

**NORTH DORSET LOCAL PLAN – 2011 to 2026 PART 1**

**SUBMISSION STATEMENT**

**(Regulation 22(1)(c) Statement)**

**November 2014**



## Contents

	Contents .....	1
<b>1.</b>	<b>Introduction .....</b>	<b>3</b>
	The Submission Statement .....	3
	Local Development Schemes (LDSs) and Plan Preparation .....	4
	Stages of Consultation .....	6
	Statement of Community Involvement (SCI) .....	7
<b>2.</b>	<b>Early Core Strategy Consultation in 2005.....</b>	<b>8</b>
	Main Elements of Consultation.....	8
	Raising Awareness Meetings.....	8
	Focus Group Meetings .....	11
	Developing the Initial Draft Aims and Objectives for the Core Strategy .....	12
	Developing the First Draft Vision for the Core Strategy .....	16
<b>3.</b>	<b>Core Strategy Issues and Alternative Options Consultation 2007 .....</b>	<b>18</b>
	Introduction .....	18
	Bodies and Persons Invited .....	18
	How Bodies and Persons were Invited to make Representations.....	18
	Summary of the Main Issues Raised .....	19
	How the Main Issues were Addressed in Subsequent Stages of Plan Preparation .....	25
<b>4.</b>	<b>Consultation on the Draft Core Strategy and Development Management Policies DPD in 2010.....</b>	<b>28</b>
	Introduction .....	28
	Consultation on the Draft DPD .....	31
<b>5.</b>	<b>Consultation with Town and Parish Councils on Options for Growth in 2011 .....</b>	<b>40</b>
	Introduction .....	40
	Bodies and Persons Invited .....	40
	How Bodies and Persons were Invited to make Representations.....	40
	Summary of the Main Issues Raised .....	42
	How the Main Issues were Addressed in Subsequent Stages of Plan Preparation .....	44
<b>6.</b>	<b>Consultation on Key Issues for the Revision of the Draft Core Strategy in 2012 .....</b>	<b>45</b>
	Introduction .....	45
	Bodies and Persons Invited .....	45
	How Bodies and Persons were Invited to make Representations.....	46
	Summary of the Main Issues Raised .....	48
	How the Main Issues were Addressed in Subsequent Stages of Plan Preparation .....	56

<b>7.</b>	<b>Gillingham Strategic Site Allocation Concept Plan Workshop 2013 .....</b>	<b>58</b>
	Background .....	58
	Concept Plan Workshop.....	59
<b>8.</b>	<b>Consultation on the North Dorset Local Plan – 2011 to 2026 Part 1 in 2013 .....</b>	<b>62</b>
	Introduction .....	62
	Bodies and Persons Invited .....	62
	How Bodies and Persons were Invited to make Representations.....	63
	Number of Representations Made .....	64
	Summary of the Main Issues Raised .....	67
<b>9.</b>	<b>Consultation on ‘Focused Changes’ to the North Dorset Local Plan – 2011 to 2026 Part 1 in 2014 .....</b>	<b>93</b>
	Introduction .....	93
	Bodies and Persons Invited .....	93
	How Bodies and Persons were Invited to Make Representations.....	93
	Number of Representations Made .....	95
	Summary of the Main Issues Raised .....	96
<b>10.</b>	<b>Conclusion.....</b>	<b>103</b>

# 1. Introduction

## The Submission Statement

- 1.1 The Local Plan Part 1 has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into force on 6 April 2012.
- 1.2 This ‘Submission Statement’ has been prepared to meet the requirements set out in Regulation 22(1)(c) regarding the submission of documents and information to the Secretary of State in order to progress a local plan through the examination process.
- 1.3 Regulation 22(1) prescribes the ‘other documents’ that Section 20(3) of the Planning and Compulsory Purchase Act 2004 indicates must be sent to the Secretary of State in addition to the development plan document that will be examined.
- 1.4 Regulation 22(1)(c) requires a statement setting out –
- (i) which bodies and persons the local planning authority invited to make representations under Regulation 18,
  - (ii) how those bodies and persons were invited to make representations under Regulation 18,
  - (iii) a summary of the main issues raised by the representations made pursuant to Regulation 18,
  - (iv) how any representations made pursuant to Regulation 18 have been taken into account;
  - (v) if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
  - (vi) if no representations were made in Regulation 20, that no such representations were made.
- 1.5 This Submission Statement gives an overview of the ‘informal’ consultation processes during the preparation of the Local Plan. It briefly summarises the main issues raised during consultation under Regulation 18 (see Chapters 2 to 7) and explains how they have been taken in to account as the Local Plan has moved forward. It also provides an overview of the main issues raised in representations on the North Dorset Local Plan – 2011 to 2026 Part 1: Pre-submission Document and on the ‘focused changes’ that were the subject of a subsequent round of consultation under Regulation 20 (see Chapters 8 and 9).
- 1.6 In accordance with Regulation 35 a copy has been made available at the Council’s principal office (in Blandford) and has been published on the Council’s website

(dorsetforyou.com). The Council has also produced a series of background papers, which provide more detail on the development of policies in the Local Plan Part 1.

## Local Development Schemes (LDSs) and Plan Preparation

- 1.7 The local plan has been developed from work previously undertaken on a draft core strategy, which itself has evolved from a 'stand-alone' document to one which includes development management policies and a Strategic Site Allocation for the southern extension of Gillingham.
- 1.8 Since 2005, the Council has produced a series of Local Development Schemes (LDSs), which provide an overview of how the Council's intentions have changed, in terms of planning policy document production, both in response to reforms of the planning system and other factors. These changes are briefly outlined below.
- 1.9 The first LDS was produced in April 2005 and this indicated that the Council would produce:
- a 'stand-alone' District-wide core strategy; and
  - a generic development control policies document.
- 1.10 The second LDS, produced in March 2007, and the third LDS produced in April 2008, both proposed four DPDs in total, which were:
- a 'stand-alone' District-wide core strategy;
  - a generic development control policies document;
  - a market towns allocations DPD; and
  - a small towns and villages DPD.
- 1.11 These LDSs also mentioned the possibility of producing a joint Gypsy and Travellers Site Allocations DPD for the whole of Dorset, including Bournemouth and Poole.
- 1.12 The proposed production of plans was rationalised in the fourth LDS, produced in April 2009, which put forward:
- a core strategy and development management policies DPD; and
  - a site specific allocations DPD covering towns and villages.
- 1.13 This version of the LDS recognised that a joint Gypsy and Travellers Site Allocations DPD would be produced for the whole of Dorset (including Bournemouth and Poole), but at that time a timetable for the production of the DPD had yet to be drawn up.
- 1.14 The Coalition Government was formed shortly after the General Election in May 2010 and has since introduced major reforms of the planning system. The Council did not produce a further update of the LDS during this period of change, but the way forward was agreed by the Council's Cabinet in June 2011.
- 1.15 At this meeting the Council agreed to revise the draft Core Strategy and Development Management Policies Development Plan Document (DPD) (also

known as the New Plan for North Dorset), which was produced in March 2010 to reflect both the Government's proposed changes to the planning system and the wider localism agenda.

- 1.16 The Cabinet report from June 2011 outlined that the review of the March 2010 draft Core Strategy should take account of the following main factors:
- the proposed review of national planning policy. The final version of the National Planning Policy Framework (NPPF) was produced in March 2012;
  - the revocation of regional strategies. The revocation order for the Regional Strategy for the South West came into force in May 2013;
  - issues arising from consultation on the draft Core Strategy. Comprehensive reports on the results of consultation on the draft Core Strategy were considered by the Council's Planning Policy Panel on 5<sup>th</sup> July 2012;
  - the implications of any new or updated 'evidence base' studies. An updated Strategic Housing Market Assessment (SHMA) and updated projections of the future need for employment land have been produced subsequent to the publication of the draft Core Strategy; and
  - the emerging 'localism' agenda including neighbourhood plans. The Council's approach to neighbourhood planning has been the subject of extensive consultation since the publication of the draft Core Strategy.
- 1.17 At this meeting the Council also agreed:
- to take forward proposals for the growth of Gillingham in the form of a Strategic Site Allocation (SSA);
  - to re-examine the overall level of growth in the District and at the main towns (i.e. Blandford, Gillingham, Shaftesbury and Sturminster Newton); and
  - to reconsider the approach to development at Stalbridge and in the villages.
- 1.18 Following the reforms of the planning system and the Council's review of its approach to taking forward planning policy, the fifth revision of the LDS was produced in November 2013. This reflected the move away from core strategies to 'new style' local plans and proposed the production of:
- The North Dorset Local Plan 2011 – 2026 Part 1. This will set out the Council's strategic planning policies for the District including strategic development management policies together with a Strategic Site Allocation (SSA) for the southern extension of Gillingham;
  - The North Dorset Local Plan 2011 – 2026 Part 2. This DPD will allocate specific sites for housing and employment growth in the main towns (other than the SSA at Gillingham) and will include a review of other land allocations and settlement boundaries;
  - The Dorset-wide Gypsy, Traveller and Travelling Showpeople Site Allocations Joint DPD. This DPD will allocate specific sites for Gypsies, Travellers and

Travelling Showpeople across the Dorset Sub-region (i.e. Dorset County, Bournemouth and Poole).

- 1.19 The fifth revision of the LDS included timetables for the production of these three documents. The sixth revision still proposes the preparation of the same three documents, but the timetables have been revised to reflect the delay caused by a further round of consultation on ‘focused changes’ to the Pre-submission Document in August and September 2014.

## Stages of Consultation

- 1.20 This Submission Statement reports on all the main stages of consultation undertaken up until the production of the pre-submission version of the Local Plan Part 1 and the subsequent ‘focused changes’. The main stages of consultation relate to the planning policy documents that were being produced at the time, as outlined above. The main stages of consultation under Regulation 18 were:

- raising awareness meetings and topic-based focus groups held in 2005 with a view to shaping the initial aims and objectives for a ‘stand-alone’ core strategy;
- consultation on ‘issues and alternative options’ that was undertaken in 2007 for the ‘stand-alone’ core strategy;
- consultation during 2010 on the Draft Core Strategy and Development Management Policies Development Plan Document (DPD) (also known as the New Plan for North Dorset);
- consultation during 2011 with town and parish councils on options for the spatial distribution of growth;
- consultation during 2012 on key issues for the revision of the March 2010 draft Core Strategy; and
- consultation during early 2013, in the form of a ‘concept plan workshop’, to take forward proposals for the southern extension of Gillingham.

- 1.21 For each stage of consultation under Regulation 18, this report sets out:

- which bodies and persons were invited to make representations;
- how those bodies and persons were invited to make such representations;
- a summary of the main issues raised by those representations; and
- how those main issues were addressed in subsequent stages of plan preparation.

- 1.22 The main stages of consultation under Regulation 20 were:

- consultation from November 2013 to January 2014 on the North Dorset Local Plan 2011 – 2026 Part 1: Pre-submission Document; and
- consultation from August to September 2014 on ‘focused changes’ to the North Dorset Local Plan 2011 – 2026 Part 1: Pre-submission Document relating to housing growth at Blandford.

- 1.23 For each stage of consultation under Regulation 20, this report sets out:



- which bodies and persons were invited to make representations;
- how those bodies and persons were invited to make such representations;
- the number of representation made; and
- a summary of the main issues raised in those representations.

## Statement of Community Involvement (SCI)

- 1.24 The Council produced a Statement of Community Involvement (SCI), which was adopted in July 2006. The SCI was prepared to reflect the planning system at the time and refers to the Regional Spatial Strategy, Local Development Frameworks and the planning policy documents that were in production at the time. It is intended to review and update the SCI to reflect the recent changes to the planning system and the documents now in production.
- 1.25 Figure 3 of the SCI sets out how the community will be consulted in the production of the various planning policy documents that were proposed at the time. Whilst the documents under preparation have changed since the publication of the SCI, the consultation methods set out in Table 3 have been used to formulate and refine policy as the draft Core Strategy / Local Plan has moved forward, as set out in more detail in this Submission Statement.

## 2. Early Core Strategy Consultation in 2005

### Main Elements of Consultation

- 2.1 The early consultation on the Core Strategy had four main elements, which were:
- A series of awareness raising meetings held in April 2005;
  - A series of topic-based focus groups held in July 2005;
  - The shaping of the initial aims and objectives – July 2005; and
  - The development of the first draft vision for North Dorset from July to December 2005.

### Raising Awareness Meetings

#### **Bodies and Persons Invited**

- 2.2 During April 2005 a series of meetings were held in each of the towns in the District, to invite initial comments on issues that the Core Strategy might need to address.
- 2.3 Representatives from local communities and key stakeholders were invited to attend. Altogether over 100 people attended representing a broad range of interest groups from Town and Parish Councils, Community Partnerships, local agents and house builder representatives, CPRE, local businesses and representatives of educational and health interests.

#### **How Bodies and Persons were Invited to make Representations**

- 2.4 The bodies and persons outlined above were invited to 'raising awareness' meetings, which were held on the following dates at the following locations:
- April 14 - Shaftesbury Christian Centre;
  - April 18 - Durweston Village Hall, Blandford;
  - April 21 - Sturminster Newton, Royal British Legion;
  - April 25 - Gillingham Town Hall; and
  - April 28 - Stalbridge Methodist Hall.
- 2.5 At each meeting, a presentation on the planning system was given, with an opportunity for general questions. Attendees were then divided up and some work groups looked at ideas for the Core Strategy.

#### **Summary of the Main Issues Raised**

- 2.6 These issues raised are set out in detail in the report on the meetings produced by the Council in April 2005. This report also gives a comprehensive account of the

comments made at each of the five meetings and includes a full list of participants in Appendix 1.<sup>1</sup>

2.7 A summary of the many diverse issues that were raised is set out in Figure 2.1 below.

Figure 2.1 – Main Issues From the Raising Awareness Meetings – April 2005

Topic	Issues
<b>Vision for the area</b>	needs to be simple and positive
	needs to consider the historic built and natural environment
<b>RSS / National context</b>	One size doesn't fit all
	Use common sense in applying policy
<b>Population</b>	The lack of wealth-making age groups and the growth of retirement age groups is a concern
	Concern that Primary Health Trust needs to be involved and thinking longer term in view of ageing population
<b>Housing</b>	Allow for flexibility of choice in dwelling types / sizes
	Need more affordable housing (including low cost homes to buy). Concern at cost of shared equity housing
	Include homes for those with disabilities in all communities
<b>Business</b>	Businesses must be involved in the planning process
	Need for growth in knowledge based industries to improve wage levels.
	Achieving sustainable communities requires the provision of employment opportunities within every settlement boundary.
	Need to keep employment and housing growth in balance
	Consider the full potential of tourism – encourage hotel development
	Differing views as to whether industry should be close to homes or on outskirts of settlement
	Towns each need a focus for future employment development
	Serviced office space is needed in towns, link with community buildings

<sup>1</sup> Results of Raising Awareness Meetings, North Dorset District Council (April 2005)

Topic	Issues
	Concern re the impact of supermarkets on local businesses
<b>Infrastructure</b>	<p>Concern at HGV growth on inadequate roads if businesses grow</p> <p>Need to be realistic on parking provision or will result in congestion in town centres. Keep some free parking in towns</p> <p>Public transport is inadequate - cars are needed, especially in villages</p> <p>Strong economic base will lead to higher employment levels and less crime. Police need to be aware of growth levels proposed to plan their resource needs</p> <p>Need for adequate open space within housing developments</p>
<b>Environment</b>	<p>Insist all new developments are energy efficient</p> <p>Need to make better use of natural assets in new development (e.g. trees / rivers.)</p> <p>Protect floodplains</p> <p>Need to ensure historic rural as well as urban environment is protected (e.g. historic parks.)</p> <p>Respect local character in towns and villages</p>
<b>Villages</b>	<p>They should be living communities. Concern that some people housed in villages have little or no affinity to the community. Second homes lead to dying villages</p> <p>Fears of village school closures. Concern that school facilities (e.g. playing fields) often not available out of hours</p> <p>Need more facilities; need to diversify pubs; and have college outposts</p> <p>More affordable housing is essential. More children are living at home as prices so high</p> <p>Concerns about over-development. Treat density with sensitivity</p> <p>Encourage entrepreneurs and enthusiasts!</p>

## How the Main Issues were Addressed in Subsequent Stages of Plan Preparation

- 2.8 The raising awareness meetings gave the Council some initial feedback on the local issues that the Core Strategy would need to deal with. The results of the meeting were used to steer the production of the draft Core Strategy.

## Focus Group Meetings

### Bodies and Persons Invited

- 2.9 During July 2005 a series of ‘focus group’ meetings were held, each focusing on a specific topic of relevance to the Core Strategy. Each Focus Group was attended by around 15-20 people who were invited either because of their expertise or because they had shown an interest in earlier meetings.

### How Bodies and Persons were Invited to make Representations

- 2.10 The bodies and persons invited, as outlined above, were invited to discuss a range of topics on the dates and at the locations as follows:
- July 7, Blandford - Environment & Renewable Issues;
  - July 12, Blandford - Living (including community facilities, health and recreation);
  - July 14, Blandford - Travelling (including public transport and accessibility);
  - July 21, Gillingham - Housing (including the need for affordable housing); and
  - July 25, Gillingham - Economy and shopping.
- 2.11 The focus groups were organised to allow everyone that attended to voice their own concerns, issues and visions for the District, and then for these to be discussed in small groups of between 3 and 5 people. It was then a Planning Officer’s task to facilitate the grouping of the issues raised, with consent from the group as a whole, and later to assist in the naming of the titles of the overarching issues.

### Summary of the Main Issues Raised

- 2.12 The participants identified all the issues they felt should be addressed by a future plan. The ‘Report on the Core Strategy Focus Group Meetings’, produced by the Council in August 2005<sup>2</sup>, includes a series of tables identifying the overarching issues relevant to each topic and the specific issues raised in relation to each overarching issue.
- 2.13 A large and highly diverse range of key issues were produced in all of the focus groups, ranging from renewable energy to waste management in the Environment Focus Group to barriers to business and quality tourism in the Economy Focus Group. Representatives from the four local community partnerships in the District

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<sup>2</sup> Report on the Core Strategy Focus Group Meetings July 2005, North Dorset District Council (August 2005)

attended the focus groups and fed in issues that were already identified in local community plans.

### How the Main Issues were Addressed in Subsequent Stages of Plan Preparation

- 2.14 The focus group meetings provided the Council with feedback from the local community and key stakeholders on key topics that had emerged from the previous raising awareness meetings and work being undertaken on local community plans.
- 2.15 The results of the focus group meetings were used alongside those of the raising awareness meetings to steer the production of the draft Core Strategy. In particular, the issues raised from the focus group meetings were analysed alongside relevant national and regional guidance and were drawn together to form a set of planning objectives.

## Developing the Initial Draft Aims and Objectives for the Core Strategy

### Initial Draft Aims and Objectives

- 2.16 The outputs from the July 2005 focus group meetings were analysed alongside relevant national and regional guidance to form a set of initial draft planning aims and objectives for the Core Strategy. These objectives were grouped under a series of broad aims which drew together related elements of different topics.
- 2.17 These initial draft aims and objectives are set out in Figure 2.2 below

Figure 2.2: Initial Draft Aims and Objectives Discussed at the Consultative Meeting of Planning Policy Panel on 27 July 2005

Strategic Aims	Objectives taken from Community Plans, Focus Groups and National / Regional Guidance
<b>1 - Sustainable Development</b>	
<b>1a</b> To create sustainable patterns of development	To provide for sufficient housing to meet the needs of the area.
	To consider the location of development and the needs of rural areas.
	To locate development in ways to minimise the need to travel by private car.
	To promote development of previously developed (brownfield) land and make best use of available land (i.e. higher densities than in the past).
<b>1b</b> To secure / provide the	To secure the infrastructure required to

Strategic Aims	Objectives taken from Community Plans, Focus Groups and National / Regional Guidance
<p>necessary infrastructure (e.g. housing / transport / education / recreation / health facilities) to support a more sustainable economy and make economic and social opportunities accessible to all residents.</p>	enable a sustainable community to develop.
	To consider the amount and type of affordable housing required and means of provision.
	To ensure business development is balanced with affordable housing and other infrastructure.
	To consider alternative forms of public transport (e.g. community transport) / green travel plans etc.
<p><b>1c</b> To encourage the use of renewable forms of energy and sustainable construction methods and minimise waste.</p>	To plan to help meet Dorset renewable energy targets
	To encourage sustainable forms of development (low energy use etc.).
	To minimise waste.
	To use more sustainable forms of building.
To provide for multi-purpose facilities.	<p><b>1d</b> To protect floodplains and other sensitive areas from development and avoid pollution.</p> <p>To locate development in ways to minimise impact on the environment (i.e. protect air quality, night skies, floodplains, minimise loss of greenfields, minimise car parking, avoid pollution).</p>
<p><b>2 - Respect Individuality of Settlements</b></p>	
<p><b>2a</b> To support development that respects the history and character of individual settlements.</p>	To conserve / enhance the historic environment (urban and rural).
	To encourage the development of market towns with ‘niche’ markets (not clone towns).
	To provide minimal levels of car parking where alternative forms of transport are available.
	To provide adequate parking to serve the needs of the towns (e.g. visitors, shoppers, employees, disabled).
<p><b>3 - Environmental Conservation</b></p>	
<p><b>3a</b> To ensure the conservation and enhancement of North Dorset’s</p>	To protect / enhance distinctive landscapes.
	To protect / enhance biodiversity.

Strategic Aims	Objectives taken from Community Plans, Focus Groups and National / Regional Guidance
diverse and distinctive natural, historic, architectural and landscape quality, particularly areas of national or international significance.	To ensure good design to create well mixed and integrated developments.
<b>4 - Economic Growth</b>	
4a To encourage the growth of new businesses and retention and growth of existing businesses that will contribute to a higher skilled economy	To promote strategic routes (road and rail) to improve accessibility.
	To encourage the development of more high skilled jobs.
	To provide suitable land and associated facilities for new / expanding businesses in sustainable locations.
4b To promote the sustainable local production of high quality produce and to increase its consumption locally.	To encourage the development of market towns with 'niche' markets (not clone towns).
4c To support the promotion of tourism that is economically and environmentally sustainable.	To encourage the development of high quality tourism focussing on 'hidden Dorset'.
	To realise the opportunities the area has to offer and make the most of them. (e.g. Olympics 2012).
<b>5 - Meeting Housing Needs</b>	
5a To provide a mixture of housing which strengthens local distinctiveness meets local needs and is in sufficient quantities and suitable locations to support the development of strong, sustainable local communities.	To understand the housing market and local housing needs (including gypsies and travellers) and plan to meet these needs.
	To consider the amount and type of affordable housing required and means of provision.
	To consider specific housing needs of all different sectors of the community.
<b>6 - Life Long Learning</b>	
6a To support access by all to opportunities for lifelong learning and development of skills that are valued by the community and employers will contribute to a	To provide for lifelong learning facilities.
	To support / enable business training opportunities.



