

GILLINGHAM NEIGHBOURHOOD PLAN 2016-2031

Submission Consultation (4 January to 15 February 2018) – Summary of Representations

Rep no	Respondent	Summary
GIL01	Allard Family	<ol style="list-style-type: none"> 1. The Draft GNP does not meet the ‘basic conditions’ set out in the relevant legislation. 2. The Draft GNP fails to allocate The Allard family Land for a purpose that is in the interests of the best planning of Gillingham as a whole and would undermine the key objective: achieving sustainable development (NPPF, including para 7.) There are three dimensions to sustainable development: economic, social and environmental. The draft GNP is not a credible or balanced response to all three dimensions. 3. The draft GNP would also not accord with the emerging Local Plan and wider development plan framework. 4. The Allard Land is part of a sector of Gillingham that has been preferred by NDDC for future housing growth and there are ‘live’ discussions with Officers at NDDC. 5. The Draft ND Local Plan is currently open for public consultation until 22nd January 2018. The Draft GNP should await progress with the Local Plan before it will be possible for it to be in conformity with the changing policy framework. 6. There is arguably no deliverable 5-year housing land supply: this problem applies to Gillingham. 7. The Government is still fine-tuning draft guidelines regarding the objective assessment of housing need (OAN). The GNP cannot move forward until a District-wide understanding of the impact of OAN is settled and the town by town housing targets re-set. 8. This objection therefore applies to the whole Gillingham Neighbourhood Plan process and all the supporting documents – see response to Q1 – not just one part of the GNP. 9. We are expecting a draft revised NPPF in April (?) 2018 and this may proceed to be a final version by Autumn 2018. Given the Government’s aim of addressing the ‘broken housing market’ it would be premature, to progress the Draft GNP, before the all of the above are better understood and reported after the Local Plan Examination. 10. There might be a prospect that the Draft GNP could be being considered at an Examination at the same time as the lead-up and actual Examination into North Dorset Local Plan: a chaotic and unmanageable collision of events – two Inspectors working in parallel – duplication of evidence and effort – confusion for all those involved. In our opinion, it would be better to allow the Local Plan to ‘go first’ and for the GNP to follow. <p>Suggested modifications: The Allard Land should be allocated for mixed use including housing and commercial and sports and public open space use (see our objections to the North Dorset Local Plan – January 2018).</p>

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GIL02	C Wheelwright	<p>All related parts of the Draft GNP would need to be amended, where relevant, to assimilate this change into the GNP.</p> <p>In order for Gillingham to maintain its viability as a shopping and community centre it is important for the population to keep growing. With the variety of out of town and online resources now available and increasingly being used ever more inhabitants are needed to maintain a footfall in a town centre.</p> <p>I do not believe this point has been adequately addressed in the plan despite the council already being woefully short of the sort of deliverable projects that could help meet, or at least get closer to achieving its housing target for the next few years.</p> <p>As well as simply providing the requisite numbers of dwellings it is important for a town to retain a certain compactness of form. Gillingham has seen much development over recent years to the north and to the south. There is now available open land to the east of the town, close to the school, the leisure centre and critically the High Street. This could allow several hundred more people to live within a short walk of the amenities and could help to maintain our fragile shopping centre.</p> <p>With good planning it could also alleviate the parking difficulties and help traffic flows near the school and leisure centre. All the on-street parking could be dispersed with and replaced by parking bays past the existing football clubhouse. The possibility of linking through from Hardings Land to Bay Road with footpaths, cycle routes and in due course vehicles would also become available as an option.</p>
GIL03	R Monksummers	<p>The Map on p.49 shows an “Important Open Gap” running from the B3092 road towards Mere westwards. Various maps, and their shading, through the plan show the developments on the B3092 in this area but not in a consistent representative manner.</p> <p>The map on p.72 does show the highlighted area of the part of Gillingham known as Milton on Stour running from the B3092 away from that road via local lanes in a SW direction (Conservation Area).</p> <p>On p.44 if one follows the B3092 northbound from Gillingham, as it leaves the Peacemarsh area moving into the Milton area, the road passes through housing, over a roundabout, past both the health centre and employment land (Neils Yard) and then having just one field on its west side prior to “The Kendalls” which is followed by a Garden Centre and residential housing (The field crossed by footpath 64/73) i.e. there is currently no “Important Open Gap” just a single field. On the east side of the B3092, immediately opposite this roadside section of field boundary hedging, is a proposed outdoor sport area – see same map on p.44. This proposed sporting use is to be applauded given both the sub requirement level for the town as a whole and this area of the town in particular.</p> <p>I conclude, submit, there is both currently no “Important Open Gap” nor a need for one within the plan.</p> <p>Milton on Stour has a “village committee”, this is not an elected body – (MoS is part of one of the wards of Gillingham Town) - but a local pressure group with considerable sway and expertise in inputting into documents like the local plan for their own secular advantage and I would offer the opinion even at the expense of the town as a whole!</p> <p>The land to the west of the B3092 – 3 fields minus the land marked for Sport – would actually make an ideal area for housing, on the A303 side of the town and well clear of potential flood areas!</p>

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		<p>Suggested modifications:</p> <ol style="list-style-type: none"> 1 – Delete said “Important open Gap” 2 – Utilise the land to the East of the B3092 for; <ul style="list-style-type: none"> • Sportsfield Use (i.e. increase amount already indicated) • Housing, with expansion space for the school allowed for at the North end adjacent to the current school.
GIL04	T Flynn	<p>GTF&S Clubhouse Ltd. in an incorporated company, limited by guarantee and situated adjacent to Riversmeet Leisure Centre. The premises are on land leased by a local farmer, is a fully licenced clubhouse and private members club with a membership of 350.</p> <p>The Clubhouse has provided changing rooms for senior football teams over the past years and has financed flood lighting and permanent hard standing around the pitch. In addition to football, the club hosts 5 hockey teams with food and hospitality and provided facilities for seven local skittles teams, pool and darts teams, both male and female. Generally encouraging all forms of sports, recreation and leisure within the local community.</p> <p>The Clubhouse had recently undergone refurbishments, replacing the roof, installing new toilets including facilities for the disabled. Although run by volunteers, local personnel are employed as bar staff.</p> <p>Because of the close proximity to the leisure centre, we are concerned that we were not recognised or acknowledged within the plan or advised of them. We consider that we are more than suitably qualified to be consulted on these issues, which could and might affect an establish of some 50 years standing.</p>
GIL05	R Pilkington	<p>To rectify ‘fizzy’ thinking of the person who was responsible for the incorrect algorithm involved in the siting and operation of the traffic lights at the junction (crossroads) of Nuberg Way and Station Road, Gillingham.</p> <p>When approach from the north, and with the intention of turning right to the Railway Station along Station Road southwards, I have observed that no green right-hand filter turn arrow exists to facilitate this manoeuvre.</p> <p>This above failure of forethought on behalf of the ‘professionals’ involved in the construction of these lights – may fairly be accused of causing ‘traffic lights assisted collisions’ as it is at all times impossible to turn right except by crossing a red light regardless as to the weight of on-coming traffic. Any person turning right is at risk of being inherently held responsible for a collision under all circumstances.</p>
GIL06	Historic England	No comments.
GIL07	Highways England	Highways England is responsible for operating, maintaining and improving the strategic road network which includes the A303 to the north west of the plan area. Due to the close proximity of the A303, we are keen to ensure that development proposals are supported by an appropriate assessment of traffic impacts and suitable mitigation. However, we note that the plan is not looking to promote levels of growth above those already set out within the North Dorset Local Plan.

