

23rd January 2014

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Our Ref: WIDV6528/MP
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Dear Sir

COMMENTS ON THE NORTH DORSET LOCAL PLAN – 2011 TO 2026 PART 1 SUBMITTED ON BEHALF OF THE COATS AND DAVIS FAMILY AT BLANDFORD FORUM

The following comments on the North Dorset Local Plan 2011 to 2026 Part 1 are made on behalf of the Coats and Davis family's who own land on the northeast of Blandford, outside the bypass. The comments respond to the specific questions raised in the consultation document, with additional comments in relation to the proposed approach to growth at Blandford.

This is to be read in conjunction with the letter dated December 2012 which we have also attached.

Policy 11 and Policy 30 need to be made consistent to allow for the extension of all sites in the countryside. We specifically comment that Policy 30 should be redrafted to allow for extensions to established business parks and industrial estates in order to provide opportunities for existing businesses to expand, without the need to relocate, and possibly to cater for other businesses looking to locate to the area. This would help to ensure a flexible approach to employment land provision to meet varying business needs over the plan period.

Blandford is one of the four main towns that Policy 2: Core Spatial Strategy focuses development on. As such, an extended industrial site (mixed use), adjacent to the built form of the existing industrial estate, in this very accessible location has many benefits. It has good road links, is on the route of a bus service, it is close to population centres and it has the ability to service a wide area in terms of customers.

Summary

In summary, it is considered that land to the northeast of Blandford can provide a sustainable location for mixed-use development. A suitable access strategy can be provided to serve the development, and in conjunction with the development proposals, there is potential to deliver a package of measures that would improve sustainable transport modes within Blandford Forum. Land to the northeast of Blandford Forum beyond the by pass but outside the AONB should be identified in the emerging Local Plan as one of the locations for meeting Blandford's future housing needs.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Yours sincerely

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21 December 2012

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Dear Sir

NEW PLAN FOR NORTH DORSET – PUBLIC CONSULTATION ON KEY ISSUES

The following comments are made on behalf of the Davis and Coats families in response to the questions raised in the New Plan for North Dorset Key Issues Consultation. The comments respond to the specific questions raised in the consultation document, with additional comments in relation to the proposed approach to growth at Blandford.

Spatial Approach to Growth

Question 2: Do you agree that the Council should concentrate the vast majority of housing growth at the District's four 'main towns', with specific sites (except the SSA at Gillingham) being taken forward primarily through a Site Allocations DPD?

Yes, the market towns represent the most sustainable locations for growth in North Dorset as such should be the main focus for housing development.

Provision of housing

Question 5: Do you agree that the Council should set a revised District-wide housing provision figure of 4,200 homes for the period from 2011 to 2026?

No, the revised District-wide housing provision figure of 4,200 homes for the period 2011 to 2026 (280 homes per annum) represents a substantial drop from the housing provision of 350 dwellings per annum proposed in the March 2010 draft Core Strategy, which would deliver 5,250 dwellings over the same period.

The revised housing provision figure is significantly lower than the average build rate for North Dorset between 2000 and 2011, which has averaged 370 dwellings per annum. The proposed level of housing would not deliver the significant boost to the supply of housing that is sought by the National Planning Policy Framework (NPPF).

The revised housing figure is based on the household change projections contained in the 2011 Strategic Housing Market Assessment Update (SHMA). This is a projection forward of past demographic trends; such forecasts have varied widely over recent years and have limitations as an indicator of future housing

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requirement. It should be considered alongside other indicators of housing need and demand such as affordability and economic/employment growth targets.

The SHMA indicates a need for affordable housing in North Dorset of 387 dwellings per annum. The revised housing provision would fall well short of meeting this need, leaving a significant gap in affordable housing provision that will not be met and risks intensifying problems such as overcrowding, sub-standard housing, social exclusion, homelessness and out-migration of younger people and families.

