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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	Messrs	Mrs	
First Name		Sarah	
Last Name	Drake	Hamilton-Foyn	
Job Title (where relevant)		Director	
Organisation (where relevant)		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: Core Policy 2	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.

Core Policy 2

An objection is raised to Core Policy 2 in respect of the spatial strategy for the larger villages. The policy restricts development outside the four main towns so that in the remainder of the district (including Stalbridge and the larger villages) will be subject to countryside polices where development will be strictly controlled, unless it is required to enable essential rural needs to be met. There needs to be a clear definition of what essential rural needs are and what local needs are as the plan loosely uses these terms which appear to be interchangeable.

The Draft Core Policy identified Stalbridge and 18 of the Districts larger villages as 'local centres' and the main focus for growth outside the four main towns. Child Okeford was identified as one of the larger villages. Draft Core Policy 3 then applied the policy of restraint to the smaller villages. This approach has not been continued in the Pre-Submission Plan.

Our clients consider that the "wash over" all settlements outside the four main towns with a policy that would not permit infilling until Neighbourhood Plans are produced is unnecessarily restrictive and inconsistent with the NPPF para 55. The Plan envisages local needs being met and delivered through neighbourhood planning.

However, it would appear that a more flexible approach would only arise if a Neighbourhood Plan was prepared; this seems unlikely if only 52% of parishes expressed an interest in preparing a Neighbourhood Plan. Neighbourhood Plans are to be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan.

Our clients consider that the Plan will not meet housing needs, North Dorset already has one of the highest affordable housing needs, the lack of housing will not fulfil the Government objectives of significantly increasing the housing land supply as set out in the NPPF. As it is not clear what the policy framework is for the larger villages the plan is unsound as it cannot be effectively delivered.

Sustainable development in rural areas should be promoted as it will enhance and maintain the vitality of rural communities (para 55 of the NPPF). If Neighbourhood Plans are not prepared then there will be a policy of restraint which will reduce the housing supply and undermine the objectives of the Plan.

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.

The strategy whilst meeting the majority of the strategic needs for growth at the four main towns (which is consistent with the NPPF), should also provide the framework for the development of sites in the larger villages which have a range of facilities and services i.e. those sustainable settlements in addition to the four main towns. Paragraph 55 of the NPPF states that local planning authorities should promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

The plan needs to ensure that the provision is made or that the plan facilitates development in those larger villages with a level of facilities and services i.e. as in the adopted Local Plan. These villages in a largely rural district have a distinct role in terms of meeting local needs. Therefore, the Local Plan needs to provide the framework for this development to take place.

Our clients consider that whilst not necessarily including an overall housing provision figure for Stalbridge and the larger villages, a policy framework which is flexible should be included in the Local Plan, this can then be taken forward through Neighbourhood Plans or provide the guidance necessary to determine planning applications. Para 17 of the NPPF states that Plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. There is risk that if the Council relies on Neighbourhood Plans to deliver growth that this will not happen and instead will result in planning by appeal. Furthermore, our clients would not support an approach which priorities infilling as a means of meeting local needs as this would be inconsistent with the NPPF.

In summary the overall housing provision should be increased and the plan period extended to 2031. A more flexible approach towards the larger villages should be encouraged and a policy framework included in the Local Plan; this will ensure that the Local Plan is sound and consistent with the NPPF and assist in meeting local housing needs.

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.

The issues raised in our objections relate to the soundness of the plan in respect of the plan period and the housing requirement and the strategy for the villages.

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.