Strategic Aims	Objectives taken from Community Plans, Focus Groups and National / Regional Guidance
high skill economy and will help individuals to achieve their full potential.	
<b>7 - Inclusive Communities</b>	
7a To enable the forging of strong, inclusive and safe communities	To foster the development of inclusive communities.
	To plan for safe and attractive environments.
	To promote traffic calming / safe environments within development.
7b To reduce social exclusion by encouraging the provision and maintenance and improved access to, housing, well paid employment, community health, leisure and cultural facilities.	To provide adequate facilities for amenity / recreation needs for all ages.
	To provide for multi-purpose facilities.
	To provide adequate health / care facilities.
	To encourage developer funding of public transport facilities.

### Bodies and Persons Invited

- 2.18 The initial draft aims and objectives (set out in Figure 2.2 above) were discussed at a special consultative meeting of the District Council’s Planning Policy Panel at Durweston Village Hall on 27 July 2005. The meeting on 27 July 2005 was attended by around 45 community representatives.

### How Bodies and Persons were Invited to make Representations

- 2.19 The special consultative meeting of the Planning Policy Panel was facilitated by external consultants (Lyn Wetenhall Associates). Participants worked in small groups to identify what they liked / disliked about the initial draft aims and objectives and how they could be amended.

### Summary of the Main Issues Raised

- 2.20 A number of changes to the initial aims and objectives were suggested and some new issues were raised.
- 2.21 In relation to the initial strategic aims, the new issues raised were:
- The need to produce an integrated transport policy;
  - The need to take full account of existing policies, along with evidence of progress to date, as a baseline for any emerging strategy;
  - The need for strategic route planning, both for road and rail; and

- The need for legislation to be produced to enable local planning authorities, in conjunction with local communities, to decide whether housing is appropriate to local need.

2.22 In relation to the initial objectives, the new issues raised were:

- A need for lower housing density targets where they could be justified by local character;
- The need to support farmers and farming in recognition of the role of agriculture in preserving rural Dorset;
- The need for the District Council to produce its own supplementary planning guidance to provide parking in North Dorset's towns; and
- The need to provide for adequate and diverse social facilities.

2.23 How the first draft aims and objectives were developed is explained in more detail in a report<sup>3</sup> produced by the Council in August 2005. Appendix 4 of this report also includes a list of participants at the Planning Policy Panel meeting held on 27 July 2005. A more complete record of the Planning Policy Panel meeting appears in a separate report produced jointly by the District Council and Lyn Wetenhall Associates (who facilitated the event).<sup>4</sup>

### **How the Main Issues were Addressed in Subsequent Stages of Plan Preparation**

2.24 The views expressed at the special consultative meeting of the Planning Policy Panel on 27 July 2005 were used to refine the initial draft aims and objectives and fed into the production of the first draft vision for the Core Strategy.

## **Developing the First Draft Vision for the Core Strategy**

### **The First Draft Vision**

2.25 The report of the 27 July 2005 meeting was considered by the next Planning Policy Panel on 3 October. Decisions were made on the wording of those aims and objectives where alternatives had been suggested. The Panel also agreed a 'first draft vision' for consultation that pulled together the themes from the strategic aims. This read as follows:

2.26 "North Dorset will be an area:

- Where in its market towns, villages and countryside development will take place in a sustainable manner, respecting the unique character of individual settlements and the local community's priorities;

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<sup>3</sup> Report on First Draft Aims and Objectives for the Core Strategy July 2005, North Dorset District Council (August 2005)

<sup>4</sup> Report of Consultative Meeting of the Planning Policy Panel July 27 2005, North Dorset District Council and Lyn Wetenhall Associates (August 2005)

- Where the quality and diversity of the natural and built environment are protected and enhanced;
- The local economy is encouraged to grow to provide more high skill jobs and high quality produce;
- Affordable housing is available to meet the needs of residents and the workforce;
- Educational opportunities are improved;
- Community life is fostered and people’s safety, health and recreational opportunities are improved.”

2.27 The first draft vision was published in December 2005<sup>5</sup>. The document setting out the first draft vision also included:

- a table showing how the draft vision drew on the strategic aims discussed on 27 July 2005 and how it related to the vision and main themes of the Dorset Strategic Partnership; and
- a table showing the full wording of the objectives that related to each of the strategic aims.

2.28 The document setting out the first draft vision states that it was ‘open for consultation’. In fact there was no formal consultation exercise on the first draft vision at that time (December 2005). However, it was consulted upon as part of the ‘issues and alternative options’ consultation in June and July 2007.

### **Emerging Regional Policy**

2.29 The early work on the vision was undertaken well before the draft Regional Spatial Strategy for the South West (RSS) was published (in June 2006). However, background material to support the draft RSS began to appear well before its publication and this changed the focus of the Council’s work at that time.

2.30 The report on the first draft vision, from December 2005, notes that the Council was, at that time considering the draft housing figures for the District that had been published by the South West Regional Assembly and was gathering further background evidence with a variety of studies being undertaken.

2.31 This report also noted that once the housing figures were firmed up and the studies were complete, the next stage would be to develop options for development in the District, which would be made available for public comment as soon as possible. This technical work also informed the subsequent ‘issues and alternative options’ consultation that took place in July 2007. This consultation is discussed in more detail in Section 3 below.

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<sup>5</sup> Local Development Framework: Shaping the Future of North Dorset - First Draft: Vision, North Dorset District Council (December 2005)

## 3. Core Strategy Issues and Alternative Options Consultation 2007

### Introduction

- 3.1 In June and July 2007 the Council consulted on ‘issues and alternative options’. This consultation exercise was undertaken to fulfil the Council’s obligations under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004. It was intended that this consultation would be used to support the production of the ‘Preferred Options’ document (i.e. the next stage of production of the Core Strategy), required under Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.

### Bodies and Persons Invited

- 3.2 Consultation was undertaken with all bodies and persons on the Council’s Core Strategy consultation database. This included all the specific and general consultation bodies outlined in the SCI as well as any other organisations and individuals that had asked to be kept informed of progress on the Core Strategy.

### How Bodies and Persons were Invited to make Representations

#### Issues and Alternative Options Paper

- 3.3 Bodies and persons were invited to make representations on the issues and alternative options paper produced by the Council.<sup>6</sup> The issues and alternative options were generated from an analysis of the work undertaken with the community during 2005 and also through a comprehensive review of existing strategies and evidence base studies relevant to North Dorset.
- 3.4 In the paper, views were sought on the initial draft vision (from December 2005), in particular whether it was still relevant and appropriate, or whether further changes were needed, especially in the light of the emerging RSS and the latest Government advice on the preparation of core strategies. Views were also sought on a first draft ‘spatial portrait’, describing what the District was like at the time (i.e. in 2007).

#### Supporting Documents

- 3.5 The draft RSS, which was published in June 2006, set out draft housing provision figures for the District and also included a set of draft policies (Development Policies A to C), which sought to guide growth towards the most sustainable

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<sup>6</sup> Core Strategy: Issues and Alternative Options, North Dorset District Council (June 2007)

locations (i.e. cities, towns and larger villages). Two background documents were produced to support the issues and alternative options paper, which sought to show the implications of draft RSS policies for North Dorset<sup>7</sup>.

### **Consultation Period**

- 3.6 Consultation took place on the issues and alternative options paper between 1 June and 13 July 2007. Due to a postal strike on 13 July, the consultation period was extended for a week until 20 July 2007.

## **Summary of the Main Issues Raised**

- 3.7 The issues and alternative options paper examined the problems, difficulties and challenges (i.e. the issues) facing North Dorset and put forward a number of possible solutions (i.e. the options). The issues and options were grouped under the five strategic themes of:

- managing future growth;
- environmental protection and enhancement;
- economic prosperity;
- balanced communities; and
- quality of life.

- 3.8 75 respondents commented on the issues and alternative options paper. On average there were 37 responses to each of the 29 issues in the document. The issues that attracted the most responses were:

- Issue 1: How could future growth be accommodated in a sustainable manner; and
- Issue 19: Affordable housing and house sizes.

### **Issues Raised in Relation to the Spatial Portrait**

- 3.9 A number of respondents expressed concern that the environmental quality and rural character of the District conveyed in the Spatial Portrait was not continued throughout the issues and options document.
- 3.10 The majority of comments on the Spatial Portrait related to the transport element and it was felt that the spatial portrait should recognise:
- the difficulties in reconciling transport demands with landscape conservation and enhancement;
  - the difficulties in balancing appropriate development along primary routes with the levels of transport demand on routes restricted by the natural land form;
  - the importance of the A354 as a route between Dorchester and Salisbury; and

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<sup>7</sup> The Implications of the Regional Spatial Strategy for the Level and Distribution of Housing Development in North Dorset, North Dorset District Council (May 2007) and Assessment of Settlements Based on Population and Community Facilities, North Dorset District Council (May 2007)

- that the A357 is used as an alternative route to the A350.

### **Issues Raised in Relation to the Draft Vision**

- 3.11 Four respondents stated the vision provided clear strategic direction; five respondents supported the reflection of aspirations; five respondents stated that the Vision was good; and a further six people responded that it was not a spatial vision and did not guide further growth.
- 3.12 Suggestions for improvements to the vision were:
- to provide clarity about what the towns, villages and rural areas will look like in the future;
  - reference to sustainability aspects which include a reduction in carbon footprint;
  - a forward view of the landscape which combines the natural environment with the interaction of people;
  - what the transport network should look like; and
  - what the employment profile should look like.
- 3.13 It was also suggested that the Vision should seek to address some of the negative outcomes of past trends, such as the impact of people retiring to the District on house prices, and lack of employment opportunities leading to commuting by the working population to nearby Strategically Significant Cities and Towns (SSCTs).

### **Issues Raised in Relation to the Management of Growth**

- 3.14 Respondents wished to avoid overdevelopment of the towns and underdevelopment of the villages. However, generally the settlement hierarchy approach was supported with two-thirds of respondents supporting the identification of Blandford (Forum and St.Mary), Gillingham, and Shaftesbury as RSS Development Policy B towns. There was also support for increased self-containment at the towns.
- 3.15 17% of respondents thought that no other market towns should have 'Development Policy B' status. 22% thought that Sturminster Newton should be a RSS Development Policy B Settlement and 6% thought that this status should be given to Stalbridge. However, 32% of respondents also supported 'Development Policy C' status for Stalbridge, Sturminster Newton and the larger villages.
- 3.16 The supporting document 'Assessment of Settlements Based on Population and Community Facilities' was welcomed as a guide and a number of other factors were suggested to provide a more robust set of criteria for the selection of 'Development Policy C' settlements.
- 3.17 It was suggested that 16 individual villages should have 'Development Policy C' status and in addition, site specific proposals were put forward on sites at Okeford Fitzpaine and Hinton St.Mary. It was also suggested that 20 villages should not have Development Policy C status. For some settlements there was a mixed response. For example, one respondent suggested that Hazelbury Bryan should have

‘Development Policy C’ status. However two respondents suggested that it should not have ‘Development Policy C’ status due to its unique arrangement of hamlets with insufficient facilities and services between them to support further development, coupled with inadequate transport routes to other settlements.

- 3.18 There were similar levels of support for both a ‘rural emphasis’ to housing growth in the period up to 2016 and a ‘greater urban emphasis’. This reflects the community’s concern that the right balance needs to be struck between ‘urban concentration’ and support for the villages in the rural area.
- 3.19 There was clear support for the redevelopment of brownfield land and the regeneration of settlements in support of a sustainable strategy and a clear lack of support for expansion onto greenfield land. It was recognised that a combination of the two was necessary to deliver growth, but that there should be a ‘brownfield first’ approach.
- 3.20 There was strong support for trying to deliver 50% of development on brownfield land (in line with the draft regional target) and much less support for delivering at a level that reflected past performance. However, respondents felt that the provision of supporting infrastructure was an important consideration for all development.
- 3.21 There was strong support for requiring green travel plans in relation to development generating significant volumes of traffic, although there was much less support for green travel plans for any development, or development that leads to an increase in car-based travel. The results reflect the general feeling that traffic has a negative impact on living conditions, but also awareness that in a rural area like North Dorset, there is a lack of viable transport alternatives. The North Dorset Trailway was supported as an alternative travel opportunity and some respondents felt that it should be given higher priority.
- 3.22 Nearly three quarters of respondents supported the suggestion that community infrastructure should be secured through a combination of public funding, funding from development, and other sources. Few felt that there should be a reliance solely on developer or public funding.
- 3.23 Support for BREEAM standards that are higher than ‘current’ (i.e. 2007) statutory targets was high and there was also support for identifying opportunities for both renewable energy and micro-renewable schemes. Some respondents qualified their support by advocating community schemes.

### **Issues Raised in Relation to the Protection and Enhancement of the Natural and Built Environment**

- 3.24 There was a clear support for taking a wider view of environmental protection, rather than just seeking to protect designated sites. There was little support for prioritising the protection of environmental assets and resources above meeting the development needs of the local community. It was also noted that in certain

cases the Council is obliged to prioritise the protection of the environment in line with government and European legislation in any event.

- 3.25 The approach of seeking to protect environmental assets and resources, where possible, whilst also meeting the development needs of the community was supported and it was suggested that the community should identify need locally, and that planning policy should set out a hierarchical approach to the protection of environmental assets, depending on the status of the asset.
- 3.26 Many respondents felt that the Council's current approach to providing green space was inadequate. There was support for a more integrated approach to the planning, delivery and maintenance of multi-functional 'green infrastructure' to meet community needs. It was also suggested that more green infrastructure is required in locations where densities on new development are high and there is little private open space.

### **Issues Raised in Relation to Economic Prosperity**

- 3.27 There was support for the extension of existing employment sites, where appropriate, and for the identification of other sustainable sites across the District. It was felt that new extensions should only come on stream when the current district-wide supply of land is used up, and that a flexible approach to the identification of future sustainable sites should be adopted to support rural regeneration and diversification that would contribute to the longer term sustainability of rural communities.
- 3.28 There was less support for the option of concentrating employment land at the three main towns. However, respondents recognised that this was a sustainable option and that there was a shortfall of supply at Blandford. It was suggested that only local workers should be employed on sites in the District. However, this approach is clearly outside the remit of planning, which cannot control the free movement of labour.
- 3.29 There was a general consensus that employment uses should be strictly controlled on employment sites. It was felt that partial or weaker controls could risk incompatible uses being located next to each other. This has been a potential issue at North Dorset Business Park, Sturminster Newton, where food handling businesses and refuse servicing could potentially be in conflict.
- 3.30 The majority of respondents supported the protection of committed and allocated employment sites, apart from those sites identified in the Employment Land Review as being potentially suitable for mixed-use development, rather than a blanket approach of seeking to protect all committed and allocated sites. It was also suggested that employment sites that have been vacant for a long time should be considered for mixed use.
- 3.31 There was support for retaining the retail hierarchy in the Local Plan, but it was recognised that there was a need to reassess and formalise town centre



designations in the light of the forthcoming retail study, in order to promote the ‘town centre first’ approach. Respondents felt that village and farm shops should be encouraged to serve local communities in rural areas. Some respondents found it difficult to comment on retail issues without an up-to-date district-wide retail study.

- 3.32 Respondents did not generally support the collection of financial contributions from developers to fund training to improve employees’ skills. Respondents felt this approach fell outside the remit of planning and that implementation could be unworkable. Respondents suggested that high calibre employers, which would foster a learning environment, should be encouraged to locate in the District.
- 3.33 Home working was generally supported for both the towns and the rural areas.
- 3.34 Respondents generally supported sustainable forms of tourism in sustainable locations and felt that the provision of quality accommodation should be promoted. It was felt that there was an opportunity to make the North Dorset tourism offer an exemplar in sustainability.
- 3.35 Respondents felt that the best approach to the sustainable re-use of buildings and rural diversification was to ensure a balance between promoting a diverse and healthy rural economy and other objectives including the protection and promotion of the countryside. It was felt that this approach might also encourage more sustainable living and working patterns. However, respondents also felt that scale and impact were important factors to consider.

### **Issues Raised in Relation to Balanced Communities**

- 3.36 There was general consensus that affordable housing was an important issue and the majority of respondents felt that a higher proportion of affordable housing should be negotiated, reflecting the needs of the District. Seeking affordable housing on smaller sites (down to one dwelling) was also supported, although to a lesser degree. However, there were concerns about locating affordable housing in settlements with few facilities.
- 3.37 Many suggestions were made as to how an increase in levels of affordable housing could be achieved. Generally respondents felt that affordable housing would be more easily achieved on greenfield sites.
- 3.38 The majority of respondents felt that gypsy and traveller sites should be found in and around the towns where access to facilities is easier. There was also some support for identifying sites in and around villages and in the rural areas. Respondents pointed out that gypsies and travellers have different needs and one respondent’s view was that a number of smaller sites would be preferable to a few large sites.
- 3.39 A clear majority of respondents felt that densities of less than 30 dwellings per hectare should be permitted where this was necessary to protect character and

amenity. However, it was also felt that areas where density could be higher should be identified. It was suggested that the Council should undertake a District-wide character assessment (in accordance with PPS 3) to identify areas where higher and lower densities would be appropriate. It was felt that urban extensions should be developed with a range of densities, but with density decreasing towards the edge of the development.

- 3.40 Most respondents supported the idea of mixed use developments, provided that the use classes were compatible. It was felt that industry should be located on the edge of towns to avoid HGVs moving through town centres. Locating uses on separate estates was also supported, but to a lesser extent.
- 3.41 Respondents supported the idea of having shared highway spaces for all types of transport, but there were also concerns about providing a pleasant environment and the safety of walkers and cyclists.
- 3.42 There was support for identifying land within a village or a community that would make a good, accessible passenger collection point for demand responsive transport. Support was also shown for the identification of good connection routes, although to a lesser degree. It was recognised that this may prove difficult to achieve in linear villages. Many suggestions were made to improve public transport provision and to make the network more user-friendly.

### **Issues Raised in Relation to the Quality of Life**

- 3.43 There was support for high standards of design for all development. One respondent questioned whether a village design statement would be needed in a village that would receive little or no development in the future. It was suggested that high quality design should specifically include 'eco-development'.
- 3.44 Respondents supported options that would locate, encourage and design facilities that positively provide for pedestrian and cycle access and encourage forms of public transport. It was suggested that low-key and local facilities should be provided within suburban residential estates to reduce the need to travel, which links with the support shown for mixed-use developments. The Trailway was seen as an important project that would reduce reliance on unsustainable modes of transport.
- 3.45 There was strong support for the provision of facilities to meet a community's needs. Some respondents felt that facilities should be in place or planned prior to residential development taking place. However, others felt that this approach would be unworkable and that it may conflict with national planning policy.
- 3.46 There was support for the provision of multi-functional open space, the protection of existing open space and the expansion of categories of open space to include green corridors, such as the Trailway. It was felt that financial contributions towards open spaces should continue to be sought from developers.

- 3.47 There was clear support for parking standards to restrain the levels of residential and destination car parking, but it was felt that this should vary spatially according to: accessibility to facilities; accessibility to other forms of transport; and, promotion of dual use of car parks. The level of car parking at Gillingham Railway Station was also highlighted as a particular issue.

## How the Main Issues were Addressed in Subsequent Stages of Plan Preparation

### Overview

- 3.48 The responses to the consultation on issues and alternative options were considered by the Council's Planning Policy Panel on 18 October 2007. The covering report was accompanied by:
- a report setting out a summary of the main findings (which provides the basis for the summary of main issues above)<sup>8</sup>; and
  - a more comprehensive report providing a more detailed analysis of the responses including a statistical breakdown of respondents that had supported or objected to the different options<sup>9</sup>.
- 3.49 As stated earlier in this section, it was intended that the outputs from the consultation on issues and alternative options would be used to support the production of the next stage of production of the Core Strategy (i.e. the 'Preferred Options' document), required under Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.
- 3.50 Following changes to the planning system, as a result of the Planning Act 2008 and new Regulations governing the production of Local Development Frameworks (LDFs), the Council reconsidered its approach to the production of the Core Strategy and other DPDs. The Council's revised approach to the production of the Core Strategy and supporting consultation is discussed in Section 4.

### Amendments to the Vision for North Dorset

- 3.51 The 'first draft' vision was produced in 2005 and consulted on (as part of the issues and alternative options consultation) in 2007. However, this version pre-dated the revision of Dorset's Sustainable Communities Strategy (SCS) (in June 2007) and subsequent Government advice on the relationships between community planning and spatial planning<sup>10</sup>.

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<sup>8</sup> Core Strategy: Issues and Alternative Options Consultation: Summary of Main Findings Report, North Dorset District Council (October 2007)

<sup>9</sup> Core Strategy: Issues and Alternative Options Consultation: Summary of Informal Consultation Responses, North Dorset District Council (October 2007)

<sup>10</sup> Planning Together – Local Strategic Partnerships and Spatial Planning: A Practical Guide, DCLG (January 2007)

- 3.52 An updated vision was prepared for inclusion in the draft Core Strategy DPD, which incorporated many of the themes from the earlier visioning work (such as the need to support the District’s market towns), but it was also re-worked to embrace the broader agenda being set at the County level through the revision of the SCS and the views expressed in the issues and alternative options consultation in 2007.
- 3.53 The revised draft vision for North Dorset (as it appears in Section 2.1 of the draft Core Strategy) is as set out below:

Revised Draft Vision for North Dorset	
In 20 years’ time North Dorset will:	
1	be a District that has played a positive role in addressing the causes and effects of climate change;
2	have more sustainable forms of development that are adequately served by infrastructure (including sustainable transport solutions) and make prudent use of natural resources (including previously developed land);
3	have expanded thriving market towns collectively providing homes, jobs and services for those living within them and within the communities they serve;
4	have sustainable smaller rural communities providing local services which enable day-to-day needs to be met locally;
5	have a protected and enhanced locally distinctive built and natural environment that retains the qualities that make the District’s urban and rural areas even more attractive and desirable places to live, work and visit;
6	have more housing, and in particular more affordable housing, that better meets the diverse needs of the District;
7	be a District: that has advanced towards more cohesive communities; that has recognised the needs of the older population; and where the life chances for children and young people have been enhanced;
8	have a more robust and prosperous economy (including sustainable tourism) with high quality jobs and skills, focused in locations that best support the District’s growing population; and
9	have a range of community, leisure, cultural and recreational facilities in locations that are accessible to the local population.

- 3.54 The vision was also re-worked to respond to new PPS 12 on Local Spatial Planning, where the Government gave a clearer indication of the role of the vision in a core strategy and how it should relate to the issues and challenges facing a local area and to the strategic objectives that should be developed to take any vision forward.
- 3.55 These relationships were summarised in Figure 2.2.1 of the draft Core Strategy which showed how national, regional, County and more local issues gave rise to a series of challenges that informed the vision.
- 3.56 Further minor changes have been made to the vision (and objectives) and slightly different versions appear in Chapter 2 of the Local Plan Part 1.
- 3.57 The development of the vision and objectives is set out in more detail in the Vision and Objectives Background Paper produced to support the Local Plan Part 1.

## 4. Consultation on the Draft Core Strategy and Development Management Policies DPD in 2010

### Introduction

- 4.1 This section provides an overview of the consultation undertaken on the draft Core Strategy and Development Management Policies DPD (the draft Core Strategy), which was published in March 2010.
- 4.2 This introductory section provides:
- an overview of the changes to the Council's Local Development Framework (LDF) that took place in early 2009 in response to changing legislation and national policy; and
  - outlines the three strands of public participation that were agreed by the Council's Cabinet in April 2009.