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		<p>Of particular interest to us is the developing masterplan for the delivery of the southern extension site, as it is important that the development is supported by a robust assessment of the traffic impact on the strategic road network. We are currently engaging with Dorset County Council and developers' transport consultants in the production of the necessary transport evidence base in order to assess whether there will be an impact on the A303 and whether any mitigation may be required. We hope to finish this soon but we note that two applications have already been submitted in relation to part of the allocated site which are currently the subject of public consultation: land at Shaftsbury Road (planning reference 2/2018/0036/OUT); and Park Farm (planning reference 2/2018/0077/OUT).</p> <p>In more general terms, we welcome the plan's proposed policies which seek to maintain the vitality of the town centre as the economic hub and focus for retail uses, protect employment space, enhance and protect community facilities, and promote improved pedestrian and cycle links along with the development of a public transport hub around the mainline railway station. These measures should support sustainability and reduce the need for out-commuting and the reliance on the private car.</p>
GIL08	Dorset County Council	<ul style="list-style-type: none"> • There are three registered veteran trees in and around Gillingham. These are a planning constraint and should be taken into account in the Plan. • The Gillingham Neighbourhood Plan should make reference to the Dorset Biodiversity Appraisal Protocol as a key way of avoiding or mitigating effects on biodiversity arising from development. This system is in use across Dorset by LPAs to help ensure that there is no net loss of biodiversity as a result of development and that LPAs fulfil their duty to biodiversity under the NERC Act 2006. The system is administered by the DCC Natural Environment Team (in consultation with Natural England and the Dorset Wildlife Trust) and involves the completion of a Biodiversity Mitigation Plan to capture all necessary mitigation, enhancements and compensation needed to ensure that ecological interests within proposed development sites are protected and addressed at the start of the planning application process. Reference to this system would inform developers of the need to complete a BMP if appropriate and provide certainty for planning officers that development will not lead to a net loss of biodiversity. • The Neighbourhood Plan does not specifically address potential losses of biodiversity or the potential for enhancements (such as creation of specific habitats/installation of bat or bird boxes as part of greenspace creation or management) and it would be useful to capture this, plus mention of the Appraisal system in a Biodiversity Policy. Such policies are normally included in Neighbourhood Plans. • The Waste Planning Authority notes the inclusion of paragraph 10.14, which refers to the provision of a household recycling centre. Gillingham is currently served by the household recycling centre located in Shaftesbury. The emerging Bournemouth, Dorset and Poole Waste Plan has identified a need for an improved household recycling centre to serve both towns and their increased sizes. The Pre-Submission Draft Waste Plan, published December 2017, proposes to allocate land at Brickfields Business Park, Gillingham as a site for the development of an improved household recycling centre. The NHP group are probably aware that the NHP cannot allocate land for Waste development – it being specifically excluded. The recognition of need is however welcomed. • DCC have concerns with the Heritage Asset Designation of St Martins House - Policy 28. St Martins House sits on a site that DCC are seeking to develop with a partner for much needed affordable extra care provision. Retention of the existing

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		<p>building will significantly compromise the development potential of the site for this use and potentially limit the number of units that can be created. The developer has indicated that they would seek to retain some of the building materials from St Martin's House in the proposed scheme to ensure that there is a continuing reference to the building's legacy.</p>
GIL09	Y Phillips	<p>A lot of time and money has been spent producing this plan. When I read under 14.4 'no single organisation is responsible for taking forward this NP and it will be a joint effort'. If the ... is serious about this a small committee must be formed whose only responsibility will be 'to take forward the plan'. Otherwise little will be done. May I strong urge you to do this.</p> <p>Suggested Modification: To move the rubbish waste disposal from Shaftesbury with its excellent access to Gillingham where they are hopeless especially in New Road access is senseless. Shaftesbury is growing as quickly as Gillingham and to transfer that traffic to Gillingham especially at school opening and closing time is dangerous and stupid.</p>
GIL10	H Bryant	<p>The Gillingham Neighbourhood Plan looks very comprehensive and covers a wide range of community services that are available to residents and visitors. It appears to leave out a couple of the most basic civic services – providing drinking water and public toilets.</p> <p>1) Drinking water free for all</p> <p>From earliest times, towns have prided themselves on providing drinking fountains, so that everyone from richest to poorest can freely drink water and (if rich enough) enjoy the beauty of the fountains. More recently, we have given up on this, and left people to buy water in plastic bottles, or even worse, sugary sweet fizzy drinks. We have problems with disposal of mountains of single use plastic bottles, and also with increasing obesity among the UK population.</p> <p>Could Gillingham provide drinking fountains where we could all drink pure water or refresh water bottles? This would certainly help the Gillingham community with the problems mentioned. If we wanted beautiful drinking fountains, could we consider a crowd-funded project to help do this?</p> <p>2) Public toilets</p> <p>I visited Gillingham for the first time ever exactly a year ago. On that occasion, I had an appointment but arrived a little early after a 4 hour drive. I assumed that Gillingham was a civilised place and would have a public toilet, and was encouraged to see a sign pointing to the public toilet just off the High St in the High Street Car Park. Imagine my horror when I found that it was locked up and inaccessible. Fortunately, disaster was averted when I found that it was still possible to get into the Disabled toilet.</p> <p>This is a true account of my first encounter with Gillingham.</p> <p>Now I know that I could go into Costa or a pub and buy something and use their facilities, a new visitor can't track these facilities</p>

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		<p>down in time, and this isn't a very welcoming situation. It doesn't truly represent Gillingham and its people, who I have found to be very welcoming.</p> <p>Are there any plans to update the public toilets? If so, it would be good to cover this in the Neighbourhood Plan. It is not reasonable to expect strangers to find facilities hidden away at the station/library etc. It would be good to know what the update might consist of, for example, would we have to pay to use them, would they all be gender neutral, would they all be suitable for disabled people, would they all provide nappy change facilities?</p> <p>If there is no plan to update the public toilets, this approach should be explained too – are retailers/pubs/restaurants all expected to allow people to use their facilities whether customers or not? Are some premises paid a grant to allow public to use their facilities? Do we expect visitors to find a pub/café and pay the proprietors something for using their facilities? Could the available facilities be signposted so that visitors to the town can find them?</p> <p>Suggested Modification:</p> <ol style="list-style-type: none"> 1) Would like to see allowance made for provision of fresh water drinking fountains. If possible, attractive drinking fountains that would make it a pleasure to use for residents and visitors. 2) Section 10 should describe approach to provision of public toilets as these are a basic community facility. If public toilets are to be replaced and updated, that should be described. If not, the plan should explain how visitors should be guided to facilities, explain what toilet facilities are available to residents and visitors and what conditions apply.
GIL11	P Sweeney	<p>Advocates the allocation of the Windyridge site for development. (This appears to have been made in response to the North Dorset Local Plan Review consultation, which was ongoing at around the same time.)</p>
GIL12	Natural England	<p>Section 11 - Green and urban spaces, and avoiding flood risk</p> <p>Natural England agree broadly with the conclusions of this section and have the following observations.</p> <p>Natural England note that a Dorset Environmental Records Centre (DERC) search does not appear to have been conducted during the neighbourhood plan process. The DERC hold the most up to date information on environmental records for Dorset and as such should be used as an evidence base when assessing the potential impact on biodiversity. The Green Infrastructure network could also be made more comprehensive by reference to the recently published Ecological Network maps, published by the Dorset Wildlife Trust.</p> <p>The 2031 target for Accessible Natural Green Space underlines the need for new developments in Gillingham to contribute to the provision of such space, which can often be combined with several other benefits such as providing space for flood waters and biodiversity. The protection and enhancement of the river corridors has the potential to provide a range of benefits and Natural England welcome the inclusion of policies associated with the use of of these areas for recreation, flood management and biodiversity.</p> <p>Dorset Biodiversity Mitigation Protocol</p>

