Fiona Ajram

From: Marsha Badon

Sent: 22 January 2018 16:52
To: PlanningPolicy NDDC

Cc: Alan Williams

Subject: North Dorset: Regulation 18 - Issues and Options Consultation

Attachments: North Dorset Consultation Representation Form - Completed.pdf; North Dorset

Local Plan Review - Representation on behalf of ALDI Stores Ltd.pdf

Dear Sir or Madam,

This representation is submitted by Planning Potential, on behalf of ALDI Stores Limited, in response to North Dorset Council Regulation 18 Local Plan Review. Our comments relate specifically to Consultation Questions 3, 4, 9, 10 and 27 within the Issues and Options document.

The purpose of this representation is to provide comments on the scope and issues associated with the North Dorset Local Plan Review, in order to ensure that ALDI's interests at Land at Park Farm, Shaftesbury Road, Gillingham are represented through the review process.

The representation includes:

- North Dorset Local Plan response form; and
- Representation cover letter.

I would be grateful if you would confirm that this representation has been received. In addition, please can you advise how the representation will be progressed by the local authority.

Your assistance is greatly appreciated.

Kind regards Marsha

Marsha Badon MRTPI

Planner



www.planningpotential.co.uk

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Batch number:	Received:
Representor ID #	Ack:
Representation #	



NORTH DORSET LOCAL PLAN REVIEW Issues and Options Consultation 27 November 2017 to 22 January 2018

Response Form

As part of the Local Plan Review (LPR), North Dorset District Council has prepared an Issues and Options Document for consultation. The Issues and Options Document, the Sustainability Appraisal and associated documents can be viewed online via:

https://www.dorsetforyou.gov.uk/planning/north-dorset/planning-policy

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

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

Deadline: 5pm on 22 January 2018. Representations received after this time may not be accepted.

Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted.** By submitting this response form you consent to your information being disclosed to third parties for this purpose. Personal details will not be visible on our website, although they will be shown on paper copies that will be available for inspection by members of the public and other interested parties.

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

	Personal Details*	Agent's Details (if applicable)*	
Title		Miss	
First Name		Marsha	
Last Name		Badon	
Job Title <i>(where</i>		Planner	
Organisation (where relevant)	ALDI Stores Ltd	Planning Potential	
Address	C/O Agent		
Postcode			
Tel. No.			
Email Address			



Part B – Representations

Please answer as many questions or as few questions as you wish. There is a box at the end of the form where you can provide any comments that you may have.

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1.	Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset? If not, please set out what you consider to be an appropriate figure and provide reasons for this.				
	Yes				
	No \square				
	If you have answered 'No' please set out an alternative housing figure and provide reasoning to support your answer.				
	n/a				
	Faculty and				
	<u>Employment</u>				
2.	Do you consider that additional employment land should be allocated for development at Blandford as part of the Local Plan Review?				
	Yes □ n/a				
	No 🗆				
3.	Do you consider that there is a need to allocate additional employment land in any other part(s) of the District?				
	Yes See attached cover letter				
	No				
	Spatial Strategy				
4.	Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?				
	Yes See attached cover letter				
	No				
5.	Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.				
	Yes □ n/a				
	No 🗆				

	If you have answered 'Yes' please set out your alternative spatial strategy and provide reasoning to support it.		
	n/a		
	Blandford (Forum and St Mary)		
6.	Do you agree with the conclusions regarding the areas of search identified at Blandford?		
	Yes □ n/a No □		
7.	Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?		
Yes			
	If you have answered 'Yes' please set out what you see as the further issues.		
	n/a		
8. What are the additional infrastructure requirements that are likely to result from potenti development at Blandford?			
	Please set out what you see as the additional infrastructure requirements.		
	n/a		
	Gillingham		
9.	Do you agree with the conclusions regarding the areas of search identified at Gillingham?		
	Yes No See attached cover letter		
10.	Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?		
	Yes ☐ See attached cover letter		

If you have answered 'Yes' please set out what you see as the further issues.		
See attached cover letter		
11. What are the additional infrastructure requirements that are likely to result from potential fut development at Gillingham?		
Please set out what you see as the additional infrastructure requirements.		
n/a		
<u>Shaftesbury</u>		
12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury?		
Yes □ n/a No □		
13. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?		
Yes □ n/a No □		
If you have answered 'Yes' please set out what you see as the further issues.		
n/a		
14. What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?		
Please set out what you see as the additional infrastructure requirements.		
n/a		