The SHMA household forecasts make no attempt to reconcile housing provision with economic growth and employment aspirations. This represents a significant shortcoming in the evidence base; the link between economic growth and housing provision should not be ignored. A particular feature of the household forecasts for North Dorset is the forecast decline in the working age population by around 7%, combined with a significant increase in those aged over 60 (a 30% increase in 60-74 age band and an 88% increase in the 75+ age group), as indicated in figures 7.7 and 7.8 of the SHMA. This raises the risk that the area may face a labour shortage which would have implications for economic growth and travel patterns, and highlights the need for more appropriately size market and affordable dwellings.

Although paragraph 2.9 of the consultation document refers to work being undertaken to produce a memorandum of understanding on joint working, however to date there is no evidence to demonstrate that the housing provision in the plan has been prepared with due regard to the duty to cooperate and that the overall housing requirements of the HMA and any deficit from adjoining HMAs will be met.

A further concern is that due to the delay in progressing the plan, and the likely timescales for delivering a Site Allocations DPD, the plan period to 2026 is insufficiently forward looking. Assuming the plan is adopted in 2014, it would only provide a 12 year time horizon, contrary to the guidance provided in the NPPF. Any subsequent Site Allocations Document would be operating to an even shorter time horizon, limiting the ability of the plan to identify specific, developable sites for years 6-10 and 10-15.

In summary, the revised housing provision only reflects one aspect of the 2011 SHMA Update, and does not take into account wider NPPF objectives of boosting substantially the supply of housing, and meeting the full, objectively assessed needs for market and affordable housing. Consideration should be given to retaining the housing provision of 350 dwellings per annum identified in the Draft Core Strategy, and extending the time period of the Plan to 2031 in order to ensure longer term requirements are met.

Question 6: Do you agree with the proposed revised distribution of housing development in the District from 2011 to 2026?

No, as set out in our response to question 5, we do not agree with the proposed reduction in the overall level of housing provision. In particular we do not agree with the reduction in housing provision proposed for Blandford from 1,500 in the 2010 Draft Core Strategy to 960 in the Key Issues consultation document.

The level of housing provision proposed for Blandford does not reflect the scale of the settlement or its role as the main service centre in the southern part of the District. Blandford is the largest of the District's market towns and has a comprehensive range of services and facilities. It is ranked overall first alongside Gillingham in the Settlement Ranking included in the Council's Assessment of Settlements (May 2007).

Blandford has a significant need for both affordable and open market housing that would not be met by the housing distribution proposed in Key Issues consultation document. The Community Strategic Plan revised draft action plan for the Blandford (DT11) area, *Shaping the Future* (DT11 Forum Community Partnership, 2011), recognises that the lack of affordable housing is possibly one of the greatest challenges facing the long term sustainability of communities in the Blandford area.

Although the 2011 SHMA Update does not provide a breakdown of housing needs within the District, the original Housing Needs survey for North Dorset (Fordham Research, June 2008) does provide a geographical breakdown. This demonstrates that Blandford has by far the highest housing need in the



District, with the number of households in unsuitable housing and the numbers of households in current and future need approximately 3 times higher than at Gillingham and Shaftesbury.

The North and north East Dorset Transport Study (Buro Happold, 2010) indicates that Blandford, Gillingham and Shaftesbury are comparable and relatively self contained in terms of commuting patterns, and are significantly more self contained than the market towns in East Dorset.

As demonstrated by the Council's Strategic Housing Land Availability Assessment, as well as the Transport and Access Appraisal and the Landscape and Visual Appraisal reports submitted in our previous consultation responses, there are suitable sites available within and adjoining the town to support growth a higher level of growth than currently proposed at Blandford in a sustainable manner in line with national and regional guidance.

In summary, the proposed revised distribution of housing does not reflect local housing needs or the availability of suitable land to support growth in a sustainable manner and the potential to improve self containment at Blandford. The distribution of housing should therefore be amended to provide for approximately 2,000 dwellings at Blandford.

Employment

Question 7: Do you agree there is no need to identify further employment sites in North Dorset in addition to those that are already allocated or have planning permission?

Provision should be made to allow for extensions to established business parks and industrial estates in order to provide opportunities for existing businesses to expand without the need to re-locate, and to attract new businesses looking to locate to the area. This would help to ensure a flexible approach to employment land provision to meet changing business needs over the plan period.