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		<p>Gillingham is within the scope of the Dorset Biodiversity Mitigation Protocol, for which all developments of 0.1ha or greater in size, or where there are known protected species or important habitats/habitat features require a Biodiversity Mitigation Plan (BMP). This is to ensure mitigation for the effects on biodiversity are secured, as well as the necessary enhancements as required of development by the National Planning Policy Framework paragraphs 7, 109 and 118 (NPPF). We recommend that this is included within an appropriate policy, or a separate new policy, to ensure this requirement is captured in the Neighbourhood Plan.</p> <p>Proposed Policies Natural England have the below comments to make on specific proposed policies;</p> <p>Policy 21; Recommend that any new development should be required to secure the management of these areas in perpetuity. Policy 23; Recommend that any alternative/suitable replacement provision should be of equal or better recreational and ecological quality or value. Policy 26; Recommend that all soft landscaping should be of native species and that new developments should incorporate trees into their design within the public realm in preference to trees within private gardens.</p>
GIL13	Cranborne Chase AONB	<p>The area of the Plan does not reach to the AONB boundary. However, the topography means that Gillingham sits in a shallow vale that is overlooked by this AONB from the north and the east. It does, therefore, reside in the setting of this AONB.</p> <p>Furthermore, the public rights of way – in addition to the highways – provide access for the ever increasing population of Gillingham to reach and appreciate the assets of this AONB. That increased access is, however, a mixed blessing as large numbers of visitors can change the tranquillity of the AONB and the experience of visitors.</p> <p>In the context of Gillingham being a key element in the setting of this AONB, Cranborne Chase AONB welcomes the emphasis on green spaces within and around the town that have the capacity to soften and break up the extent of development when viewed from the high ground of the AONB. The AONB is, however, still concerned that further efforts should be made to ensure development integrates with the local scene. Light coloured, shiny, and reflective roofs – particularly on extensive employment buildings – can be unnecessarily intrusive. Darker roofs should be an important element of good design, as identified in our good practice guide on Colour in the Landscape.</p> <p>Cranborne Chase also has particularly dark night skies which are nationally recognised and the AONB team is in the process of gaining international designation of those dark skies. It is, therefore, vitally important that towns and villages within the setting of this AONB adopt policies and strategies to reduce and prevent light pollution. A Neighbourhood Plan is a good vehicle for doing that, so Cranborne Chase AONB would wish to see the Gillingham Neighbourhood Plan including policies and actions to control new lighting and to reduce the light pollution from existing lighting. Quite a lot of guidance and information is available on our web sites. http://www.ccwwdaonb.org.uk/publications/planning-related-publications/ http://www.chasingstars.org.uk/ The team are happy to help with the formulation of policies and action plans.</p> <p>Gillingham is important as a sustainable gateway to this AONB via the railway and the railway station, as well as the public rights</p>

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		<p>of way. Cranborne Chase AONB Partnership is seeking to encourage sustainable travel and green tourism. To that end it is seeking to facilitate the re-opening of stations and halts within the AONB on the route between Gillingham and Salisbury to enable visitors to access the villages and assets of the AONB. That could also facilitate journeys to work as well as encouraging visitors. However a key factor in getting visitors to use the railway is the availability of affordable parking. The AONB would, therefore, wish to see any adopted plans, such as the Neighbourhood Plan, making provision for additional, and affordable, parking at Gillingham station. That principle is set out clearly in policy PT22 of the AONB Management Plan, which has been adopted by North Dorset District Council and Dorset County Council. For the avoidance of doubt, that provision should be additional to any provision being made to accommodate the growing population of Gillingham that commutes to work elsewhere.</p>
GIL14	Persimmon	<ul style="list-style-type: none"> • The Local Plan was found sound on the understanding that an immediate review was undertaken to plan for the revised housing need figures .This review is underway . It is considered that the Neighbourhood plan should not progress until the Local Plan has decided on the level of housing to be accommodated in the various Towns ,specifically Gillingham. • It is an important element of sustainable development that opportunities to improve pedestrian and cycle links are utilised so that the use of private vehicles is discouraged. • Persimmon have serious concerns regarding the requirement for custom and self build within larger sites .There are health and safety issues of having self build within an active construction site and this applies even when the main build is complete and the houses are occupied. There would be uncertainty over the take up of such plots which would affect the deliverability of housing sites which is critical if North Dorset is to resolve its housing shortage both in terms of the short term 5 year land supply but also in the longer term as it seeks to meets its objectively assessed housing need in the Local Plan review currently underway. The Local Plan does not contain a policy that requires an element of self build on larger housing sites .Para 5.56 clearly explains that self build and custom build can be provided by utilising infill plots in towns or villages ,or by replacing an existing dwelling in the countryside . This policy is clearly contrary to the Adopted Local Plan and therefore the Neighbourhood Plan would not be in accordance with the strategic housing policies in the Local Plan .The policy would add an additional burden on developers over and above the policies of the Local Plan. There seems to be an assumption that self build is a form of affordable housing .The people that are in need of affordable housing are unlikely to be in a position to buy a building plot in the Market and pay for the necessary professional services required to gain and implement planning and building regulation approval. • The objective of protecting existing public open spaces whether formal or informal is understood and appreciated. However, The concept of Safeguarding land for possible future open space use is flawed and prejudicial to sound planning in the future. The future use of land is a matter that should be resolved through the review of the Local Plan. It is well recognised that the Local Plan review needs to find additional land for residential development to meet the objectively assessed need for housing .The Local Plan was only found sound on the premise that an early review was undertaken in order to meet the acknowledged higher objectively assessed need .The review of the Local Plan should not be hindered in this regard by a safeguarding policy which would limit the options open in the Local Plan review in selecting sites to meet the requirement for additional residential development. In this regard the recently published Issues and Options consultation document identified the Windyridge area as an area with possible development potential .This area is include in the open space safeguarding area . This is a clear conflict between the review of the Local Plan and the Neighbourhood

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		<p>Plan. In addition there is no evidence that land in the areas of search which is in private ownership is likely to come forward for open space use within the plan period or indeed at all. Para 11.7 recognises this uncertainty “ By taking a longer term view of local needs (to 2031) and how these needs will change further as the local population grows ,it should be possible to plan and bring forward accessible green spaces as funds allow .The funding for the provision of sport ,recreation and leisure facilities <u>may come (in part)</u> from funding secured as part of new housing developments, <u>but their delivery ‘on the ground ‘ will be dependant on negotiation with landowners if there is no suitable land within public control .”(my underlining)</u> Para 11.13 Refers to “ Limited funding towards such provision (outdoor sports provision) <u>may</u> be made available from the Community Infrastructure Levy“ There is therefore no guarantee that land will come forward for open space uses within the plan period or at all and as such the policy is unsound. There is no Policy in the Local Plan regarding safeguarding land for new open space .The Local Plan concerns itself with “ Local Green Spaces “ which is an entirely different matter and is dealt with separately in the Neighbourhood Plan .The Safeguarding policy is not therefore in conformity with the Local Plan. The policies as worded imply that if opportunities were to emerge outside the areas of search for open space these would not acceptable .I am sure this is not the intention of the policy. It follows from the above that policies or sections of policies referencing safeguarding land in the areas of search for formal and or informal open space, especially Policy 23, should be deleted. The policies should be reworded to recognise that opportunities outside the areas of search would be considered on their merits.</p> <p>Suggested Modifications:</p> <ul style="list-style-type: none"> • The NP should be held back until the review of the Local Plan identifies the additional land required to meet the new housing need numbers. • Policy 1 should reflect the wording at para 5.56 of the Local Plan • All references to the safeguarding of land for provision of formal sports and informal recreation /amenity space and ancillary development should be deleted from the policies 18,20 and 23 .
GIL15	G Longcroft	<p>In principle the scheme has much to praise however I have some reservations, development around the station area is welcome but I find it hard to see how this will help the main High St .parking is difficult and has a charge it desperately needs free parking and existing businesses and or start ups would benefit from some form of rate relief. All the majority of the new housing has to access the town or beyond via the Kingsmead roundabout and onto the Shaftesbury Road which already is very busy and prone to hold ups from the pinch point at the railway bridge back as far as the roundabout and sometimes beyond. I am not convinced by the developers assurances that intelligent traffic lights will solve any issues and the new link road to the B3092 just ends up at the railway bridge lights , the amount of pollution caused is also a consideration, much of the current traffic is heavy goods and only on route elsewhere I feel a relief road of some sort is essential. I was also puzzled by Aldi's planning application being refused siting amongst other points traffic congestion ,when it is perfectly happy for all the housing traffic to exit at this point. The car parking in the towns supermarkets is just about at capacity now and with no possibility of expansion how will they serve all our new shoppers ?. There must be assurances that the medical centre ,schools, community hub etc. are all at the forefront of construction and that along with low cost homes a decent supply of social housing is included. I am fully in support of the scheme but want to ensure that the town grows and prospers from it.</p>