Sturminster Newton

15.	Do y	ou agr	ee with the conclusions regarding the areas of search identified at Sturminster Newton?
	Yes		n/a
	No		II/a
16.	Are		any further issues relating to the areas of search that you think should have been as part of the assessment process?
	Yes		,
	No		n/a
		_	
	If y	ou have	answered 'Yes' please set out what you see as the further issues.
		n/a	
	_		
17.	Wha	at are tl	he additional infrastructure requirements that are likely to result from potential future
1,.			ent at Sturminster Newton?
		•	
	Ple	ase set (out what you see as the additional infrastructure requirements.
		n/a	
	_		
	<u>Stal</u>	<u>bridge</u>	
18.	Do y	you agr	ee with the conclusions regarding the areas of search identified at Stalbridge?
	Yes		
			n/a
	No		
19.			any further issues relating to the areas of search that you think should have been as part of the assessment process?
	Yes		n/a
	No		II/a
	If yo	ou have	answered 'Yes' please set out what you see as the further issues.
		n/a	A Committee of the Comm

	future development at Stalbridge?
	Please set out what you see as the additional infrastructure requirements.
	n/a
	The Villages
	Do you agree with the Council's proposed approach in relation to future development at the eighteen larger villages within the District or do you think that the Council should consider an alternative approach?
	Yes 🗆
	n/a No □
	If you have answered 'No' please set out your alternative approach and information/reasoning behind this.
	n/a
	Affordable Housing
22.	Affordable Housing Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?
22.	Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings? Yes
22.	Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?
22. 23.	Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings? Yes
22.	Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings? Yes
22.	Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings? Yes n/a No Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?
22. 23.	Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings? Yes
22. 23.	Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings? Yes

Self-Build and Custom-Build Housing

25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?
Yes □ n/a No □
a. Allowing serviced plots to come forward under the current development plan policies. Yes $\ \square$ No $\ \square$
b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing. Yes \Box No \Box
c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site. Yes \Box No \Box
d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties). Yes \Box No \Box
e. Identifying land in public ownership which would be sold only for self-build development. Yes $\ \square$ No $\ \square$
f. The use of Local Development Orders to facilitate self-build development. Yes \qed No \qed
26. Are there any other approaches that could be used to meet the demand for self-build housing?
Yes □ n/a No □
If you have answered 'Yes' please outline the other approaches which the Council could pursue.
n/a
Ensuring the Vitality and Viability of Town Centres
27. Do you consider that the existing hierarchy and network of centres, as set out in LPP1, should be amended to include Stalbridge as a 'local centre'?
Yes □ No □ See attached cover letter

Important Open or Wooded Areas (IOWAs)

28.	Do you agree that those IOWAs, which are protected from development by other planning policies or legislation, should be deleted?				
	Yes □ n/a No □				
	The A350 Corridor				
29.	Do you consider that the land which is identified and safeguarded for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass should continue to be identified and safeguarded for such purposes?				
	Yes □ n/a No □				
	Comments				
	If you have any comments about the Issues and Options Document or the Sustainability Appraisal please set them out in the box below. If your comments are in relation to a specific question or chapter of the Issues and Options Document then please state which question or chapter your comments relate to.				
	See attached cover letter				

	Continue on a separate sheet if necessary
De view with the less contests of the 100 to	a to the Level Division 1 2
Do you wish to be contacted about future consultations relating	g to the Local Plan Review?
Yes 💢	
No \square	
Signature:	Date: 22.01.2018
If submitting the form electronically, no signature is required.	<u> </u>
ij sabilitalily the joint electronically, no signature is required.	

When completed please send form to $\underline{\mathsf{planningpolicy@north\text{-}dorset.gov.uk}}$









Planning Policy North Dorset Council South Walks House South Walks Road Dorchester DT1 1UZ

22nd January 2018

Our Ref: 18/3152M

Dear Sir or Madam,

North Dorset Local Plan Review - Regulation 18 Consultation: Issues and Options

This representation is submitted by Planning Potential, on behalf of ALDI Stores Limited, in response to North Dorset Council Regulation 18 Local Plan Review. Our comments relate specifically to Consultation Questions 3, 4, 9, 10 and 27 within the Issues and Options document.

The purpose of this representation is to provide comments on the scope and issues associated with the North Dorset Local Plan Review, in order to ensure that ALDI's interests at Land at Park Farm, Shaftesbury Road, Gillingham are represented through the review process.

We note that the North Dorset Local Plan Review Issues and Options consultation document refers to the evidence base and other relevant documents, including the North Dorset 2016 Annual Monitoring Report (AMR). However, this representation considers the findings of more recently published versions of the supporting documentation, including the North Dorset 2017 AMR.

Our comments in relation to Consultation Questions 3, 4, 9, 10 and 27 are set out below.

Consultation Question 3

The updated Bournemouth, Dorset and Poole Workspace Strategy (Workspace Strategy) 2016, demonstrates that the amount of employment land available in Eastern Dorset, and across Dorset as a whole, exceeds the employment land demand requirements up to 2033.

Notwithstanding, at Paragraph 4.10 of the Local Plan Review Issues and Options consultation document, the Council states that there is likely to be a need to allocate additional employment land in certain parts of North Dorset through the Local Plan Review, including at Blanford.

