

North Dorset Local Plan Part 1 Examination

Issue 1: Duty to Co-operate, Legal Requirements and the Council's Broad Strategy (Policies 1 and 2)

**Statement on behalf of South Gillingham
Consortium (Respondent ID: 2984)**

February 2015

Introduction

1. This statement is submitted on behalf of C G Fry & Son Limited, Welbeck Land, Taylor Wimpey, and the landowners at Newhouse Farm (the Consortium) in connection with the examination in public of the submitted North Dorset Local Plan Part 1 2011 – 2026 (LP1). Together the land owners and developers control approximately 102.3 hectares of land to the south of Gillingham, comprising 82% of the total site area within the proposed strategic allocation for the southern extension of Gillingham. These four parties are working together as a consortium to ensure a co-ordinated approach to the delivery of the Gillingham Strategic Site Allocation (SSA). This statement has been prepared jointly by the professional advisors of these companies and landowners.
2. This statement addresses selected Inspector's questions under Issue 1. It should be read in conjunction with the statements prepared by the Consortium in respect of Issues 2, 4, 5 and 8. The Consortium is working with the Council to agree a Statement of Common Ground and will endeavour to submit this to the Programme Officer no later than two weeks before the Issue 8 (Gillingham) hearing session on 18 March 2015.

Examination Issue 1: Duty to Co-operate, legal requirements and the Council's Broad Strategy (Policies 1 and 2)

3. This statement addresses Inspector's questions 1.4, 1.5 and 1.14:

Question 1.4 Is LP1 based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the strategic site selection process been objective and based on appropriate criteria? Is there clear evidence demonstrating how and why the preferred strategy was selected?

4. This statement responds to question 1.4 with particular reference to Gillingham.
5. The basis for the assessment of options for the extension of Gillingham is contained within *Assessing the Growth Potential of Gillingham* - Atkins 2009 (**MTC004**). The Atkins report underpinned the various stages of sustainability testing undertaken by the Council and its selection of the current Strategic Site Allocation (SSA). Of the four scenarios tested, Option 2 – Southern Focus - performed the best (Figure 4.5: Assessment Summary – Initial Growth Scenarios on pg 46).

6. The *Initial Sustainability Appraisal Report (COD010)* was published in March 2010 and was undertaken in respect of the draft New Plan. It considered options for the level growth to be directed to the main four settlements. For Gillingham, it considered five options for the growth of the town up to 2016 and three options for growth beyond 2016, all involving greenfield land. These three options were:
 - Option 16(2) a: South and South East
 - Option 16(2) b: North and West
 - Option 16(2) c: a combination of b and b.
7. Paragraph 2.26 confirms that Option 16(2) a, which concentrated development to the south and south east of the town, was identified as the preferred option by the Council. Accordingly, the southern extension to Gillingham was found by Atkins and the Council to be the preferred option, following objective and appropriate testing during early stages of plan preparation.
8. The Addendum to the Initial Sustainability Appraisal Report (**COD004**) was published in October 2012 and includes an appraisal of development management policies together with growth options at Blandford and Gillingham (land to the north east of Gillingham) that were not assessed by the Initial Sustainability Appraisal report. While the land to the north east of Gillingham was considered by Atkins, it was rejected by the Council in the early stages of plan preparation and was not therefore assessed by the Initial Sustainability Appraisal.
9. The Addendum concluded that the land to the north east of Gillingham scores poorly in terms of its proximity to services (especially to the north of Bay), access, flooding and landscape.
10. The sustainability appraisal process referred to above is brought together by the Pre-Submission Sustainability Appraisal Report November 2013 (**SUD03 a – d**). This document also includes the Strategic Environmental Assessment (SEA) in accordance with the European Strategic Environmental Assessment Directive (2001/42/EC). In this respect, the appraisal process also accords with the Environmental Assessment of Plans and Programmes Regulations 2004.
11. SUD03 also refers to the scoping process undertaken at various stages of plan preparation, namely the Scoping Report produced in 2007 and the revised and updated Scoping Report produced in 2009.

12. National Planning Practice Guidance (NPPG) sets out requirements for testing local plans (Sustainability appraisal requirements for local plans). Paragraph ref ID 11-006-20140306 states that work should start on sustainability testing at the same time as work starts on plan preparation. The Council's approach complies broadly with this requirement.
13. Paragraph Reference ID: 11-009-20140306 advocates a focused and proportionate appraisal process relating to environmental, economic and social impacts.
14. The approach to the Gillingham SSA has also involved appropriate community and technical stakeholder engagement led by the Council.
15. It is therefore considered that the Council's approach to sustainability testing is proportionate and objective and that it accords with the provisions of the NPPG and the Environmental Assessment of Plans and Programmes Regulations 2004. Furthermore it provides appropriate clarity on the basis for site selection, particularly in so far as the Gillingham SSA is concerned.

Question 1.5: Is the Council's core spatial strategy (policy 2) justified and compatible with the principles referred to in paragraphs 17 and 55 of the NPPF? Will the policies and proposals in LP1 contribute to the sustainable growth of the District?

16. Gillingham is identified as being one of "The Four Main Towns" by LP1. LP1 explains that these towns function as the main service centres and will be the main focus for housing and employment development. This is an appropriate strategy and accords in broad terms with the core planning principles in the NPPF paragraph 17. In particular, it seeks to meet the need for housing (market and affordable) and jobs where the need is greatest and it ensures a balanced approach to managing the effects of development on the environment.
17. It is understood that other submitters are seeking an increased housing allocation for the rural areas. The consortium considers that any increase in housing numbers in the rural areas should not be at the expense of housing allocation for the main towns, including the Gillingham SSA. The level of housing and jobs identified for the Gillingham SSA will help achieve the wider objectives for the future role and function of the town. The SSA as proposed is required to meet the need for market and affordable housing and jobs. It will also ensure that the development is viable and deliverable in the context of the corresponding infrastructure that the development is required to deliver.
18. In so far as focussing most development on the main towns is concerned, the core spatial strategy appears sound and will help achieve sustainable development.

Question 1.14: Although not necessarily a matter of soundness, LP1 is over 400 pages long. Planning Practice Guidance (paragraph 010 under Local Plans) advises that 'local plans should be as focused, concise and accessible as possible'. Are there any opportunities which the Council could take to streamline the document?

19. The Consortium's representations identify the following principal issues:
- Repetition between different sections and policies, including the separate chapters for Gillingham (Policy 17 and Policy 21)
 - Lengthy quotations eg from NPPF
 - Lengthy and overly prescriptive policies.
20. As drafted, the plan is not focused, concise and accessible, contrary to NPPG ref ID 12/010-20140306, which also states that plans should avoid undue repetition and that there should be no need to reiterate NPPF policies.
21. The Consortium presented various opportunities to the Council to streamline LP1 both in its representations and at a meeting with officers on 9 January 2014, but no changes ensued.

Conclusions

22. C G Fry and the Consortium consider that the Council's evidence base and sustainability testing process as a whole is proportionate and appropriate. In particular, the selection process for the Gillingham SSA is objective and based on appropriate criteria.
23. The overall policy approach of focussing most development at the four main towns such as Gillingham is sound and accords with the NPPF. Other submitters suggest that the housing allocation for rural areas should be increased, but the Consortium considers that this should not be at the expense of the allocations for the main towns including Gillingham.
24. The submitters consider that LP1 is repetitive unnecessarily long, which limits its accessibility. The submitters have identified clear opportunities to streamline the document.