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Our Reference: 503-SP



Dear Mr Hogger,

North Dorset Local Plan Examination - Additional Mid Hearing Written Material

On behalf of Persimmon Homes South West Ltd, this letter comments on the key issues arising from the additional mid hearing written material published by North Dorset District Council following your request during the Examination in Public (EiP) hearing sessions for the Council to further consider certain matters raised, to produce additional Explanatory Notes on topics, and to show how consequential minor amendments could be incorporated into the draft Plan.

As you are aware, Persimmon Homes SW controls approximately 26.7ha of land at Windyridge Farm and Woodwater Farm, Gillingham. The land has been promoted for a mixed use development comprising in total approximately 450 dwellings, a Royal Forest country park, and other wider community benefits including the provision of additional playing field land to allow for the growth and outward expansion of Gillingham High School. Provision of the additional playing field land could be delivered in connection with the early release of a first phase of development for c. 150 dwellings on the Land at Windyridge Farm, accessed off of Bay Road.

Responses to the key issues arising from the Council's additional mid hearing written material are set out in turn below.

Gillingham High School

The Council's mid hearing statement MHD013 states that Dorset County Council records (April 2015) show that, on the basis of existing class size requirements, Gillingham High School has a spare capacity of 2 places¹. As a consequence, Dorset County Council (the Education Authority) has confirmed that there will be a need to develop and enhance the Secondary School facilities and

¹ Para 2.1, MHD013

accommodation, and that the Authority has been looking for additional playing field land to supplement that which is currently available adjacent to the school².

MHD013 reaffirms that the Education Authority is of the view that growth can be accommodated at the existing High School without the need for a new school³, but is ambiguous about the timing for the delivery of the additional playing field land to support housing and population growth in the Town. The requirement for additional playing fields is indicated in Paragraph 2.4 of MHD013.

The Council's responses set out in MHD013 go on to state that specific projects for the outward expansion of the existing School campus are not sufficiently advanced, and that care is needed in the short term to ensure that works are neither abortive nor prejudicial to future need, having regard to both baseline need and evolving growth options being developed for the town through the emerging Local Plan⁴.

Whilst it is not clear what is meant by the 'evolving options being developed for the town', in light of the classification of secondary educational facilities as 'critical' in Appendix A of the Council's Infrastructure Delivery Plan (document ref: SUD020) there is a clear need for the School to be able to expand in a planned way. The current absence of any defined options for, or timing of, land to support the expansion of Gillingham High School is therefore alarming, and we consider that the Council's approach to growth in Gillingham is not therefore deliverable as currently proposed, and that on this basis the Local Plan Part 1 is unsound in the absence of further main modifications.

Persimmon Homes South West Ltd would welcome a dialogue with both the Local Education Authority and Local Planning Authority to consider options for the provision of additional playing field land surrounding Gillingham High School on land within their control, together with accompanying residential development, and consider that this should be a pre-requisite for growth given the critical nature of secondary education facilities in the Town and the absence of any reasonable alternatives.

Council's Broad Strategy

As set out in our hearing statements, paragraph 157 of the National Planning Policy Framework (NPPF) requires local plans to be drawn up over an appropriate time scale, preferably a 15-year time horizon, and that the Local Plan should look forward from the current time to last for 15 years post adoption. We therefore support the Council's proposed recommendation set out in MHD006 to extend the Plan period to cover the period from 2011-2031.

This change, in combination with the recommendation to increase the annualised housing target from 280 dwellings per annum to 285 dwellings per annum, supports the Council's proposal to

² Para 2.4, MHD013

³ Para 2.3, MHD013

⁴ Para 2.4, MHD013

increase the overall housing supply target for the Local Plan to 5,700 dwellings by 2031, an overall increase of 1,500 dwellings above that set out in the current draft of the Local Plan.

In MHD006 the Council identifies what it considers is a shortfall of 350 dwellings against the increased identified need for 5,700 dwellings in the period up to 2031, accounting for the delivery of an estimated 642 dwellings at the Gillingham Southern Extension post 2026 and an allowance for windfall development of 'about' 70 dwellings post 2026⁵. Paragraph 3.8 of MHD006 states that this shortfall can be met from two main sources of supply, which are:

- *'Adjustments to the assumed capacity of certain broad locations for growth already identified in LP1; and*
- *Rural areas (i.e. outside the four main towns), where the Inspector has asked the Council to assess the need for growth and re-assess the policy approach to housing and employment in rural settlements.'*

We consider that the increase in the overall housing supply target for the Local Plan to 5,700 dwellings by 2031 represents a significant change to the current draft of the Local Plan, and must therefore be treated as a Main Modification.

The Council should consult on the Main Modification and seek to provide a refined series of options for meeting the additional housing numbers, based on the evidence which has been considered through the EiP, rather than simply relying on an approach which seeks to retrofit the broad locations for growth identified within the Plan with a higher 'assumed' capacity, and placing a reliance upon smaller scale developments in the rural area which will not be capable of delivering the key infrastructure needed to support the needs of a growing population.

As set out above, we consider that one option which the Council should consult upon is the identification of an additional allocation or direction of growth for the Land at Windyridge Farm, Gillingham for a residential-led development which makes provision for additional playing field land to enable the expansion of Gillingham High School.

Optional Technical Standards

We support the Council's conclusion set out in MHD017 that there is insufficient locally derived evidence to justify the adoption of the nationally described standards for new housing.

Conclusion

In summary, we acknowledge the Council's additional mid hearing written material and support the recommendations to increase the length of the Plan period to 2031 and to increase the annualised housing target to 285 dwellings per annum, together with the Council's decision not to seek to adopt the nationally described standards for new housing.

⁵ Paragraph 3.7, MHD016

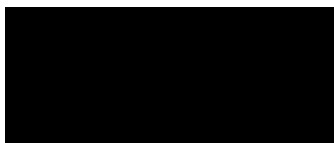
However, the Council has failed to adequately demonstrate that the approach to growth in Gillingham is deliverable in its current form in light of the absence of any identified solution to enable the expansion of Gillingham High School to accommodate the current and forecast growth in pupil numbers. Persimmon Homes South West Ltd has repeatedly offered, through representations to the Plan process, the opportunity to make available land within their control adjacent to the existing School as additional school playing fields brought forward as part of a residential-led development. However, this option has consistently been overlooked by the Council who appear to have ignored the needs of the School to expand.

In light of the critical nature of secondary education infrastructure within the District, and most notably within Gillingham, coupled with the increase in the housing target requirement set out within the Local Plan to 2031, it is considered that the Council has a unique opportunity to address both issues through the presentation of a proposed Main Modification to identify the land at Windyridge Farm, Gillingham as an additional allocation or direction of growth within the Local Plan Part 1.

The land at Windyridge Farm and Woodwater Farm is available and deliverable, and could be brought forward immediately as an early initial phase of development to meet the immediate needs of the Town. To this end, we can confirm that our client's would welcome a dialogue with both the Local Planning Authority and Local Education Authority to explore the delivery options for the site.

We trust that this response of assistance to the Local Plan process and would be grateful to be kept informed of all further progress.

Yours sincerely



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Director