

Our Introduction:

These representations are made by Symonds & Sampson on behalf of Robert Coles in respect of the North Dorset Local Plan Review Issues and Options Consultation. We specialise in the promotion of strategic land for residential development with associated community infrastructure. From this experience, we understand the need for the planning system to ensure that local communities have access to both decent homes and local employment opportunities.

The National Planning Policy Framework (NPPF) has brought about fundamental changes to the planning process since its inception. One such change relates to the need to significantly boost the supply of housing and how this fundamental requirement of the Framework should be reflected in the plan making process. We have considerable experience in contributing to the Local Plan preparation process since the NPPF came into effect.

What continues to be clear from this experience is that many local authorities are not fully addressing the requirements of the Framework when preparing their Local Plans, this has led to significant concerns being expressed by Inspectors on the soundness of their plans in their current form.

We very much welcomes the Council's decision to undertake an early Review of the North Dorset Local Plan and is grateful for the opportunity to comment at this very early stage in the Review process. Our responses to specific questions contained in the Issues and Options Consultation are set out below.

Part B – Representations

Please answer as many questions or as few questions as you wish. There is a box at the end of the form where you can provide any comments that you may have.

Housing

1. Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset? If not, please set out what you consider to be an appropriate figure and provide reasons for this.

Yes

No

We agree that the housing need figure of 366 dwellings per annum is a sensible starting point for planning housing growth in North Dorset. However, it should be borne in mind that this figure is based on the Government's currently proposed standard methodology for calculating the Objectively Assessed Need for Housing (OAHN) and this may be subject to change following the recent consultation. Also this figure does not take into account any additional housing provision that may be required to support economic growth. In this connection, it is pertinent to note that the 2015 Eastern Dorset SHMA report suggested an uplift in housing need of at least 105 dwellings per annum to reflect expected economic growth. In addition the recently published Western Dorset Economic Growth Strategy, which includes North Dorset, has ambitious economic growth plans, including 20,000 new homes and 13, 200 new full-time equivalent jobs for the period up to 2033. In terms of

North Dorset, the Economic Growth Strategy identifies the Gillingham, Shaftesbury and Blandford Forum corridor as a focus for economic growth. It is important therefore, that the housing growth planned for in the Local Plan Review, positively supports these economic growth aspirations.

It is also important that the housing requirement in the Local Plan Review takes into account any unmet need from other authorities in the Strategic Housing Market Area. If the Government's standard methodology for calculating the OAHN is adopted, the OAHN for the Eastern Dorset HMA will be significantly higher than that set out in the Eastern Dorset SHMA. As a consequence of this, it is possible that the two major urban areas in the HMA, Bournemouth and Poole, will be unable to accommodate all of their OAHN within their authority areas and there may be a need for North Dorset to accommodate a share of that unmet need under the Duty to Cooperate.

Employment

2. Do you consider that additional employment land should be allocated for development at Blandford as part of the Local Plan Review?
- Yes
- No
3. Do you consider that there is a need to allocate additional employment land in any other part(s) of the District?
- Yes
- No

Spatial Strategy

4. Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?
- Yes
- No
5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.
- Yes
- No

The Local Plan Review offers the opportunity for the Council to undertake a fundamental review of its spatial strategy and settlement hierarchy. In particular, the Local Plan Review should ensure that there is a more flexible and positive approach to new housing in the rural areas of the District which addresses the difficulties affecting rural communities including a shortage of housing supply and unaffordability. Paragraph 55 of the NPPF stresses that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities" and the National Planning Practice Guidance makes it clear that all settlements can play a role in delivering sustainable development in rural areas and consequently blanket policies restricting housing in some settlements and preventing other settlements from expanding should be avoided.

Blandford (Forum and St Mary)

6. Do you agree with the conclusions regarding the areas of search identified at Blandford?
- Yes

No

7. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

8. What are the additional infrastructure requirements that are likely to result from potential future development at Blandford?

Please set out what you see as the additional infrastructure requirements.

Gillingham

9. Do you agree with the conclusions regarding the areas of search identified at Gillingham?

Yes

No

10. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

11. What are the additional infrastructure requirements that are likely to result from potential future development at Gillingham?

Please set out what you see as the additional infrastructure requirements.

Shaftesbury

12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury?

We agree with the Council's conclusions that areas A, B and D have development potential and in particular, we believe that Area D which within our client's land is located, is the most sustainable of all the sites reviewed for the expansion of Shaftesbury..

Yes

No

13. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

14. What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?

Please see representations.

Sturminster Newton

15. Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton?

Yes

No

16. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

17. What are the additional infrastructure requirements that are likely to result from potential future development at Sturminster Newton?