### Changes to the Programme for Plan Production

- 4.3 During 2008 and 2009 new planning legislation was introduced and Government advice on how Councils should approach LDF production changed. The most fundamental change was the Planning Act 2008, which came into effect in April 2009, but new Regulations governing LDF production also were introduced in June 2008 and April 2009. These legislative changes were supported by changes to Government policy in the form of a revised Planning Policy Statement 12 (PPS 12): Local Spatial Planning, which was published in June 2008.
- 4.4 Regional Government Offices provided advice on the aspirations behind the legislative and policy changes and two of the key messages aimed at 'streamlining LDFs' were that:
- only those DPDs that are absolutely necessary should be produced; and
  - Councils should consider whether there is the potential to incorporate a limited number of development management policies into their Core Strategy documents.
- 4.5 As a result of these legislative and national policy changes, the Council reviewed its Local Development Scheme (LDS) in early 2009 and made some fundamental changes to its LDF programme. Taking account of the issues discussed above, the Council decided to merge the four documents proposed in the 2008 LDS to produce just two, which were:
- a Core Strategy and Development Management Policies DPD; and
  - a Site Specific Allocations DPD for the whole District.

- 4.6 The fourth revision of the LDS, which outlined these changes, was brought into effect on 7 April 2009. A more complete overview of changes made to the Council's LDS is set out in Section 1.

### Changes to Planning Regulations

- 4.7 The amended Planning Regulations required a local planning authority to consider how public participation in the preparation of a DPD should be undertaken. The new arrangements were less prescriptive than those in the 2004 Regulations prior to amendment, which required separate 'issues and options' and 'preferred options' consultation stages (under 'old' Regulations 25 and 26 respectively).
- 4.8 Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) required a Council to:
- notify organisations and people in the District of the subject of a DPD they propose to prepare; and
  - invite organisations and people in the District to make representations about what a DPD ought to contain.

### Consultation Strands

- 4.9 The implications of the changes to the planning system were discussed and an approach for taking forward consultation was agreed by the Council's Cabinet on 20 April 2009. Cabinet agreed that correspondence should be sent to all consultees outlining the subject of the DPD highlighting that it would include: a vision; objectives; core policies; development management policies; a delivery plan and a key diagram.
- 4.10 The correspondence, which was sent out in April 2009, also outlined the three strands to the consultation that the Council intended to undertake before the DPD was published prior to submission to the Secretary of State. These were:
- **Strand 1** – inviting comments on what the DPD ought to contain, which was being carried out in tandem with consultation on the scope of the Sustainability Appraisal for this DPD;
  - **Strand 2** – the production of a series of 'topic papers' in summer 2009 as a basis for on-going dialogue with the community; and
  - **Strand 3** – consultation on a draft DPD originally programmed for autumn 2009 but put back to spring 2010.

### Strand 1 – Seeking Comments on What the DPD Ought to Contain

- 4.11 Although the Council had already sought views on the content of the Core Strategy in 2005 and 2007, this was prior to the decision to merge it with the development management policies. Since the merged DPD would be materially different to the 'stand-alone' Core Strategy proposed previously, it was considered important to

give the public another opportunity to comment on what it ought to contain, in order to ensure compliance with new Regulation 25.

- 4.12 Regulation 25 indicated that a local planning authority needed to consider which of the ‘specific consultation bodies’ and ‘general consultation bodies’ it should consult and whether it was appropriate to invite representations from ‘persons who are resident or carrying on business’ in the area. Since the DPD would relate to the whole District, it was decided to consult widely on it. The lists of relevant specific and general consultation bodies on the database that has previously been used for consultation on the ‘stand-alone’ Core Strategy were updated and comments were invited from all on these amended lists.
- 4.13 Comments were also invited from those local residents and businesses on the database. Consultation on the DPD was not restricted to those that the Council wrote to in April 2009. Information was placed on the Council’s website and anyone was able to respond.

### Strand 2 – Consultation on the Topic Papers

- 4.14 The Government requires DPDs to be based on sound and credible evidence. The ‘evidence base’ information that supported the draft Core Strategy and now the Local Plan Part 1, is extensive and although much of it is available online, it is not easy for the community to interpret. To try and facilitate a better understanding of the evidence behind the emerging policies, it was decided to draw this information together and to discuss its implications for policy making in a series of topic papers. It was envisaged that these would be updated periodically and would provide the basis for an on-going dialogue with the community about the contents of the DPD.
- 4.15 The April 2009 correspondence indicated that the main topics covered would be:
- the spatial strategy for the District;
  - housing;
  - economy;
  - environment; and
  - transport.

- 4.16 The first versions of all five topic papers were published in August 2009. Updated versions were produced in 2012 and much of the information has now been incorporated into the background papers that accompany the Local Plan Part 1.

### Strand 3 – Consultation on the Draft DPD

- 4.17 The final strand of consultation was to produce a draft DPD containing both ‘core’ and ‘development management’ policies, which would set out the Council’s ‘preferred approach’ to taking forward development in the District. The aim was to produce the draft DPD in spring 2010 for public consultation and to try and resolve as many potential conflicts as possible before producing a revised DPD for publication prior to submission to the Secretary of State.



## Consultation on the Draft DPD

### Bodies and Persons Invited

#### Specific Consultation Bodies

- 4.18 Hard copies of the draft DPD (and comments forms) were sent to all town and parish councils within and adjoining the District, together with a poster listing a series of exhibition dates. They were informed that an initial SA Report was available and that they could be provided with a hard copy on request. All other 'specific consultation bodies' were sent a copy of the draft DPD and a copy of the initial SA Report.

#### General Consultation Bodies and Others

- 4.19 All 'general consultation bodies' and any other people, organisations and businesses listed on the consultation database were sent a letter outlining the arrangements for consultation and informing them that all the relevant documentation was available online. Posters giving details of the exhibitions were also sent to all schools and post offices in the District.
- 4.20 Copies of the draft DPD (and comments forms) were also sent to the four Local Community Partnerships in the District. The Community Partnerships Executive for North Dorset was given an overview of the draft DPD and was informed of the forthcoming consultation at their meeting on 2 February 2010. During the consultation period meetings were also arranged with each Local Community Partnership and the main Town Councils to discuss the issue of infrastructure and to encourage feedback on the content of the Infrastructure Delivery Plan (IDP) that the Council intended to prepare prior to submission.

#### Hard to Reach and Disability Groups

- 4.21 A letter was sent to groups identified as being potentially hard to reach through the Equality Impact Assessment (EqIA) process, which offered meetings and / or presentations that would help to engage these groups in the consultation process.
- 4.22 A letter was sent to the County Council's Gypsy and Traveller Liaison Officer outlining the parts of the DPD relating to Gypsies and Travellers. The letter also sought advice on how these groups could be engaged in the consultation process.
- 4.23 A 'talking newspaper' is produced and circulated to about 70 visually impaired people in the District. The producers of the talking newspaper were contacted and sent a letter with a copy of the press release relating to the DPD, which they could then record on tape and circulate.

## How Bodies and Persons were Invited to make Representations

- 4.24 Specific consultation bodies, general consultation bodies and any other bodies, businesses or individuals on the Council's Core Strategy consultation database were invited to respond to the draft Core Strategy by the means outlined above.
- 4.25 The Council also made information about the draft Core Strategy available in a number of other ways to encourage engagement, as set out below.

### North Dorset Website

- 4.26 The Planning Policy pages of the District Council's website were comprehensively re-modelled and updated to ensure that consultees were able to access the draft DPD, the initial SA Report and other associated assessments and all the relevant evidence base studies. A link to the Planning Policy pages was provided on the homepage under the 'Latest Council News' section.

### Libraries

- 4.27 Copies of the draft DPD, the initial SA Report, comments forms and a poster giving details of a series of exhibitions were sent to all the libraries in the District.

### Exhibitions

- 4.28 A series of exhibitions were set up for the early part of the consultation period. The exhibitions were manned both by officers from the District Council and County Council Highways and were held at the following locations:
- 18 March – Shaftesbury Town Hall (10am to 7pm);
  - 22 March – Gillingham Town Council Offices (10am to 7pm);
  - 24 March – North Dorset District Council Offices, Blandford Forum (3 to 7pm);
  - 25 March – Corn Exchange, Blandford Forum (10am to 5pm);
  - 29 March – The Exchange, Sturminster Newton (10am to 7pm); and
  - 31 March – Congregational Hall, Stalbridge (10am to 7pm).

### Residents' Newsletter

- 4.29 At the time the Council produced a regular newsletter for local residents, called Open Line, which was distributed to all households. The March 2010 edition included a 4-page centre spread setting out: the overall approach of the draft DPD; summaries of the draft proposals for the main towns, the villages and the countryside; the exhibition dates and a form for making comments.

### Press Release

- 4.30 A press release was produced and was circulated to the local media enabling them to make local people aware of the consultation, including:
- The Western Gazette;
  - The Blackmore Vale Magazine;

- Unity.com Magazine (covering the Sturminster Newton area); and
- Mid West Radio, based in Shaftesbury.

## Summary of the Main Issues Raised

### Introduction

- 4.31 The Draft Core Strategy and Development Management Policies DPD (draft Core Strategy) was subject to extensive consultation between 15 March and 14 May 2010.
- 4.32 A report was taken to Planning Policy Panel on 16 June 2010 outlining the consultation process and informing Members of the main issues raised. A second report was taken to Planning Policy Panel on 13 September 2010 with an update on progress and some preliminary facts and figures.
- 4.33 On 5 July 2012 a comprehensive final report on the consultation was considered by the Council's Planning Policy Panel and can be viewed on the Council's website. This final report gave an overview of the key issues raised and identified the main actions required to take the Core Strategy forward.

### Overview of Responses

- 4.34 The overall number of individuals and organisations commenting on the draft Core Strategy was 1,657 and in total they made 5,734 individual comments. 27 specific consultation bodies responded to the consultation making 192 individual comments.
- 4.35 Comments were made in a variety of forms:
- 162 people completed the comments form;
  - 193 people submitted individual letters; and
  - 103 people sent their comments electronically by email.
- 4.36 75% of the people commenting on the DPD did so using a standard letter prepared by the following two groups:
- Bryanston Park Preservation Group (BPPG). The standard letter produced by the BPPG was used by 1,134 people to object to the proposed housing development on land west of Blandford Forum (or Crown Meadows) as set out in draft Core Policy 15: Blandford; and
  - Child Okeford Parish Council. 103 residents of Child Okeford registered their views on a variety of issues in the draft Core Strategy using a standard letter produced by the Parish Council.
- 4.37 A large proportion of standard letters were annotated with additional comments. All these additional comments were recorded on the database of responses.
- 4.38 As part of the consultation the Council also received two petitions from:

- the ‘Save Our Wyke’ group who objected to the proposed employment site at Wyke, Gillingham as set out in draft Core Policy 16: Gillingham. This petition containing 2,105 signatures, mainly from people in the Gillingham area; and
- residents of Bay, Gillingham who objected to proposed housing in this area, as set out in draft Core Policy 16: Gillingham. This petition had 28 signatories.

4.39 Despite the Council sending its Open Line magazine to nearly all residents, just 56 comments were submitted on the form included with the article on the draft Core Strategy.

4.40 As part of the consultation process specific consultees and the general public were also invited to comment on other documents that were either associated with or supported the draft Core Strategy. They were:

- the Habitats Regulations Assessment (HRA);
- the Initial Sustainability Appraisal (SA);
- the Equalities Impact Assessment (EqIA); and
- various Topic Papers.

4.41 The total number of comments made on the above documents was low with:

- 6 people making 19 comments on the SA;
- one person making 7 comments on the HRA; and
- 3 comments being made on the topic papers.

### Report on Responses

4.42 All comments received in relation to the draft Core Strategy were recorded in a Microsoft Access database to enable them to be analysed. All comments made were attributed to specific policies in the draft Core Strategy and categorised by issue and sub-issue, where possible. The analysis of comments in this way enabled the Council to produce a comprehensive report of the responses policy-by-policy, which was appended to the covering report to Planning Policy Panel on 5 July 2012.

4.43 For each introductory section and each policy of the draft Core Strategy, an individual analysis of the consultation responses was undertaken set out on a standard report template, to enable easy comparison between policies.

4.44 The first page of each report on consultation responses is a précis of facts and figures in relation to the policy that shows:

- the total number of people who commented;
- where the policy ranks in terms of overall responses to the consultation;
- the number and names of the specific consultees that commented;
- the total number of general consultees;
- the number of comments received supporting, objecting to, or commenting on the policy further broken down by key issue; and

- graphs showing the breakdown of opinion (i.e. levels of support / objection / comment) and who said what by percentage (i.e. levels of support / objection / comment from both general and specific consultees).

4.45 Behind the summary sheet for each policy is an in-depth analysis of the key issues raised by issue. At the end of the report is a conclusion and a list of actions and amendments.

### Issues from the Consultation

4.46 Although many comments were received in response to the consultation, as set out in the report to Planning Policy Panel, three overarching issues have been identified which are:

- the levels of growth proposed in terms of housing numbers and tenures;
- the economy and jobs; and
- the distribution of growth (spatial strategy).

4.47 The main site-based issues related to:

- Land to the west of Blandford Forum (also known as Crown Meadows or the Deer Park), put forward under draft Core Policy 15 - Blandford; and
- The proposed new employment site at Wyke, Gillingham, put forward under draft Core Policy 16 – Gillingham.

### Overarching Issue - Housing Numbers and Tenures

4.48 The proposed overall level of housing growth (7,000 new homes over 20 years) had similar levels of support and objection, but there were conflicting views on the balance of development (a) between the towns and (b) between the towns and the villages, as set out in draft Core Policy 4 - Housing.

4.49 In general the provision of affordable housing especially outside the main towns was supported but high levels of housing growth proposed in the District's larger villages to help deliver this were the main point of objection to housing numbers. The main concerns in relation to the level of development in the villages were that proposed housing numbers were too high (draft Core Policy 4 – Housing) and that the proposed housing figures would be imposed on villages in a subsequent Site Allocations DPD (draft Core Policy 19 – Stalbridge and the Larger Villages).

### Overarching Issue - Economy and Jobs

4.50 The key issues in relation to the economy were the overall number of jobs proposed, the land proposed for employment uses and how this was split between the towns and the villages, especially in relation to road capacity and infrastructure (draft Core Policy 6 – The Economy). One proposed employment site at Wyke in Gillingham was particularly opposed by local residents who questioned the need for the site and the impact development in this location would have on the

landscape setting of the town and the impact on the local road network and highway safety (draft Core Policy 16 – Gillingham).

### Overarching Issue - Spatial Strategy

- 4.51 In general those responding to the consultation supported growth in the main towns but many in the towns and villages identified as RSS Development Policy C settlements (i.e. the 'larger villages') disagreed with the amount of growth allocated and to how settlements had been assessed as being sustainable in the first place (draft Core Policy 3 – Core Spatial Strategy for North Dorset). Others were concerned that the countryside policy of restraint (draft Core Policy 20 – The Countryside Including Smaller Villages), even with the rural exceptions policy (draft Core Policy 10 – Affordable Housing: Rural Exception Schemes), was too restrictive and that smaller communities could be disadvantaged.

### Site Specific Issues

- 4.52 Within the draft Core Strategy individual policies for the three main towns and Sturminster Newton (draft Core Policies 15 to 18) discussed the broad location for future housing and other uses such as employment and a specific policy focussed on Stalbridge and the District's larger villages (draft Core Policy 19). These place-specific policies, especially for Blandford and Gillingham, received a significant number of comments.

### Site Specific Issue – Land West of Blandford Forum

- 4.53 The key issue for many in Blandford was the appropriateness of the location of the preferred options for residential development (as set out in draft Core Policy 15) in particular the land to the west of Blandford Forum (also known as Crown Meadows or the Deer Park). A wide range of concerns were raised including: the perceived impacts of this site on the landscape and biodiversity; flooding; traffic congestion, particularly in the town centre, and the merits of alternative sites beyond the bypass.

### Site Specific Issue – Proposed Employment Site at Wyke, Gillingham

- 4.54 In Gillingham the key issue was the appropriateness of the location of the preferred option for employment growth to the west of Gillingham (Wyke) (as set out in draft Core Policy 16). A wide range of concerns were raised including: the perceived impact it may have on nearby historic buildings and the landscape; increased traffic congestion in the area; the implications of the proposed growth of the town; and the need to secure the associated infrastructure.

## How the Main Issues were Addressed in Subsequent Stages of Plan Preparation

### Proposed Actions and Policy Amendments

4.55 The analysis of the responses to consultation on the draft Core Strategy set out, for each policy, a comprehensive list of actions and amendments to be considered. From this analysis, three overarching actions were identified which were:

- a review of the overall housing numbers proposed for the District;
- a review of the overall level of employment land; and
- a review of the spatial strategy.

4.56 These overarching actions reflected changes needed in the light of the emerging localism agenda at the time and new national policy in the form of the National Planning Policy Framework (NPPF).

### Overarching Issue - Review of Housing Numbers

4.57 The NPPF recommends that local planning authorities prepare a Strategic Housing Market Assessment (SHMA) to assess the full housing needs of a District and that the SHMA should also identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.

4.58 An updated SHMA was produced in 2012 for the Bournemouth and Poole Housing Market Area, which includes the whole of North Dorset. The updated SHMA was jointly commissioned by all other local authorities in the Dorset Sub-region. The final updated SHMA report was presented to the Council's Planning Policy Panel on 7 March 2012. A more detailed account of its preparation is given in the Meeting Housing Needs Background Paper and the Duty to Co-operate Statement.

### Overarching Issue - Review of the Need for Employment Land

4.59 The NPPF also requires local plans to have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this they are required to assess the needs for land or floor space for economic development and assess the existing and future supply of land available for economic development.

4.60 The Council worked with all other local authorities in the Dorset Sub-region to produce updated employment land projections. The final updated employment land projections were presented to the Council's Planning Policy Panel on 5 July 2012. A more detailed account of the preparation of the revised projections is given in the Supporting Economic Development Background Paper and the Duty to Co-operate Statement.

### Overarching Issue - Review of the Spatial Strategy

- 4.61 The review of housing numbers, which identified a need for a lower level of housing provision in North Dorset, has informed the review of the spatial strategy. This review needed to take account of the revocation of the Regional Strategy (and the abandonment of the emerging revised Regional Strategy and its draft policies for the spatial distribution of development across the South West).
- 4.62 It also needed to consider the opportunities for local communities emerging from the Localism Act, in particular neighbourhood plans and community right to build orders.
- 4.63 Taking forward growth in Stalbridge and the villages and the topic of neighbourhood planning were the subject of targeted consultation with Towns and Parish Councils in 2011 and are discussed in more detail in Section 5 below. A more comprehensive discussion of how the Council has developed and revised its spatial strategy is set out in the Sustainable Development Strategy Background Paper.

### Site Specific Issues

- 4.64 In moving forward from the draft Core Strategy in 2010 to the Local Plan Part 1, the Council has had regard to the many site specific issues that were raised in the consultation: in the three main towns and Sturminster Newton (draft Core Policies 15 to 18); at Stalbridge and the District's larger villages (draft Core Policy 19) and in the countryside (draft Core Policy 20).
- 4.65 How the Council has moved forward in relation to the key site-specific issues raised in relation to Blandford and Gillingham is set out below.

### Site Specific Issue – Land West of Blandford Forum

- 4.66 The proposed location for residential development (as set out in draft Core Policy 15) on the land to the west of Blandford Forum (also known as Crown Meadows or the Deer Park) raised a wide range of concerns.
- 4.67 Following the production of the draft Core Strategy in 2010, the Council re-examined the suitability of the site and more technical work to address the issues raised was undertaken by the landowner, the Crown Estate.
- 4.68 The Council undertook an evaluation of the landscape sensitivity of all potential housing sites around Blandford and Shaftesbury and to accompany the later 'key issues' consultation, the sustainability appraisal of an additional potential alternative site beyond the town's bypass was undertaken.
- 4.69 The Crown Estate had undertaken work on a range of issues including: landscape impact; ecology; traffic generation; access; and flooding. The Crown Estate also undertook its own public consultation exercise on their proposals in January 2012, explaining how it was proposed to address the issues raised by local residents.



- 4.70 The landscape sensitivity work undertaken by the Crown Estate also led the Council to suggest a reduction in the number of dwellings that might be accommodated on the site. A proposed reduction from 200 to 150 homes was put forward in the Council's consultation on the key issues for the revision of the draft Core Strategy in 2012. The site was taken forward in the Local Plan: Pre-submission Document with an estimated capacity of 150, rather than 200, homes.
- 4.71 The issues in relation to this site (and Blandford more generally) are discussed in more detail in the Market Towns Site Selection Background Paper.
- 4.72 Following discussions with English Heritage in early 2014, the Council undertook consultation on 'focused changes' to the Pre-submission Document relating to locations for proposed housing growth at Blandford. The consultation on these 'focused changes' including the proposed deletion of the land west of Blandford Fourm (Crown Meadows) and the proposed inclusion of land south of Blandford St. Mary (St. Mary's Hill) is discussed in more detail in Section 9.

#### Site Specific Issue – Proposed Employment Site at Wyke, Gillingham

- 4.73 The proposed employment site to the west of Gillingham at Wyke (as set out in draft Core Policy 16) attracted a lot of objection and raised a wide range of concerns. The site was suggested to try and stimulate 'supply-led demand' and help realise the significant potential for economic growth identified in the Gillingham Study. Draft Core Policy 16 recognised that the site would not be required to meet the town's economic development needs until after 2016, even on the basis of the pre-recession predicted rates of growth in the emerging revised Regional Strategy.
- 4.74 The re-examination of the need for employment land showed that there was sufficient land elsewhere in Gillingham to meet the identified need until 2026. Figure 6.1 of the Local Plan Part 1, which is based on the updated employment land projections, shows that there were 17.5 hectares of available employment land in April 2011 against an identified need for 9.2 hectares in the period up to 2026.
- 4.75 On the basis of this re-assessment of need, and in the light of the other concerns raised (such as the location of this site away from the main areas of proposed housing growth to the south of the town), the Council sought views on the deletion of this site in the 'key issues' consultation in 2012. The proposed deletion of the site was supported by the local community and it is not being taken forward in the Local Plan Part 1.
- 4.76 The issues in relation to this site (and Gillingham more generally) are discussed in more detail in the Market Towns Site Selection Background Paper.

## 5. Consultation with Town and Parish Councils on Options for Growth in 2011

### Introduction

- 5.1 In November 2011 the Localism Bill was enacted that gave local communities new rights and powers to prepare neighbourhood plans. At the same time the draft NPPF was published. These changes gave the Council an opportunity to consider developing a more flexible, locally-based approach to development in the District, outside the four main towns of Blandford, Gillingham, Shaftesbury and Sturminster Newton. The policy options that would allow greater choice for Stalbridge and the villages, was the subject of consultation with all the District's Town and Parish Councils at the end of 2011.
- 5.2 The purpose of this consultation was to gain a better understanding of community views on the strategic approach that should be applied outside the District's four main towns. Neighbourhood plans would play an important role in delivering some of the options outlined in the consultation document. Since these plans would be taken forward by Town and Parish Councils together with their local communities, the District Council felt it was important to gauge their likely appetite for neighbourhood planning before consulting more widely on the strategic approach to development outside the four main towns.

