

NORTH DORSET DISTRICT COUNCIL
THE NORTH DORSET LOCAL PLAN PART 1
2011- 2026 EXAMINATION

CONSULTEE ID – 3085

REPRESENTATIONS

ISSUE 8
18th MARCH 2015

MATTERS:

GILLINGHAM, INCLUDING GILLINGHAM
SOUTHERN EXTENSION (POLICIES 17 AND 21)

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Gillingham Town (policy 17)

Question 8.1

Is there any evidence that the proposed residential development sites in Gillingham, including the development of land east and south of Ham; Station Road; and south and south-west of Bay, are not available, sustainable or deliverable? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?

- 1.1 The main evidence base document MTC004 (Assessing the growth potential of Gillingham – Atkins 2009) demonstrates that without significant strategic highway improvements Gillingham could accommodate growth up to 2026 in the order of 2,300 dwellings, with a further 1,000 dwellings after 2026. The Council have however decided to allocate a lower level of growth to the town (1,490 homes) and we address this matter in representations on Issue 1. What the evidence base also demonstrates, that with the only direct rail connection in the District, Gillingham is an important location for future growth, and the Plan recognises this to an extent in seeking to deliver 1,490 homes over the plan period. Whilst our principal concerns lies with the high reliance on a single strategic southern extension we also have concerns that evidence base in the form of the 2010 SHLAA published in August 2011 is now so out of the date (5 years) that it cannot serve to demonstrate that sites remain available, sustainable and deliverable. We contend that an updated assessment of sites at Gillingham is required given the strategic importance of the settlement within the District. We are also concerned that the plan fails to show precise locations for development other than the southern extension. This makes it virtually impossible to draw firm conclusions on site credentials.
- 1.2 One site that is available, sustainable and deliverable is Land South of Le Neubourg Way (formerly referred to as Chantry

Fields) which is capable of accommodating circa 240 dwellings. This site was the subject of a planning application in 2014 (reference 2/2014/0916/OUT and which can be viewed via the <http://planning.north-dorset.gov.uk/online-applications/>). The Planning and Design and Access statements and illustrative layout and site location plans submitted with this application are provided as Appendix 1 and summarise the key credentials of this site. Whilst the application was refused on a number of grounds, these can be overcome and an appeal against the refusal is currently being lodged.

- 1.3 We draw the Inspectors attention to the fact that the site was considered during the examination of the North Dorset District-Wide Local Plan in 2000. That Inspector concluded that the site was suitable for housing *"the plan be modified by allocation that part of this objection site which lies outside the sewage treatment works protection area (Policy 1.16) and outside the area liable to flood (policy 1.13) for housing."* An extract from the Inspectors Report is provided as Appendix 2.
- 1.4 The evidence base document Assessing the growth potential of Gillingham – Atkins 2009 (ref. MTC004) also considers the site as part of its 'evaluation of major sites' and scored the site 34 points out of a potential of 55 (13th out of 25 sites). Set in context the lowest scoring site achieved 16 points and the highest 50 points.
- 1.5 We also point out concerns with the scoring process. In the first instance the assessment appears geared towards supporting a southern strategic extension rather than objectively assessing existing site conditions and it relies heavily weighting 'future potential' which may or may not be realised. Furthermore we contend that a number of the individual scores the site received are flawed. The Chantry Fields site scored 1 for a potential impact on existing wooded areas or open space. Under reference 2/2000/0341 planning permission was granted for a community centre and the creation of a vehicular access, car parking and open space. However, the outline planning permission was never progressed to reserved matters stage and has now lapsed. The land fulfils no open space function and should have scored 4 if not 5 points in this regard. The site scored 2 with regards the potential to improve recreational facilities, but the illustrative layout submitted in respect of application 2/2014/0916/OUT clearly shows significant potential to improve recreational opportunities. The site scored 3 for potential to integrate with the existing settlement despite largely sitting adjacent to existing development whilst several of the sites on the southern edge of the settlement scored 4 points. The site is scored 2 with regards to the potential of landscape impact. However, in respect of application 2/2014/0916/OUT the Officer Report to Committee (appendix 3) concurred with the submitted LVA

which found that the site is visually well contained within the wider landscape, does not impact negatively on identified designations. The recent planning application also established that only limited highway improvements would be required to bring the site forward and therefore deliverability would not be hindered by viability concerns.

- 1.6 It is our contention that insufficient robust evidence exists to demonstrate that residential development sites in Gillingham are available, sustainable or deliverable and that additional sites are required and one suitable of allocation is Land South of Le Neubourg Way which has been demonstrated to be available, sustainable and deliverable.

Gillingham Strategic Site Allocation SSA (policy 21)

Question 8.7

Is there any evidence that the proposed Gillingham Strategic Site (or any part of it) is not available, sustainable or deliverable? If such evidence exists what alternatives are available to the Council? Is the proposed boundary of the SSA justified?