Please set out what you see as the additional infrastructure requirements.

Stalbridge

18. Do you agree with the conclusions regarding the areas of search identified at Stalbridge?

Yes

No

19. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

20. What are the most important infrastructure requirements that are likely to result from potential future development at Stalbridge?

Please set out what you see as the additional infrastructure requirements.

The Villages

21. Do you agree with the Council's proposed approach in relation to future development at the eighteen larger villages within the District or do you think that the Council should consider an alternative approach?

Yes

No

If you have answered 'No' please set out your alternative approach and information/reasoning behind this.

As indicated in the response to Q5 above, we consider that the Local Plan Review should support the provision of housing growth in key villages which offer a wide range of community facilities and services. We generally support an approach to the distribution of housing which reflects the needs and characteristics of individual settlements. However in considering the distribution of housing growth it is important to note that a fundamental objective of NPPF is to secure a thriving rural economy "by taking a positive approach to sustainable new development"¹ The NPPF seeks to significantly boost the supply of new housing and in rural areas "housing should be located where it will enhance or maintain the vitality of rural communities"² and market housing may be allowed where it "would facilitate the provision of significant affordable housing to meet local needs".³

There are several benefits of providing new housing in rural areas. These benefits are:

- New housing can help sustain rural communities and businesses. Planning Practice Guidance states that "A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities"⁴;
- The provision of family housing in rural areas would help redress the current age structure imbalance towards those aged over 65;
- The amount of affordable housing in rural areas can be significantly increased by allowing new and larger sites to be developed; and
- Locating housing development in settlements with good public transport links can assist in encouraging sustainable travel choices and can assist in maintaining the viability of those transport links.

We submit that it is inappropriate to use settlement boundaries used as a mechanism to restrict otherwise sustainable development from coming forward. The NPPF is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable and sustainable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by NPPF. Planning Practice Guidance⁵ also advises that "*all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence*".

¹ NPPF para 28

² ibid para 55

³ Ibid para 54

⁴ PPG Rural Housing 50-001-20140306

⁵ PPG Rural Housing Ref 50-001-20140306

There is nothing in NPPF which states that development in the open countryside should be restricted in the extensive manner which the adopted Local Plan suggests. Instead, we suggest that the Local Plan Review should take a more permissive stance. In reality, in its current form, the policy approach creates a 'presumption against development' in all areas beyond the settlement boundaries. We recommend that the policy approach needs to be significantly revised to provide a more permissive approach to development in the open countryside. Greenfield sites on the edge of settlements, but lying outside of the currently built up area may offer opportunities for sustainable development which could help meet the housing needs of North Dorset and help achieve NPPF's objective to '*significantly boost the supply of housing*' and would accord with the presumption in favour of sustainable development.

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We would commend to the Council the policy approach taken by Harborough District Council in its Submission Local Plan published in September 2017. Policy GD2 of that Plan concerns Settlement Development and states that:

1. *In addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicester Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where:*
 - a) *In the case of housing, it does not, cumulatively with other proposals, significantly exceed the target for the delivery of new homes in the Rural Centres and Selected Rural Villages specified in Policy H1 Provision of new housing;*
 - b) *It reflects the size of the settlement concerned and the level of service provision within that settlement;*
 - c) *It is physically and visually connected to and respects the form and character of the existing settlement;*
 - d) *It retains as far as possible existing natural boundaries within and around the site and the settlement;*
 - e) *It does not harmfully diminish the physical and/or visual separation of neighbouring settlements.*
2. *Development involving the appropriate and efficient re-development of previously developed land which is not of high environmental value and re-use of buildings will be permitted where such re-use achieves the objectives of sustainable development.*

Such an approach, which allows identified settlements to grow in order to maintain rural vitality but ensures that rural communities maintain their identity and distinctiveness, would be fully in line with the NPPF objectives for rural housing and an appropriate approach for the North Dorset Local Plan review to adopt.

Affordable Housing

22. Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?

We agree that the reference to a maximum figure of dwellings in Policy 9 of LPP1 should be removed.

Yes

No

23. Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?

Yes

No

24. Do you consider that the Council should continue with its existing policy approach, which allows for a small number of market homes on rural exception sites?

We consider that the Council should continue with its existing policy approach which allows for the provision of market housing on rural exceptions sites. In many cases affordable housing can only be viable on such sites if cross subsidised by market housing.

Yes

No

Self-Build and Custom-Build Housing

25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?

We agree with the principal of providing self-build properties subject to evidence of demand. However, contrary to what is proposed under option c above, we would object to a requirement for the provision of self-build plots on major development sites as this would not boost housing supply but merely changes the delivery mechanism. We would have no objection to options a, b, d, e and f.