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GIL16	CG Fry	<p>Site Allocations The strategy of limiting development allocations to those identified in the adopted North Dorset Local Plan is supported.</p> <p>Vision The vision set out at paragraph 5.2 is supported.</p> <p>Policy 1 – Custom and Self Build Housing We note that the Town Council has collected evidence showing potential demand for 30 self-build plots within Gillingham (NDP, paragraph 6.10). As noted at paragraph 6.11 of the NDP, delivery of 5% custom-build plots on the Gillingham Strategic Site Allocation would provide 90 plots, three times the need identified by the Town Council.</p> <p>It is considered that the 5% provision sought by the NDP should not simply replicate approaches in other parts of the Country, as suggested in paragraph 6.11. It should more appropriately be based on robust, local evidence of demand. The flexibility provided by paragraphs 6.11 and 6.13 is welcomed (demand/viability etc). However, it should also be acknowledged that the nature of the site and its access will also influence the ability of a scheme to support custom-build housing. It would also be helpful for terms such as “...marketed appropriately...” to be defined, so as to avoid uncertainty.</p> <p>Policy 2 – Flexible living accommodation to suit all needs Policy 2 is supported.</p> <p>Figure 5.1 – Overview of Neighbourhood Plan area strategy In respect of the strategy for Park Farm, the annotation for the Alternative pedestrian/cycle network on Figure 5.1 is noted. It is suggested, however, that the alignment follows more closely that shown on the Illustrative Framework Plan submitted in connection with the above application (see comments and Framework Plan below).</p> <p>Footpath/Cycle network It is considered that the cycle network connection shown on Figure 9.5, where it relates to Park Farm, should follow the western boundary of the site, as it does on Figure 9.4.</p> <p>Policy 13 Road designs in new development We suggest the following additional text to the final sentence of Policy 13 to provide flexibility where hard surfaces are justified as part of great placemaking design: <u>Excessive Large areas of hard shared surfacing and narrow winding roads should be avoided unless these can be justified on urban design or placemaking grounds.</u></p> <p>Policy 21 – Accessible Natural Green Space and River Corridors NDP Figure 11.4 Green Spaces and paragraph 11.20 identifies Fern Brook, Ham (No. 7) as Accessible Green Space. It should</p>

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be noted that Site 7 is not publicly accessible currently. Figure 11.4 also identifies an area of “Additional informal recreation”. This land follows broadly the open space strategy proposed in the above application (Illustrative Framework Plan reproduced below).



Paragraph 11.20 and Policy 21 confirm that the Town Council will work with private landowners to increase public access to these areas, which is a laudable aspiration. However, land that is not currently accessible to the public - such as Site 7 - cannot “...be safeguarded as an important green infrastructure resource for local residents”. (Policy 21, 2nd paragraph, 1st sentence). Policy cannot be used to force landowners to make their land publicly accessible, when it is not accessible at the current time. It is

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		<p>considered that Area 7 should be deleted from Figure 11.4 and paragraph 11.20.</p> <p>The Illustrative Framework Plan that is submitted in connection with the above planning application is reproduced above. The land identified as Area 7 and the “Additional informal recreation” land identified on Figure 11.4 are very broadly contiguous with the open space/recreation strategy on the Illustrative Framework Plan. However, it should be noted that this application is in outline only at this stage, with layout reserved for future consideration. While it is the case that under the Illustrative Framework Plan, land in the broad areas identified on Figure 11.4 will be made publicly accessible in the event that the current planning application is approved and developed out, they are not public now. In the event that these areas are not deleted as suggested above, the NDP should at the very least make this distinction and should also ensure that the designations on Figure 11.4 are referred to as Areas of Search, with the accompanying text explaining that the precise areas stand to be agreed under the planning application process.</p> <p>The following amended wording for Policy 21, 2nd paragraph, 2nd sentence is also proposed:</p> <p><i>Where possible, development proposals on land identified on Figure 11.4 should consider the potential to provide for new or enhanced public access.</i></p> <p>Policy 23 – Protecting Important Green Spaces Policy 23 refers to “Existing areas of green space (as shown in Figure 11.4)...” It is not clear to which areas of land this refers as there is no annotation in the key indicating existing green space.</p> <p>If existing includes Area 7, this is considered inappropriate for the reasons expressed above. It is considered that Area 7 should therefore be deleted from Figure 11.4 and paragraph 11.20. It is considered that there is no evidence to suggest that this is an important green space and this designation is therefore unsound.</p>
GIL17	Magna Housing	<p>Policy 1 – Custom and Self Build Housing We note that the Town Council has collected evidence showing potential demand for 30 self-build plots within Gillingham (NDP, paragraph 6.10). It is considered that the Town Council should also collect evidence of demand for other specific types of housing need, including for example, demand for independent care units, noting the identified increase in elderly population at paragraph 10.5 of the NDP and the contribution that such units can make to meeting a wider need for housing. Such evidence may be held by the Town or District councils to inform policy choices.</p> <p>As noted at paragraph 6.11 of the NDP, delivery of 5% custom-build plots on the Gillingham Strategic Site Allocation would provide 90 plots, three times the need identified by the Town Council.</p> <p>Policy 2 – Flexible living accommodation to suit all needs We support the aims of Policy 2 for housing proposals to provide greater flexibility to adapt to changing needs.</p>

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		<p>Policy 17 – Safeguarding existing community facilities</p> <p>Figure 11.4, which identifies community facilities to be safeguarded, is unclear and it is requested that a higher resolution plan is provided so that individual buildings can be identified by owners and other interested parties. St Martins House appears to be listed as an educational and training facility within paragraph 10.7 of the NDP and identified as being in use for Education and Training on Figure 10.3.</p> <p>Its use as an Adult education Centre is, however, the former use of the building. This use ceased in 2011 and the building has been vacant ever since. There are no proposals to re-instate this use and as noted above, the owner is developing a scheme for the comprehensive redevelopment of the site for other uses.</p> <p>As such, St Martins House does not fall into any of the six categories of a community facility listed at paragraph 10.15 of the NDP. St Martin’s House is cannot therefore be considered to be an existing community facility.</p> <p>If St Martins house is identified as an existing community facility, Magna Housing Limited would object to this. Confirmation of the position is sought from the Neighbourhood Plan Authority and Magna reserves the right to make further representations. However, the simplest approach would be to remove reference to St Martins House at paragraph 10.7 of the NDP and delete it from Figure 10.3 (if it is identified as a community facility on the plan).</p> <p>Policy 21 – Accessible Natural Green Space and River Corridors</p> <p>NDP Figure 11.4 and paragraph 11.20 identifies Shreen Water (No. 3) as Accessible Green Space. That part of Site 3 controlled by Magna Housing Limited and falling within the above area is not publicly accessible currently. Paragraph 11.20 and Policy 21 confirm that the Town Council will work with private landowners to increase public access to these areas, which is a laudable aspiration.</p> <p>However, areas that are not currently accessible to the public cannot “...be safeguarded as an important green infrastructure resource for local residents” when they are not in public use (Policy 21, 2nd paragraph, 1st sentence). Policy cannot be used to force landowners to make their land publicly accessible. Accordingly, Magna Housing Limited objects to this sentence and suggests that it is deleted. Magna suggests the following amended wording for Policy 21, 2nd sentence:</p> <p><i>Where possible, development proposals on land identified on Figure 11.4 should consider the potential to provide for new or enhanced public access.</i></p> <p>Policy 23 – Protecting Important Green Spaces</p> <p>We object to the inclusion of Area 3 (Shreen Water) within Figure 11.4 as an area to be safeguarded for accessible natural green space. As noted above, that part of Area 3 within our client’s control is not currently accessible to the public.</p> <p>We note that additional public access may be sought in conjunction with private landowners (paragraph 11.20). However, Policy</p>

