1**

We represent the **South West RSL Planning Consortium** which includes all the leading Registered Social Landlords (RSLs) across the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

#### **Introduction**

Our primary concern is the restrictive approach which the Council is seeking to apply to the villages and in particular, the proposal to allow housing to be delivered only in small numbers on exception sites. This will offer our clients' very little scope to deliver the affordable housing that is so readily lacking in rural North Dorset and is therefore contrary to the stated aims and objective of the draft Plan.

Our detailed comments on draft policies are provided below.

#### **Policy 2 – Core Spatial Strategy**

Our concern is driven by the intention to remove settlement boundaries and place the District's villages in the countryside. It is thus assumed that each will be "*subject to countryside policies where development will be strictly controlled unless it is required to enable essential rural needs to be met*", unless a village works to define a settlement boundary and/or allocate sites in future plan making ("*opting in*").

We do not agree that this is a sound approach. Parish Councils may have a conservative attitude to providing more housing and resist opting in. Even if they do decide to pursue a Neighbourhood Plan or have sites allocated in Part 2 of the Local Plan this will take a number of years. The Council should be aware that a similar policy approach has attracted criticism from the Inspector conducting the examination of the Wiltshire Core Strategy – see Section 5 of his letter of 2 December 2013, copy enclosed.

We seek for the Council to rectify this by reviewing settlement boundaries, so as to make sure they are fit for purpose. To avoid holding Part 1 up, it may be more appropriate for the boundaries to be redefined in the process of preparing Part 2 however this must be reflected in a revision to the Spatial Strategy in Part 1.

#### **Policy 6 – Housing Provision**

Assuming Part 1 is adopted in 2014, the current housing target to 2026 will mean the Council only has a housing supply of 12 years as opposed to the 15 required by the NPPF (paragraph 157, bullet point 2). We seek for this to be rectified by an appropriate extension and suggest a 20 year time horizon is optimum.

### **Policy 9 – Rural Exceptions**

Our concern here follows on from those set out above. Via the proposed Spatial Strategy which we are objecting to, the Council has already sought to restrict rural house building to exception sites. It is creating further difficulties by restricting schemes to an arbitrary figure of nine dwellings and no more than one third market housing.

We prefer the Council to adopt an approach akin to that being taken in Mendip - please refer to Policy DP12 of the Pre-Submission Local Plan which will shortly undergo examination. This is a criteria-based policy which allows the level of affordable and market housing to be determined on a site by site basis taking into account important factors such as scheme viability.

We remind the Council that this policy will be easier to operate if it has settlement boundaries around the villages. As drafted, the policy refers to the need for a site to be "adjoining the existing built-up area" which does not offer sufficient clarity for our clients.

### **Policy 11 – The Economy**

We refer the Council to paragraph 22 of the NPPF which asserts that:

*"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities".*

Employment land has not been designated in perpetuity so if suitable and more practical uses are available we suggest that the Council takes this into consideration, via a more flexible policy.

### **Policy 20 – Development in the Countryside**

We request that this is revised in line with our comments on the above.

### **Additional Comments**

As per our previous representation on the Plan we are concerned about the lack of policy coverage for older people. Paragraph 7.7 of the SHMA draws attention to the proportion of household growth for older people:

*"The results are striking, although consistent with regional and national trends. The data shows that over the next twenty years in the HMA there is expected to be a dramatic increase in the population of those aged over 60, and decreases (or only very modest increases) in the population of all other age groups."*

Within the life of the Plan, failure to address these needs could cause unintended consequences. Planning for older people and building desirable homes for them to live in also helps to free up family size homes and so create more fluidity in the housing market. We therefore reemphasise the need for a specific policy response in Part 1.

We trust that these comments will be given careful consideration in the advancement of the Plan.

Yours faithfully



**CHRIS BURTON**  
**ASSISTANT PLANNER**  
For and On Behalf Of  
TETLOW KING PLANNING

Encs: Response Form

Cc: Aster Group  
Raglan Housing Association  
Sanctuary Housing Group  
Spectrum Housing Group

John Hammond – Housing Department

**For office use only**

Batch number: \_\_\_\_\_

Received: \_\_\_\_\_

RepresentorID #: \_\_\_\_\_

Ack: \_\_\_\_\_

Representation# \_\_\_\_\_

# NorthDorsetLocalPlan Part1

## Pre-submissionConsultation29November2013to24January2014

Regulation19of Townand Country Planning (Local Planning) (England)Regulations 2012)

### ResponseForm

For eachrepresentationyouwishto makeaseparateresponseform willneed tobecompleted.

Thisisa formalconsultation on thelegalcomplianceandsoundnessof the Local Planbeforeit is submittedtotheSecretaryofStateforexaminationby an Inspector. Foradviceon howtorespond to theconsultationand fillinthisformpleaseseethe 'GuidanceNotesforMakingRepresentations'that can befound on theCouncil's websiteat[www.dorsetforyou.com/planning/north-dorset/planning-policy](http://www.dorsetforyou.com/planning/north-dorset/planning-policy)

**Pleasereturncompletedformsto:**

Email: [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

Post: PlanningPolicy,North DorsetDistrict Council,Nordon,SalisburyRoad,BlandfordForum,Dorset DT117LL

Alternatively youcan submit yourcommentsonline at:[www.surveymonkey.com/s/NorthDorsetLocalPlan](http://www.surveymonkey.com/s/NorthDorsetLocalPlan)

**Deadline:5pmon24 January2014.Representationsreceived afterthistimemaynotbe accepted.**

### PartA–Personaldetails

Thispartof theformmustbecompletedby allpeoplemakingrepresentationsas**anonymouselements cannotbe accepted**.RepresentationscannotbetreatedinconfidenceasRegulation 22 of theTown and CountyPlanning(Local Planning) (England) Regulations2012requirescopiesof allrepresentationstobe madepublically available.Bysubmittingthis responseformon thepre-submissionNorthDorsetLocal Plan Part1youconsenttoyourinformationbeingdisclosedtothird partiesforthis purpose,but signatures,privatetelephonenumberand e-mail addressesorprivateaddresseswillnotbevisible on ourwebsite,althoughtheywillbeshownon paper copiesthatwillbesent totheInspectorand 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.

PersonalDetails(ifapplicable)*		Agent'sDetails(ifapplicable)*
Title		Mr
FirstName		Christopher
LastName		Burton
Job Title( <i>where relevant</i> )		Assistant town Planner
Organisation ( <i>where relevant</i> )	South West HARPs	Tetlow King Planning
Address		Unit 2 Eclipse Office Park, High Street Staple Hill, Bristol
Postcode		BS16 5EL
Tel. No.		01179561916
EmailAddress		christopher.burton@tetlow-king.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 representation 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 01258484201.

### 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 aspect 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: \_\_\_\_\_

Date: \_\_\_\_\_

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