North Dorset Local Plan Part 1 Examination

Statement submitted on behalf of the South Gillingham Consortium

Issue 5: Infrastructure Provision

Respondent reference number: 2984

February 2015

Issue 5: Infrastructure Provision (policies 13 to 15), including retention of community facilities (policy 27)

Introduction

- 1. This statement is submitted on behalf of CG Fry & Son, Welbeck Land, Taylor Wimpey, and the landowners at Newhouse Farm. 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 5. It should be read in conjunction with the statements prepared by the Consortium in respect of Issue issues 1, 2, 4, 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.

Inspector's Questions

5.1 What assessment has been undertaken regarding the impact of the proposed development on existing infrastructure, for example roads, schools, community facilities (including sports pitches), health services, utilities and drainage?

- 3. These comments are made primarily in relation to the infrastructure provision for the Gillingham SSA. The Consortium has undertaken a significant amount of work on infrastructure delivery for the SSA, as detailed in our statement on Matter 8.
- 4. Work undertaken by the Consortium has included a Preliminary Infrastructure Appraisal report by WYG to assess the availability of existing utility infrastructure to meet the anticipated demand of the proposed development of land at the Gillingham Southern Extension, Dorset and to identify constraints associated with existing service wayleaves or easements and diversion requirements. The report also provides indicative costs for the new infrastructure connections, diversions and any off site network reinforcement

requirements. These have not identified any major constraints that would compromise the delivery of the SSA.

- 5. In relation to transport, an S-Paramics micro-simulation model has been prepared to assess the likely traffic impact of the proposed Gillingham Southern Extension. The base model has been agreed with DCC as local highway authority as being representative of existing conditions. The traffic generation of the SSA along with the distribution / assignment profile of development generated traffic has also been agreed with DCC. The modelling parameters used take account of the agreed sustainable transport strategy in order to undertake a realistic analysis of the likely impacts of the proposed Local Plan development on the local highway network.
- 6. In accordance with the requirements set out in the emerging North Dorset Local Plan a number of highway improvements have been identified to deal with the residual traffic impact of the development of the Gillingham SSA. As a result of the proposed highway improvements, it has been demonstrated the local highway network can accommodate at least 1,800 dwellings plus the expanded Brickfields Business Park at the proposed Gillingham Southern Extension by 2026. This has been agreed with the local highway authority. The proposed phasing and trigger points for the highway mitigation measures have been agreed with DCC and are acceptable without resulting in a severe impact on travel conditions.

5.2 Is it sufficiently clear what infrastructure is required, who is going to fund it and how it relates to the anticipated rate and phasing of development (PPG paragraph 018 under Local Plans)?

- 7. In relation to the Gillingham SSA, it is anticipated that infrastructure delivery will be secured by S106 agreement. An infrastructure delivery plan for the SSA will form part of the MPF. As set out in the statement on matter 8, the consortium have concerns regarding certain specific infrastructure requirements for the SSA.
- 8. Clarification of NDDC's proposed approach in relation to CIL, particularly in respect to the Gillingham SSA, would be welcomed.

5.3 Is sufficient advice provided on drainage and flood prevention and does policy 13 achieve the correct balance between detail and flexibility and does it reflect the advice within the Written Ministerial Statement on sustainable drainage systems dated 18th December 2014? Is the threshold of two dwellings

(under Drainage and Flood Prevention) justified? Is there a word missing at the start of criteria (a) and (b)?

9. This policy is primarily a statement of how NDDC will work with statutory undertakers. In the course of the planning process, infrastructure required to mitigate the effects of development will be delivered by the development, and thus we do not consider that a specific policy is required. In any event, much of the wording of the policy is too general to be enforceable or used in any meaningful way as a decision-making tool. Certain parts of the policy and supporting text could potentially remain within the Local Plan, but as background information only. Insofar as there is a requirement for transportation, drainage or other issues to be considered, these would better be described in policies which refer to specific towns or allocations. There is also a lack of evidence for specific measures in policy 13, for example public art, which is sought on (undefined) 'prominent sites'.

5.4 Are all the components of policy 14 justified?

- 10. This policy addresses a range of matters that are not land-use related and/or cannot be controlled through a Local Plan. Many of the facilities identified as social infrastructure are delivered by other agencies over which NDDC does not have control. No objective assessment of the need for key facilities (such as surgeries and health centres) has been carried out or made available in relation to specific parts of the district. Insofar as 'social infrastructure' is required to be addressed in the Local Plan, it would be preferable to focus on the needs in individual parts of the district and address these in the policies dealing with individual urban extensions.
- 11. The following changes are suggested:
 - Either delete the whole of the policy, or retain only the first paragraph, as follows:

"The Council will work with partners and developers to ensure that the level of social infrastructure across the District meets identified needs through the retention and improvement of existing facilities and new provision, where required."

• Replace final sentence to 7.93 as follows:

"The scale and nature of new health facilities provided as a result of the Gillingham Southern Extension shall be agreed subject to further assessment of the likely needs generated by the development. These may include new health facilities including a doctor's surgery, dentist and pharmacy" 5.6 Is it appropriate to refer to the Green Infrastructure Strategy in policy 15 when it has not yet been prepared?

and

5.7 Are all the components of policy 15 justified and is it sufficiently clear what developments would be expected to deliver requirements (i) to (m) and where? Are these requirements reasonable?

and

5.9 How will the Council ensure that appropriate new facilities for recreation and sport will be provided and existing facilities retained? Is it sufficiently clear to a decision-maker what outdoor sports and play space standards should be applied and to which parts of the District?

- 12. Policy 15 appears to be a statement of intent rather than a clear policy to guide development and decision making. The policy does not appear to be sufficiently clear or justified. In the absence of a clear and robust policy, any assessment of green infrastructure requirements would more appropriately take place on a case-by-case basis responding to the specific impacts of each development. Green Infrastructure strategies for individual allocations are described elsewhere in the draft plan; this means that there is no need for an overarching and non-specific policy such as Policy 15.
- 13. The following changes are suggested:
 - Either delete the whole of the policy, or retain only the first paragraph, amended as follows:

"The Council will seek to provide an integrated network of green spaces, green links and other green elements. <u>Subsequent sections of this plan outline key Green</u> <u>Infrastructure considerations for individual parts of the district.</u>"

5.11 Is the Council's approach to allotment provision sufficiently flexible (paragraph 7.139)? Is this supporting text a policy?

14. The approach to allotment provision set out at paragraph 7.139 is not considered sufficiently flexible or justified. Allotment provision in the emerging Master Plan Framework for the Gillingham SSA is based on 75 plots at half NSAG standards, as agreed with NDDC.