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Ack: _____

Representation # _____

GILLINGHAM NEIGHBOURHOOD PLAN

Regulation 16 Consultation: 4 January – 15 February 2018

Response Form

Gillingham Town Council has submitted a Neighbourhood Plan for Gillingham to North Dorset District Council (NDDC) under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). Regulation 16 requires NDDC to publicise the plan on its website and to invite representations for a prescribed period of time. All representations made at this stage will be sent to an independent examiner.

The submitted plan and supporting documents can be accessed online from

dorsetforyou.gov.uk/Proposed-Gillingham-Plan

All comments must be received by **5pm Thursday 15 February 2018**. We cannot accept late responses.

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

Part A – Personal Details

Please complete this part of the form as unfortunately we cannot accept confidential or anonymous representations. By submitting this 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 sent to the independent examiner and available for inspection.

Note, if comments are being made by an agent, all correspondence will be sent to the agent unless requested otherwise.

	Details of person(s) making response	Details of appointed agent (if applicable)
Title	Mr	
First Name	Paul	
Last Name	Bedford	
Job Title (where relevant)	Senior land and Planning Manager	
Organisation (where relevant)	Persimmon Homes South Coast	
Address		
Postcode		
Tel. No.		
Email Address		

Part B – Representation

1. Which document does the comment relate?

Tick one box only.

<input checked="" type="checkbox"/>	Neighbourhood Plan – Submission version
<input type="checkbox"/>	Neighbourhood Area Map (included within the neighbourhood plan document)
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Strategic Environmental Assessment and Habitats Regulations Assessment Determination Notice
<input type="checkbox"/>	Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report
<input type="checkbox"/>	Other <i>Please specify:</i>

2. Which part of the document does the comment relate?

Identify the text that you are commenting on as appropriate.

	<i>Location of Text</i>
Whole document	<input checked="" type="checkbox"/>
Section / chapter / appendix	<input type="checkbox"/>
Policy	<input type="checkbox"/>
Page	<input type="checkbox"/>

3. Do you wish to?

Tick one box only.

<input type="checkbox"/>	Support
<input type="checkbox"/>	Support with conditions
<input type="checkbox"/>	Object
<input checked="" type="checkbox"/>	Make an observation

4. Please give your reasons in the box below.

The Local Plan was found sound on the understanding that an immediate review was undertaken to plan for the revised housing need figures .This review is underway . It is considered that the Neighbourhood plan should not progress until the Local Plan has decided on the level of housing to be accommodated in the various Towns ,specifically Gillingham.-

5. Please give details of any suggested modifications in the box below.

The NP should be held back until the review of the Local Plan identifies the additional land required to meet the new housing need numbers .

Continue overleaf if necessary

6. Do you wish to be notified of the District Council’s decision to make or refuse to make the neighbourhood plan?

Please tick one box only.

x	Yes
	No

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x	Basic Conditions Statement	
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	Other	<i>Please specify:</i>

2. Which part of the document does the comment relate?

Identify the text that you are commenting on as appropriate.

	<i>Location of Text</i>
Whole document	
Section / chapter / appendix	Housing
Policy	NP Policy 1
Page	7

3. Do you wish to?

Tick one box only.

	Support
	Support with conditions
x	Object
	Make an observation

4. Please give your reasons in the box below.

Despite the statement concluding there is “no apparent conflict with the Local Plan “ It is considered this policy is totally in conflict with the Local Plan .

The Local Plan states that “ People wishing to build their own home can do so either on an infill plot in a town or village ,or by replacing an existing dwelling in the countryside .(para 5.57)

There is no mention of an element of self build being required on large sites .

A large, empty rectangular box with a thin black border, occupying the top half of the page. It is intended for providing details of suggested modifications.A second large, empty rectangular box with a thin black border, identical in size and style to the one above, occupying the middle section of the page. It is also intended for providing details of suggested modifications.

5. Please give details of any suggested modifications in the box below.

Policy 1 should be deleted .

Continue overleaf if necessary

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x	Yes
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<input type="checkbox"/>	Other <i>Please specify:</i>

2. Which part of the document does the comment relate?

Identify the text that you are commenting on as appropriate.

	<i>Location of Text</i>
Whole document	<input checked="" type="checkbox"/>
Section / chapter / appendix	Housing
Policy	Policy 1
Page	12/13

3. Do you wish to?

Tick one box only.

