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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: Para 2.11	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.

Question housing market area given para 2.11 and 2.12

The plan states that the northern part of the district (including the main towns of Gillingham, Shaftesbury and Sturminster Newton) tends to look towards the Yeovil and Salisbury functional housing markets, whilst the south of the district tends to look towards the Bournemouth and Poole functional housing market.

It is noted that the northern part of the district lies within the A303 functional economic zone, which stretches from Salisbury in the east to Taunton in the west. Furthermore, the community planning model in North Dorset has four local community partnerships focused on the districts four largest towns and their rural hinterlands. The Three Rivers Partnership covering Gillingham, the far north of the district and parts of South Somerset, is a further example of the relationship this part of the district has with neighbouring local authorities.

It is also noted in the Background Paper Meeting Housing Needs that the HMAs were defined through the preparation of the RSS. Figure 3.1 in the Background Paper shows that there is "*considerable overlap between "functional" HMAs and they do not fall directly within local authority boundaries*". The Background Paper at para 3.18 states that, "the evidence shows that in terms of how housing markets function, North Dorset forms part of: Bournemouth and Poole HMA; the Salisbury HMA; and the South Somerset – West Dorset HMA." However, for the purposes of the 'emerging' RSS, HMAs were defined along administrative boundaries and for planning purposes, North Dorset is defined as falling entirely within the Bournemouth and Poole HMA. The main evidence base studies for North Dorset have therefore been produced to reflect the basis of the HMA.

Para 2.12 of the North Dorset Pre- Submission Plan states that the recent SHMA update recognises that the northern part of the District has only a limited functional relationship with the South East Dorset conurbation

The Bournemouth and Poole SHMA was produced in 2007 with an update in 2011 and published in January 2012. It is noted that this SHMA is the same vintage as the Dorchester/Weymouth Housing Market Area as it was also prepared in 2007 with an update in 2011 and published in January 2012 and prepared by the same consultants, JG consulting and CBA). The Inspector for the West Dorset, Weymouth and Portland Local Plan Examination has raised this as an issue in his preliminary notes of concern – 10th December 2013. He has noted that despite work to update the original Strategic Housing Market Assessment (SHMA) it is essentially out of date.

"The original study was undertaken when the approach to housing needs was different and when the emerging Regional Strategy (RS) provided the basis for determining the growth in each district. Although the RS remained in draft form and has since been revoked, it provided a rigorous and independent approach to assessing housing needs and a context for understanding the demands on each area. It would be helpful, in my view, to know what and how circumstances have changed since the draft RS was produced and what factors have influenced and led to the housing numbers which are being advocated in the current Plan."

The NPPF para 158 requires each local planning authority to ensure that the Local Plan is based on adequate, up-

to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

Given the above it raises two questions, firstly whether the SHMA is up-to-date and takes full account of relevant market and economic signals and secondly whether the SHMA covers the most appropriate area given the northern part of the district relates to settlements in South Somerset and Wiltshire. This raises the question, whether the SHMA reflects the most appropriate area in terms of assessing housing needs in relation to the wider strategy, and whether a revised SHMA should have been considered in the preparation of the Plan. This could have been prepared reflecting the districts responsibility under the duty to co-operate. The robustness in terms of the extent and relevance of the SHMA must therefore be questioned and whether any consideration was given to the northern part of the district being considered in a new SHMA which took into account the neighbouring areas of Yeovil and Salisbury prepared under the duty to co-operate.

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.

Consideration should be given to providing an updated SHMA in so far as it relates to the northern part of the district and its neighbouring local planning authorities, having regard to the duty to co-operate.

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

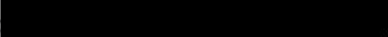
9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary. Please note that the Inspector determines who is heard at the examination.

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:  _____

Date: 23rd January 2014

If submitting the form electronically, no signature is required.