### Bodies and Persons Invited

- 5.3 This round of consultation was undertaken with all 12 parish meetings, 33 parish councils, 9 grouped councils and 5 town councils in North Dorset in November 2011. They were encouraged to consult locally with their communities before responding to the District Council.

### How Bodies and Persons were Invited to make Representations

#### Consultation Documentation

- 5.4 Town and Parish Councils were invited to respond to consultation documentation prepared by the District Council and agreed by Planning Policy Panel on 16 November 2011. The consultation documentation included:
- a letter that explained why the Council was consulting with the parishes;
  - a hand-out explaining the options, the interim position, what a neighbourhood plan was and the stages in preparing a plan, their funding and support that is available; and
  - a reply form.

- 5.5 Town and Parish Councils were invited to make representations on:
- three options for taking forward growth outside the four main towns; and
  - whether their community was interested in preparing a neighbourhood plan and if so, what issues it might cover.
- 5.6 These options, based on draft guidance and primary legislation at the time, are set out below.

**Option 1 - The Council gives a strong strategic steer in Stalbridge and the larger villages with greater choice elsewhere**

This option was similar to draft Core Policy 3 in the draft Core Strategy. The Council will:

- Identify Stalbridge and up to 20 'sustainable' villages for growth;
- Define overall levels of housing provision for Stalbridge and the 'sustainable' villages (in the draft Core Strategy this was 1,200 homes over 20 years in Stalbridge and 18 villages);
- In partnership with local communities identify suitable sites for housing and other uses in Stalbridge and the 'sustainable' villages in a subsequent Site Allocations Document to meet the level of provision proposed;
- Give no strategic steer for the remaining less sustainable villages that will be washed over with countryside policy that restricts development.

**Option 2 - The Council gives a strong strategic steer in Stalbridge and a more limited number of larger villages with greater local choice elsewhere**

For this option the Council will:

- Identify Stalbridge and a more limited number of 'more sustainable' villages for growth, perhaps less than 10;
- Define overall levels of housing provision for Stalbridge and a more limited number of 'more sustainable' villages;
- In partnership with local communities identify suitable sites for housing and other uses in Stalbridge and a more limited number of 'more sustainable' villages in a subsequent Site Allocations Document to meet the level of provision proposed;
- Give no strategic steer for the remaining less sustainable villages that will be washed over with countryside policy that restricts development.

### Option 3 - The Council gives 'light touch' strategic guidance only with greater local choice in Stalbridge and all villages

For this option, the Council will:

- Set out an 'indicative framework' for guidance purposes only highlighting those settlements that are more or less sustainable in terms of population size, facilities and accessibility to services;
- Not set any overall housing provision figures for Stalbridge or the villages in the new style Local Plan;
- Not identify any sites for housing or other uses in Stalbridge or the villages in the Site Allocations Document.

5.7 The consultation document made it clear that under 'Option 3' the Council's 'new style' Local Plan would provide some guidance on the general distribution of development in the District by indicating those settlements (outside of the four main towns) that, in the Council's view, are more sustainable. However, this 'light touch' approach would be for guidance only and the scale and type of housing and other uses, such as employment, in Stalbridge or any village would ultimately be a matter for local communities to determine through the production of a neighbourhood plan or a community right to build project.

#### **Consultation Process**

5.8 The letter, hand-out setting out the options, and reply form were sent to all 12 parish meetings, 33 parish councils, 9 grouped councils and 5 town councils in North Dorset on 28 November 2011. Reply forms were to be completed and returned to the Planning Policy Team by 29 February 2012.

5.9 The letter also included an invitation to a 'drop-in' session on 18 January 2012 where local Town and Parish Council members could have a one-to-one chat with a Planning Policy Officer to discuss the implications of the options on their particular village and how a neighbourhood plan could work for them.

## **Summary of the Main Issues Raised**

### **Issues Raised at the Drop-In Session**

5.10 In total representatives from 21 (28%) of parished areas attended the drop-in session. Many parishes took the opportunity to discuss the advantages and disadvantages of each option in relation to their particular village and asked how a neighbourhood plan could work for them, if one was needed at all. Officers answered questions to the best of their knowledge in terms of new legislation and based on draft regulations and limited official guidance at the time.

5.11 For a number of parishes it was important to explain that the default position of being 'washed over' with countryside policy did not mean no development as some

forms of development would still be permitted to help support the rural economy and meet essential rural needs.

- 5.12 For a more limited number of individuals, officers also described what a Neighbourhood Development Order was and what a Community Right to Build scheme could achieve.
- 5.13 During the drop-in session many questions were asked and it was decided in advance to collate these and produce a Frequently Asked Questions (FAQ) hand-out to be distributed after the event. A copy of the FAQ was sent to all the parishes on 10 February 2012 and a copy was also uploaded to the neighbourhood planning page of the Council's website.<sup>11</sup>
- 5.14 The FAQs were sent out in advance of the deadline for consultation (29 February 2012) to enable local town and parish members to review the questions prior to submitting their response as to their preferred option for growth and their interest in preparing a neighbourhood plan.

### **Issues Raised in Response to the Consultation Document**

- 5.15 In total 26 reply forms from 35 parished areas were completed and returned. 25 (71%) indicated that Option 3 was their preferred approach for taking forward growth in Stalbridge and the villages. Just two parished areas expressed a preference for Option 2 and only Gillingham Town Council expressed a preference for Option 1.
- 5.16 The same consultation also asked the question 'Is your local community interested in preparing a neighbourhood plan?' Thirty three parished areas responded to this question of which 17 (52%) said yes.
- 5.17 Of those 17 parished areas saying 'yes', one was Gillingham Town Council who were subsequently awarded front runner funding and on 20 August were the first parish to have their application for a neighbourhood area approved.
- 5.18 Ten of the parished areas responding were what the Council considered to be 'more sustainable' settlements, based on earlier technical work undertaken on population, facilities and accessibility<sup>12</sup>. These were: Blandford Forum, Bourton, Child Okeford, Fontmell Magna, Hazelbury Bryan, Iwerne Minster, Marnhull, Pimperne, Stalbridge and Winterborne Stickland.
- 5.19 Fourteen parished areas said 'no' to neighbourhood planning citing that it was not the right time for them or that there was no evidence of community enthusiasm in their area. As part of the consultation with the parishes the Council also sought to establish what type of issues local communities would like to consider in their neighbourhood plan. Many simply ticked all of the issues listed:

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<sup>11</sup> <http://www.dorsetforyou.com/neighbourhoodplanning/north>

<sup>12</sup> This technical work is discussed in more detail in the Sustainable Development Strategy Background Paper

- Housing;
- Affordable housing;
- Shops;
- Employment;
- Green energy;
- Village hall;
- Local green spaces; and
- Design and character guidelines.

5.20 A full report on the results of the consultation was presented to the Council's Planning Policy Panel on 7 March 2012.

## How the Main Issues were Addressed in Subsequent Stages of Plan Preparation

- 5.21 The results of this consultation helped to establish that Town and Parish Councils preferred Option 3 as an approach to growth outside the four main towns, which would give a 'light touch' strategic steer and greater local choice for communities in Stalbridge and all villages to meet their own needs.
- 5.22 It also demonstrated that local communities were keen to pursue neighbourhood planning, which they saw as an opportunity to consider and address a range of local issues.
- 5.23 The responses to this consultation provided the Council with evidence that a more flexible approach to development in Stalbridge and the villages had a measure of support from local communities and that, in the event that the Council put in place a strategic policy to facilitate such an approach, that communities would be likely to respond by preparing neighbourhood plans.
- 5.24 On the basis of this evidence, the Council then consulted more widely on taking forward an approach based on Option 3 in the subsequent consultation on key issues for the revision of the draft Core Strategy. This subsequent consultation, which took place in late 2012 is discussed in more detail in Section 6.
- 5.25 By October 2014 there were 9 neighbourhood plans in production in North Dorset covering 13 parishes and over 60% of the District's population. At this time neighbourhood areas had been designated for: Blandford+ (Blandford Forum, Blandford St. Mary and Bryanston); Bourton; Gillingham; Okeford Fitzpaine; Pimperne; Milborne St. Andrew; Shaftesbury, Melbury Abbas and Cann; Shillingstone; and Sturminster Newton.

## 6. Consultation on Key Issues for the Revision of the Draft Core Strategy in 2012

### Introduction

- 6.1 The Draft Core Strategy was subject to extensive consultation between 15 March and 14 May 2010. A full report on the results of consultation was presented to the Council's Planning Policy Panel on 5 July 2012. This report identified a range of issues that required further consideration, especially in the light of the reforms of the planning system introduced by the Coalition Government and the global economic downturn.
- 6.2 In June 2011 the Council's Cabinet agreed to revise the draft Core Strategy, having regard to a range of different factors, with a view to producing a 'new style' Local Plan. To enable the draft Core Strategy to be revised, a further round of consultation targeted on key issues was undertaken between 29 October and 21 December 2012. The results of this consultation fed into the Local Plan Part 1, which was published in November 2013, prior to submission to the Secretary of State.

### Bodies and Persons Invited

- 6.3 Letters (or e-mails) were sent to all 2,532 people on the Core Strategy consultation database. The database included all 'specific' consultees required under the Regulations to be notified of emerging policy and all residents, businesses and organisations who responded to the Core Strategy consultation in May 2010. The letter included a link to the Council's website where people could access the consultation documents and make a response either on-line via Survey Monkey or by downloading a comments form.

#### **Specific Consultation Bodies**

- 6.4 Hard copies of the 'key issues' consultation documents were sent to all town and parish councils within and adjoining the District, together with a poster listing a series of exhibition dates. English Heritage, Natural England and the Environment Agency were also sent hard copies of the consultation documents. All other 'specific consultation bodies' were sent a letter or e-mail outlining the arrangements for consultation and informing them that all the relevant documentation was available online.

## General Consultation Bodies and Others

- 6.5 All 'general consultation bodies' and any other people, organisations and businesses listed on the consultation database were sent a letter outlining the arrangements for consultation and informing them that all the relevant documentation was available online. For people with no access to the internet hard copies were available on request.

## How Bodies and Persons were Invited to make Representations

### Main Consultation Documents

- 6.6 The Council produced three documents for the targeted consultation on key issues. All three documents were approved for consultation by the Council's Cabinet on 15 October 2012. The three documents were:
- the main consultation document on key issues for the revision of the draft Core Strategy. This explained the background to the consultation and the factors the Council had regard to in undertaking the review. For most sections the key issues were explained in the light of the changes that had occurred since the draft Core Strategy had been produced and for each section a summary of the proposed revisions was included. The Council sought responses to 28 questions on the revised approaches now being considered;
  - the second consultation document focused on the options for the Southern Extension of Gillingham and sought views on options for taking forward key aspects of development in the Strategic Site Allocation (SSA) site. Views were sought on a series of 9 questions;
  - the third document was the Infrastructure Delivery Plan (IDP) Background Paper. This took the form of a draft IDP and provided: an overview of infrastructure issues in North Dorset; assigned significance (in terms of being critical, essential, necessary or desirable) to different infrastructure categories; and included a schedule of the infrastructure currently programmed or required to support the proposals for future growth. Questions 17 to 19 in the main consultation document sought views on the IDP Background Paper.

### Supporting Documents

- 6.7 Documents to support the targeted consultation on key issues, were:
- an update to the Initial Sustainability Appraisal Report. The 'addendum' included the sustainability appraisal of two additional sites: one in Blandford; and one in Gillingham, plus the sustainability appraisal of the draft Development Management policies from the 2010 draft Core Strategy;
  - an updated set of topic papers. The topic papers produced in 2009 were updated: to summarise the 'evidence' underpinning emerging policies (including



any more recent studies); and explain the changes to the national, regional and sub-regional policy context. A new topic paper, updating and amending the issues, challenges, visions and objectives for North Dorset was also produced.

### Consultation Arrangements

- 6.8 Specific consultation bodies, general consultation bodies and any other bodies, businesses or individuals on the Council's Core Strategy consultation database were invited to respond to the 'key issues' consultation by the means outlined above.
- 6.9 The Council also made information about the key issues consultation available in a number of other ways to encourage engagement, as set out below. Responses could be made:
- using an online survey form (Survey Monkey);
  - by e-mail to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk); or
  - by post to Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum DT11 7LL.

### Dorsetforyou.com Dorset Website

- 6.10 An additional page was created on the Council's website providing links to all the 'key issues' consultation material and setting out the different ways in which responses could be made. To ensure as many people as possible were aware of the consultation, an item was placed in the 'news' section of the website and included in the 'consultation tracker' facility.

### Libraries

- 6.11 Copies of the consultation material were sent to all libraries in the District so members of the public could access the information locally. The libraries were also sent a poster advertising the exhibitions.

### Exhibitions

- 6.12 A series of exhibitions was set up to explain the changes proposed and answer any questions. These were held in:
- Blandford at the Parish Centre on 1 November;
  - Sturminster Newton at The Exchange on 12 November;
  - Shaftesbury at the Town Hall on 22 November; and
  - Gillingham at the Rivers Meet leisure centre on 29 November.
- 6.13 At the four exhibitions summary boards were displayed that mirrored the key issues raised in the consultation documents. People were able to walk around, read up on the key points and consider the specific questions raised. Officers and Members were available to answer questions and explain the revised approaches proposed. Separate displays were dedicated to the options for the Southern Extension of Gillingham and the IDP.

- 6.14 On the tables below each display board extracts of the consultation documents were available for members of the public to pick up or take home together with postcards showing the dates for the consultation and the website address of where to find out more and how to make a response.
- 6.15 To encourage as many comments as possible members of the public had the opportunity to complete a comment form on the day, take home a form to complete and return at a later date or take a card with our website details so they could either download a form or use the online submission facility.
- 6.16 All exhibitions were open to the public from 10am to 7pm to ensure as many people as possible had the opportunity to attend. Some exhibitions attracted more members of the public than others and this was often related to specific local issues:
- in Blandford 293 people visited the Parish Meeting Rooms;
  - in Sturminster Newton 126 residents joined members and officers at the Exchange;
  - in Gillingham the busy leisure centre and the issue of Wyke attracted 278 visitors; and
  - just 49 people in Shaftesbury attended the exhibition in the Town Hall.

### Public Notice and Press Article

- 6.17 To notify people of the consultation an advert was placed in the public notices section of the Blackmore Vale Magazine on the 26 October 2012. This notice followed on from a general announcement that had been included in the North Dorset District Council News section of the magazine on 12 October 2012.

### Press Release

- 6.18 A press release was produced and circulated to the local media enabling them to make local people aware of the consultation, including:
- the Blackmore Vale Magazine;
  - the Western Gazette;
  - local community publications, including Unity.com, Forum Focus, Gillingham Guide and Valley News; and
  - local radio and TV stations.
- 6.19 Nearly all local publications published articles relating to the consultation.

## Summary of the Main Issues Raised

### Introduction

- 6.20 A report was taken to Planning Policy Panel on 27 March 2013 outlining the consultation process and informing Members of the main issues raised. A

comprehensive report analysing the responses in detail was appended to the Planning Policy Panel agenda item.

- 6.21 At the beginning of each report for each question a simple breakdown of the views expressed (i.e. yes/no/comment) was given. This was displayed numerically and in the form of a simple pie chart with percentages to give a quick reference guide to the views expressed on how policy might be revised. Each report provided a detailed analysis of the comments raised by both specific and general consultees before drawing to a conclusion as to how the Council could move forward with the revision of policy.
- 6.22 The report setting out the detailed analysis of responses to this consultation is available to view on the Council's website.

### **Overview of Responses to Consultation**

- 6.23 Overall 812 people and organisations commented on the consultation. All responses and comments were recorded on the consultation database and fed into the detailed report that examines the responses to each individual question.

### **Key Issues for the Revision of the draft Core Strategy**

- 6.24 There were 473 responses to the main consultation (including responses to the questions relating to the IDP Background Paper), but not everyone expressed an opinion on all of the 28 questions raised. Of those commenting 270 (57%) used the comments form provided, 35 (7%) sent an email, 101 (21%) submitted a letter outlining their concerns and 67 (14%) did so online.
- 6.25 Overall 28 specific bodies responded to the key issues consultation and these included the following town and parish councils:
- Blandford Forum Town Council;
  - Charlton Marshall Parish Council;
  - Child Okeford Parish Council;
  - Durweston Parish Council;
  - Fifehead Neville Parish Meeting;
  - Iwerne Courtney and Steepleton Group Parish Council;
  - Iwerne Minster Parish Council;
  - Lydlinch Parish Council;
  - Marnhull Parish Council;
  - Melbury Abbas and Cann Parish Council;
  - Milborne St Andrew Parish Council;
  - Okeford Fitzpaine Parish Council;
  - Pimperne Parish Council;
  - Shaftesbury Town Council;
  - Shillingstone Parish Council;
  - South Tarrant Valley Parish Council;

- Stalbridge Town Council;
  - Stourpaine Parish Council;
  - Tarrant Gunville Parish Council; and
  - Winterborne Stickland Parish Council.
- 6.26 Blandford Town were also included in a joint response from Blandford St Mary and Bryanston Parish Councils together with the DT11 Partnership.
- 6.27 Other specific bodies responding included:
- Dorset County Council (Countryside);
  - Dorset County Council;
  - Environment Agency;
  - Highways Agency;
  - Natural England;
  - South Somerset District Council; and
  - Wessex Water.
- 6.28 During the course of the consultation two ‘alternative questionnaires’ were circulated by other bodies based on the Council’s official comments form.
- a questionnaire was circulated by the Bryanston Park Preservation Group (BPPG), which resembled the Council’s formal comment form and included the Council’s logo and reply address. However, it only contained Questions 20 and 21 relating to Blandford together with three additional questions, including a question relating to an alternative site (opposite Tesco on the A354/A350 junction). 215 BPPG questionnaires were submitted to the Council and the responses to the revised questions were analysed as part of report on consultation.
  - A second ‘alternative questionnaire’ was prepared and circulated by Bryanston Parish Council. This response form included 25 questions based on (but in many cases slightly different from) the 28 questions on the Council’s official comments form. 32 of these forms were submitted and the comments raised were also analysed as part of report on consultation.
- 6.29 An additional questionnaire was also prepared by Bryanston Parish Council that sought the views and aspirations of Bryanston residents on local issues. 33 forms were submitted to the Council for consideration and again the comments raised were analysed as part of report on consultation.

### Options for the Southern Extension of Gillingham

- 6.30 In summary 58 individuals and organisations responded to the options for the Southern Extension of Gillingham specific consultation questions. 29 (50%) did so on the comment form provided, 7 (12%) sent an email, 7 (12%) sent a letter and 15 (26%) utilised the online facility.

6.31 Of the 58 responses 53 (91%) were from local residents and businesses and 5 (9%) were from those classified as specific consultees. The specific consultees were:

- the Environment Agency;
- Highways Agency;
- Wessex Water;
- Dorset County Council (Strategic Planning); and
- Natural England.

### Main Issues from the Key Issues Consultation

#### Spatial Approach to Growth

6.32 From the four questions posed in relation to the proposed spatial approach for growth in the District there was a general consensus to:

- identify Sturminster Newton as a ‘main town’ (Q1);
- allocate the vast majority of housing growth in the District in the four main towns with specific sites being taken forward primarily through a Site Allocations DPD (with the exception of the SSA at Gillingham) (Q2);
- meet local (rather than strategic) need in Stalbridge and the villages primarily through neighbourhood planning (Q3); and
- include an option for Stalbridge and the villages to ‘opt in’ to the Council’s Site Allocations DPD as an alternative to meeting local needs through neighbourhood planning (Q4).

#### Provision of Housing

6.33 From the two questions posed in relation to the provision of housing in the District, there was a majority that supported:

- a revised housing provision figure of 4,200 being set for the period from 2011 to 2026 (Q5); and
- a revised distribution of housing, as set out in the table below (Q6).

Location	Homes proposed 2011 to 2026	% of total
Blandford	about 960	23%
Gillingham	about 1,490	35%
Shaftesbury	about 1,140	27%
Sturminster Newton	about 380	9%
Stalbridge, villages and countryside	at least 230	6%
Total	about 4,200	100%

## Provision of Employment Land

- 6.34 In response to the two questions posed in relation to the provision of employment land in the District there was a general consensus to:
- not identify any further employment sites in North Dorset in addition to those that are already allocated or have planning permission (Q7);
  - allow employment generating uses other than Classes B1, B2 and B8 on employment sites (Q8).

## Housing Density, Infilling and Residential Gardens

- 6.35 Support was given for a flexible approach to density, reflecting local character but with a maximum density standard being retained to prevent inappropriate development (Q9). There was also support for making efficient use of land to prevent high levels of development on greenfield land.
- 6.36 It was suggested that local communities should have an input into establishing District-wide criteria to encourage more sensitive infilling (Q10). Support was given to developing locally-derived criteria to encourage more sensitive infilling (Q11).

## Affordable Housing

- 6.37 There was a wide variety of views on both the overall level of affordable housing that should be sought and the tenure split that should form the starting point for negotiation on the affordable element (Q12). Of those that quoted a percentage split, the largest number (11) supported a 70% social and / or affordable rent / 30% intermediate housing split. However, 16 respondents (10 of which were agents) felt that a starting point figure for tenure split should not be set.
- 6.38 There was also strong support for:
- offering developers the opportunity to involve a valuer to negotiate on the issue of viability (Q13); and
  - seeking off-site contributions towards the cost of affordable housing based on realistic assessments of cost (Q14).

## Rural Exception Schemes

- 6.39 The consultation drew clear support for allowing an element of market housing on affordable housing rural exception schemes. However, viability of delivery and sustainability of location were the issues of most concern (Q15).
- 6.40 A variety of criteria were suggested to control the market element. It was suggested that the market element should be 'no more than the minimum' necessary to deliver the affordable element. It was also felt that the criteria should include reference to local character, and that the Council should consider how they would deal with contributions in place of direct provision (Q16).

## Grey, Social and Green Infrastructure

6.41 The main points that emerged in relation to the infrastructure questions (Q17 to 19) were:

- the provision of additional medical facilities is particularly important to many people, perhaps more so than improvements in roads and education;
- walking and cycling facilities are significant infrastructure elements;
- there are different views as to the relative importance of infrastructure elements in the towns and the rural areas; and
- the draft IDP provides a fairly comprehensive list of infrastructure project requirements over the plan period.

## Blandford

6.42 From the responses to the two questions relating to Blandford it could be seen that:

- many members of the public had reiterated their general and previous objections to any development on land west of Blandford Forum (Crown Meadows), often reiterating flooding issues, increased traffic congestion, adverse visual impact, impact on wildlife and the availability of an alternative site (Q20) ;
- there was some support for the provision of public open space on the floodplain but, for many respondents, having residential development on the remaining land was perceived as too high a price to pay (Q21); and
- respondents felt that other land should be investigated as an alternative to Crown Meadows, especially land adjoining the A350/A354 but also other sites beyond the bypass, although development of the A350/A354 site attracted opposition from the Highways Agency which had concerns about the potential impact of additional traffic going onto the A31.

6.43 The responses to Q20 and 21 on the 'alternative' questionnaire produced by the BPPG largely show opposition to any development on the Crown Meadows site. The comments generally voiced issues similar to those highlighted by respondents to the Council's consultation and:

- pointed to the issue of flooding;
- expressed concerns about traffic impact from development;
- suggested that a lack of employment opportunities would create problems;
- identified adverse visual impact as an outcome of development; and
- stressed perceived infrastructure deficiencies in Blandford, especially highways.