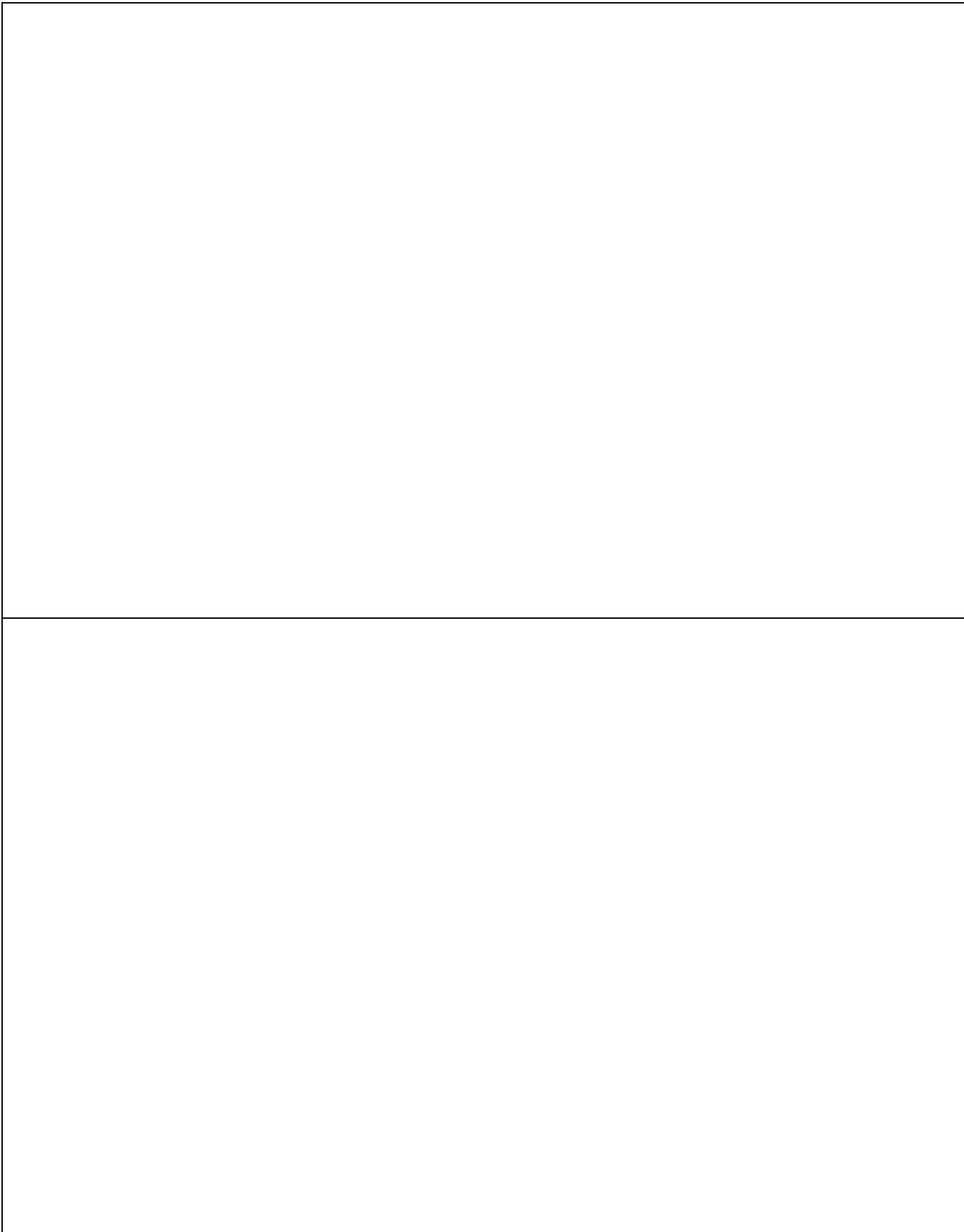
<input type="checkbox"/>	Support
<input type="checkbox"/>	Support with conditions
<input checked="" type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation

4. Please give your reasons in the box below.

Persimmon have serious concerns regarding the requirement for custom and self build within larger sites .There are health and safety issues of having self build within an active construction site and this applies even when the main build is complete and the houses are occupied .
There would be uncertainty over the take up of such plots which would affect the deliverability of housing sites which is critical if North Dorset is to resolve its housing shortage both in terms of the short term 5 year land supply but also in the longer term as it seeks to meets its objectively assessed housing need in the Local Plan review currently underway.

The Local Plan does not contain a policy that requires an element of self build on larger housing sites .Para 5.56 clearly explains that self build and custom build can be provided by utilising infill plots in towns or villages ,or by replacing an existing dwelling in the countryside . This policy is clearly contrary to the Adopted Local Plan and therefore the Neighbourhood Plan would not be in accordance with the strategic housing policies in the Local Plan .The policy would add an additional burden on developers over and above the policies of the Local Plan .

