

For office use only

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	Michael	Edward
Last Name	Miller	Dyke
Job Title (where relevant)	Farmer	
Organisation (where relevant)		Symonds & Sampson
Address	c/o agent	Agriculture House, Market Place, Sturminster Newton,
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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: see references in 6 below	Policy/site: Policy 2, 7, 20	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 2 - Core Spatial Strategy

3.33 and 3.34 – We agree with North Dorset District Council (NDDC) highlighting these key points in the National Planning Policy Framework (NPPF) DCLG March 2012 however we do not believe the policy contained in this section of the draft North Dorset Local Plan (NDLP) supports these statements.

3.35 – National Policy is not properly accounted for in the Core Spatial Strategy. In part it seems to contradict the principles set out in Part 3 of the NPPF which seeks to support a prosperous rural economy.

3.38 and 3.39 – the Core Strategy does not simply focus development on the 4 major towns, it effectively eliminates a significant proportion of development anywhere outside of these 4 settlements. The Core Strategy does not take into consideration that there are a number of

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.

We suggest that the blanket removal of settlement boundaries need to be removed and the boundaries retained where appropriate.

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.

Our representations identify that there are fundamental flaws in the plan's soundness, which may be best discussed at a public hearing due to consideration of the evidence. Should the Inspector wish to invite me to discuss these at the public hearing then I would be pleased to attend.

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.

n/a

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: 24/01/2014

If submitting the form electronically, no signature is required.

Submit Form

This button should attach your form to a pre-addressed email, if it does not, please save the form and send it to planningpolicy@north-dorset.gov.uk

Full text from fields (6) where some text is hidden from view in the pdf

Michael Miller

Number 146 of responses received

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 2 - Core Spatial Strategy

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3.35 – National Policy is not properly accounted for in the Core Spatial Strategy. In part it seems to contradict the principles set out in Part 3 of the NPPF which seeks to support a prosperous rural economy.

3.38 and 3.39 – the Core Strategy does not simply focus development on the 4 major towns, it effectively eliminates a significant proportion of development anywhere outside of these 4 settlements. The Core Strategy does not take into consideration that there are a number of large villages that have all the essential services mentioned and need an element of growth to maintain sustainability.

3.40 – We would suggest that “carefully managing of development” should apply equally to the 4 major towns as well as the countryside. To base this policy on past mistakes is wrong. NDDC has always been playing catch up in respect of housing numbers and should seek to adopt an approach which promotes sustainable development in the rural community in line with Part 3 of the NPPF.

3.42 – North Dorset is a rural district and as such the communities it encompasses are largely reliant on the private car for transport, this is true (albeit to a marginally lesser extent) in the 4 identified towns. We do not feel this is a substantiated reason to place such a marked restriction on development outside of these 4 towns.

3.46 – At the time of writing little or no information is available on Part 2 of the NDLP, the extent of information is found in para 1.7 “Part 1 of the Local Plan (this document) sets out the strategic planning policies for North Dorset. Part 2 (a subsequent document) will allocate specific sites for housing and employment growth in the main towns and will include a review of other land allocations and settlement boundaries. Work will commence on Part 2 following the adoption of Part 1.” It is unreasonable that following the blanket removal of settlement boundaries NDDC has chosen to give such limited information at this stage, as the policies set out in Part 1 will have a significant impact on the allocations identified in Part 2.

3.47 – The Countryside Policies provide for development in a number of very limited

scenarios (renewable energy schemes, rural exception housing sites (providing predominantly affordable homes), essential occupational dwellings, re-use of rural buildings, rural tourist accommodation and community facilities) there is minimal scope for the development within sustainable and sizable villages to provide private homes for rural families. We argue that these policies do not therefore meet the “essential rural needs”

3.51 – The Neighbourhood Plans will be limited in their ability to meet local needs as

they are constrained by the Local Plan policies for the Countryside. Para 5.20 indicates that the number of residential units allocated to the Countryside (including Stalbridge and the Villages) is “At least 230” in order to meet the regional allocation of 4,200. There are in excess of 50 village parishes within North Dorset and approximately 50% of the population current resides outside of the 4 main towns. If an allocation of 230 units (it is noted that this is not a cap) is presented this would afford each parish one new unit every 3 years. Notwithstanding the number of units that have already been consented and built since the start of the plan period in 2011. We would argue that this is an unrealistically small number and contrary to NPPF guidance on supporting a prosperous rural economy (Part 3) and delivering a wide choice of quality homes (Part 5).