6.44 Overall, the 'alternative' questionnaire's results in relation to Q20 and 21 largely mirrored concerns expressed in the Council's consultation, both with regard to housing development at Crown Meadows and to an area of land being made available for public open space.

6.45 The BPPG questionnaire also asked three additional questions. The responses reflected the general consensus of opposition to development at Crown Meadows. A number of comments accompanied the responses to these 'alternative' questions and generally:

- emphasised the matter of flooding;
- expressed concerns about traffic impact from development;
- identified adverse visual impact as an outcome of development;
- stressed perceived infrastructure deficiencies in Blandford.

6.46 Overall, the responses to the BPPG 'alternative' questionnaire mirrored concerns expressed in the District Council's consultation.

### Gillingham

6.47 The key question in relation to Gillingham was whether the proposed business park at Wyke should be deleted from the draft Core Strategy (Q 22). The response was an overwhelming 'yes' from local residents and businesses alike, a view also shared with the specific bodies who responded to this question. Objections were limited to those who considered that an overall review of employment provision in the town was required.

### Stalbridge, the Villages and the Countryside

6.48 From the four questions posed in relation to the proposed approach for growth in Stalbridge, the villages and the countryside there was a general consensus to:

- not set an overall housing provision figure for Stalbridge, the villages and the countryside (Q23);
- meet the future development needs in Stalbridge and all villages primarily through neighbourhood planning (Q24);
- apply the countryside policy (i.e. a policy of restraint) to Stalbridge and all villages prior to, or in the absence of, the production of neighbourhood plans (Q25); and
- amend the countryside policy to permit essential community facilities within or adjoining Stalbridge and all the villages (Q26).

### Development Management Policies

6.49 There was almost unanimous support to:

- update draft Development Management Policy 4 – Amenity to deal with the issue of noise (Q27); and
- include a new policy in the Local Plan to deal with occupational dwellings in the countryside (Q28).



## Main Issues from the Consultation on Gillingham Southern Extension

### Green Infrastructure

- 6.50 Views on whether sports pitches should be clustered or dispersed across the southern extension site were evenly balanced (QG1). Some felt that clustered pitches may lead to the provision of better facilities, which would be easier to manage, whereas others were concerned that clustering may lead to facilities not being accessible to all. The best compromise to address the issues raised in relation to the configuration of sports pitches was for clusters to be provided in accessible locations.
- 6.51 In response to the question that asked what types of pitches were needed, the top three sports were: football including five-a-side all weather pitches; tennis; and cricket (QG2). Pedestrian or cycle access to open space was seen as important as were linkages between the green infrastructure assets on site.
- 6.52 The community preference was for allotments to be dispersed about the site in locations accessible to local people (QG3).

### Transport and Access

- 6.53 Respondents felt that it would be important to minimise the impact of the 'principal street' linking the B3092 and the B3081. There was no clear preferred option for the route, although the potential impact on Cole Street Lane was raised as a concern. The potential to create a more attractive entrance to the town at Shaftesbury Road was supported, as was the use of the principal street by public transport (GQ4).
- 6.54 The main concern with the creation of access points linking into existing development was the potential impact on existing residential areas. The preference was for new accesses to be established rather than for loading existing residential streets. It was felt that the principal street should access the majority of the site, with primarily non-vehicular connections being established to the existing built-up area elsewhere (QG5).

### Local Centre

- 6.55 No clear preference was expressed for the location of the local centre. However, some comments recognised the merits of establishing a local centre at Orchard Park (Kingsmead Business Park), building on the commercial activity that exists in that location. It was recognised that any uses at the local centre would need to be kept small-scale to serve just the local area, in order to avoid a negative impact on the existing town centre and the efforts being made to enhance it (QG7).

### Education

- 6.56 There was a clear preference expressed for the provision of a new primary school within the Southern Extension site with a site on the eastern side of the B3081

being the preferred option. The expansion of St Mary the Virgin was also supported to provide for residents on the western side of the B3081 (QG8).

### Employment Growth

- 6.57 Expansion of Brickfields and Orchard Park was seen as a better approach than expansion just at Brickfields, as this approach would provide for the maximum amount of employment and business opportunities to serve the town. The need for good pedestrian and cycle links to the employment sites was highlighted as important.

## How the Main Issues were Addressed in Subsequent Stages of Plan Preparation

### Key Issues Consultation

- 6.58 The responses to the key issues consultation were used to inform the revision of the 2010 draft Core Strategy to become Part 1 of the Council's 'new style' Local Plan. Many of the issues raised and views expressed were reflected in the policies of the Local Plan Part 1: Pre-submission Document. The main changes included:
- a revised spatial strategy that focusses the vast majority of growth at the four main towns, with a focus on meeting local needs elsewhere (Policy 2);
  - a revised overall level of housing provision (4,200 homes over 15 years) focused on the four main towns (Policy 6);
  - a revised overall level of employment land provision and a more flexible approach to uses on such land to encourage economic development (Policy 11);
  - a more flexible approach to residential densities and infilling (Policy 7);
  - an affordable housing policy that takes account of the affordable rent product and builds in flexibility in relation to viability assessments and off-site financial contributions (Policy 8);
  - a rural exception schemes policy that may permit an element of market housing in certain circumstances (Policy 9);
  - updated policies on grey, social and green infrastructure (and an updated Infrastructure Delivery Plan) that reflect more recent discussions with stakeholders and local communities on infrastructure needs (Policies 13, 14 and 15);
  - a revised policy for Blandford which proposes fewer new homes on the land west of Blandford Forum (Crown Meadows site) together with an extensive new area of public open space (Policy 16);
  - a revised policy for Gillingham which no longer proposes a new strategic business park at Wyke, but nevertheless make adequate provision for employment land to meet needs to 2026 (Policy 17);
  - a more flexible policy for the countryside, which will apply to all settlements outside the four main towns (Policy 20);

- a more comprehensive policy on amenity that deals with the issue of noise (Policy 25); and
- a new policy on occupational dwellings in the countryside, that establishes functional and financial tests (Policy 33).

### **Gillingham Southern Extension**

- 6.59 The results of the consultation on Gillingham Southern Extension discussed broad issues on a variety of subjects such as access, green infrastructure, the provision of community facilities in the form of a local centre and the need for additional primary education facilities.
- 6.60 The results of this consultation fed into a second stage of consultation that took the form of a ‘concept plan workshop’ with a selection of key stakeholders and representatives of the local community. Consultation on the concept plan workshop is discussed in more detail in Section 7.

## 7. Gillingham Strategic Site Allocation Concept Plan Workshop 2013

### Background

- 7.1 The Council has worked closely with landowners, developers, key stakeholders and the local community over a number of years to develop the proposals for the southern extension of Gillingham.

#### **Gillingham Study**

- 7.2 During 2009, the community was engaged in the production of the report “Assessing the Growth Potential of Gillingham”<sup>13</sup>, which identified that the town had the economic potential, the capacity (in terms of suitable and available sites) and a relative lack of constraints to enable it to accommodate significant growth. The study examined a range of potential spatial options and the scenario for growth which was considered most sustainable was the ‘southern focus’.
- 7.3 The project was managed by a small steering group of officers from the District Council and Dorset County Council. A wider ‘reference group’ was also set up comprising key stakeholders at both the regional and local levels. Details of the attendees at the two reference group meetings are set out in Appendix H of the final report.

#### **Decision to Take Forward a Strategic Site Allocation (SSA)**

- 7.4 The Council used the Gillingham Study to draw up proposals for development to the south of the town in the draft Core Strategy<sup>14</sup>. Consultation took place in 2010 and the main issues raised are discussed in Section 4.
- 7.5 The issues raised in consultation on proposals for growth to the south of Gillingham in the draft Core Strategy largely related to certain site-based issues and were not fundamental to the selection of the site. This issue is discussed in more detail in the Market Towns Site Selection Background Paper.
- 7.6 Following on from consultation on the draft Core Strategy, in June 2011, the Council decided to develop a more detailed policy to take forward growth to the south of Gillingham in the form of a Strategic Site Allocation (SSA)<sup>15</sup>. It was recognised that to take forward proposals in greater detail, further consultation would be required.

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<sup>13</sup> Assessing the Growth Potential of Gillingham, Dorset, Atkins (December 2009)

<sup>14</sup> Draft Core Policy 16, The New Plan for North Dorset – The Draft Core Strategy and Development Management Policies DPD, North Dorset District Council (March 2010)

<sup>15</sup> The decision to take forward growth to the south of Gillingham in the form of a Strategic Site Allocation was made by the Council’s Cabinet on 13 June 2011

## Strategic Site Allocation Consultations

- 7.7 The Council consulted on the options for the southern extension of Gillingham as part of the wider consultation on key issues for the revision of the draft Core Strategy in autumn 2012<sup>16</sup>. The main issues raised in that consultation are discussed in Section 6.
- 7.8 The second part of the consultation took the form of a subsequent ‘concept plan workshop’, which was attended by landowners, developers, key stakeholders and representatives of the local community. The workshop was held at RiversMeet in Gillingham on 22 March 2013 and was facilitated by the Homes and Communities Agency’s Advisory Team for Large Applications (ATLAS). The results of the workshop are presented in a report prepared by ATLAS<sup>17</sup>.

## Concept Plan Workshop

### Bodies and Persons Invited

- 7.9 Consultation on the options for the southern extension of Gillingham which formed part of the wider consultation on key issues for the revision of the draft Core Strategy in autumn 2012 was undertaken with all bodies and persons on the Council’s Core Strategy consultation database.
- 7.10 In the light of the results of that consultation, a workshop was held with landowners, prospective developers of the site, a cross section of the local community and key stakeholders. Appendix 2 of the report on the workshop produced by ATLAS includes an attendance list.

### How Bodies and Persons were Invited to make Representations

- 7.11 There were three stages to the concept plan workshop, which were:
- Stage 1: Introduction, including a site visit;
  - Stage 2: Producing the Concept Plan; and
  - Stage 3: Agreeing the Design Principles.
- 7.12 The programme for the day is included as Appendix 1 of the report on the workshop produced by ATLAS.
- 7.13 Having visited the site, the attendees were organised into six groups, each one including an urban designer and facilitator, who were tasked with sketching the group’s own concept plan based on the inputs of the group participants. The six concept plan drawings from the workshop are included in Appendix 4 of the report on the workshop produced by ATLAS.

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<sup>16</sup> Public Consultation on Options for the Southern Extension of Gillingham, North Dorset District Council (October 2012)

<sup>17</sup> Gillingham Southern Extension Concept Plan Workshop March 2013: ATLAS Report on the Workshop, ATLAS (July 2013)

- 7.14 The local community has produced a town design statement (TDS)<sup>18</sup>, which describes the distinctive local features in Gillingham and includes a set of development guidelines. These guidelines were used to form a set of ‘potential design principles’ for the attendees of the workshop to consider. Participants were invited to vote on whether each principle should: be kept unchanged; be kept with some changes to the wording; or be rejected. Participants were also invited to provide written comments on each potential design principle. The responses to this exercise are set out in tables on pages 8 to 12 of the report on the workshop produced by ATLAS.

### **Summary of the Main Issues Raised**

- 7.15 Each concept plan drawing was analysed to see how each group had addressed key aspects of the proposed mixed-use development of the site. The key points from the concept plan drawing exercise are set out in Figure 1 (on Page 5) of the report on the workshop produced by ATLAS. In summary, the key points raised provided views on:

- the location and alignment of the main access routes through the site;
- the wider movement network and linkages with existing routes;
- the location of the local centre to serve the SSA;
- the disposition of the main land uses;
- variations in density;
- the extent and role of green infrastructure within the site;
- focal points and gateways; and
- key views into and out of the site.

- 7.16 Most potential design principles were supported although in many cases changes to the wording were suggested. 15 participants felt that the principle relating to adaptability should not be kept, although many of those felt that clarification was required as the principle, as drafted, was confusing.

- 7.17 The key outputs from the concept plan workshop were:

- a potential development concept for the SSA (see Figure 4 in the ATLAS report);
- a composite concept plan based on the six concept drawings produced at the workshop (see Figure 2 in the ATLAS report); and
- a set of revised design principles (see Figure 3 in the ATLAS report).

### **How the Main Issues were Addressed in Subsequent Stages of Plan Preparation**

- 7.18 The outputs of the concept plan workshop have been used to establish the ‘conceptual framework’ in Policy 21 - Gillingham Strategic Site Allocation in the pre-submission Document to guide the future development of the southern extension.

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<sup>18</sup> Gillingham Town Design Statement, Gillingham Town Design Statement Steering Group (June 2012)

This policy outlines the importance of achieving the comprehensive development of the site and suggests that this could best be achieved through the preparation of a 'master plan framework' by landowners and developers. The policy states that the master plan framework should reflect the three elements of the 'conceptual framework' outlined in the policy, which are:

- a 'concept statement' (see Figure 9.2 in the Local Plan Part 1) largely based on the potential development concept for the SSA in Figure 4 of the ATLAS report;
- a 'concept plan' (see Figure 9.3 in the Local Plan Part 1), which is a reproduction of the composite concept plan shown in Figure 2 of the ATLAS report; and
- a set of 'design principles' largely based on the set of revised design principles in Figure 3 of the ATLAS report.

7.19 The consultation undertaken in relation to Gillingham and in particular the concept plan workshop helped to establish a collective vision and a set of agreed priorities for the sustainable development of the southern extension to the town. This consultation was used to inform not only Policy 21 – Gillingham Strategic Site Allocation, but also Policy 17 – Gillingham, which provides the overall strategic policy framework for the town.

## 8. Consultation on the North Dorset Local Plan – 2011 to 2026 Part 1 in 2013

### Introduction

- 8.1 The period of publication for representations on the North Dorset Local Plan 2011 to 2026 Part 1: Pre-submission document ran from Friday 29 November 2013 to Friday 24 January 2014.
- 8.2 This section explains the bodies and persons that were invited to make representations, outlines the ways in which they were invited to respond and sets out the number of representations made and a summary of the main issues raised in this consultation.
- 8.3 The Council undertook further consultation on focused changes relating to Blandford during August and September 2014. Details of that consultation are set out in the next chapter.

### Bodies and Persons Invited

#### Specific Consultation Bodies

- 8.4 Hard copies of the Local Plan Part 1 were sent to all town and parish councils within the District, together with: the Statement of Representations Procedure; guidance notes for making representations; and a poster listing a series of exhibition dates to be placed on parish notice boards. They were informed that the proposed submission documents would be available online and for inspection at the Council's principal offices in Blandford.
- 8.5 Other 'specific consultation bodies' were sent the Statement of Representations Procedure and informed that the proposed submission documents would be available online and for inspection at the Council's principal offices in Blandford.

#### General Consultation Bodies

- 8.6 All 'general consultation bodies' and any other people, organisations and businesses listed on the consultation database were sent the Statement of Representations Procedure and informed that the proposed submission documents would be available online and for inspection at the Council's principal offices in Blandford.
- 8.7 The Community Partnerships Executive for North Dorset was given an overview of the Local Plan Part 1 and was informed of the forthcoming consultation at their meeting on 17 October 2013.



## How Bodies and Persons were Invited to make Representations

- 8.8 Specific consultation bodies, general consultation bodies and any other bodies, businesses or individuals on the Council's Local Plan Part 1 consultation database were invited to respond to the Local Plan Part 1: Pre-submission Document:
- using an online survey form (Survey Monkey);
  - by e-mail to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk); or
  - by post to Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum DT11 7LL.
- 8.9 To assist respondents in making comments in relation to legal compliance and 'soundness', the Council prepared guidance notes, which were available online.
- 8.10 The Council also made information about the Local Plan Part 1 available in a number of other ways to encourage engagement, as set out below.

### Dorsetforyou.com Website

- 8.11 The Planning Policy pages of the District Council's website were comprehensively re-modelled and updated to ensure that consultees were able to access: the Local Plan Part 1; the SA Report and other associated assessments; the background papers; other relevant documents such as the LDS and SCI; and all the relevant evidence base studies.

### Libraries

- 8.12 Copies of: the Local Plan Part 1; the SA Report; the Statement of Representations Procedure; guidance notes for making representations; and a poster listing a series of exhibition dates (to be placed on library notice boards) were sent to all the libraries in the District.

### Exhibitions

- 8.13 A series of exhibitions were set up for the early part of the consultation period. The exhibitions were manned by officers from the Council and held at the following locations:
- 2 December – The Exchange, Sturminster Newton (10am to 7pm);
  - 4 December – Shaftesbury Town Hall (10am to 7pm);
  - 9 December – RiversMeet Centre, Gillingham (10am to 6.30pm);
  - 12 December – Parish Centre, Blandford Forum (10am to 7pm).
- 8.14 A record of attendance was kept and the approximate number of people attending the exhibitions was:
- |                      |     |
|----------------------|-----|
| • Sturminster Newton | 130 |
| • Shaftesbury        | 74  |

- Gillingham 94
- Blandford Forum 99
- **Total 397**

### Press Article and Public Notice

- 8.15 In March 2010, the Council produced a regular newsletter for local residents, called Open Line, which was distributed to all households. The March 2010 edition included a 4-page centre spread about the draft Core Strategy.
- 8.16 The Council no longer produces a regular newsletter for local residents, but instead reserves a half page in the Blackmore Vale Magazine each week to inform local residents of Council news. An article about the Local Plan Part 1 was included in the 22 November 2013 edition of the Blackmore Vale Magazine.
- 8.17 A public notice was placed in the 29 November 2013 edition of the Blackmore Vale Magazine.

### Press Release

- 8.18 A press release was produced and was circulated to the local media enabling them to make local people aware of the consultation, including:
- the Western Gazette;
  - the Blackmore Vale Magazine;
  - Forum Focus (covering the Blandford area);
  - Gillingham Guide (covering the Gillingham area);
  - Valley News (covering the Shaftesbury area);
  - Unity.com Magazine (covering the Sturminster Newton area);
  - the Talking Newspaper (for visually impaired people based in the Shaftesbury area);
  - Dorset newsroom on dorsetforyou.com;
  - This is Dorset website;
  - BBC Dorset website;
  - Meridian TV;
  - BBC TV South;
  - BBC Radio Solent; and
  - the Breeze Radio.

## Number of Representations Made

- 8.1 2,012 representations relating to the Local Plan Part 1: Pre-submission Document were received by the Council, including both objections and expressions of support.
- 8.2 Of the 2,012 representations received in total, 1,372 were on a questionnaire prepared by the Bryanston Park Preservation Groups (BPPG) in relation to housing growth options for the town of Blandford.

8.3 The following table, including two late representations, provides a breakdown of the 640 representations (from 138 representors) made in relation to each policy, excluding those on the BPPG questionnaire.

Figure 8.1 – Number of Representations Made by Policy to the North Dorset Local Plan 2011 to 2026 Part 1: Pre-submission Document (Excluding Those on the BPPG Questionnaire)

Policy	Count
General/ Not Specific	23
1. Introduction	17
2. North Dorset Context	2
Issues and Challenges	4
Vision for North Dorset	3
Objectives for the Local Plan Part 1	10
3. Sustainable Development Strategy	
Policy 1 - Presumption in Favour of Sustainable Development	12
Policy 2 - Core Spatial Strategy	57
4. Environment and Climate Change	
Policy 3 - Climate Change	13
Policy 4 - The Natural Environment	33
Policy 5 - The Historic Environment	6
5. Meeting Housing Needs	
Policy 6 - Housing Distribution	44
Policy 7 - Delivering Homes	17
Policy 8 - Affordable Housing	19
Policy 9 - Rural Exception Affordable Housing	5
Policy 10 - Gypsies, Travellers and Travelling Showpeople	2
6. Supporting Economic Development	
Policy 11 – The Economy	13
Policy 12 - Retail, Leisure and Other Commercial Developments	9
7. Infrastructure	
Policy 13 - Grey Infrastructure	32
Policy 14 - Social Infrastructure	8

Policy 15 - Green Infrastructure	16
<b>8. Market Towns and the Countryside</b>	
Policy 16 - Blandford	55
Policy 17 - Gillingham	32
Policy 18 - Shaftesbury	28
Policy 19 - Sturminster Newton	10
Policy 20 – The Countryside	10
<b>9. Gillingham Southern Extension</b>	
Policy 21 – Gillingham Strategic Site Allocation	74
<b>10. Development Management Policies</b>	
Policy 22 – Renewable and Low Carbon Energy	6
Policy 23 – Parking	7
Policy 24 – Design	12
Policy 25 – Amenity	7
Policy 26 – Sites for Gypsies, Travellers and Travelling Showpeople	2
Policy 27 – Retention of Community Facilities	3
Policy 28 – Existing Dwellings in the Countryside	8
Policy 29 – The Re-use of Existing Buildings in the Countryside	8
Policy 30 – Existing Employment Sites in the Countryside	8
Policy 31 – Tourist Accommodation in the Countryside	7
Policy 32 – Equine-related Developments in the Countryside	5
Policy 33 – Occupational Dwellings in the Countryside	5
<b>11. Implementation</b>	<b>5</b>
Appendix	4
<b>TOTAL</b>	<b>640</b>

- 8.4 The BPPG questionnaire identified two different options in Blandford and respondents were invited to indicate their preference for their favoured site for growth. The two sites were Option 1: ‘St Mary’s Hill, Blandford St Mary (site opposite the Tesco roundabout)’ and Option 2: ‘Crown Meadows site (land west of Blandford)’ as identified in Policy 16 of the Local Plan Part 1: Pre-submission Document. A breakdown of responses is provided in the table below.

Figure 8.2 – Number of Representations Made to the Options on the BPPG Questionnaire. Option 1 = St Mary’s Hill, Blandford St Mary (site opposite the Tesco roundabout); Option 2 = Crown Meadows site (land west of Blandford)

	Option 1 Preferred	Option 2 Preferred	No Preference Indicated
Responses sent directly to North Dorset District Council	68	7	3
Response forms sent directly to Bryanston Park Preservation Group	1,012	8	2
Responses submitted by Survey Monkey direct to Bryanston Park Preservation Group	260	12	0
<b>Breakdown of Responses from the Survey</b>	<b>1,340</b>	<b>27</b>	<b>5</b>
<b>Total Responses</b>	<b>1,372</b>		

8.5 A total of 1,372 questionnaires (from 1,372 representors) were submitted in various different ways, as outlined in Figure 8.2 above. 98% of those submitting a questionnaire (1,340) preferred Option 1: the St Mary’s Hill site. Only 2% (27) preferred Option 2: the Crown Meadows site.

## Summary of the Main Issues Raised

8.6 A breakdown of the main issues raised in response to consultation on the North Dorset Local Plan Part 1: Pre-submission Document is set out below. The breakdown sets out the main issues policy-by-policy.

### General/Not Specific

8.7 A number of general comments not related to a particular policy were made.

8.8 Wiltshire Council supported the Local Plan Part 1 and West Dorset District Council confirmed they had no objections. Dorset County Council sought a number of changes / updates to the draft Infrastructure Delivery Plan (IDP) and the Gillingham Neighbourhood Plan Group felt that the Local Plan reflected the aspirations of the local community. The group also thanked Planning Policy Officers for:

- the drop-in exhibitions in the District’s four main towns, including Gillingham;
- the careful thought given to the planning needs of the communities of North Dorset;
- the structure and layout of the Local Plan; and
- the support given to the Gillingham Neighbourhood Plan Group.