In particular, Blandford has the highest proportion of working age population of the District's market towns and plays a key role in the economic sustainability of the area and we would highlight the opportunity for the emerging plan to make provision for a small scale extension of the Sunrise Business Park.

Blandford

Although we do not have any specific comments in response to questions 20 and 21 regarding land to the west of Blandford, we note that there has been significant local opposition to the Council's proposed approach to growth at Blandford.

The Localism agenda and the NPPF place significant weight on the need for local plans to reflect the vision and aspirations of local communities, including early and meaningful engagement and collaboration with neighbourhoods and local organisations. We do not consider that the approach to Blandford set out in the Key Issues consultation document reflects local community aspirations. In particular we would highlight Blandford Town Council's response to the 2010 Core Strategy Consultation document, which recognises the need to plan for the longer term growth of Blandford, and supports the identification of land to the north east of the bypass between the A354 and Black Lane.

We consider that the emerging Core Strategy has prematurely dismissed the option of growth to the north-east of the town beyond the bypass, discounting one of only a limited number of unconstrained sites around the town (as identified in the SHLAA), leaving the Core Strategy with little flexibility in relation to future housing provision at Blandford, and with insufficient housing provision to meet identified needs (as set out in our response to questions 5 and 6).

The reasons for not taking this option forward were cited at paragraph 2.8.10 of the 2010 draft Core Strategy and accessibility to services and facilities, and landscape impact. These issues have been addressed in the detailed evidence base submitted by Savills in response to the 2010 consultation, including a Landscape and



Visual Report and Indicative Masterplan, and Transport and Access Appraisal which demonstrate the capacity of land to the north/northeast of Blandford to accommodate growth in a sustainable manner.

This location offers the opportunity for a mixed use development with significant amounts of open space for the existing and new residents of Blandford Forum. These include sports pitches, allotments, play areas and riverside meadows, as well as woodland screens. The proposals will provide an attractive setting for residential and employment uses that are well connected with both Blandford Forum and the surrounding area. The capacity of the site is such that there is scope to incorporate a local centre and primary school within the proposed development, significantly improving the accessibility of services and facilities.

An indicative masterplan has been prepared and submitted to the Council to illustrate how the area can be developed in a sensitive and appropriate manner. It is considered that approximately 550 dwellings could be accommodated, allowing a significant landscape setting to be provided. Properties need be no higher than two storeys in height so as to minimise visual impact and reflect the existing housing on the western side of the Blandford Bypass.

The Masterplan includes the following features:

- 550 dwellings, no higher than two storeys in height
- Potential for provision of 800 m² primary school site located on the main access road around the site and within easy access of the A364 Blandford bypass.
- 915 m² local centre site to be located within the middle of the residential development. Central location will facilitate pedestrian access and allow easy connection to the A354 Blandford bypass and proposed primary school
- 3.0 ha employment site, forming an extension to the existing Sunrise Business Park
- 9.10 ha sports pitches, including changing and parking facilities, reflecting the current allocation in the North Dorset District-wide Local Plan (policy BL6)
- 0.7 ha allotment site, forming an extension to the existing Lamperd's Field allotments.
- 6.10 ha strategic riverside open space with additional tree planting and wildflower meadows.
- Further 2.60 ha general and play space associated with the residential development.
- Native landscape planting around the site boundaries to visually integrate them with the surrounding countryside.

The use of large-scale trees and hedgerow planting will reinforce the character of the area and help to integrate development with the surrounding area and when combined with the sensitive layout and massing of buildings, overall effects would be minimal. The provision of the on-site local centre, possible primary school and sports facility and the provision of new walking and cycling links and improved services can provide good accessibility to existing and planned local facilities.



Summary

In summary, it is considered that land to the northeast of Blandford can provide a sustainable location for mixed-use development. A suitable access strategy can be provided to serve the development, and in conjunction with the development proposals, there is potential to deliver a package of measures that would improve sustainable transport modes within Blandford Forum. Land to the northeast of Blandford Forum beyond the by pass but outside the AONB should be identified in the emerging Core Strategy as one of the locations for meeting Blandford's future housing needs.

Yours sincerely

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