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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	Mrs
First Name	Shaun	Sarah
Last Name	Pettitt	Hamilton-Foyn
Job Title(<i>where relevant</i>)	Strategic Land Manager	Director
Organisation (<i>where relevant</i>)	Persimmon Homes (South West)	Pegasus Group
Address		Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire,
Postcode		GL7 1RT
Tel. No.		01285 641717
Email Address		Sarah.hamilton-foyn@pegasuspg.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 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 6	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.

Policy 6 Housing Distribution

An objection is made to Policy 6 which states that at least 4,200 dwellings will be provided in North Dorset between 2011-2026, representations on paragraphs 5.12 and 5.14 address this issue.

Firstly it is considered that the Plan period should be extended to 2031 in order to meet the requirements of the NPPF para 157.

Secondly concerns are also raised that the housing provision appears to be based on trend data of around 273 dwellings per annum rather than putting forward a figure which would significantly boost housing supply in the district in accordance with the NPPF para 47. The proposed provision does not provide a step change in housing provision and is in fact lower than the adopted Local Plan which had a figure of 347 dwellings per annum over the period 1994 – 2011 ie a total requirement of 5,900 dwellings over the 15 year plan period compared with what is proposed which is 4,200 dwellings.

It should also be noted that the Local Plan provision of 5,900 was actually exceeded by 808 dwellings resulting in an average figure of 447 dwellings per annum.

More recent evidence for the period 2011/12 indicates that 375 dwellings were completed.

Furthermore the background papers and evidence base acknowledge that there is a significant affordable housing issue in the district (the AMR indicates at para 2.5 that the district faces a real challenge in providing enough affordable housing for local people) and that there is real disparity between what people earn and the cost of buying a house in the district. This is reflected in the high house price income ratio for 2012 of 9.93.

The SHMA also indicates that as well as an ageing population (the district profile varies from the national profile with a larger proportion in older age bands), if current trends continue this will lead to the number of people in key working age bands declining which will potentially generate a labour shortage in the long term. This may then act as a barrier to economic growth in the District.

The Availability of Land does not appear to be a constraint in the district as more land has been identified than meets the housing requirement.

The distribution to the main towns is supported, although it is considered that further development can be accommodated at Gillingham in addition to the proposed allocation for the southern urban extension in order to meet housing needs and provide a wider choice of housing, see representations on Policy 17.

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.

It is considered that this strategy is inconsistent with the NPPF para 47 which aims to significantly boost housing land supply, instead the Council has reduced the housing requirement to 280 per annum. Persimmon Homes considers that the overall housing provision should be increased to at least 5,600 dwellings and the plan period extended to at least 2031.

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.

Persimmon Homes South West has concerns about the soundness of the plan in respect of the plan period and the housing requirement and the deliverability of the urban extension to Gillingham.

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: [REDACTED] _____

Date: 23rd January 2014

If submitting the form electronically, no signature is required.