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		<p>23 as currently worded, provides no opportunity to explore re-development opportunities which would contribute to green space adjacent to the Shreen Water. Furthermore, it pertains to land which is already accessible to the public, and relates to ensuring that replacement occurs where development results in a reduction of recreational or amenity value. As part of Area 3 is not publicly accessible, it would be unreasonable to seek alternative publicly accessible land as part of any redevelopment proposals.</p> <p>Currently there is no public access available along the western bank to the Shreen Water. St Martins House has been closed since 2011, so there has been no public access for at least 7 years along this stretch. Therefore, there is little or no recreational or amenity value, except to the landowner. Moreover, purely safeguarding will not open up opportunities to improve amenity space through re-development along the Shreen Water. We conclude that the safeguarding of this land for the purposes of Policy 23 is not relevant and that the designation of area 3 within Figure 11.4 be removed or amended to reflect areas which do not currently offer recreational or amenity value to the public.</p> <p>Policy 28 – Protection of locally important heritage assets</p> <p>Figure 13.2 is not capable of easy interpretation, such that it is not possible to identify specific buildings. We suggest that Figure 13.2 is re-produced to address this shortcoming.</p> <p>We are concerned with Policy 28 as currently worded for the following reasons:</p> <ul style="list-style-type: none"> • Draft Policy 28, as currently worded, does not contribute to the achievement of sustainable development because it does not distinguish between the significance of designated and non-designated historic assets or offer any opportunity to enhance the historic environment through re-development where alternative options have been proven to be unsuitable; • It applies policy requirements without regard to the significance of the asset and viability considerations, which is not the proportionate approach advocated by the NPPF; • The proposed approach within Policy 28 is not in conformity with adopted North Dorset Local Plan Policy 5 and its supporting text, which encourages an evidenced-based assessment on a case-by-case basis, again with consideration of the significance of non-designated assets, the scale of any harm or loss and the desirability of sustaining and enhancing the significance of the asset; and • The draft policy does not meet the basic conditions tests (for the reasons above). <p>The protection of statutory designated buildings and (conservation) areas is enshrined within both the TCPA and the NPPF/NPPG. For non-designated assets, the approach to re-use and/or redevelopment needs to be taken on a case-by-case basis, recognising both the historic importance of the asset and opportunities to contribute to the wider historic environment through re-development of the site with sensitive design and references to the wider historic environment.</p> <p>We suggest that Policy 28 is re-worded as follows (strike-through for deletion, new text underscored):</p> <p>“Locally listed buildings and locally important buildings, Conservation Areas, scheduled Monuments and the locally important parkland at Wyke Hall are heritage assets of the Plan area and must be protected for future generations, in line with national and</p>

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		<p>adopted Local Plan policies.</p> <p>Where historic/locally important buildings and features are within the same site as a development proposal, their repair (if needed) and retention should be secured, <u>where possible, having regard to the provisions of the adopted Local Plan and the NPPF.</u></p> <p><u>Where it has been demonstrated that the re-use of the building or feature is not economically viable or realistic for other reasons, redevelopment proposals should be accompanied by a proportionate Heritage Assessment to determine the significance of the asset and the impact of the proposal on it. New development proposals should make a positive contribution to local character and distinctiveness.”</u></p>
GIL18	Network Rail	<p>Comments relating to Chapters 7 & 8:</p> <p>With regards to the potential redevelopment of Station Road, whilst Network Rail does not have any specific comments at this stage, NR would look for developer contributions for any improvements needed for the station realm.</p> <p>Comments relating to Chapter 9. Transport:</p> <ul style="list-style-type: none"> • Figures 8.1 & 9.1 maps appear to show a path across the railway at the west end of the station. There is a Station Barrow Crossing (SBC) at this location which does not serve any public rights. A SBC is a gated level crossing for use by station staff to escort vulnerable personnel across the railway and is locked closed when not in use and when the station is unmanned. The station is equipped with a stepped footbridge for use of customers to cross between platforms. • Table 9.3 sect I states “Establish a new foot and cycle right of way from the railway station south across the railway line to a new junction with Footpaths N64/47 and N64/48.” Level crossings are considered the main source of catastrophic risk by our regulator, the Office of Rail and Road (ORR) and the recommended way of dealing with this risk is by eliminating it and closure of dangerous level crossings. Dedication of any rights for the public across the rails (at a grade) would contradict Network Rail’s obligation to run “a safe and efficient railway network” in UK and would be unlikely to receive the consent of the ORR. Additionally, dedication of public rights requires that a grantor is capable; Network Rail does not possess the requisite capacity to dedicate its land to the public. Network Rail is open to consider creation of public rights over or under its railway. • Table 9.3 sect g proposes a new FP/bridleway to run “underneath the railway line where it crosses the River Lodden to a junction with Footpath N69/20” Network Rail (NR) is an active participant of the Motcombe Cycle Link Working Group and have discussed this proposal at length. Network Rail supports the proposal in principle and would consider dedicating its land for public use providing that footpath N69/20 is diverted from the current level crossing (Kings Court) underneath the bridge thereby providing members of the public with a reliable and fundamentally safer means of crossing its railway. This proposal appeared to have met with a positive reception by the Working Group and Network Rail has offered to proactively support such scheme.
GIL19	S & P Joyce	<p>My clients own properties in Gillingham (Peacemarsh Farm and Peacemere) and 36 acres of farm land to the north of Wavering Lane West and due west of the River Stour.</p>

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		<p>Whilst they appreciate the significant work that the council have given to creating this plan, they do not understand why with reference to Housing (Section 6) in the Gillingham Town Plan does not match the housing suggestions made by NDDC.</p> <p>NDDC established that out of 11 possibilities, 4 areas were in their opinion, suitable for new housing for Gillingham. This included land at Peacemarsh to the north of Wavering Lane West, and names three other smaller areas. In this plan Gillingham Town council have concentrated all their major building to the south and south east of Gillingham. This is regardless of the current and significant historic delays in getting the planning applications submitted due to land disagreements. They know that this area has issues of significant flooding, compounded with the enormous cost of a ring road, and the historic bottleneck that already occurs over the railway bridge.</p> <p>On Page 2 of the plan they state categorically that there are 'no future areas for development'. My clients wish to ask the question 'WHY', when there are other parcels of land suitable with sequential building options to the NE of the town's current development?</p> <p>My clients note the Town Councils interest in developing new facilities for the town, for local walkways, green spaces, allotments etc and they question why the larger parcel of land at Peacemarsh has not been considered as it can offer all the requirements of the council, in a new and comprehensive way. It is an area that already has good walking and cycle links to the town and both access via Rolls Bridge Road, and a number of landowners interested, with a major builder committed to working together to facilitate this.</p> <p>By focussing on Peacemarsh (W L West) it would leave the town able to grow its historical heritage in relations to Constable, develop the station area and enliven the town centre itself which it says that it wishes to do. The income from this significant housing would facilitate it happening through revenue generated from the dwellings via Council Tax, Section 106 Contributions or CIL.</p> <p>Easy access onto the A303 from this end of the town without significant cost must also be defining factor as well.</p> <p>My clients' land forms a natural area of infilling as an area for Gillingham to naturally expand as a community in a cohesive way.</p> <p>My clients working in partnership with neighbouring landowners, wish to propose that a main tranche of building be to the NW and to that end have attached a 'master plan' (Appendix 1) which shows quite clearly the potential for growth in this area as a natural expansion and infilling of Gillingham.</p> <p>The plan still allows Milton on Stour to remain a 'village' area which many councillors feel very strongly about. In addition, to protect Milton on Stour and preserve the area of separation between this development and Milton on Stour, my clients would propose that a significant tree screening barrier is planted at the western end of this proposal to ensure that there is a clear definition between this development and Milton on Stour.</p>