Yes

No

a. Allowing serviced plots to come forward under the current development plan policies.

Yes

No

b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing.

Yes

No

c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site.

Yes

No

d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties).

Yes

No

e. Identifying land in public ownership which would be sold only for self-build development.

Yes

No

f. The use of Local Development Orders to facilitate self-build development.

Yes

No

26. Are there any other approaches that could be used to meet the demand for self-build housing?

Yes

No

If you have answered 'Yes' please outline the other approaches which the Council could pursue.

Please see representations

Ensuring the Vitality and Viability of Town Centres

27. Do you consider that the existing hierarchy and network of centres, as set out in LPP1, should be amended to include Stalbridge as a 'local centre'?

Yes

No

Important Open or Wooded Areas (IOWAs)

28. Do you agree that those IOWAs, which are protected from development by other planning policies or legislation, should be deleted?

We agree that those IOWAs which are protected from development by other planning policies. Indeed there is a strong case for all IOWAs to be deleted as the underlying concept appears to have been superseded by the ability to make Local Green Space designations introduced by the NPPF.

Yes

No

The A350 Corridor

29. Do you consider that the land which is identified and safeguarded for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass should continue to be identified and safeguarded for such purposes?

We consider that the land currently identified for the Shaftesbury Outer Bypass should no longer be safeguarded for that purpose. As noted in Paragraph 8.11 of the Consultation Paper, Dorset County Council as Highway Authority, has no funding in place for this scheme and does not consider that funding for the scheme is likely to be available in the foreseeable future.

Paragraph 41 of the NPPF makes it clear that local planning authorities should only *“identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice”* (our emphasis). Furthermore Paragraph 173 advises that *“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.”* Indeed one of the key tests of soundness for Local Plans is effectiveness – Plans must be deliverable.

In the absence of funding for this scheme, it is clear that it is highly unlikely to be delivered during the plan period and it should therefore not be identified or safeguarded in the Local Plan Review.

Yes

No

Comments – *See below*

If you have any comments about the Issues and Options Document or the Sustainability Appraisal please set them out in the box below. If your comments are in relation to a specific question or chapter of the Issues and Options Document then please state which question or chapter your comments relate to.

The Land Owner is working with a specialist Land Promoter in order to obtain the allocation for Housing Development at Salisbury and Shaftesbury. We note that the land is currently safeguarded.

The Land Owner wishes to obtain the allocation for housing development of land at Salisbury Road, Shaftesbury in the Local Plan Review. The site represents an ideal opportunity to deliver a high quality, sustainable development opportunity to address the town's and the wider District's housing needs.

The Council's Issues and Options Consultation for the Local Plan Review has identified Shaftesbury as a sustainable location to deliver future residential growth. There are no technical impediments or environmental constraints that would preclude the development of the land at Salisbury Road and its ability to make a welcome contribution to the town's and the district's future development requirements. The site is under the control of willing landowners, who actively wish to see the land brought forward for development.

The site, which is located within Shaftesbury Area of Search A in the Issues and Options Consultation Paper, is identified on the Plan (attached).

The site lies to the north of the A30 Salisbury Road and adjoins existing residential development on the eastern edge of the town. It extends to some 4.3 hectares and has the capacity to accommodate in the region of 90 dwellings together with extensive landscaping and public open space.

The site at Salisbury Road represents a sustainable location for residential development. It is located within easy walking distance of a good range of services and facilities in the eastern part of Shaftesbury. These include the secondary school, medical centre and leisure and recreation facilities. The town centre can be reached by the bus service which passes the site.

It is envisaged that the development of the site could commence within a period of five years once a successful allocation has been achieved and planning permission has been obtained.

We note that land is currently safeguarded immediately to the west of this site for a Shaftesbury Outer By-Pass. Gladman considers that the land currently identified for the Shaftesbury Outer Bypass should no longer be safeguarded for that purpose. It is evident that Dorset County Council, the Highway Authority, has no funding in place for this scheme and does not consider that funding for the scheme is likely to be available in the foreseeable future.

Paragraph 41 of the NPPF makes it clear that local planning authorities should only "identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice" (our emphasis). Furthermore Paragraph 173 advises that "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable." Indeed one of the key tests of soundness for Local Plans is effectiveness – Plans must be deliverable.

In the absence of funding for this scheme, it is clear that it is highly unlikely to be delivered during the plan period and it should therefore not be identified or safeguarded in the Local Plan Review.

Continue on a separate sheet if necessary

Do you wish to be contacted about future consultations relating to the Local Plan Review?

Yes

No

Signature: _____

Date: 22/01/2018

If submitting the form electronically, no signature is required.

When completed please send form to planningpolicy@north-dorset.gov.uk