- 1.7 We do not believe that the southern extension will deliver the quantum of development required due to infrastructure constraints. The IDP Background Paper 2012 is not fully clear as to whether the full extent of the works required to foster the southern extension have been allowed for nor does it make detailed costings and sources of funding clear. Given the reliance on the southern extension to provide the majority of the housing proposed at Gillingham we do not believe that the underlying evidence base is sufficiently robust to demonstrate that it can be delivered in the manner envisaged.
- 1.8 The supporting text to Policy 21 refers to a number of particular highway 'pinch points'. In particular the junction to the south of railway bridge on B3081. It is plain any additional traffic passing through this junction as a result of the southern extension will have a serious detrimental impact on its operation, unless highway improvement works are undertaken to increase its capacity, which could be difficult to achieve. There are also concerns regarding the impact of the Southern relief road on the whole length of Le Neubourg Way and its junctions. Policy 21 makes only passing reference to the road bridge that provides the only vehicular crossing point over the railway. It appears that the suitability of this structure to accommodate likely future traffic flows has not been robustly assessed and that the policy ignores the fact that upgrade works would, most likely, be required. The significant cost of any works and inevitable delay in negotiations with Railtrack could render the southern

extension undeliverable in a timely manner further reinforcing the position that the site will not be able to provide the required housing numbers in an appropriate timeframe.

- 1.9 Given the stated importance of the strategic urban extension to the strategy for Gillingham and the district as a whole it is a fundamental flaw that no detailed work as to how the infrastructure requirements of 1,800 dwellings (including those beyond the plan period) will be met. We hold that sufficient evidence exists to question the deliverability of the southern extension and also that there is insufficient evidence to demonstrate to the contrary.
- 1.10 Given the uncertainties over the deliverability of the full scope of the southern extension a more robust solution would be to allocate a number of sites around the town. This could still include land to the south of the settlement but at a lower quantum and which would place less pressure on the infrastructure around this location. One of the additional sites which could deliver part of the housing requirement of the town is Land South of Le Neubourg Way. Even if the southern extension is allocated as it stands we believe additional sites are required to deliver housing at the rate needed over the plan period.

Question 8.8

Are all the infrastructure requirements related to the southern extension (as set out in policy 21) justified, viable and deliverable? For example the off-site highway improvements; other off-site measures and the improvements relating to social infrastructure, including the proposed local centre. Is it sufficiently clear how a decision maker should re-act to a proposal – the 'what, where, when and how'

- 1.11 The southern extension will require significant infrastructure to support it, not the least because it is largely removed from the bulk of the town. However, we do not believe the policy or supporting evidence base is sufficiently clear to fully establish what is and is not required and as observed a point 1.7 there appears to be at least one significant item of infrastructure which has not been included. Given the lack of detailed viability work to support the policy there is no evidence to demonstrate that the required infrastructure is viable and deliverable. The lack of any phasing provision or trigger points within the policy fail to provide direction as to how a decision maker should determine applications which may come forward in a piecemeal fashion

Question 8.11

What are the risks to the delivery of the southern extension at Gillingham and does the Council's approach ensure that they are, as far as possible, minimised? What is the trajectory for the provision of the housing and what is the Council's fall-back position should the southern extension not deliver housing at the rate currently anticipated?

- 1.12 There are only 11 years of the proposed plan period remaining. Over this time the Council expect the southern extension to be able to deliver 1,240 dwellings. Policy 21 states that a Master Plan Framework is expected to be produced by the developers involved with the southern extension in conjunction with the community and other stakeholders, prior to the approval of this by the Council, proposals on the southern extension will not be supported. Agreement between all parties will not necessarily be automatic and timely. Even if the plan were to be adopted later this year and work commenced on a Master Plan Framework promptly it is realistic to think that development would not come forward until 2017 at the earliest. This is especially pertinent as we have seen no evidence of an equalisation agreement between the various landowners involved and without which it cannot be expected that the southern extension will be delivered promptly. Commencement in 2017 would require the delivery of circa 140 dwellings per year which with only a small number of developers involved and with other infrastructure constraints is very unlikely to be deliverable. We once again draw the Inspectors attention to the identified highway issues and in particular the New Road with Shaftsbury Road junction and its relationship to the bridge over the railway. Even if the plan period is extended we do not believe a single strategic site will deliver housing at the rate required to meet the stated need by 2026.
- 1.13 In our opinion due to the lack of robust, detailed, up-to-date evidence, the risk to delivery of the southern extension are high and it cannot be concluded that it would deliver sufficient housing over the plan period.
- 1.14 Due to the intention to not allocate other sites and the reliance on land within the settlement boundary to deliver the remaining homes, there is no suitable fall-back position should the southern extension not deliver the required number of homes. Our view is that a better informed view is required and that a more realistic approach would be to continue to support the southern extension for longer term growth, but at a more achievable rate, whilst allocating other suitable sites around the boundaries of the town to meet shorter term housing needs. This approach would broadly accord with the Scenario 1 of the Assessing the growth potential of Gillingham document which is

described as a refined growth scenario and proposed development both north and south of the settlement and included development at Land South of Le Neubourg Way (Chantry Fields site ATK51).