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		<p>There is room within this tranche of land for a wide variety of community facilities, indeed the facilities that are named in their plan could be accommodated here. In particular the potential for places to self-build could be met as could the social housing requirements of the Neighbourhood Plan.</p> <p>This seems to my clients to be a natural growth area. If however it is felt that the quantum of development is too great and the Council have sadly committed themselves too fully to the south eastern area, then my clients can offer a smaller proposal that would use up a small part of the land for 15 dwellings which can be achieved with no significant impact nor any change to the local highway network. They have investigated this fully by, not only funding and obtaining a detailed highways report, but also commissioning a plan which has been prepared by Matrix Partnership to show how this can be achieved (Appendix 2).</p> <p>My clients ask that you consider this submission in the alternative. They have a clear preference for the scheme proposed in Appendix 1 to come forward as an exciting opportunity that could help fulfil the vision that Gillingham Town Council, the North Dorset District Council and interested parties have for Gillingham and could deliver many benefits to the Town. If, however, they wish to consider a more modest alternative, then we believe that the proposal in Appendix 2 could be considered in the alternative.</p> <p>My clients ask that you consider this submission in the light of the exciting opportunities that the Gillingham Town Council have for Gillingham and the many benefits that the options they give could offer.</p>
GIL20	Aldi Stores	<p>Section 6: Housing</p> <p>We welcome the consideration within the GNP of where new housing should be located within the Plan Area.</p> <p>However, we note that Paragraph 6.1 of the GNP advises that the North Dorset Local Plan Part 1 2016 has set a housing target of at least 2,200 homes over the plan period. Whereas, the recent North Dorset Local Plan Review Issues and Options consultation document (November 2017) acknowledges that additional land is likely be required in Gillingham to assist in delivering the uplift in housing need, over and above the 2016 Local Plan target.</p> <p>Specifically, Paragraphs 5.7 and 5.8 of the recent Local Plan Review Issues and Options consultation document outline that the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA), which includes Gillingham, gives an objectively assessed need (OAN) for housing in North Dorset of 330 dwellings per annum up to 2033. This represents an increase of 45 dwellings per annum compared with the adopted Local Plan Part 1 (2016). Moreover, the Local Plan Review Issues and Options consultation document confirms that the most appropriate housing need figure on which to progress the Local Plan Review is 366 dwellings per annum based on the standardised methodology for assessing housing need set out in the 'Planning for the right homes in the right places: consultation proposals' (September 2017). This represents an increase of 81 dwellings per annum over the plan period.</p> <p>Therefore, without taking into consideration the up to date assessment of housing need in Gillingham contained within the more</p>

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		<p>recent Local Plan Review evidence base, the GNP would not be up to date or robust, or appropriately and positively prepared to contribute towards sustainable development in Gillingham. Accordingly, at present, the GNP is considered contrary to the basic conditions, as specified in legislation for new NP's.</p> <p>Paragraph 6.1 of the GNP also confirms that the majority of new housing required in Gillingham to meet the required number of houses over the Plan period will be located in the southern extension of the town. Furthermore, the Local Plan Review Issues and Options consultation document analyses possible additional sites to deliver the increase in the housing requirement. These include further sites to the south of Gillingham.</p> <p>It is considered that the GNP should include provision for additional facilities and services, including a discount foodstore, to support the existing residents, the southern extension area, and additional housing to assist in meeting the day to day needs of the existing and new population. This is particularly the case as the Local Plan Review suggests a need for an increase in the number of additional dwellings required.</p> <p>Section 7: Economy and Section 8: Retail and Town Centre Uses</p> <p>We support the aspiration set by Paragraph 7.3 of the GNP, which states that maintaining and growing local employment is a key factor in supporting the attractive character and economic health of the town.</p> <p>However, it should be noted that Paragraph 22 of the NPPF states that planning policies should avoid the long term protection of sites allocation for employment use where there is no reasonable prospect of a site being used for that purpose, and land allocations should be regularly reviewed.</p> <p>Paragraph 6.1 of the GNP confirms that the majority of new housing required in Gillingham to meet the Development Plan housing target over the Plan period will be located in the southern extension of the town. In addition, land south of Park Farm is being considered as a location for additional housing in the recent Local Plan Review Issues and Options consultation document.</p> <p>However, maintaining the allocation of the land at Park Farm as an employment site within the Development Plan could restrict the ability for the site to provide local services to support existing and future housing.</p> <p>In this context, whilst we acknowledge the Council's intention to develop a new Local Centre to support the southern extension, it is considered that the GNP should also include support for additional facilities and services, including a discount foodstore, in locations that will assist in meeting the day to day needs of the existing residents of Gillingham, and the new population of the southern extension and additional housing developments. An ALDI discount foodstore on land at Park Farm would be well located to improve the retail offer of the area and choice for customers in south Gillingham, as well as provide local employment opportunities. Furthermore, it would represent sustainable development that will benefit the local economy, and the existing and future residents, particularly in south Gillingham.</p>

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		<p>The updated Bournemouth, Dorset and Poole Workspace Strategy (Workspace Strategy) 2016, demonstrates that the amount of employment land available in Eastern Dorset, which includes Gillingham, exceeds the employment land demand requirements up to 2033. As a result, it is considered that the loss of a limited extent of allocated employment land to an alternative employment generating use would not impact on the overall employment provision in the area, and would contribute to achieving sustainable development, which accords with planning policy at all levels. Therefore, in order to satisfy the basic conditions for a NP it is considered that proposed Policy 5 The loss of employment sites outside the Town Centre of the GNP should be revised to facilitate alternative uses on employment sites in locations where other uses would provide local employment, and facilities that support existing and future housing development in the town.</p> <p>Similarly, it is considered necessary to amend Policy 9 Town Centre uses outside of the Town Centre of the GNP to facilitate retail development in a broader range of locations than those identified in the GNP, which are currently limited to land within or adjoining the local centres in Milton on Stour, Lodbourne, Broad Robin and the new southern neighbourhood centre. The broadening of Policy 9 to allow facilities that will support the existing and additional housing requirement above the existing Local Plan target, as identified in the Local Plan Review Issues and Options consultation document and the Eastern Dorset 2015 SHMA, ensures that the GNP does not restrict future sustainable growth in the town.</p> <p>We note that Paragraph 13.10 of the Local Plan Issues and Options consultation document states that a new retail study for North Dorset is being prepared, in conjunction with West Dorset and Weymouth & Portland Councils, which will form the retail evidence base for the Local Plan Review.</p> <p>Although, we reserve judgement on the issue of the vitality and viability of the Town Centre until the new retail evidence base has been published, it is considered that the NP should reflect the findings of the new retail study to be robust and up-to-date.</p> <p>Section 12: Design, Climate Change & Renewable Energy</p> <p>Figure 12.1 of the GNP confirms that the land to the south east of Gillingham at Park Farm is within the Ham Character Area. Table 12.5 of the document advises that the Ham Character Area is dominated by the main road to Shaftesbury. At present it is bounded by open countryside, but importantly, it is acknowledged in the document that this area will change with the development of the Southern Extension.</p> <p>Policies 24, 25 and 26 of the GNP relate to design matters. Policy 25 Plots and buildings advises that a limited number of landmark buildings of increased height may be permissible in locations which represent a key view or junction on an important route through the area. The proposed development of an ALDI foodstore on land at Park Farm, adjacent to the B3081 Shaftesbury Road, could meet these criteria, and deliver beneficial economic development.</p>
GIL21	North Dorset District Council	<p>General</p> <p>The proposed neighbourhood plan contains a number of maps that illustrate the spatial extent of its policies. In order to provide clarity and certainty, these maps should be drawn at an appropriate size and scale, on an appropriate basemap (ideally OS</p>