- 8.9 Some general comments criticised the Local Plan Part 1 for being: too long; repetitive; unnecessarily wordy; too restrictive; over prescriptive; not based on adequate evidence; and not based on effective joint working on cross boundary strategic priorities. Where such comments relate to particular policies, they are discussed in more detail below.

### **Introduction**

- 8.10 A total of 17 representations were made in relation to the Introduction to the Local Plan Part 1.
- 8.11 A number of comments suggested that the Duty to Co-operate had not been satisfied since many unresolved issues existed in neighbouring authority areas. Dorset County Council expressed concern that emerging plans in the Dorset LEP area risked failing to plan effectively for matters of a strategic nature, undermining the County Council's ability to provide infrastructure and other services. The County Council considered that North Dorset should give a long term commitment to the production of a jointly agreed strategy on cross boundary matters. It was also felt that the section of text relating to the Duty to Co-operate should make reference to parish councils.
- 8.12 A number of respondents felt that the plan period should be extended and most indicated that 2031 would be the most appropriate end date. Some respondents also felt that the housing requirement should be increased on a pro-rata basis to 5,600 homes over the period 2011 to 2031.
- 8.13 More general concerns were that the plan failed to meet objectively assessed housing needs and that the settlement strategy undermined its effectiveness. One respondent felt that the plan should not place so much reliance on the Gillingham Southern Extension to meet North Dorset's development needs and considered that additional sites should be allocated to provide flexibility and choice. Another felt that these shortcomings could be overcome by modifying a number of policies to allow development at Stalbridge. It was also considered that more clarity and certainty was required in relation to the rural area, including the District's villages.
- 8.14 The view was expressed that the allocation of sites and the revision of existing settlement boundaries should not be deferred until the Local Plan Part 2 as this would create uncertainty. It was felt that there was no justification for producing the Local Plan in two parts.
- 8.15 There was concern with the lack of clarity with regard to the progress with neighbourhood planning in North Dorset and with the potential impacts of neighbourhood development orders. A number of deletions and minor wording changes, mainly relating to local plans, neighbourhood planning and the use of the NPPF in decision-making, were also proposed to add clarity and focus to the introduction.

### North Dorset Context

- 8.16 A total of 2 representations were made in relation to the introductory section of Chapter 2 describing the North Dorset context.
- 8.17 One was the Highways Agency who suggested that reference should be made, and diagrams amended, to recognise that the A31, A35 and A303 are trunk roads.
- 8.18 The second raised concern that the SHMA was out-of-date and did not take into account fully the northern part of the district and the situation in neighbouring local planning authorities, having regard to the duty to co-operate.

### Issues and Challenges

- 8.19 A total of 4 representations were made in relation to the Issues and Challenges. The main issue related to the scale of proposed housing growth, which was not considered sufficient to meet the District's identified housing needs. On that basis it was considered that the Local Plan would fail to meet Objective 5, which seeks to deliver more housing, including affordable housing that better meets the diverse needs of the District.

### Vision for North Dorset

- 8.20 A total of 3 representations were made in relation to the Vision for North Dorset. The main issue raised related to housing numbers. It was considered that proposed growth would be too low and would not support the local economy and address the growing generational imbalance that was identified in the District. One person was of the opinion that too many new houses were proposed and that there is inadequate infrastructure.

### Objectives for the Local Plan Part 1

- 8.21 A total of 10 representations were made in relation to the objectives for the Local Plan Part 1. The main issue raised by the majority of those commenting was that the plan does not make sufficient housing provision to meet housing needs and economic objectives. This was considered to be inconsistent with paragraph 47 of the NPPF, which states that local planning authorities should significantly boost the supply of housing and take account of market signals and land prices and affordability. Increasing housing provision and extending the plan period to 2031 were recommended approaches and one person suggested that Stalbridge should be added as the 'fifth main town' with associated housing growth.
- 8.22 A second issue identified was that the plan does not provide a positive framework for development in the larger more sustainable settlements, especially those that have a range of facilities and services.

## Sustainable Development Strategy

### Policy 1 - Presumption in Favour of Sustainable Development

- 8.23 A total of 12 representations were made in relation to Policy 1 - Presumption in Favour of Sustainable Development. Some of the representations made in relation to Policy 1 raised issues about the plan as a whole.
- 8.24 Some respondents considered that many of the policies in the plan did not reflect the principles in Policy 1. The plan was considered to be not sufficiently flexible or adaptable to change and it was felt that the 'strategic' policies of the plan set out in chapters 1 -9 went beyond the 'aspirational and realistic' requirement set out at paragraph 154 of the NPPF.
- 8.25 One respondent commented that an up-to-date whole plan viability assessment should be undertaken including the testing of a range of policies relating to climate change, housing, infrastructure, design, amenity and parking.
- 8.26 A number of respondents felt that the supporting text to Policy 1 largely repeated the NPPF and that much of it was unnecessary. It was considered that the supporting text should be reduced to a short explanatory passage that refers to and quotes from the NPPF.
- 8.27 A specific concern with the policy and supporting text was that they did not fully reflect the provisions of footnote 9 to paragraph 14 of the NPPF, which establishes that development should be restricted in accordance with specific policies in the Framework.

### Policy 2 - Core Spatial Strategy

- 8.28 A total of 57 representations were made in relation to Policy 2 - Core Spatial Strategy and four main issues were identified, which were:
- Retaining settlement boundaries around the villages;
  - Providing a framework for growth for the larger more sustainable villages;
  - Reviewing settlement boundaries around the towns to include identified housing growth sites; and
  - Making provision for housing growth by area, rather than at specific towns.
- 8.29 Many of those commenting were of the opinion that to support thriving rural communities within the countryside, the settlement boundaries as shown in the 2003 Local Plan should be retained. It was felt that this would provide certainty that some growth would be delivered in Stalbridge and the District's villages until settlement boundaries were reviewed through the Local Plan Part 2 and/or a neighbourhood plan. A small number of representors express their concerns in relation to specific settlements, including Stalbridge and a number of the larger villages. Others were concerned that relying on neighbourhood planning would place a burden on parish councils (who do not have the time or resources to



produce a plan) and that in general local communities would not embrace neighbourhood planning.

- 8.30 A number of representors were concerned that the Core Spatial Strategy gave little strategic direction to local communities on what constituted a sustainable settlement and that the 'opt in' policy should be focused on those settlements that were considered to be more sustainable to support local services and enable provision of infrastructure. Again the size and level of facilities at Stalbridge were highlighted and it was suggested that the town should have its own policy and housing allocation. A number of villages were also suggested for growth including Winterborne Kingston and Milborne St. Andrew.
- 8.31 A majority of agents representing the key housing growth sites were of the opinion, based on recent examination decisions elsewhere in the country, that retaining existing settlement boundaries around the four main towns was unsound as they are out-of-date and their continued use for development management purposes would restrict opportunities for sustainable development. In their opinion this approach was contrary to national policy and the solution to provide a supply of specific deliverable sites to meet housing requirements was to review the settlement boundaries of the four main towns in Part 1 of the Plan.
- 8.32 Finally, there was concern that the core spatial strategy did not allow growth in villages located in the immediate hinterlands of the main towns. Respondents considered that these villages were not isolated but were sustainable as they relied on the range of services in the towns. On that basis they suggested that area-wide housing targets were required, rather than town specific targets.

## **Environment and Climate Change**

### **Policy 3 - Climate Change**

- 8.33 A total of 13 representations were made in relation to Policy 3 - Climate Change.
- 8.34 The main issue raised by developers related to the requirement to build developments to high standards of sustainable construction. It was suggested that national standards should be used and that the policy should not be overly prescriptive in the way these are achieved. It was suggested that the reference to allowable solutions should be removed in this context. Suggestions were that the application of standards should be based on viability and deliverability and should not be rigid. The requirement for energy statements to be submitted alongside development proposals also raised objection from developers.
- 8.35 Issues were raised about flood risk with one respondent suggesting that there should be absolutely no development in areas at risk from flooding. However, there were also suggestions that flood risk can be mitigated through design including planting and that development can help to reduce flood risk through the removal of features which exacerbate the issue, such as impermeable surfaces and canalised watercourses.

- 8.36 The Environment Agency suggested some amendments to the policy to clarify that flood risk already exists in some locations and does not always arise as a result of climate change. The Environment Agency also suggested that there were two omissions from the Local Plan; one relating to the protection of groundwater resources; the other to the redevelopment of contaminated brownfield land.
- 8.37 In terms of encouraging sustainable modes of travel, one suggestion was that the Manual for Streets should be referred to in relation to safe routes through / between development.
- 8.38 It was also suggested that the adverse impacts of large scale renewable energy proposals on landscape and on the AONBs needed to be addressed in this policy.

#### Policy 4 - The Natural Environment

- 8.39 A total of 33 representations were made in relation to Policy 4 - The Natural Environment.
- 8.40 It was suggested that the concept of 'landscape' was more holistic than the 'natural environment', encompassing geology, topography, wildlife, cultural associations, land use and the historic and built environment. It was considered that this wider definition was not reflected in the policy. It was also suggested that developments should be accompanied by Landscape and Visual Impact Assessments to ensure that landscape impact is taken into account in development proposals.
- 8.41 One of the key issues raised was the perceived need to strengthen the policy to give greater protection to AONBs. It was considered that development in AONBs should be treated differently, as set out in the NPPF, with the high quality environment shaping the way development is managed. The incremental degradation of the landscape in and around AONBs was raised as a concern and it was also suggested that developments within AONBs should be required to demonstrate how they comply with AONB management plans.
- 8.42 Respondents considered that the policy should reflect the NPPF, which indicates that major development in AONBs should only be permitted in exceptional circumstances and where it can be demonstrated that it is in the public interest. Respondents felt that it was the role of the developer to prove 'exceptional circumstances' and 'public interest'. It was also highlighted that development requirements within AONBs should first consider alternative sites, if harm is identified.
- 8.43 It was suggested that the policy (para 4.99) should not identify AONBs and SSSIs as the backbone of the Green Infrastructure network since the primary role of the network is to provide recreation and public access, which is not the purpose of AONBs or SSSIs. Five different responses suggested that the plan should encourage development which brings about gains in biodiversity where opportunities exist. The suggestion was that developers should seek to work with natural processes and the network of habitats/species to achieve biodiversity gain, linked with Green

Infrastructure. Objection was raised to the concept of biodiversity offsetting suggesting that the approach is flawed.

- 8.44 In relation to heathlands, it was suggested that reference needed to be made to the Heathlands Planning Framework rather than the joint DPD. It was also suggested that the approach to mitigating impacts from development on heathlands was too inflexible and that the approach should embrace ecosystem services.
- 8.45 There was a suggestion that the Strategy for Managing Nitrogen in Poole Harbour was inappropriate and that mitigation should be agreed on a site-by-site basis. However the approach in the Local Plan was supported by the Environment Agency. The Agency also suggested that the policy should specifically mention the need for native planting in landscaping schemes to discourage the use of non-native species, some of which may be invasive.
- 8.46 It was noted that the Local Plan does not mention the need to protect and enhance soils and to promote their sustainable use. There were also concerns that it fails to set out an approach in relation to best and most versatile agricultural land.
- 8.47 Whilst it is clear that the Important Open and Wooded Areas (IOWAs) identified in the 2003 Local Plan remain 'saved', there was concern that they were not mentioned in Policy 4. There was also considered to be a lack of clarity about whether it was intended to replace IOWAs by the new Local Green Space designation. It was also suggested that the application of Green Belt policy to Local Green Spaces, was unjustified.

### Policy 5 - The Historic Environment

- 8.48 A total of 5 representations were made in relation to Policy 5 - The Historic Environment.
- 8.49 Comments received suggested that the policy was too onerous and that a pragmatic position should be taken to protect and enhance the historic environment. However one other response suggested that the policy was 'legally weak' and should be strengthened.
- 8.50 The suggestion was that the impact of proposals should be assessed on a case by case basis and that visual impact should be taken into account.
- 8.51 In relation to Shaftesbury it was suggested that the town's heritage has opportunities for enhancement to promote tourism.

### Meeting Housing Needs

#### Policy 6 - Housing Distribution

- 8.52 A total of 44 representations were made in relation to Policy 6 - Housing Distribution.

- 8.53 A number of respondents felt that the plan period should be extended both in order to provide clarity on how longer term needs would be met and to have at least a 15-year time horizon on adoption. Whilst some respondents suggested an end date of 2029, most suggested 2031.
- 8.54 Many respondents considered that the proposed level of housing provision was too low. Some were concerned that the plan had not been positively prepared to meet the objectively assessed needs for housing and that it would not significantly boost housing supply, as sought by the NPPF. Others were concerned that the level of provision was below past delivery rates and lower than previous draft figures (including those in draft RSS). One respondent was concerned that a shortfall in housing provision could give rise to shortages in labour supply.
- 8.55 A number of different housing provision figures were suggested. One respondent suggested 6,000 homes for the period up to 2026 or 8,000 if the plan period was extended to 2031. A number of respondents suggested 5,600 homes, whereas others suggested 5,250 or 5,040. Higher levels of provision were sought in the event that the plan period was extended. It was also suggested that consideration should be given to higher levels of provision to take account of the very high levels of need for affordable housing in North Dorset.
- 8.56 Some respondents commented on the sub-area targets, suggesting that the housing provision figures for the sub-areas should be expressed as minima. Some respondents felt that any increase in the overall level of provision should be reflected in pro-rata adjustments to the figures for each sub-area, whereas others made more specific suggestions. Some felt that the 'broad locations' currently shown for housing should be formally allocated and that additional strategic allocations are required to take account of higher levels of housing need.
- 8.57 It was suggested that additional sites should be identified at Gillingham. Land at Windyridge Farm was specifically suggested for release in the short term (in addition to the proposed Strategic Site Allocation south of the town). It was also suggested that Stalbridge should be identified as the 'fifth main town' with a defined settlement boundary and a housing provision figure of 240 dwellings. Another response sought the provision of an additional 5-10 hectares of employment land at Blandford (either at Letton Park or Sunrise Business Park) to meet the need for jobs in the town arising from the proposed housing development.
- 8.58 A number of respondents expressed concern about the potential impacts of the proposed level of housing provision and its distribution. Some were concerned about the allocation of the majority of housing to the four main towns and the social and economic problems this may cause, particularly in relation to concentrations of affordable housing. Concerns in relation to Shaftesbury related to the threat of urban sprawl and the impacts of additional traffic on the C13 and Melbury Abbas. At Gillingham there were concerns about the over-concentration

of development in one location, that the proposals had not been prepared based on a strategy to meet infrastructure needs and that the policy for the SSA was not based on effective joint working on cross-boundary issues.

- 8.59 Whilst one respondent was concerned about the threat of development in the villages resulting from the policy, others were concerned that insufficient provision had been made for housing outside the four main towns. It was suggested that a more positive approach to development was required in Stalbridge and the villages. It was suggested that the settlement boundaries around villages from the 2003 Local Plan should be retained, rather than removed and a site between Newland Manor House and Tannery Court, Bournemouth Road, Charlton Marshall was suggested as a housing allocation.
- 8.60 Some respondents suggested that the town-based figures for affordable housing should be deleted from the policy as they were inconsistent with the criteria-based approach in Policy 8. Others felt that a single affordable housing target of 30% should be applied across the District. One respondent highlighted the need for self-build sites.
- 8.61 A number of respondents questioned the evidence underpinning the policy. Some felt that the issue of housing need should be re-examined, whilst others suggested that an updated SHMA was required. There was a concern that the 280 dpa figure over emphasised the effects of the recession on household formation rates. It was considered that, in the event that a higher level of need was identified, this should be met. Some respondents considered that the District was capable of delivering a higher level of growth, in view of the potential land supply identified in the SHLAA. Others questioned whether the Council continued to have a 5-year supply including a buffer of 5%.
- 8.62 In response to this policy concerns were expressed about the impacts of the proposed level of housing development on the historic environment at Blandford and one respondent suggested that the extent of the Stalbridge Conservation Area should be reviewed.

### Policy 7 - Delivering Homes

- 8.63 A total of 17 representations were made in relation to Policy 7 - Delivering Homes.
- 8.64 A number of respondents sought greater flexibility in the mix of homes (in terms of bedroom size) that should be provided on larger housing sites. It was considered that Policy 7 should be re-worded to allow a departure from the market housing mix sought on larger sites, not only due to local circumstances, but also on grounds of viability. Others felt that the policy should be more flexible to allow a mix on any large site that reflected local market conditions at the time of promoting the development or to take account of local needs. The view was also expressed that Policy 7 should not stipulate a precise market housing mix, but should indicate that

the mix sought should be based on an up-to-date assessment of need having regard to market demand.

- 8.65 Respondents also sought greater flexibility in relation to the mix of affordable homes, indicating that a departure from the housing mix sought should be permitted to take account of local needs.
- 8.66 A number of respondents felt that the reference to an emphasis on smaller (2 and 3 bedroom unit) market homes in the policy should be deleted.
- 8.67 The issue of housing for older people was raised and some respondents felt that the policy should be reworded to ensure that new development offers opportunities for older and more vulnerable people to live securely, independently and inclusively within communities. The provision of homes that incorporate flexible and sustainable design principles was also sought.
- 8.68 Viability was raised as an issue. There was a concern that the housing mixes being sought for market and affordable homes had not been viability tested. The implications of self-build being exempt from paying CIL was also raised as an issue that needed to be taken into account in any assessment of CIL viability.

### Policy 8 - Affordable Housing

- 8.69 A total of 19 representations were made in relation to Policy 8 - Affordable Housing
- 8.70 Some comments formed part of a wider concern about the Local Plan's approach to the assessment of housing need and its provision. There were concerns that the overall approach to housing was too inflexible and it was felt that Policy 8 compounded this overly restrictive approach. There was also concern that the full objectively assessed need for affordable housing had not been met and that evidence had not been provided to show that options to deliver more, or curtail provision of, affordable housing had been fully explored. Another concern was that the policy would lead to the concentration of social and affordable housing in one location giving rise to social problems, as has occurred in Shaftesbury.
- 8.71 A number of respondents expressed the view that the viability assessment from 2009 was out of date. Some suggested that this should be reviewed whilst others felt that a whole plan viability assessment was required.
- 8.72 There were a number of objections to the threshold of three units, above which affordable housing will be sought. Concerns were that it was set too low, stalling the development of small sites and that it was arbitrary.
- 8.73 Various views were expressed in relation to the target proportions of affordable housing being sought. One view was that these proportions should be seen as maxima, another was that the policy should state that the Council would seek to deliver these proportions informed by viability and deliverability considerations. One respondent felt that the 'two tier' approach was not sound and that 30% affordable should be sought across the District. Several responses were also made

in relation to the issue of viability. One view was that the policy should be explicit that a reduced level of affordable housing may be acceptable, if justified, by an open book viability assessment. Another view was that the policy should permit the use of an independent assessor, rather than just the District Valuer to resolve viability disputes. There was a concern that the requirement to provide affordable housing could discourage heritage-led regeneration in town centres, particularly Blandford and it was considered that heritage-led regeneration should not require viability assessments for the purpose of assessing liability to affordable housing.

- 8.74 Respondents felt there should be no requirement to review the level of affordable housing once it has been established in a planning obligation. Another view was that any review should allow the level of provision to be reduced as well as increased and where viability is in dispute, the costs of any assessment should be borne by the unsuccessful party. One respondent also felt that this principle should be applied to off-site contributions.
- 8.75 It was considered that the tenure split being sought for affordable housing was too inflexible to respond to changes in needs, new forms of affordable housing that might arise and viability considerations. It was felt that this should be considered on a site-by-site basis. It was also considered that there should be no requirement to provide social rented housing where people were unlikely to be able to afford 'affordable' rented properties. Other respondents felt, in relation to larger sites, that the policy should reflect the needs of older and disabled households and that the policy should require a percentage of housing to be for other forms of affordable housing, such as community self-build or land trusts.
- 8.76 In relation to delivery, it was considered that affordable housing in small groups was appropriate, but 'pepper-potting' was not. It was also felt that any Local Lettings Plan should be prepared in conjunction with and agreed by the developer of a site.

### Policy 9 - Rural Exception Affordable Housing

- 8.77 A total of 5 representations were made in relation to Policy 9 - Rural Exception Affordable Housing.
- 8.78 Respondents considered that the policy was too restrictive and felt that it would not deliver rural exception homes to support rural communities, as sought by national policy. Key concerns were: the restriction of schemes to 9 dwellings in total; the restriction of the market element to one third of the total; the restriction on the size of any market homes; and the onerous nature of the criteria for assessing local need and local connection.
- 8.79 One respondent felt that the supporting text that cross referred to other policies should be reflected in the policy itself. The Highways Agency had no objection to the policy, subject to its potential impacts being monitored.



## Policy 10 - Gypsies, Travellers and Travelling Showpeople

- 8.80 Two representations were made in relation to Policy 10 - Gypsies, Travellers and Travelling Showpeople.
- 8.81 One expressed the view that the policy should place a limit on the number of sites in the District and on the maximum number of occupants on any one site. This representor also considered that the policy should set out a strategy for replacement of the temporary Gypsy and Traveller site at Shaftesbury.
- 8.82 The other respondent considered that the text should be updated to refer to the most up-to-date Gypsy and Traveller Needs Assessment for Dorset.

## Supporting Economic Development

### Policy 11 – The Economy

- 8.83 A total of 13 representations were made in relation to Policy 11 - The Economy.
- 8.84 One respondent felt that the policy did not adequately show strategic level linkages between employment allocation, projected job creation and housing provision. It was also felt that there was insufficient clarity as to the nature of the need on existing key strategic employment sites, including that proposed as mixed-use urban extensions.
- 8.85 Some respondents felt that the policy should be more flexible to reflect changing business needs, including tourism, and that retail and residential uses should be allowed on employment sites. Others thought the policy to be insufficiently flexible as it sought to allocate employment land in perpetuity.
- 8.86 One respondent suggested that land adjoining Sunrise Business Park, Blandford Forum should be allocated for employment growth. Another suggested the mixed use development to the north-east of the town on land beyond the bypass, but outside the Cranborne Chase and West Wiltshire Downs AONB. Also in the context of Blandford, the policy was considered to be too rigid by not identifying town centres as places for mixed-use regeneration, whilst certain edge-of-town-centre locations had been identified as being appropriate for such uses.
- 8.87 There was a concern that the policy needed to be more positive and more imaginative in considering the needs of the rural economy, the tourism industry and homeworking. It was also considered that the potential harm from equine developments on the landscape should be recognised in Policy 11 to ensure consistency with Policy 4 – The Natural Environment.

### Policy 12 - Retail, Leisure and Other Commercial Developments

- 8.88 A total of 9 representations were made in relation to Policy 12 - Retail, Leisure & other Commercial Developments.



