



Ref: A087399-8  
[Redacted]

Planning Policy (North Dorset),  
South Walks House,  
South Walks Road,  
Dorchester,  
DT1 1UZ

14<sup>th</sup> February 2018

Dear Sir/Madam

**Gillingham Neighbourhood Development Plan  
Regulation 16 Consultation Draft  
Representations on Behalf of Magna Housing Limited**

**Introduction**

We enclose representations submitted on behalf of Magna Housing Limited in response to the Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 consultation for the proposed Gillingham Neighbourhood Development Plan (NDP).

Magna Housing Limited has an interest in St Martins House and adjoining land at Queen Street, Gillingham SP8 4DZ. The site is identified on Plan A001 (attached). It comprises:

- St Martins House in the south of the site, a former adult education centre and offices (now vacant)
- A building known as The Grange in the north of the site, which is in use as a residential care facility
- A vacant bungalow
- A derelict stone barn to the south of St Martins House
- Undeveloped land fronting Shreen Water.

Magna Housing Limited is developing proposals for the comprehensive redevelopment of the site for a 59-unit extra-care facility scheme including ancillary services and facilities and communal areas. Magna Housing limited is keen to work positively and openly with the District and Town councils in respect of its proposals.

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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, 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, 2<sup>nd</sup> paragraph, 1<sup>st</sup> 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, 2<sup>nd</sup> sentence:

*Where possible, development proposals on land identified on Figure 11.4 should consider the potential to provide for new or enhanced public access.*

**Policy 23 – Protecting Important Green Spaces**

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.

We note that additional public access may be sought in conjunction with private landowners (paragraph 11.20). However, Policy 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.

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.

**Policy 28 – Protection of locally important heritage assets**

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.

We are concerned with Policy 28 as currently worded for the following reasons:

- 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;

██  
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- 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).

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.

We suggest that Policy 28 is re-worded as follows (strike-through for deletion, new text underscored):

~~“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 adopted Local Plan policies.~~

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, where possible, having regard to the provisions of the adopted Local Plan and the NPPF.

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.”

## Conclusions

We trust that these representations will be considered in the positive way in which they are intended.

Please notify us of any decisions or further consultation in respect of the proposed Neighbourhood Development Plan and any of its associated evidence base and submission documents.

We welcome any further discussion on the points raised in our representations and look forward to hearing from you with regards to the progress of the proposed Neighbourhood Development Plan. In the meantime, should you have any queries please do not hesitate to contact us.

Yours faithfully

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[Redacted contact information]



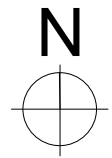


Simon Coles  
**Director**  
For and on behalf of WYG



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Client: Magna Housing  
Project: St Martin's Extra-care, Gillingham  
Drawing Title: Concept 7 - Indicative Scale Plan



Project No:A87399-8 Scale: 1:1250 @ A3  
Drawn: ADS Date: 27th September 2017  
Drawing No: A001 Revision:

