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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. | Mr |
| First Name | Jason | Nicholas |
| Last Name | McGuinness | Taylor |
| Job Title(<i>where relevant</i>) | | Planning Consultant |
| Organisation (<i>where relevant</i>) | | Nicholas Taylor and Associates |
| Address | c/o agent | 128 Southwark Street, London |
| Postcode | c/o agent | SE1 0SW |
| Tel. No. | | 020 7928 8955 |
| Email Address | | npt@nptaylor.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: | Policies map: |
|-----------------------------------|-----------------------|---------------|
| 2.46, 2.52, 3.46, 3.53-3.54, 3.56 | Policies 2, 12 and 20 | |

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.

We are a firm of town planning consultants acting for a land owner in Okeford Fitzpaine. We object to the Council's plans to direct the spatial distribution of development, particularly housing, to the four main towns to the detriment of the smaller villages.

The adoption of the Localism Act offers greater freedom and flexibility for local people. The Act passed significant new rights direct to communities and individuals, to make it easier for them to achieve their ambitions for the place where they live.

The Localism Act, advocates neighbourhood plans through which communities, which include residents, employees and business, are encouraged to come together and say where they think new houses, businesses and shops should go.

Paragraph 3.49 of the draft NDLP advocates the preparation of a neighbourhood plan where a local community wishes to see growth to meet local needs but where such needs cannot be met

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.

Policy 2 Core Spatial Strategy

The Countryside (including Stalbridge and the Villages) outside the defined boundaries of the four main towns, the Council will restrict development to the following categories:

- development that is required to meet essential rural needs;
- development that is required to meet local (rather than strategic) needs, which will be delivered primarily through neighbourhood planning or site allocations in Part 2 of the Local Plan

We propose no change to the rest of Policy 2.

Policy 12

1. Insert a new section after 'Town Centre Uses Outside Town Centres'

Commercial uses in Stalbridge and the Villages

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.

We, working in conjunction with the Okeford Fitzpaine Parish Council, feel that the draft NDLP does not reflect the needs of the parish. We feel it is necessary to participate in the oral part of the examination to ensure the views of local people are provided and taken into consideration in during the examination process.

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.

None

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: 24/01/2013

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 and 7) where some text is hidden from view in the pdf

Jason McGuinness

139 batch 156593

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.

We are a firm of town planning consultants acting for a land owner in Okeford Fitzpaine. We object to the Council's plans to direct the spatial distribution of development, particularly housing, to the four main towns to the detriment of the smaller villages.

The adoption of the Localism Act offers greater freedom and flexibility for local people. The Act passed significant new rights direct to communities and individuals, to make it easier for them to achieve their ambitions for the place where they live.

The Localism Act, advocates neighbourhood plans through which communities, which include residents, employees and business, are encouraged to come together and say where they think new houses, businesses and shops should go.

Paragraph 3.49 of the draft NDLP advocates the preparation of a neighbourhood plan where a local community wishes to see growth to meet local needs but where such needs cannot be met through countryside policies alone.

Neighbourhood plans must accord with the principal authority's strategic priorities, i.e. a neighbourhood development plan must be in line with the core strategy/ the vision for the wider area set by the local authority.

We are concerned that as the draft NDLP seeks to concentrate the vast majority of new development in the four main towns of the District, this leaves very little potential for new development anywhere else in the District. Below we outline our particular concerns in relation to specific sections of the draft Local Plan:

Policy 2

We object to the structure of this policy and would urge that it is re-worded. In its present form, the policy for 'The Countryside (including Stalbridge and the Villages)' states that "development in this area will be subject to countryside policies". The policy then adds that "the focus will be on meeting local needs". In our view, the wording of the policy suggests that the Council attaches a lower priority to meeting local needs than applying countryside policies. The policy does not reflect the explanatory text e.g. in paragraphs 2.46 bullet point 4, 2.52, 3.46 and 5.27.

We consider that the concentration of residential development in the four main towns would have a detrimental impact upon the vitality and viability of Okeford Fitzpaine. The village currently has an aging population with 14-17% of the population aged 65 and over. The gradually aging population is demonstrated by the variation between the 2001 and 2011 census data. In 2001 the median age of the population within the Okeford Fitzpaine parish was between 39-43, however, by 2011 this had increased to 43 years plus.

The North Dorset Parish Profile for Okeford Fitzpaine published in Oct 2011 does not take account of the most recent 2011 census data. As such we do not feel that in drafting the NDLP that the Council has utilised the most up-to-date information and population statistics available.

Nevertheless, the Parish Profile identifies the dearth of younger adults in their 20s and 30s, with people aged 20-39 years making up just 12.7% of the population in Okeford Fitzpaine. This is significantly below the national average of 26.8%. In addition, unlike National trends, between 2001 and 2010 the population of Okeford Fitzpaine has decreased by 1%.

In terms of local amenities Okeford Fitzpaine currently has a primary school, village hall and post office all of which are dependent upon a generationally balanced population for their continued existence.