- 8.89 One respondent considered that focussing retail and leisure growth in the four main towns failed to meet the needs of the rural area and felt that this was not consistent with national policy that encourages development. There was also concern that there was no guidance on retail and town centre uses in the policy for Stalbridge, the villages and the rural parts of the District.
- 8.90 Another respondent thought that the definition of primary and secondary frontages is obsolete, as it discourages non-retail uses that could bring activity to town centres. There was also concern that the plan promotes mixed use regeneration in specific edge-of-town-centre locations, rather than in town centres. It was felt that there should be support for mixed use regeneration in town centres and more recognition of the value of the evening economy. One respondent specifically stated that the policy did not give sufficient support to Blandford Town Centre.
- 8.91 One respondent felt that there were limited options for regeneration in Gillingham centre and argued that alternative options to accommodate retail growth should be sought. It was suggested that this could take the form of a new supermarket to support Gillingham SSA. It was also suggested that the policy should be amended to allow retailing in neighbourhood centres without a requirement to test for town centre impacts.

## **Infrastructure**

### **Policy 13 - Grey Infrastructure**

- 8.92 A total of 32 representations were made in relation to Policy 13 – Grey Infrastructure.
- 8.93 General points were made that: the policy is too general and should be deleted; the policy lacks flexibility and is overly prescriptive; and the grey infrastructure needs of the District and the importance of freight transport are not fully reflected in the policy.
- 8.94 It was felt that road infrastructure needs were not fully reflected in the policy and that the District's roads would not be able to cope with the traffic from future development, particularly additional housing. One respondent also felt that liaison with adjoining counties is required to resolve traffic issues and another considered that the policy should make reference to the Dorset Rural Roads Protocol.
- 8.95 The Highways Agency suggested that the wording of the policy should be amended to ensure that any impacts of proposed development on the Strategic Road Network are taken into account and mitigation provided. The Agency also felt it may be pertinent to add reference to capacity enhancement to A303 junctions, if identified as being necessary by Transport Assessments.
- 8.96 A general point was made that the road network around Shaftesbury and Gillingham should be improved and one respondent considered that dualling the

A303 would be a better alternative to encouraging greater use of the A30, which is of inferior quality. One respondent questioned the need for the Enmore Green link to the A30 and felt that consideration should be given to using Lox Lane instead. Another respondent disagreed with the early implementation of the Enmore Green link ahead of improvements to the A350/C13 corridor. One respondent felt that a by-pass route to the west of Shaftesbury should be identified and shown on the Proposals Map.

- 8.97 The view was expressed that more parking is required at railway stations, especially Gillingham and one respondent considered that an additional railway station near Gillingham is required.
- 8.98 The general point was made that footpath/cycleway improvements should be promoted. One respondent also felt that cycle friendly routes should be established between Gillingham and Shaftesbury and that the Trailway should be extended from Sturminster Newton to Stalbridge.
- 8.99 Comments made in relation to utilities were that: the plan should seek to place power lines underground in protected landscapes; and the plan should include a development management policy for telecoms (detailed policy wording was provided).
- 8.100 One respondent felt that the policy should require drainage for all developments, including single dwellings and highways. It was felt that the supporting text should refer to site specific Flood Risk Assessments; provide more detail on SUDS; and clarify flood management responsibilities. It was also considered that the policy should make reference to wastewater.
- 8.101 One respondent felt that the plan should make provision for waste facilities and it was also considered that the waste hierarchy and the benefits of recycling construction/demolition waste should be highlighted in this section. It was noted that the wording in relation to the Dorset Waste Partnership requires updating to reflect current arrangements.
- 8.102 In relation to the public realm, it was felt that the policy about public art provision should be re-worded to be less prescriptive. It was also considered that paragraph 7.65 relating to art / landscaping of roundabouts should be deleted.

### Policy 14 - Social Infrastructure

- 8.103 A total of 7 representations were made in relation to Policy 14 - Social Infrastructure.
- 8.104 The main issue raised was that the policy addresses a range of matters that are not land-use related and/or cannot be controlled through the Local Plan. Concern was also raised that the policy duplicated settlement specific policies. On the basis of these concerns it was suggested that the policy should be deleted, or that a shorter, more general policy is required.

- 8.105 Respondents also considered that further assessment of the need and funding for additional healthcare provision in the main towns of Blandford, Gillingham and Shaftesbury was required.

### Policy 15 - Green Infrastructure

- 8.106 A total of 17 representations were made in relation to Policy 15 - Green Infrastructure.
- 8.107 Comments suggested that there was no need for a District-wide strategic approach to Green Infrastructure (GI), suggesting that GI should be assessed on a site-by-site basis with the strategic element being delivered at the town scale. However, another comment highlighted the importance of GI for biodiversity and ecology in rural areas as well as urban. One other suggestion was that GI should be dealt with as part of neighbourhood planning (NP) with assessments being undertaken before or during the NP process.
- 8.108 As the policy infers public access and recreation on the GI network, concern was raised that the inclusion of SACs, SPAs, SSSIs, AONB and other Nature Reserves within the network may harm their reasons for designation.
- 8.109 As the Plan seeks to use the Fields in Trust standards for provision of sports pitches, it was suggested that it would be useful for the policy to clearly identify which parts of the District are considered urban and which are considered rural.
- 8.110 Responses highlighted that in some instances, it may not be practical or desirable (in visual amenity terms) to provide allotments on development sites. To this end, it was suggested that a financial contribution to off-site provision would be a better approach. There was also an objection received to the policy's implication that developments would be required to make up any shortfall in allotment provision.
- 8.111 Several respondents argued that Policy 1.9 from the 2003 Local Plan relating to Important Open and Wooded Areas (IOWAs) should not continue to be 'saved'. The majority of these disagreed with its retention, suggesting that all identified IOWAs should be reviewed. There was disagreement with IOWAs potentially becoming Local Green Spaces, although one respondent suggested that, once reviewed, they should form part of the GI network.
- 8.112 The Environment Agency would like to see mention of the need for SuDS to be located outside floodplains.

### Market Towns and the Countryside

#### Policy 16 – Blandford

- 8.113 A total of 55 representations were made in relation to Policy 16 – Blandford.
- 8.114 A general comment was made that some information in the policy is out-of-date, partial and inaccurate. It was also noted that the boundary of the Cranborne Chase and West Wiltshire Downs AONB was incorrectly delineated on Figure 8.1.

- 8.115 It was argued that the housing requirements had been underestimated and it was suggested that provision should be made for 2,000 dwellings in Blandford. One respondent put forward a mixed-use development on land to the north east of the town to help meet this perceived need. Another respondent objected to the proposed phasing arguing that the policy should not seek the development of allocated sites and sites with planning permission before the development of greenfield sites.
- 8.116 Numerous representations included objections to housing growth at Crown Meadows, arguing that the site should be deleted from the Plan. A variety of reasons were given including:
- the impact on flora and fauna (especially bats);
  - the risk of fluvial flooding from the River Stour;
  - exacerbation of groundwater flooding;
  - exacerbation of traffic congestion in the town centre;
  - access issues;
  - impact on the Conservation Area and historic environment, in particular impact on the listed WW2 defences on the edge of the town and impact on the setting of the town and views from the bridge over the River Stour;
  - overloading of health and other services in Blandford;
  - the availability of an alternative site at the A354/A350 junction (i.e. the St Mary's Hill site);
  - artificial light pollution; and
  - the proposals are against community wishes as evidenced by the petition against Crown Meadows, which was submitted with nearly 6,000 signatures.
- 8.117 English Heritage expressed concern that the policy made no reference to Blandford's status as one of the finest Georgian towns in England and the contribution of its setting to that status. They were concerned that the preferred locations for development had been selected primarily on the basis of an assessment of accessibility and landscape impact and felt that equal weight should have been given to both the conservation of heritage assets and the protection of AONBs, when assessing the merits of alternative sites. In particular they were concerned that the selection of the site at Crown Meadows had not been fully justified and evidenced.
- 8.118 A few representations supported housing growth at Crown Meadows for the following reasons:
- it is in a sustainable location;
  - it relates to existing development;
  - it contains development within the line of the bypass and prevents urban sprawl; and

- the alternative site on the A350/A354 junction (i.e. the St Mary's Hill site) would have unacceptable landscape impacts.
- 8.119 The landowner also supported housing growth at Crown Meadows, suggesting that about 175 dwellings could be accommodated on site, rather than 150 assumed in the Local Plan.
- 8.120 A number of representations specifically expressed a preference for the alternative site at the A354/A350 junction (i.e. the St Mary's Hill site), rather than the Crown Meadows site, for a number of reasons including:
- traffic would not have to go through the town centre (and its one way system) but could access the bypass directly;
  - lack of flooding issues;
  - acceptable visual impact with landscaping mitigation;
  - acceptable access to town centre; and
  - no impact on wildlife.
- 8.121 A number of respondents argued that the site to the west of Blandford St Mary should be deleted from the plan. Issues raised included:
- impact on bats, which use the site for feeding;
  - concerns over traffic congestion and highway safety issues;
  - flooding;
  - impact on the existing livery yard and bed and breakfast businesses at Lower Bryanston Farm; and
  - the availability of an alternative at the A354/A350 junction (i.e. the St Mary's Hill site).
- 8.122 Some respondents felt that land west of Blandford St Mary is a sustainable site but were concerned that development on the upper part of site would be intrusive in the landscape. It was suggested that this part of the site should not be developed.
- 8.123 One respondent expressed the view that the Brewery site was a sustainable location for regeneration. Another argued that the policy should promote regeneration in the town centre, which should be linked to the town's green infrastructure network.
- 8.124 One respondent felt that the policy did not support economic growth and argued that land adjacent to Sunrise Business Park should be allocated for employment use.
- 8.125 Dorset County Council suggested that the policy should be more flexible in relation to meeting the future need for primary education in the town. It was suggested that the provision of a new two form entry primary school may be an alternative to the expansion of the existing Milldown Primary School.

## Policy 17 – Gillingham

- 8.126 A total of 32 representations were made in relation to Policy 17 – Gillingham.
- 8.127 Six respondents were concerned with infrastructure provision. It was considered that the policy did not address issues such as:
- transportation and the road network;
  - inadequate school provision;
  - the poor retail offer in the town centre and the need for town centre regeneration; and
  - the need for a waste disposal site and a burial ground.
- 8.128 It was also argued that the policy should secure a second road crossing of the railway and a replacement railway station.
- 8.129 Three respondents considered the approach to growth at Gillingham, including the Strategic Site Allocation (SSA), to be sound. However, one respondent felt that the approach to growth was unsound, as only one site had been allocated (i.e. the SSA).
- 8.130 Two respondents considered that the identified infrastructure requirements for the SSA had not been justified including: the allocation of employment land; a new school and additional GP surgery within the proposed local centre; a nursery school; allotments; and contributions to an off-site community hall. Another objector questioned whether the proposed link road through the SSA would benefit the town as a whole.
- 8.131 One respondent considered that regeneration in the Station Road area should have priority, whereas another thought this approach would draw retail out of the town centre. One respondent argued that further retail development should be allowed as part of the new local centre for the SSA, as the policy approach to the regeneration of the Station Road area had not been justified.
- 8.132 It was considered that other options for growth at Gillingham had not been adequately assessed and three other sites were suggested by respondents.
- Land at Peacemarsh was suggested as an alternative to the SSA which was considered to be better placed to meet the long term growth needs of the town;
  - land at Windyridge Farm was put forward as an additional site, recognising the significant growth potential of the town; and
  - land at Chantry Fields was also put forward as an additional site, which it was argued, could come forward at an early stage to meet the town's housing needs.
- 8.133 Twelve representors objected to the proposed development of about 50 dwellings at Bay. Respondents raised a number of issues including:
- the potential impacts from traffic generation onto nearby roads which were perceived to be inadequate;
  - the loss of the site as a green space;

- the landscape impact on the setting of Bay; and
- flooding from the Shreen Water.

8.134 One respondent argued that alternative non-employment uses (including housing) should be allowed on employment land at Neal's Yard Remedies.

### Policy 18 – Shaftesbury

8.135 A total of 27 representations were made in relation to Policy 18 - Shaftesbury.

8.136 The Shaftesbury, Melbury Abbas and Cann Neighbourhood Plan Group disagreed with the overall policy approach and considered that it failed to address existing problems relating to education, open spaces and community facilities in the town. The group suggested that a revised policy should be based on the 'socially sustainable' approach, which would see infrastructure brought forward before housing growth and the provision of additional areas for employment growth. The need to provide infrastructure before housing growth was also echoed by other respondents. The group argued that the Shaftesbury Outer Eastern by-pass corridor should be reviewed and considered that the county boundary with Wiltshire should not be a barrier to the provision of open space needed by the town.

8.137 The Neighbourhood Plan Group and other respondents identified a number of issues with the development to the east of the town, which is currently under construction. Respondents felt that growth in this area was not the best strategy, or was unsustainable, whereas others identified a need for integration and better links between the two. The Town Council felt that a school should be provided on the site.

8.138 Developers of all three areas proposed for housing growth supported the policy, although two of them also sought the allocation of their sites and changes to the current settlement boundary to include these sites. They suggested that these changes should be made in the Local Plan Part 1. The agent for the land to the south east of Wincombe Business Park also suggested a possible expansion of the site into Wiltshire.

8.139 Dorset County Council was concerned that the housing growth areas to the west of A350 and south east of Wincombe Business Park could be in conflict with the mineral safeguarding designation in the Bournemouth, Dorset and Poole Minerals Strategy.

8.140 The Town Council sought greater flexibility in the uses that may be permitted on the employment land proposed south of the A30 suggesting that a college and a budget hotel should be allowed in this area. The landowner supported the flexible approach in policy to uses on this site.

8.141 The Town Council considered that land between the town centre and Christy's Lane should be used just for leisure and community facilities.

- 8.142 One respondent suggested that improvements to Lox Lane should be undertaken to provide a link from the B3081 to the A30, rather than the construction of the entirely new Enmore Green Link, as proposed in the policy.

### Policy 19 - Sturminster Newton

- 8.143 A total of 10 representations were made in relation to Policy 19 - Sturminster Newton.
- 8.144 It was suggested that the broad locations for housing growth shown in the plan should be allocated and included within the town's settlement boundary. It was considered that these changes should be made in the Local Plan Part 1. However, another respondent suggested that development within existing settlement boundaries should be given preference over greenfield extensions. It was suggested that the policy should not require allotments to be provided on the proposed housing site at Elm Close.
- 8.145 A number of concerns were raised in relation to the land north of the former livestock market, including: traffic generation; impact on badgers; and surface water flooding. It was argued that since the William Barnes School is at capacity, it should be relocated to the land north of the former livestock market. It was also suggested that development on this site would generate a need for expanded retail provision, expanded GP services, more parking and greater access to the library and police.
- 8.146 The Environment Agency suggested that the wording of the policy should be strengthened, to clarify that climate change was not the only cause of flooding.

### Policy 20 - The Countryside

- 8.147 A total of 10 representations were made in relation to Policy 20 - The Countryside.
- 8.148 Most were concerned that the policy was too restrictive and did not support a prosperous rural economy or deliver a wide choice of high quality homes, as required by national policy. Many suggested that existing settlement boundaries should be retained until they are formally reviewed in the Local Plan Part 2 or through the neighbourhood planning process. A number of people were concerned that uncertainty would lead to a moratorium on growth in the rural areas as some parishes could take years to decide on their approach.
- 8.149 One respondent felt that the term 'local needs' was unclear and another felt that further guidance was required on the circumstances when isolated dwellings of exceptional quality or innovative design might be permitted in the countryside.

### Gillingham Southern Extension

#### Policy 21 - Gillingham Strategic Site Allocation

- 8.150 A total of 74 representations were made in relation to Policy 21 - Gillingham Strategic Site Allocation.



- 8.151 The Environment Agency, Natural England and the Highways Agency agreed that the policy is sound and English Heritage sought clarification on whether the development would cause harm to the setting of Kings Court Palace Scheduled Monument.
- 8.152 51 of the representations came from five landowners and developers with land interests in the SSA, who either responded individually or a part of the consortium. All five respondents supported growth at Gillingham and the allocation of the SSA, but a number of specific concerns were raised including:
- the overly prescriptive nature of the policy, which should be simplified to allow flexibility and adaptability (revised wording is provided);
  - the unnecessary reiteration of policy requirements elsewhere in the plan, relating to issues such as energy efficiency, affordable housing provision, and design principles;
  - insufficient justification for some infrastructure requirements, such as: the requirement for the principal street to be the main access to Brickfields Business Park; the provision of a primary school at the local centre; additional health care facilities; formal and informal open space provision; off-site non-vehicular links; the proposal to make Cole Street Lane a green route; and off-site contributions to schemes such as the enhancement of Gillingham Railway Station;
  - the requirement for the preferred location of the local centre to be used for employment uses in the event that the local centre was provided elsewhere;
  - the lack of flexibility in relation to the Master Plan Framework (MPF), which the policy indicates should be produced, consulted on, and agreed by the Council, prior to the Council supporting the submission of planning applications for the SSA; and
  - the adequacy of the level of retail specified for the local centre (i.e. more floorspace is required to make the local centre viable).
- 8.153 A number of specific requests were made in relation to the policy including that:
- an early phase at Ham Farm should be released in order to fund off-site transport infrastructure required early in the development;
  - the SSA should be exempt from CIL;
  - the housing and employment elements of the SSA should be the subject of separate allocations;
  - the policy should set out that its primary purpose is to meet the identified housing need; and
  - the housing numbers in the policy should not be seen as a cap, either in the period up to 2026 or overall.
- 8.154 Representations were received from developers promoting alternative or additional sites at Windyridge Farm and Chantry Fields. One landowner also sought a minor extension to the SSA on its south eastern edge on Cole Street Lane (adjacent to the Threshold Centre). All these respondents supported growth at

Gillingham. However, two of them were concerned that the significant infrastructure requirements for the SSA could result the slow delivery of housing, hence the need for additional / alternative sites.

- 8.155 No objection was raised from neighbouring South Somerset District Council although a nearby parish council was concerned about the wider impacts on the transport network. A number of respondents were concerned that the policy did not deal sufficiently with the existing deficit of infrastructure in the town including the existing and future traffic issues at the New Road / Shaftesbury Road junction.

## **Development Management Policies**

### **Policy 22 - Renewable and Low Carbon Energy**

- 8.156 A total of 7 representations were made in relation to Policy 22 - Renewable and Low Carbon Energy.
- 8.157 One respondent felt that the Plan should seek to meet ‘objectively assessed energy infrastructure requirements’ and that the policy should contain a positive strategy to promote renewable energy. It was noted that one of the main barriers to delivering renewables is the need for grid connection and associated infrastructure.
- 8.158 One respondent felt that some of the detail in the policy should be moved into the supporting text and another felt that consideration should be given to potential impacts on high grade agricultural land.
- 8.159 Several comments highlighted the need to consider impacts on the landscape and AONBs and one respondent felt that the policy did not pay sufficient attention to AONB management plans. The need for Landscape and Visual Impact Assessments (LVIAs) was highlighted, as was the need to consider alternative sites, if landscape harm has been identified.
- 8.160 The preparation of the North Dorset Landscape Sensitivity Assessment for wind and solar energy developments was supported and it was suggested that this should be undertaken as soon as practicable.

### **Policy 23 – Parking**

- 8.161 A total of 7 representations were made in relation to Policy 23 – Parking.
- 8.162 One respondent felt that rising car usage in rural areas should be reflected in parking standards with standards for houses in the countryside different from those for houses in the towns. It was also argued that reduced parking standards should be developed specifically for town centre redevelopment sites. One respondent felt that single garages should be limited to 6 metres x 3 metres and no larger.

### **Policy 24 – Design**

- 8.163 A total of 12 representations were made in relation to Policy 24 – Design.

- 8.164 A number of representations felt that the ‘design principles’ and ‘aspects of design’ identified in the policy duplicated ‘By Design’. It was suggested that these sections of the policy could be deleted and replaced by a reference to the ‘By Design’ document.
- 8.165 Responses suggested that engagement with local communities should be ‘encouraged’ rather than ‘required’. In addition, clarity was sought in the policy on the role of town and village design statements in the decision making process.
- 8.166 Comments relating to the requirements of the policy included: specifying the required length of a clothes drying line is too prescriptive; the requirement for cycle parking space duplicated Policy 23; it is not always possible or desirable to include all elements of landscaping in the public domain of a development; and the requirement for contemporary design to be ‘innovative and achieve very high standards’ is contrary to the NPPF.
- 8.167 In relation to the Design Quality Assessment, it was considered that the requirement to submit a detailed design rationale was a duplication of the statutory requirement to submit a Design and Access Statement. It was also considered that the process of reviewing design was unclear.

#### Policy 25 – Amenity

- 8.168 A total of 7 representations were made in relation to Policy 25 – Amenity.
- 8.169 A number of respondents felt that Policy 25 should be replaced by a more concise criteria-based policy (detailed wording was provided).

#### Policy 26 - Sites for Gypsies, Travellers and Travelling Showpeople

- 8.170 There was one representation in relation to Policy 26 - Sites for Gypsies, Travellers and Travelling Showpeople.
- 8.171 The Environment Agency felt that the policy should indicate that Gypsy and Traveller sites should not be located in areas at risk of flooding.

#### Policy 27 - Retention of Community Facilities

- 8.172 A total of 3 representations were made in relation to Policy 27 - Retention of Community Facilities.
- 8.173 It was suggested that a more flexible approach to the potential loss of a community facility should be taken in the four towns compared to the villages, where facilities are generally more limited. It was felt that the policy required greater clarity on how the importance of a facility to the local community would be judged in decision-making.

#### Policy 28 - Existing Dwellings in the Countryside

- 8.174 A total of 8 representations were made in relation to Policy 28 - Existing Dwellings in the Countryside.

- 8.175 Some respondents considered the policy to be too restrictive whilst others objected to specific restrictions, for example: those requiring extensions to be subservient to the existing dwelling; those requiring extensions to be in character with the existing dwelling; and those that do not permit the extension of residential curtilages.
- 8.176 Some criteria, such as those requiring annexes to be ancillary rather than separate dwellings, were considered to be unnecessary and parts of policy relating to extensions and ancillary buildings were considered to be inconsistent. The view was also expressed that the policy itself, not just the supporting text, should encourage contemporary design.

### Policy 29 - The Re-use of Existing Buildings in the Countryside

- 8.177 A total of 8 representations were made in relation to Policy 29 - The Re-use of Existing Buildings in the Countryside.
- 8.178 Some respondents considered the policy to be contrary to national policy as it was too restrictive by imposing conditions on: location (para d); the condition of the building (para e); replacement buildings (para c); and the extension of curtilages (para j). Others suggested changes to the policy: to guard against the impact of industrial uses on amenity and nature: and to acknowledge flood risk issues.

### Policy 30 - Existing Employment Sites in the Countryside

- 8.179 A total of 6 representations were made in relation to Policy 30 - Existing Employment Sites in the Countryside.
- 8.180 The main issues raised were that the policy was too restrictive and that existing business parks and employment sites should be allowed to expand into the countryside in accordance with paragraph 28 of the NPPF. Respondents argued that the policy is also contrary to paragraph 22 of NPPF and that it should be more flexible to allow for other uses where there is no reasonable prospect of a site being used for employment. It was considered that any potential impacts of expansion on countryside character and amenity could be controlled through amendments to criterion (d).

### Policy 31 - Tourist Accommodation in the Countryside

- 8.181 A total of 7 representations were made in relation to Policy 31 - Tourist Accommodation in the Countryside.
- 8.182 All representors who considered the policy unsound were of the opinion that the policy was overly restrictive and contrary to national policy. In particular they were concerned that the policy seeks to restrict tourist accommodation to those locations that are considered to be more sustainable and accessible by car. The policy was also considered to be inconsistent with paragraph 28 of the NPPF that supports the sustainable growth and expansion of all types of business and

enterprise in rural areas, both through conversion of existing buildings and well-designed new ones.