3.53 and 3.54 – Little information is provided on the subject of Part 2 of the Local Plan. It is also noted that the Part 1 of the NDLP provides little scope for communities in the villages to allocate sites for housing and employment growth.

3.55 – The removal of settlement boundaries effectively removes infill development within the sustainable villages of North Dorset. This is not in accordance with the NPPF (Part 9).

In relation to the removal of the settlement boundaries as directed by Policy 2 we also wish to highlight the following policies ;

Policy 7 – Delivering Homes

5.57 – The NDLP correctly identifies the importance of small scale development in rural communities. However by placing the control outside of NDDC we feel it is shunning it’s responsibility to fulfil it’s own targets. Infill sites offer opportunities in rural communities that would otherwise be outside the reach of many local people, through partnership with small scale developers these sites play a key role in the rural economy. Although identified here we fail to see any policy that supports small scale infill development in the villages due to the blanket removal of the settlement boundaries in Policy 2.

Policy 20 – the Countryside

8.170 – Identifies that the NPPF directs Local Planning Authorities to support the thriving rural communities, the NDLP fails to do this in a number of respects as identified in this representation.

8.174 – In allowing a “fine grain approach” we feel the NDDC is shunning it’s responsibility to the rural community, the removal of the settlement boundaries by Policy 2 affectively removes their responsibility for development.

8.192 – Little or no information is provided on what Part 2 of the NDLP will contain, in light of it’s importance we feel this is not acceptable in the context of the significance Part 2 plays in the wider NDLP.

General Comments

- Para 54 of the NPPF states “local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing”. In their blanket approach of removal of the settlement boundaries, which were designated in the first place only around those villages that were deemed sustainable and suitable, NDDC have spurned their responsibility under the NPPF to respond to the local needs, instead leaving the response and future of the communities of North Dorset to the residents themselves. We have grave concerns that allowing communities to ‘self determine’ through writing their own Neighbourhood Plan is unlikely to produce the desired results with personal preference of those in decision making roles being projected into Neighbourhood Plans. We are also concerned that some smaller communities will lack the resources and enthusiasm to produce effective and sustainable plans.
- The Landscape of North Dorset has evolved over hundreds of years, by exercising a blanket removal of settlement boundaries NDDC is limiting the ability of the rural community to continue to grow sustainably and organically.
- NDDC’s intention to remove the settlement boundaries around the district’s villages will have far reaching implications on the rural economy and we do not believe NDDC has properly considered these. This is in conflict with the Core Spatial Strategy which states the rural economy will be supported.
- The organic growth of the villages and rural communities at a relatively slow pace in comparison to the larger towns supports a variety of smaller business’ that have developed to meet this need – for example small architects, planning consultants and builders/developers. We fear that these types of business’ will become largely redundant if sustainable development of the rural villages and communities halts as a result of the policies and proposals set out in the draft NDLP. In addition the equity released by small scale development such as these is reinvested into the rural economy.
- The plans, which are provided in Appendix B, to show the removal of the settlement boundaries are wholly unhelpful. These plans, which were out of date at the time of their initial production and adoption in 2003 and continue to present an inaccurate picture of development in the villages. The relevance of these documents as an aide to Part 2 of the NDLP is farcical and shows scant regard for the policies set out in Part 3 of the NPPF.
- Part 2 of the Plan has yet to be produced, in relation to Policy 2 this is fundamental and commenting on the suitability of this plan is therefore challenging at best!