There seems to be an assumption that self build is a form of affordable housing .The people that are in need of affordable housing are unlikely to be in a position to buy a building plot in the Market and pay for the necessary professional services required to gain and implement planning and building regulation approval .



5. Please give details of any suggested modifications in the box below.

The Policy should reflect the wording at para 5.56 of the Local Plan

Continue overleaf if necessary

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x	Yes
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2. Which part of the document does the comment relate?

Identify the text that you are commenting on as appropriate.

	<i>Location of Text</i>
Whole document	<input checked="" type="checkbox"/>
Section / chapter / appendix	Transport
Policy	12
Page	33

3. Do you wish to?

Tick one box only.

<input checked="" type="checkbox"/>	Support
<input type="checkbox"/>	Support with conditions
<input type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation

4. Please give your reasons in the box below.

It is an important element of sustainable development that opportunities to improve pedestrian and cycle links are utilised so that the use of private vehicles is discouraged .

5. Please give details of any suggested modifications in the box below.

Continue overleaf if necessary

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Identify the text that you are commenting on as appropriate.

	<i>Location of Text</i>
Whole document	x
Section / chapter / appendix	Green and Urban Spaces
Policy	18 ,20 and23
Page	43

3. Do you wish to?

Tick one box only.

<input type="checkbox"/>	Support
<input type="checkbox"/>	Support with conditions
x	Object
<input type="checkbox"/>	Make an observation

4. Please give your reasons in the box below.

The objective of protecting existing public open spaces whether formal or informal is understood and appreciated .However, The concept of Safeguarding land for possible future open space use is flawed and prejudicial to sound planning in the future.

The future use of land is a matter that should be resolved through the review of the Local Plan. It is well recognised that the Local Plan review needs to find additional land for residential development to meet the objectively assessed need for housing .The Local Plan was only found sound on the premise that an early review was undertaken in order to meet the acknowledged higher objectively assessed need .The review of the Local Plan should not be hindered in this regard by a safeguarding policy which would limit the options open in the Local Plan review in selecting sites to meet the requirement for additional residential development. In this regard the recently published Issues and Options consultation document identified the Windyridge area as an area with possible development potential .This area is include in the open space safeguarding area . This is a clear conflict between the review of the Local Plan and the Neighbourhood Plan .

In addition there is no evidence that land in the areas of search which is in private ownership is likely to come forward for open space use within the plan period or indeed at all .

Para 11.7 recognises this uncertainty “ By taking a longer term view of local needs (to 2031) and how these needs will change further as the local population grows ,it should be possible to plan and bring forward accessible green spaces as funds allow .The funding for the provision of sport ,recreation and leisure facilities may come (in part) from funding secured as part of new housing developments, but their delivery ‘on the ground ‘ will be dependant on negotiation with landowners if there is no suitable land within public control .”(my underlining)

Para 11.13 Refers to “ Limited funding towards such provision (*outdoor sports provision*) may be made available from the Community Infrastructure Levy

There is therefore no guarantee that land will come forward for open space uses within the plan period or at all and as such the policy is unsound.

There is no Policy in the Local Plan regarding safeguarding land for new open space .The Local Plan concerns itself with “ Local Green Spaces “ which is an entirely different matter and is dealt with separately in the Neighbourhood Plan .The Safeguarding policy is not therefore in conformity with the Local Plan .

The policies as worded imply that if opportunities were to emerge outside the areas of search for open space these would not acceptable .I am sure this is not the intention of the policy.

It follows from the above that policies or sections of policies referencing safeguarding land in the areas of search for formal and or informal open space, especially Policy 23, should be deleted. The policies should be reworded to recognise that opportunities outside the areas of search would be considered on their merits .

5. Please give details of any suggested modifications in the box below.

All references to the safeguarding of land for provision of formal sports and informal recreation /amenity space and ancillary development should be deleted from the policies 18,20 and 23 .

Continue overleaf if necessary

Policy 18 add “preferably” after should in last sentence .

Policy 20 add “preferably” after or in last sentence

Policy 23 The first paragraph within policy 23 on page 51 should be deleted .However If it is considered a policy is required the following wording is put forward.

“New provision of formal sports and informal recreation / amenity space and ancillary development should preferably be provided within the areas of search (as shown in figure 11.4). New provision outside the areas of search will be considered on it’s merits.

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Please tick one box only.

x	Yes
	No

Signature: _____

Date: _____

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