- 8.183 By restricting new buildings, it was considered that the policy conflicts with Policy 27, which seeks to retain community facilities, since new build tourist accommodation in the countryside could improve viability or ensure the continued use of a community facility.

### Policy 32 - Equine-related Developments in the Countryside

- 8.184 A total of 5 representations were made in relation to Policy 32 - Equine -related Developments in the Countryside.
- 8.185 Two main issues were raised. The first was that the policy was too restrictive and did not allow for well-designed new buildings in line with national policy. The second issue related to the cumulative impact of equine- related development on the character of the countryside. Although this impact is mentioned in the supporting text, it was felt that it should also be mentioned in the policy itself.

### Policy 33 - Occupational Dwellings in the Countryside

- 8.186 A total of 5 representations were made in relation to Policy 33 - Occupational Dwellings in the Countryside.
- 8.187 The main issues focus on the restrictive nature of the policy. Greater flexibility was sought in relation to temporary dwellings and a wider definition of 'rural workers' was also sought in order to support sustainable growth in the countryside. In contrast one representor suggested that the policy should be tightened in relation to the removal of occupancy conditions.

### Implementation

- 8.188 A total of 5 representations were made in relation to Implementation.
- 8.189 Natural England suggested that the quality of biodiversity sites should be monitored as well any losses or additions of sites.
- 8.190 One respondent suggested that the density of renewable energy developments should be monitored.
- 8.191 The Environment Agency suggested an alternative indicator to 'the number of planning applications approved contrary to their advice'. They felt that an indicator that sought to prevent new development from being located in areas at risk from fluvial flooding was better.

### Appendices

- 8.192 A total of 4 representations were made in relation to the Appendices.
- 8.193 It was pointed out that the AONB boundary is incorrectly shown on the inset maps from the 2003 Local Plan for Compton Abbas and Iwerne Minster. These insets

provide the bases for the maps showing the proposed removal of the settlement boundaries from these villages, as listed in Appendix B.

- 8.194 One respondent felt that the requirements for residential cycle parking provision, as set out in Appendix B, are unclear and another noted that the glossary of terms, in Appendix D, does not define the term 'regeneration'.

## 9. Consultation on ‘Focused Changes’ to the North Dorset Local Plan – 2011 to 2026 Part 1 in 2014

### Introduction

- 9.1 The period of publication for representations on the ‘focused changes’ to the North Dorset Local Plan 2011 to 2026 Part 1: Pre-submission document ran from Friday 01 August to Friday 15 September 2014.
- 9.2 This section explains the bodies and persons that were invited to make representations, outlines the ways in which they were invited to respond and sets out the number of representations made and a summary of the main issues raised in this consultation.

### Bodies and Persons Invited

#### Specific Consultation Bodies

- 9.3 Hard copies of the ‘focused changes’ were sent to all town and parish councils within the District, together with: the Statement of Representations Procedure; and a poster giving the exhibition date to be placed on parish notice boards. They were informed that the ‘focused changes’ documents would be available online and for inspection at the Council’s principal offices in Blandford.
- 9.4 Other ‘specific consultation bodies’ were sent the Statement of Representations Procedure and informed that the ‘focused changes’ documents would be available online and for inspection at the Council’s principal offices in Blandford.

#### General Consultation Bodies

- 9.5 All ‘general consultation bodies’ and any other people, organisations and businesses listed on the consultation database were sent the Statement of Representations Procedure and informed that the ‘focused changes’ documents would be available online and for inspection at the Council’s principal offices in Blandford.

### How Bodies and Persons were Invited to Make Representations

- 9.6 Specific consultation bodies, general consultation bodies and any other bodies, businesses or individuals on the Council’s Local Plan Part 1 consultation database were invited to respond to the ‘focused changes’:
- using an online survey form (Survey Monkey);

- by e-mail to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk); or
- by post to Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum DT11 7LL.

9.7 To assist respondents in making comments in relation to legal compliance and ‘soundness’, the Council prepared guidance notes, which were available online.

9.8 The Council also made information about the ‘focused changes’ available in a number of other ways to encourage engagement, as set out below.

### Dorsetforyou.com Website

9.9 A separate ‘focused changes’ page was created on the Planning Policy pages of the District Council’s website to enable consultees to access: the ‘focused changes’; the supplement to the SA Report; the addendum to the Habitats Regulations Assessment (HRA); and other associated documents.

### Libraries

9.10 Copies of: the ‘focused changes’; the supplement to the SA Report; the addendum to the HRA; the Statement of Representations Procedure; guidance notes for making representations; and a poster giving the date of the exhibition (to be placed on library notice boards) were sent to all the libraries in the District.

### Exhibitions

9.11 An exhibition manned by officers from the Council and the Portfolio Holder for Development was held at the Parish Centre, Blandford Forum between 10am and 6.30pm on 14 August 2014. A record of attendance was kept and 37 people attended the exhibitions.

### Press Article and Public Notice

9.12 A public notice was placed in the 01 November 2014 edition of the Blackmore Vale Magazine.

### Press Release

9.13 Press releases were produced and circulated on 02 and 21 July 2014 to the local media enabling them to make local people aware of the consultation, including:

- the Blackmore Vale Magazine;
- Forum Focus (covering the Blandford area);
- Gillingham Guide (covering the Gillingham area);
- Valley News (covering the Shaftesbury area);
- Unity.com Magazine (covering the Sturminster Newton area);
- the Talking Newspaper (for visually impaired people based in the Shaftesbury area);
- Dorset newsroom on dorsetforyou.com;
- This is Dorset website;



- BBC Dorset website;
- Meridian TV;
- BBC TV South;
- BBC Radio Solent; and
- the Breeze Radio.

## Number of Representations Made

9.14 126 representations (from 65 representors) relating to the ‘focused changes’ were received by the Council, including both objections and expressions of support.

9.15 The following table provides a breakdown of the 126 representations made in relation to each focused change.

Figure 9.1 – Number of Representations Made to the Focused Changes to the North Dorset Local Plan 2011 to 2026 Part 1: Pre-submission Document

Change Reference	Type of Change	Count
General	General non-specific comments about the focused changes	22
All	Comments that referred to focused changes as whole, rather than individual changes	10
Major Changes to the Pre-submission Document		
MAJ /16/1	Deletion of the west of Blandford Forum (Crown Meadows) broad location for housing growth and the informal open space associated with the development.	25
MAJ/16/2	Addition of housing on land to the south east of Blandford St Mary (St Mary’s Hill), and the identification of a safeguarded route for the Spetisbury and Charlton Marshall Bypass.	32
Changes to Blandford Inset Diagram		
INSET/16/1	Change to Inset Diagram to reflect Major Changes (MAJ/16/1 and MAJ/16/2).	2
Further Changes to the Proposals Map		
MAP/2/1	Deletion of the road layout proposed for the safeguarded route of the Spetisbury and Charlton Marshall Bypass.	2
Consequential Changes to the Pre-submission Document		
CON/6/1	Revision of supporting text to reflect major change	3
CON/6/2	Revision of supporting text to reflect major change	1
CON/6/3	Revision of supporting text to reflect major change	1
CON/6/4	Revision of supporting text to reflect major change	2
CON/6/5	Revision of supporting text to reflect major change	1

CON/6/6	Revision of supporting text to reflect major change	0
CON/6/7	Revision of supporting text to reflect major change	1
CON/6/8	Revision of policy to reflect major change	4
CON/16/1	Revision of supporting text to reflect major change	3
CON/16/2	Revision of supporting text to reflect major change	1
CON/16/3	Revision of supporting text to reflect major change	2
CON/16/4	Revision of supporting text to reflect major change	2
CON/16/5	Inclusion of new supporting text to reflect major change	5
CON/16/6	Deletion of supporting text to reflect major change	1
CON/16/7	Revision of Policy to reflect major change	3
CON/16/8	Minor change of policy numbering	1
CON/16/9	Minor change of policy numbering	0
CON/APPA/1	Revision of Appendix text to reflect major change	2
<b>TOTAL</b>		<b>126</b>

## Summary of the Main Issues Raised

9.16 A breakdown of the main issues raised in response to consultation on the ‘focused changes’ is set out below.

### General/All

9.17 Three bodies made general statements on the focused changes. The Environment Agency noted that the proposed changes were around Blandford and that they had no objection or further comment to make on this change. Purbeck District Council did not consider that there were any issues with the consultation materials from a cross-boundary/Duty to Co-operate perspective and Sport England reviewed the document and had no comment to make.

9.18 Of the remaining representations four were of the opinion that the plan was unsound. One developer disputed the housing numbers within the plan, was critical of the spatial approach to development in the District and raised concerns about the deliverability of the Gillingham Strategic Site Allocation (SSA). One resident suggested that the proposed housing growth to the West of Blandford St Mary should be removed as it had poor road access, no pavements for local people and school children and that it would destroy the feeding habitats for protected bats.

9.19 The remaining 15 representations found the plan (as amended by the focused changes) ‘sound’.

- 9.20 Ten representors considered ‘all’ of the focused changes to be sound. This included Blandford Town Council who supported the focused changes but were saddened to see the proposed community access to the Deer Park had been withdrawn.
- 9.21 English Heritage noted the Council's preparation of additional evidence and its application to inform a review of the distribution of future growth at Blandford. They stated that they had ‘no reason to consider the Plan is unsound as a consequence of the focussed changes proposed.’
- 9.22 Natural England had no specific comments regarding the proposed changes, but made a number of supportive comments. The Chairman of the Bryanston Park Preservation Group (BPPG) supported all the changes proposed and other local residents were in agreement.

### **Major Changes to the Pre-submission Document**

- 9.23 A total of 57 representations were received in response to the two major changes proposed to the Pre-submission Document.
- 9.24 In response to the deletion of the west of Blandford Forum (Crown Meadows) broad location for housing growth and the informal open space associated with the development (MAJ/16/1) 25 representations were made of which 17 (68%) considered the focus change would make the plan ‘sound’.
- 9.25 The Dorset Gardens Trust supported the removal of the Crown Meadows site from development locations. They were pleased that the relationship of the parklands to Bryanston House is recognised and that the historical linkage is now much clearer.
- 9.26 Many local residents supported the deletion of the Crown Meadows site as they had raised concerns about flooding, and impacts on wildlife and Blandford's historic setting. The Whitecliff Group Practice supported the changes as the Practice had concerns about access and traffic congestion if the site was developed.
- 9.27 Of the 6 representations that disagreed with the deletion of the site and considered MAJ/16/1 to be ‘unsound’ two were made by the Crown Estate, owners of the deleted site.
- 9.28 They objected to proposed change MAJ/16/1 as in their opinion it fails to meet the tests of soundness set out in NPPF, in particular it is not justified or consistent with national policy. The Crown Estate questions the conclusions of the Council’s heritage assessment arguing that it has not been adequately demonstrated that development at West Blandford (Crown Meadows) would result in change that would meet the ‘high test’ of substantial harm as set out in paragraph 132 of the NPPF.
- 9.29 They argue that the Council’s assessment is inconsistent in its approach in relation to the impact on the Conservation Area especially the impact on Sub-Area VIII: Stour Meadows. Whilst the baseline describes the area in which the site is located as an urban fringe, being one of medium sensitivity, the assessment incorrectly

considers it as comprising an area of open and undeveloped landscape and being highly sensitive.

- 9.30 The Crown Estate does not agree that substantial harm could be caused to the Conservation Area simply on the basis of the principle of development. In their view, it is within an area in which modern development is already present and the proposals offer significant potential for improvement. Given the current location and nature of development around the listed WWII structures and Bryanston Cottage, the Crown Estate does not agree with the Council's conclusions that development would result in significant harm to these assets. The Crown Estate's initial concept drawings have already sought to protect the setting of these assets for example through the provision of sight lines through from the pill box and maintaining an open aspect adjacent to the curtilage with Bryanston Cottage.
- 9.31 The Crown Estate suggests that the Council should have considered other reasonable alternatives and further design responses to mitigate any impact on these two assets. This could have included removing the arm of development which runs parallel to the anti-tank defence ditch thereby further protecting the setting of these assets.
- 9.32 A second agent representing a town centre land owner raised concern that the focused changes and deletion of the Crown Meadows site was contrary to national policy as it promotes a site (St Mary's Hill) that reinforces development in an area that is inaccessible to and 'severed' from the town centre. In his opinion, the focused changes reject a sustainable solution, which would help to make the town more self-contained. He was also concerned that the deletion of the site at Crown Meadows had been determined upon just one consideration - heritage. He believes that deleting the Crown Meadows site will have a negative impact on the viability and vitality of the town centre. In his view mitigation measures could overcome heritage concerns and he considers that both the Crown Meadows site (revised to mitigate impacts on heritage) and the St Mary's Hill site should be included in the plan.
- 9.33 The agent also argues that the focused changes have not assessed the impact on the town centre of re-focusing development and in particular on the potential harm that shifting new urban development from a site close to the town centre to a site beyond Tesco, which is 'an out-of-town site' severed from Blandford by a main road. The severance creates a barrier for pedestrians and cyclists to obtain safe access to the facilities (schools, shops etc.) within the town. Concern was expressed that all substantive housing allocations are now located in and beyond Blandford St Mary away from Blandford Forum and linked to the out-of-town retail area at Tesco, effectively creating a new and separate settlement.
- 9.34 Other landowners consider the focused changes as unsound as the consultation restricted itself to omitting the Crown Meadows site and replacing it with land to the west and south east of Blandford St Mary. They are of the opinion that a full

and meaningful consultation on the alternative options for growth at Blandford should have been undertaken. From the current consultation, it is unclear why growth to the south east of Blandford St Mary has been selected ahead of other options, particularly their client's land to the north and north-west of Blandford.

- 9.35 In particular they do not consider that the focused changes have adequately assessed the merits of the Blandford St Mary site in relation to other sites. To meet potential housing needs in Blandford and provide strategic guidance for the longer term growth of the town for the emerging Neighbourhood Plan and Site Allocations DPD, it is argued that consideration should be given to the inclusion of more than just one site.
- 9.36 The final two representations in relation to MAJ/16/1 consider the focused changes as unsound as they do not make sufficient provision for housing growth. In their opinion development of land to the south-east of Blandford St Mary (St Mary's Hill) should be expanded to include the area up to the track way known as Wards Drove. This would enhance the railway link back up to Blandford and would also ensure a more cohesive strategy to the identification of a safeguarded route for the Spetisbury and Charlton Marshall By-Pass.
- 9.37 One comment raised in relation to the deletion of the Crown Meadow site is also supported by many of the people objecting to the addition of housing on land to the south east of Blandford St Mary (St Mary's Hill), and that is that the allocation of the site south east of Blandford St Mary should enable the site west of Blandford St Mary to be re-examined and removed.
- 9.38 In total 32 representations were made in response to MAJ/16/2 the addition of housing on land to the south east of Blandford St Mary (St Mary's Hill), and the identification of a safeguarded route for the Spetisbury and Charlton Marshall Bypass. Representations were made by the Crown Estate, owners of the deleted Crown Meadows, and by the agent representing the St Mary's Hill site.
- 9.39 The Crown Estate re-iterated its criticism of the Council's heritage assessment and decision to delete the Crown Meadows site and suggested that mitigation and a comprehensive master plan/heritage/landscape assessment would enable the site to be retained. They also consider the focused changes to be unsound as the Council had not considered all reasonable alternatives including the option of a revised scheme on the site taking into consideration the heritage impacts.
- 9.40 The agent representing the land owner of the St Mary's Hill site welcomed the proposed changes ( MAJ/16/1 and MAJ/16/2) and the proposed changes to the Proposals Map Inset/16/1 but did suggest some minor wording changes in relation to describing the site.
- 9.41 Thirteen representors supported the addition of housing on land to the south east of Blandford St Mary (St Mary's Hill), and the identification of a safeguarded route for the Spetisbury and Charlton Marshall Bypass.

- 9.42 Seven respondents submitted variations of a standard letter in which their shared concerns were clear - they did not object to the inclusion of the St Mary's Hill site, but they considered that the land to the west of Blandford St Mary (Dorchester Hill and the Lower Bryanston Farm sites) should be taken out of the plan to compensate for its inclusion. The capacity of the St Mary's Hill site is greater than the deleted Crown Meadows site and so these respondents considered that the land to the west of Blandford St Mary should be deleted as access to it is poor (the road is too narrow to take extra traffic), it has no footpath and the junction at the bottom is dangerous. In comparison, they argue that the St Mary's Hill site has better road access and would be more suitable for those commuting to Bournemouth and Poole. In their shared opinion the site would also have less of an impact on feeding bats and by deleting the site it would remove the landscape impact of development on the adjacent AONB. It would also protect Blandford St Mary village from over development and local flood risk would be reduced.
- 9.43 Three representors re-iterated their concerns raised in relation to MAJ/16/1 namely: the provision for housing growth and extending the St Mary Hill site towards Wards Drove; the lack of assessment of other suitable sites; and the negative impact on the viability and vitality of the town centre. One couple made three suggestions to improve the plans for the St Mary's Hill site relating to highways issues.
- 9.44 The Cranborne Chase and West Wiltshire Downs AONB raised concern that the focused changes did not take account of the fact that the land at St Mary's Hill is in the setting of the AONB and therefore development proposals, including those associated with the safeguarded route for the Spetisbury and Charlton Marshall Bypass, will need to have special regard to conserving the rural vistas of that setting.

### **Blandford Inset Diagram**

- 9.45 There were two comments in relation to the Blandford Inset Diagram (INSET/16/1). The first follows on from the comments raised in response to MAJ/16/1 and MAJ/16/2 where the respondent suggested that both the Crown Meadow site, albeit revised to mitigate the heritage impacts, and the St Mary's Hill site should be retained. The second comment supported the change.

### **Further Changes to the Proposals Map**

- 9.46 Again two representations were made in response to the further changes to the proposals map (MAP/2/1). One suggested a minor editorial change to the image to clarify the focused change and the second supported the approach.

### **Consequential Changes to the Pre-submission Document**

- 9.47 In total there were 33 representations made in response to consequential changes to the Pre-submission Document - 13 representations were made to Policy 6 - Housing Distribution, 18 to Policy 16 –Blandford and 2 to the Appendices.

- 9.48 Of the 13 representations received in relation to Policy 6 – Housing Distribution all but one considered the focused changes to be unsound and that the District wide housing requirement should be increased. The only person supporting the consequential changes to Policy 6 is the landowner of the St Mary’s Hill.
- 9.49 18 representations were made in response to the consequential changes to Policy 16 – Blandford. Four representations supported the consequential changes.
- 9.50 Revision CON/16/1 makes amendments to the supporting text to reflect the major changes. This section summarises the key spatial aspects of the strategy and introduces new text to reflect the policy change. Those critical of this consequential change also consider the major changes to be unsound and have re-iterated their concerns in relation to impact on the town centre and the need for additional housing growth.
- 9.51 The Crown Estate states that some changes are being included to justify or fit the Council’s proposed amendments to the plan. Change reference CON/16/1 amends Policy 16 stating that housing will be located in accessible locations, particularly those close to the town centre and ‘other facilities’. In their view, this is clear evidence that the Council’s previous focus on town centre locations is being diminished through changes which seek to fit the revised plan. The policy was originally drafted to ensure that development was located to have good access to the town centre and to provide support to town centre businesses. The Crown Estate considers that revisions to Policy 16 dilute this policy objective and mean that the Local Plan has less potential to support town centre regeneration and will in fact support out of town retailing to the detriment of the town centre.
- 9.52 In response to consequential revisions CON/16/2, CON/16/3 and CON/16/4 a total of 5 representations were made. All considered the changes as unsound and re-iterated their previous concerns in relation to MAJ/16/1 and MAJ/16/2 that housing numbers needed to be increased and that the changes were detrimental to the town centre.
- 9.53 In CON/16/5 specific reference is made to the opportunity to re-establish the trailway on the line of the former railway and to the need to identify a safeguarded route for the Spetisbury and Charlton Marshall Bypass within the development. Of the 5 representations made two considered the change to be sound. Dorset County Council in particular supports the new wording but clarifies the current position in relation to the Local Transport Plan, funding and the need for the final route to be agreed in Part 2 of the Local Plan.
- 9.54 Those objecting to CON/16/5 include the landowner of the St Mary’s Hill site who suggests some minor re-wording to ensure that the supporting text reflects the policy wording. Others are seeking changes to the wording to improve connectivity with the town centre or are suggesting specific routes.



- 9.55 Only one comment was made in response to CON/16/6 that deletes the text relating to additional open space at Crown Meadows in association with housing growth. The representor suggests that the proposal should be retained as this area provides foraging habitat for the Greater Horseshoe Bat colony at Bryanston SSSI and that the informal recreation space would reduce pressure on other high value wildlife sites. It is argued that these needs exist and the open space should not be dependent on the associated land being allocated for housing. The representor considered that the open space area is readily accessible to Blandford Forum and contributes to the objective of self-containment.
- 9.56 Consequential change CON/16/7 has been made to reflect the higher capacity of the alternative location for housing growth in MAJ/16/2. A total of 3 representations were made. Although Dorset County Council supported this change they raised concern in relation to the impact this will have on the library service that is already undersized. The impact on infrastructure is also a concern of the Whitecliff Group Practice who would like to have further discussions with the Council regarding how health needs of the local population will be met in the future.
- 9.57 One comment was raised in response to consequential change CON/16/8. This was critical of housing provision although the revisions themselves were amendments to the numbering of the text only.
- 9.58 Finally two representations were received in response to the proposed consequential change to Appendix A that reflects the revised policy approach in MAJ/16/2. Dorset County Council supports the proposed new wording whilst the second comment suggests an alternative wording.



## 10. Conclusion

- 10.1 This Submission Statement provides an overview of the consultation undertaken to support the production of the North Dorset Local Plan Part 1 and has been prepared to fulfil the Council's obligations under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 10.2 More detail on the consultation undertaken by the Council is contained within:
- the Duty Co-operate Statement, which reports on how the Council has worked collaboratively with other bodies to ensure that strategic priorities are co-ordinated across administrative boundaries;
  - the Sustainability Appraisal Report. This examines how the results of consultation on options and alternatives have informed the development of policy, which has then been tested against a set of sustainability objectives; and
  - the Background Papers, which summarise the technical evidence and show how this, together with the results of consultation, have informed policy development.
- 10.3 For each of the main stages of consultation discussed in this Submission Statement, the Council has prepared a detailed report (or reports) all of which are available on the Council's website. These reports provide a much more detailed discussion of: the main issues raised; and how these issues have been taken into account in subsequent stages of plan preparation.
- 10.4 To obtain a full picture of the consultation undertaken by the Council during the preparation of the Local Plan Part 1, this Submission Statement should be read in conjunction with the other documents listed above.
- 10.5 In conclusion, the Council considers that early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses has been undertaken. A wide selection of the community has been proactively engaged at different stages of plan production and, as far as possible, the Local Plan Part 1 reflects a collective vision and a set of agreed priorities for the sustainable development of the area, as sought by national policy<sup>19</sup>.

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<sup>19</sup> Paragraph 155, National Planning Policy Framework, DCLG (March 2012)