The lack of younger adults within the village, within prime child bearing age, is likely to result in a further decrease in young children within the ward and declining student numbers for the local school. The census data demonstrates this decline; in 2001 21-24% of the population was aged 0-15, by 2011 this has decreased to 16-19%. Should development, and in particular family sized dwellings, continue to be restricted this will inevitably result in a further reduction in pupil numbers putting the Okeford Fitzpaine Primary School at risk of closure.

ACORN socio-economic classifications show that just over 78% of all households in Okeford Fitzpaine are in the 'wealthy achievers' category, significantly higher than the County average of 40%. Conversely 9% are categorised as 'comfortably off' much lower than the County average, and almost 13% are 'hard pressed', higher than the County average. This demonstrates a distinct socio-economic divide between residents within the village. The latest revision of NDLP would severely restrict development outside the four main towns. This would result in Okeford Fitzpaine effectively becoming an enclave for the wealthy.

In terms of home ownership in 2011 40.9% of residents owned their home outright, an increase from 33.2 - 40.9% in 2001. 28.3-36.4% of residents were home owners with a mortgage or loan. A mere 0-0.4% of homes were in shared ownership; 1-3.3% were for social rent from the Council; 9.4% were social rented from private landlords. Between 8.2 – 14.1% of the housing stock was private rented accommodation. Again this demonstrates the dichotomy within the ward between the wealthier older population and the younger less affluent residents.

We believe the current provision of housing stock is insufficient to meet local needs. Where younger residents are in a position to secure a mortgage demand for dwellings significantly exceeds supply, with resultant increase in house prices. We feel a wider range of properties is required within the parish to meet the need for smaller and family sized dwellings.

A Place Survey was undertaken in 2008 for the Bulbarrow Ward which asked residents how satisfied they were with their area as a place to live. The survey asked residents to choose, from a list of options, what was important in making an area a good place to live. For residents in Bulbarrow the three most selected were: affordable housing, levels of crime and provision of health services. Bulbarrow's residents felt that (from the same list of options) public transport, affordable housing and activities for teenagers were most in need of improvement. We consider the draft NDLP will not address local residents concerns and will prevent the creation of sustainable balanced and mixed communities outside of the four larger towns. This is particularly evident in the case of Okeford Fitzpaine.

Information supplied by the Council as to the housing need in the parish show that as of January 2014, 17 individuals/families have expressed an interest in living in the area, 6 of whom have a specific housing need. This is out of a total of 1400 individuals/families on the list within the North Dorset District Council area. This represents a significant demand for homes within Okeford Fitzpaine given its modest size. Of these 17 individuals/families expressing an interest 10 require one bedroom properties, 4 require two bedrooms, 2 require three bedrooms, while 1 requires a four bedroom property. This demonstrates the need for smaller and family-sized properties within the area of which there is a limited supply at present given the dominance of larger detached dwellings.

We consider that the NDLP in its current form would stifle development outside of the four main identified towns. In our view the draft NDLP is insufficient to meet the needs of the local population and re-balance the generational divide within the ward at present.

Policy 2 Paragraph 3.53 – 3.54

We fail to understand the rationale for the 'opting-in' method of securing development in villages. It does not sit comfortably alongside the general strategy of supporting major development in the 4 main towns and allowing development in villages where this is both sustainable and meets local needs.

Policy 2 Paragraph 3.56

This paragraph introduces, without justification, the word 'infill' into the type of development that may be acceptable. This is a matter of concern because typically 'infill' means a very small number of dwellings e.g. up to 5. If the Council intends that it should cover any amount of development, provided it is within the development boundary established through a neighbourhood plan or through the 'opt-in' procedure, then the Council should say so. If this is not the Council's intention, we would request that the word 'infill' is deleted from the text.

Policy 12

We note that the policy deals with retail development in the four main towns of the District. There is no policy guidance here in relation to retail development outside these four locations. This might suggest that the Council is not interested in such development.

However, reading on, we note that Policy 27 does in fact deal with commercial development in villages, as well as community development. It may be better if the reference to commercial

development is transposed to Policy 12 since this would in our view be a more logical place for it. We propose a form of wording in Section 7 of this form.

Policy 20 - Paragraphs 8.174-8.176

We feel these do not carry through the twin approach to development set out in Policy 2. Thus, there is no mention in these paragraphs of development to meet 'local needs'. It appears to be restricted to 'essential rural needs' or 'overriding needs', which differ from local needs.

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.

Policy 2 Core Spatial Strategy

The Countryside (including Stalbridge and the Villages) outside the defined boundaries of the four main towns, the Council will restrict development to the following categories:

- development that is required to meet essential rural needs;
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We propose no change to the rest of Policy 2.

Policy 12

1. Insert a new section after 'Town Centre Uses Outside Town Centres'

Commercial uses in Stalbridge and the Villages

The Council will:

- a. Respond positively to applications for extending existing commercial development, where this is necessary to improve their viability or to ensure their continued use.
- b. Development which involves the loss of commercial facilities which provide an important asset to the community will be resisted unless the applicant can show that it is no longer practical to retain the facility.
- c. Respond positively to applications for new commercial development where this serves a local need and does not threaten the vitality or viability of a nearby town centre.