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Representation # _____



North Dorset Local Plan Part 1

Pre-submission Consultation 29 November 2013 to 24 January 2014

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012)

Response Form

For each representation you wish to make a separate response form will need to be completed.

This is a formal consultation on the legal compliance and soundness of the Local Plan before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at www.dorsetforyou.com/planning/north-dorset/planning-policy

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Alternatively you can submit your comments online at: www.surveymonkey.com/s/NorthDorsetLocalPlan

Deadline: 5pm on 24 January 2014. Representations received after this time may not be accepted.

Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form on the pre-submission North Dorset Local Plan Part 1 you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title	Mr	Mr
First Name	Barry	Jonathan
Last Name	Pliskin	Kamm
Job Title(<i>where relevant</i>)	Director	
Organisation (<i>where relevant</i>)	Clemdell Ltd	Jonathan Kamm Consultancy
Address	[REDACTED]	2 Marsh Court Farm Romsey Road Stockbridge, Hampshire
Postcode	BH7 6DY	SO20 6DF
Tel. No.		01264 810442
Email Address		KammJP@aol.com

Part B – Representation

The North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representations to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which documents have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the documents it is likely that your comments or objections relate to the **soundness** of the plans and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at one of the consultation exhibitions or call 01258 484201.

1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1 (please complete Questions 2 to 9)
- Final Sustainability Appraisal Report (please complete Questions 2 and 10)
- Habitats Regulations Assessment (please complete Questions 2 and 10)

2. Please state the part of that document you are commenting on:

Paragraph numbers: C1; C6; C27	Policy: 23 PARKING & APPX C	Policies map:
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3. Do you consider the Local Plan to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

- Yes No

4. Do you consider the Local Plan to be 'sound'?

- Yes No

5. If you consider the Local Plan to be unsound please specify your reason(s) by ticking the box(es) that apply below

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy

6. Please give specific details of why you consider the Local Plan has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be **unsound**. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

Please see the separate sheets **REP P23** attached

Continue on a separate sheet if necessary

7. **What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound?** It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the separate sheets **REP P23** attached

8. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No, I do not wish to participate in the oral examination

Yes, I would like to participate in the oral examination

9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary. Please note that the Inspector determines who is heard at the examination.

Clemdell Ltd is a local company that has various properties in Blandford Forum town centre – including national and local retailers and residential properties.
It has a keen and active interest in seeing that national policies for supporting sustainable town centres are implemented in Blandford Forum.
By way, inter alia, of positive investment Clemdell wishes to pro-actively participate in ensuring that town centre regeneration takes place within, and not on the edge of, the town centre.
That will support the viability of its commercial tenants
Clemdell's participation in the Hearing could, therefore, assist the Inspector in determining the outcome of the Examination and in drawing together the range of issues affecting the town centre, spread throughout the Plan.

10. Please outline your comments on the Final Sustainability Appraisal Report or Habitats Regulations Assessment. Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

Not applicable

11. Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.

- That the Local Plan Part 1 has been submitted for independent examination
- The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1
- The adoption of the Local Plan Part 1.

Signature: 

Date: 23 January 2014

If submitting the form electronically, no signature is required.

**CLEMDLL LIMITED REPRESENTATIONS ON
POLICY 23 PARKING & APPENDIX C**

6. Please give specific details of why you consider the Local Plan has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

This representation makes objection to some aspects of Policy 23 and Appendix C, in the North Dorset Local Plan - 2011 to 2026 Part 1 Pre-submission Document ("the Local Plan"), where the Policy and the Appendix appear unsound.

The Policy and Appendix refer to parking. The Local Plan statement, at paragraph 10.45, regarding parking standards that "some flexibility is needed, nevertheless, to allow a different level of provision on individual sites where there is sound justification based on local circumstances" is welcome.

Therefore Table C6 is surprising applying, as it does, the same parking standards to town centre flats as to out-of town-houses. That is not supporting sustainability.

Also surprisingly, the County-wide calculator (referenced at footnote 373 of the Local Plan) does not recognise any distinction for town-centre residential development in North Dorset. This is in contradistinction to the Local Plan which identifies that the four main towns, at least, each have an identifiable town centre. The County-wide calculator applies lower town-centre parking standards for smaller towns with smaller centres in other Districts in the County.

Albeit that the Local Plan does not at present set out policies to encourage town centre residential development that omission is contrary to the NPPF paragraph 23 and the subject of separate submissions. Town-centre regeneration, supported as a vision and objective in the Local Plan, will involve the creation of additional dwellings, for example by conversion within heritage assets, to support the vitality of the town-centres and the viability of "heritage-led regeneration, particularly in the four main towns". (paragraph 4.163)

Applying out-of-town parking standards to sensitive town-centre regeneration sites is inappropriate. Reduced and appropriate town-centre levels of additional parking should be reflected in Policy and not left to subjective flexibility.

7. What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound? It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is considered that the changes underlined are appropriate & necessary:

POLICY 23: PARKING

Development will be permitted provided that:

- a provision for residential and non-residential vehicle and cycle parking is made in accordance with the Council's parking standards, ~~unless a different level of provision can be justified by local or site-specific circumstances~~; and
- b provision for motorcycle parking is made to a level appropriate for the size and location of the development, having regard to the council's standards and guidance; and
- c provision for parking for people with impaired mobility is made in accordance with the Council's standards and guidance.

unless a different level of provision can be justified by policy, local or site-specific requirements and town-centre circumstances.

C.1 This appendix provides guidance on the provision of parking associated with new development in respect of cars, motorcycles and bicycles as well as provision for people with impaired mobility. It supports policies in the Local Plan Part 1 which aim to promote more sustainable transport in North Dorset and should be read in conjunction with Policy 23 - Parking, which relates parking requirements to the acceptability or otherwise of development proposals. The levels of parking to be provided reflect the need to promote sustainable travel choices and reduce reliance on the private car. This appendix reflects and draws from: existing policy; national and other guidance; and examples of best practice. Some flexibility is needed, nevertheless, to allow a different level of provision on individual sites where there is sound justification based on local circumstances

C.6 There is unlikely to be sufficient land on smaller developments to enable the effective use of allocated and unallocated spaces so the standards for allocated spaces shown in Figure A.1 will be applied to developments of 5 dwellings or fewer that are not located in the town centres in the District:

C.27 Car parking for non-residential uses should be provided to the extent set out in Figure A3 (which also indicates, where appropriate, the level of HGV and cycle parking which will be expected except for developments in the town centres where provision will be justified by policy, local or site-specific requirements and town-centre circumstances.

Footnote 373: The various Tables used in the calculations are contained in Volume 1 of the Dorset Residential Car Parking Study except for developments in the town centres where provision will be justified by policy, local or site-specific requirements and town-centre circumstances.