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		<p>Mastermap lines), and include a suitable key/legend. As with the written policies, the maps should provide a clear guide to the decision maker.</p> <p>In addition, it should be noted that some of these spatial policies overlap extant Local Plan policies. The plan does not explicitly acknowledge these extant Local Plan policies. The Examiner should therefore compare the proposals to the current Proposals Map to determine the potential level and extent of conflict between Neighbourhood Plan and Local Plan policies.</p> <p>Section 4. The Planning Framework</p> <p>4.3 Suggest amending the first sentence to read “A Neighbourhood Plan has to be in general conformity to the strategic policies of the local plan – but it can change and influence things.” to make it consistent with paragraph 184 of the National Planning Policy Framework (NPPF).</p> <p>4.5 The dates on the diagram below have slipped. E.g. Examination likely to start Feb/March 2018, etc.</p> <p>Section 5. Vision and Objectives</p> <p>Figure 5.1 We note that the map is described as “not definitive and the symbols are not to scale.” As it is diagrammatic it could be called a Key Diagram or Strategic Diagram to distinguish it from a Policy Map.</p> <p>Section 6. Housing</p> <p>6.10 This paragraph should refer to the numbers registered on the North Dorset Self/Custom Build Register which has been in operation since April 2016. The North Dorset Annual Monitoring Report 2017 records that 36 people have expressed an interest in custom and self-building housing in the Gillingham/Shafesbury area as of 30 October 2017.</p> <p>6.11 This paragraph makes a number of specifications (sites of 20+ homes, 5% plots, affordable housing, 12 months’ marketing). We note although many of these are described as a “guide”, no evidence or justification has been provided. They appear to be the same as Teignbridge, which at least suggests that the requirements have already been tested and implemented to a certain extent. However, a supporting paper that considers the anticipated impact of these requirements in Gillingham might be useful. In particular, the requirements could have an impact on development viability. The Southern Extension is set to deliver 1800 homes, but we cannot find any evidence in the supporting documents that the Consortium behind the Extension (Welbeck, CG Fry and WYG) were directly consulted on the pre-submission consultation draft.</p> <p>In terms of policy implementation, the requirements for self build raise a number of technical issues and for this reason Teignbridge have produced a detailed 32 page SPD – something similar may be necessary here in order to provide a clear implementation mechanism.</p> <p>6.12 The southern extension appears to be the main anticipated source for self build units (1800 x 5% = 90). See comments above regarding consultation of the Consortium to confirm delivery.</p>

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		<p>Policy 1 is vague and so doesn't provide a clear guide to the decision maker. Without further information, it is assumed that the policy seeks to implement the requirements of paragraph 6.11 – if so then this should be made clear.</p> <p>Policy 1 must explicitly exclude development as part of the Gillingham Southern Extension. As noted in paragraph 6.1, the Southern Extension is expected to deliver approximately 1,800 homes, which is a significant proportion of the District's housing requirement. A Masterplan has been in development for this area, and outline planning applications are just starting to be submitted to the Council (January 2018). There is no evidence that this requirement has been produced in consultation with the landowners/developers of the southern extension. Therefore this policy as currently drafted is not in general conformity to the strategic policies contained in the Local Plan Part 1 and so does not meet basic conditions.</p> <p>Policy 2 provides no clear guide to the decision maker in determining planning applications. NPPF para 154 states: "Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan;" and para 183 states: "Parishes... can use neighbourhood planning to set planning policies through neighbourhood plans to determine decisions on planning applications." Unless there is clear evidence to make this policy a requirement, the policy should be deleted.</p> <p>Section 7. Economy</p> <p>7.15 It is assumed that this sentence is stating that vacant sites should be marketed for 12 months before an application for change of use is submitted, but as drafted, this is not clear. If this is the case, then as it currently sits in supporting text it is unenforceable.</p> <p>Policy 5. The criteria should: be labelled e.g. a) b) c), for ease of reference in the use of the policy when taking decisions.</p> <p>It is noted that Policy 5 is basically a re-wording of LP1 Policy 11, with the addition of "transport infrastructure improvements" in the list of exceptions. The supporting text clarifies that this is likely to mean parking provision to relieve congestions in and around the town centre.</p> <p>7.16 refers to a policy under the previous Local Plan (adopted 2003). The Gillingham Royal Forest policy GRF1 has been 'saved' and the correct reference to this policy should be reflected in the draft Plan.</p> <p>7.17 It should be noted that a large proportion of the Gillingham Royal Forest Area sits inside Motcombe parish, which is outside the neighbourhood plan area. The two policies (Policy 6 and GRF1) appear to be very similar so we don't have a concern that potential conflict between the two is likely. However, for clarity it might be useful to state here that the GRF area spans across the parish boundary, and that in Motcombe Policy 6 does not apply.</p> <p>Section 8. Retail and Town Centres</p>

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		<p>8.6 Ideally the Primary Shopping Area should be defined in addition to the Primary and Secondary Shopping Frontages and the Town Centre Boundary, in accordance with Policy 12 of LP1.</p> <p>A Retail Study has been commissioned and is nearing completion (February 2018). A draft version exists which identifies Primary and Secondary Shopping Areas, a Primary Shopping Area, and a Town Centre Boundary for Gillingham. We appreciate that the findings of the Retail Study are likely to be too late for inclusion in the Neighbourhood Plan, but the Study is likely to inform the forthcoming Local Plan Review.</p> <p>Figure 8.1 should be labelled as a Policy Map and be of a sufficient size, scale and clarity to be used in the decision taking process. The base map should be clear and not opaque. All lines on the map should be annotated in the legend – it appears that the different coloured pedestrian/cycle links are only identifiable from Figure 9.5.</p> <p>Policy 7. The line “General industrial and storage / warehouses are encouraged to relocate to more suitable employment sites outside of the town centre area.” does not give clear steer to a decision taker in determining planning applications and should either be deleted or moved to supporting text.</p> <p>8.11 The correct title of The Gillingham Growth Study undertaken by Atkins (2009) is ‘Assessing The Growth Potential of Gillingham, Atkins (2009)’.</p> <p>Policy 8. The first line “Development in this area should be compatible with the main aims for its mixed use regeneration, i.e.:" is not clear. Perhaps revise to “Mixed use redevelopment will be supported in the Station Road Area (as shown on Figure 8.1) and should be compatible with the following aims:”?</p> <p>The final sentence of the policy does not guide a decision maker and so should be deleted / moved into paragraph 8.12.</p> <p>8.15 reference to a Conservation Enhancement Plan should include the author/body responsible and directions as to where the plan can be accessed. See comment to para 13.9.</p> <p>8.16 Refers to a “new local centre planned to serve the southern extension to the town” but Policy 9 and Figure 9.5 describe it as a “New Southern Neighbourhood Centre” – the terminology needs to be consistent.</p> <p>Policy 9. The new southern centre should be described as a local centre, not neighbourhood centre (see LP1 Policy 21(z)).</p> <p>The last sentence is negatively worded. Policy should be positively worded where possible and an alternative wording is suggested ‘The retention of town centre uses in the defined local centres will be supported’.</p> <p>Section 9. Transport</p>

