

SHF/CIR.P.0890

23rd January 2014

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

Dear Sir

North Dorset Local Plan Part 1 Pre-Submission Consultation

Pegasus Group has been instructed by Persimmon Homes South West to submit representations in response to the consultation on the Pre-Submission Local Plan 2011 - 2026. In summary, our comments address the plan period, the objectively assessed housing need and the overall housing provision, the delivery and growth at Gillingham and representations to support a complimentary site to the strategy for Gillingham which will assist in the delivery of growth to the town. I enclose 13 representations forms.

Should you have any queries or would like to discuss the representations further please do not hesitate to contact me.

Yours faithfully









SARAH HAMILTON-FOYN
Director

Email: sarah.hamilton-foyn@pegasuspg.co.uk

Enc

cc Shaun Pettitt, Persimmon Homes South West

- KEY**
-  POTENTIAL RESIDENTIAL DEVELOPMENT AREA - 12.2Ha (427 units @ 35DPH, 488 units @ 40DPH)
 -  POTENTIAL PHASING OF DEVELOPMENT
 -  OPPORTUNITY FOR 'ROYAL FOREST PARK'
 -  OPPORTUNITY FOR NEW/RELOCATED SPORTS PITCH
 -  EXISTING PITCHES/PLAYING FIELDS
 -  EXISTING PEDESTRIAN LINKS TO TOWN CENTRE



WINDYRIDGE FARM, GILLINGHAM - CONCEPT PHASING PLAN

I T 01285 641717 | F 01285 642348 | www.pegasuspg.co.uk | Team: SHF/CJH | Date: DECEMBER 2012 | Scale: 1:5000 @ A3 | drwg: P.0890_01 | Client: Persimmon Homes

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For office use only

Batch number: _____ Received: _____
Representor ID # _____ Ack: _____
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	Mrs
First Name	Shaun	Sarah
Last Name	Pettitt	Hamilton-Foyn
Job Title(<i>where relevant</i>)	Strategic Land Manager	Director
Organisation (<i>where relevant</i>)	Persimmon Homes (South West)	Pegasus Group
Address		Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire,
Postcode		GL7 1RT
Tel. No.		01285 641717
Email Address		Sarah.hamilton-foyn@pegasuspg.co.uk

Part B – Representation

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

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

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

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

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

1. Please select which document you are commenting on:

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

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

Paragraph number: Para 1.7	Policy/site:	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.

It is noted that the Council remain intent to produce more than one document which will comprise the Local Plan i.e. Part 1 which addresses the overall housing provision and strategy and Part 2 which is in effect a Site Allocations DPD which will be a subsequent document which will allocate specific sites for housing and employment growth in the main towns and will included a review of the land allocations and settlement boundaries.

There does not appear to be any justification for this approach.

Persimmon Homes objects to this approach and considers that the emphasis in the NPPF is that each local planning authority should produce a Local Plan for its area (paragraph 153 of the NPPF) which can be reviewed in whole or in part to respond to changing circumstances. Any additional development plan documents should only be prepared where clearly justified. It is therefore clear from the NPPF that the emphasis is on one single Local Plan document and the use of any other documents only when justified.

The National Planning Practice Guidance also supports this approach and states that:

"The National Planning Policy Framework makes clear that the Government's preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas). While additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so."

This approach does not address the requirements in the NPPF in terms of Para 47 which states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing Including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

It is also noted that the Local Plan only allocates the urban extension to south of Gillingham, as other sites are to come forward through the site allocations DPD or the Neighbourhood Plan process. This would appear to be inconsistent with the NPPF paras 47 and also para 157 which states that Local Plans should allocate sites to promote development and flexible use of land , bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.

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.

In order for the Plan to be sound, a justification for the preparation of the Plan in two Parts should be included in the Introduction. Furthermore if this approach is to be pursued consideration should be given to including other allocations in the Plan to provide certainty and clarity on the scale, form and quantum of development to meet housing needs in the plan period (see representations submitted to Policy 21 and para 1.9).

Continue on a separate sheet if necessary

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

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

Yes, I would like to participate in the oral examination

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

Persimmon Homes South West has concerns about the soundness of the plan in respect of the plan period and the housing requirement and the deliverability of the urban extension to Gillingham.

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

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

That the Local Plan Part 1 has been submitted for independent examination

The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1

The adoption of the Local Plan Part 1.

Signature: _____

Date: 23rd January 2014

If submitting the form electronically, no signature is required.