It is considered that the sustainable growth of areas in North Dorset could be more effectively achieved through a more proportionate and even distribution of employment land throughout the District. Although this representation does not seek to include a direct position on the specific need for additional employment sites within Blanford (Consultation Question 2), it is considered that at present, there is an over reliance on Gillingham for employment land as Gillingham currently has circa 50% of the allocated employment land for North Dorset (Paragraph 5.19 of the North Dorset AMR 2017).

Furthermore, the disproportionate allocation of employment land in Gilllingham means that available employment land across North Dorset is restricted, resulting in the potential for a lack of employment opportunities in the rest of the District.

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple | Alastair Close
Dan Templeton
Associate Director
Katie Turvey

Consultant Caroline Dawson

Associates

Sally Arnold | Rob Scadding | Heather Vickers | Alan Williams | David Williams

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Paragraphs 18 of the National Planning Policy Framework (NPPF) states that the Government is committed to securing economic growth, and Paragraph 20 states that Local Planning Authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st Century. In addition, Paragraph 21 states that "investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning Policies should recognise and seek to address potential barriers to investment ..."

It is considered that it is necessary to allocate additional employment land in appropriate strategic locations throughout North Dorset, but outside of Gillingham, which will extend the geographical extent of land allocated for employment use, and effectively deliver sustainable economic growth.

It should also 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.

The allocation of additional employment sites throughout North Dorset would reduce the pressure on Gillingham and create a more proportionate distribution of allocated employment sites within the District. Furthermore, it would reduce the need for as much employment land within Gillingham specifically.

Therefore, a limited number of existing employment sites in Gillingham, including Land at Park Farm, should be considered for more appropriate alternate uses, including retail, which would support sustainable growth in Gillingham.

Consultation Question 4

The housing requirement for North Dorset is discussed in Paragraphs 5.7 and 5.8 of the Local Plan Review Issues and Options consultation document. They outline that the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA) gives an objectively assessed need (OAN) for housing in North Dorset of 330 dwellings per annum up to 2033, which is an increase on the requirement of 285 dwellings per annum as outlined in the adopted Local Plan Part 1 (2016).

Furthermore, North Dorset District Council considers 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.

Whilst it is appreciated that the Council is considering some limited growth at Stalbridge, it is likely that the majority of this need for additional housing will be met by the four main towns, including Gillingham. Therefore, additional facilities and services, including discount foodstores, will be required to meet the day to day needs of the existing and new population.

Consultation Questions 9 & 10

Section 7 of the Local Plan Review Issues and Options consultation document considers future development in Gillingham. It acknowledges that Policy 6 of the Local Plan Part 1 (2016) outlines that at least 2,200 homes will be provided at Gillingham during the period 2011–2031, with about 480 of these classed as affordable homes. However, as set out above, the latest housing requirement for North Dorset is considered by the Council to be 366 dwellings.

The Council acknowledge in the Local Plan Review Issues and Options consultation document that additional land is likely be required in Gillingham to assist in delivering the uplift in housing need. We welcome the consideration by the Council of whether there is potential for additional growth at Gillingham, which could contribute towards meeting the additional housing need for North Dorset.

The Local Plan Review Issues and Options consultation document considers a number of future development areas, including Land at Park Farm (Area D on Map 7.2). Whilst we reserve judgement on the specific merits of the areas reviewed by the Council for future development, it is considered that additional areas of land are required to meet the housing demand for the

District, including Gillingham. This will ensure that the development of the town over the Plan period accords with the spatial strategy and objectives set out in Policy 2 of the Local Plan Part 1 (2016) and Paragraph 47 of the NPPF.

Specifically, the Issues and Options consultation document reviews Land at Park Farm, Gillingham (Area D), and considers that there is development potential in this location.

For the reasons set out above, we are of the view that alternative uses on the Land at Park Farm that is currently allocated for employment uses should be considered. Furthermore, should the additional Land at Park Farm (Area D) be selected for additional dwellings to assist in meeting the up to date housing need for North Dorset (366 dwellings per annum), additional supporting facilities and services will be required to meet the day to day needs of the existing and new population.

An ALDI discount foodstore on Land at Park Farm, alongside additional housing, would be well located to improve the retail offer of the area and choice for customers, as well as provide local employment opportunities. It would represent sustainable development that will benefit the local economy, and the existing and future residents, particularly in south Gillingham.

Consultation Question 27

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.

We reserve judgement on the issue of the vitality and viability of centres, and the hierarchy and network of centres until the new retail evidence base has been published.

Conclusions

This representation is submitted by Planning Potential, on behalf of ALDI Stores Limited, in response to North Dorset Council Regulation 18 Local Plan Review.

This representation provides comments on the scope and issues associated with the North Dorset Local Plan Review (specifically relating to Consultation Questions 3, 4, 9, 10 and 27), in order to ensure that ALDI's interests at Land at Park Farm, Shaftesbury Road, Gillingham are represented through the review process, and to assist in the preparation of a sound and robust North Dorset Local Plan Review.

We trust you will give this representation due consideration. Should you have any questions or queries, please do not hesitate to contact us.

Yours faithfully,

Planning Potential

Bristol

Enc.