Rep no	Respondent	Summary
		<p>Figure 9.1 should be labelled as a Proposal Map, be of a sufficient size, scale and clarity to be used in the decision taking process and include a legend. The base map should be clear and not opaque.</p> <p>Policy 10 As with Policy 8, the first line is poorly worded. Perhaps rephrase to “Redevelopment of sites within the Station Hub area (as shown on Figure 9.1) should support its use as an integrated transport hub by being compatible with the following aims:”</p> <p>The final paragraph appears to be instructing applicants to seek pre-app advice from various bodies/organisations, in which case it should be in the supporting text.</p> <p>Section “The road network, and alternative pedestrian and cycle links” – the term “alternative” is used throughout this section, which is unnecessary and confusing. Whereas NPPF para 29 states: “The transport system needs to be balanced in favour of sustainable transport modes...”, referring to walking and cycling routes as “alternative” appears to give them secondary importance. Table 9.3 states that “routes are indicative only” and “alternative routes may be preferable” – so by Policy 12 it is unclear what is meant by “The provision of the alternative pedestrian and cycle network”. Suggest deleting the word “alternative” from this section apart from when strictly necessary to give clarity.</p> <p>9.13 This paragraph is the final reference in the document to Figure 9.5. It then states that Table 9.3 and Figure 9.4 show routes in more detail. Although it would require some renumbering it would seem logical to place Fig 9.5 before Table 9.3 and Fig 9.4. That would allow Fig 9.4 to be nearer to Policy 12 (which makes reference to it).</p> <p>Figure 9.4 Title of map (in bold and underlined) “Neighbourhood Plan Policy Suggestions” is confusing as these are not proposed as neighbourhood plan policies. Suggest deleting this title and adding the line “Note: These routes are indicative only and alternative routes may be preferable” to be consistent with Table 9.3.</p> <p>Figure 9.5 The New Southern Local/Neighbourhood Centre should be consistently referenced (see comments on Figure 8.16 and Policy 9 above).</p> <p>Policy 12 See comments above regarding use of the word “alternative” – recommend deleting this word from the policy as it appears to be unnecessary and misleading.</p> <p>The title of the policy is “The road network, and alternative pedestrian and cycle links” however policy text refers solely to the pedestrian and cycle network. Consider changing the policy title to “Pedestrian and cycle network” for clarity.</p> <p>Section 10. Community Facilities</p> <p>Policy 14 the final sentence is inconsistent with Policy 21(z) of LP1 by introducing inflexibility to delivery methods whilst not recognising the broad scope of the proposed provision of services. Suggested re-wording ‘Health facilities (including a doctors’ surgery, a dentist and a dispensing pharmacy) will be delivered in the local centre of the Southern Extension.’</p>

Rep no	Respondent	Summary
		<p>Policy 15 The criteria should be labelled e.g. a) b) c), for ease of reference in the use of the policy when taking decisions.</p> <p>Table 10.1 should have a title that explains what it is.</p> <p>10.12 The consultations referred to should be accurately cross referenced and identified.</p> <p>Figure 10.2 should be labelled as a Policy Map, if this is the case (or, if not, be labelled as an extract from a different map) be of a sufficient size, scale and clarity to be used in the decision taking process and include a legend.</p> <p>Policy 16 The criteria should be labelled e.g. a) b) c), for ease of reference in the use of the policy when taking decisions. In the final sentence change “strategic southern extension” to “southern extension” for consistency.</p> <p>Policy 17 relates to community facilities, but is unclear whether this policy applies to the specific facilities shown on Figure 10.3 or to potentially new sites falling within the general categories listed in para 10.15.</p> <p>It is unclear how the criteria set out in para 10.16 relate to this policy. If a proposal has the community’s backing, does it still need to provide clear evidence on the factors listed in (a), (b) and (c)?</p> <p>Figure 10.3 Map illustrates that there are community facilities in Gillingham, but due to the scale it is impossible to make out what or where they are (many are overlapping). If the map is to be used as part of the decision making process in support of Policy 17 then it needs to be a lot clearer. Otherwise mark it for illustrative purposes only.</p> <p>Section 11. Green and Urban Spaces</p> <p>Table 11.1 should have a title explaining what it is.</p> <p>Figure 11.2 should be labelled as a Policy Map, be of a sufficient size, scale and clarity to be used in the decision taking process and include the neighbourhood area boundary and a legend.</p> <p>Table 11.3 should have a title description that encapsulates what is set out in the table. Numbering of figures/tables appears to be out of order in the document.</p> <p>Figure 11.4 should be labelled as a Policy Map, be of a sufficient size, scale and clarity to be used in the decision taking process.</p> <p>Some of the allocations on this map overlap policies from the Local Plan (2003). As the Neighbourhood Plan cannot delete Local Plan policies, the Examiner should be aware of the Local Plan allocations in order to determine whether any potential conflicts are likely to arise.</p> <p>Figure 11.5 should be labelled as a Policy Map, be of a sufficient size, scale and clarity to be used in the decision taking process.</p>

Rep no	Respondent	Summary
		<p>The base map should be clear and not be opaque.</p> <p>Section 12. Design Policy 26: 2nd para. The sentence that begins “Existing trees other landscape features...” perhaps should read “Existing trees and other landscape features...”</p> <p>Section 13. Heritage 13.6 and 13.7 There are now four designated conservation areas in the parish as Colesbrook Conservation Area was officially designated 26/09/2017. 13.9 The ‘At Risk Register’ is now maintained by Historic England.</p> <p>Details of the ‘Conservation Enhancement Plan’ should be listed in Section 15 ‘Useful Documents’ – especially as it is relied upon by Policy 27.</p> <p>Figure 13.1 The supporting text does not discuss this map at all. The Conservation Enhancement Area appears to have been lifted from the Conservation Enhancement Plan. It would help if the supporting text above this map gave some sort of introduction/explanation.</p> <p>Policy 27. This policy relies upon the ‘Conservation Enhancement Plan’ for implementation. At the least, details of the ‘Conservation Enhancement Plan’ should be listed in Section 15 ‘Useful Documents’. However, it is noted that the Conservation Enhancement Plan submitted alongside this plan is watermarked as “Draft” – bearing in mind the document is dated October 2015, is this correct, and if so is there any chance it could change? It is unreasonable to base a policy on a document that has not been finalised.</p> <p>Figure 13.2 As noted above, the Colesbrook Conservation Area was officially designated 26/09/2017. It perhaps worth stating that this map is for illustrative purposes since the conservation designations can change at any point (as noted by para 13.7).</p> <p>13.18 The separate report should be clearly referenced so it can be obtained if needed.</p> <p>Below Policy 28, in the list of Listed Buildings in the Historic Town Centre, it might be worth indicating that The Parish Church of St Mary the Virgin is Grade I, as opposed to others which are all Grade II. Accept that it is noted in para 13.4 but for clarity it might be worth stating it here as well.</p> <p>Section 14. How the plan works 14.4 The phrase “taking forward” is ambiguous. Perhaps change to “...implementing this neighbourhood plan...”.</p>
GIL22	St Benedict’s	There is no provision for a site for a new Catholic church

Rep no	Respondent	Summary
	Catholic Church	<p><i>Present Position</i></p> <p>St Benedict's church is a combined Catholic parish with Our Lady's church Marnhull which adjoins St Mary's VC Primary school and the Presbytery (where the priest lives) in Old Mill Lane Marnhull. Historically the parish has been based in Marnhull where Our Lady's church was built in 1832, being one of the first catholic churches to be built in the country as a parish church after the reformation.</p> <p>It would now be advantageous for the centre of the parish to be situated in Gillingham to include:</p> <ol style="list-style-type: none"> 1. A new Church with a capacity 200–250, plus a sacristy 2. Hall/meeting room with parish office 3. New presbytery 4. Car park <p><i>Site Requirements</i></p> <p>Level site of about half an acre (0.4ha) with additional area for car parking. Total; 0.75–1.00 acre</p> <p><i>Possible Sites</i></p> <ol style="list-style-type: none"> 1. Within South East Town Extension 2. Chantry Fields off Stour Meadows – adjoining new Cemetery (Policy 22) 3. Off Pound Lane, behind the new Mirus 55 Motor Bike Showroom and Café Newt (Old Talisman Antiques) 4. Adjoining Iceland Stores and Pets are Home Stores off Newbourg Way <p><i>Policy 16 Add:</i></p> <p>To provide a site for a new Catholic Church, Hall and Priest's House to serve the Catholic community of North Dorset.</p>