

For office use only

Batch number: _____

Representor ID # _____

Representation # _____

Received: _____

Ack: _____

North Dorset Local Plan Part 1

Pre-submission Consultation 29 November 2013 to 24 January 2014

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012)

Response Form

For each representation you wish to make a separate response form will need to be completed.

This is a formal consultation on the legal compliance and soundness of the Local Plan before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at www.dorsetforyou.com/planning/north-dorset/planning-policy

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Alternatively you can submit your comments online at: www.surveymonkey.com/s/NorthDorsetLocalPlan

Deadline: 5pm on 24 January 2014. Representations received after this time may not be accepted.

Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form on the pre-submission North Dorset Local Plan Part 1 you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

| Personal Details (if applicable)* | | Agent's Details (if applicable)* |
|--|------------------------------|--|
| Title | Mr | Mrs |
| First Name | Shaun | Sarah |
| Last Name | Pettitt | Hamilton-Foyn |
| Job Title(<i>where relevant</i>) | Strategic Land Manager | Director |
| Organisation (<i>where relevant</i>) | Persimmon Homes (South West) | Pegasus Group |
| Address | | Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, |
| Postcode | | GL7 1RT |
| Tel. No. | | 01285 641717 |
| Email Address | | Sarah.hamilton-foyn@pegasuspg.co.uk |

Part B – Representation

The North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representations to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which documents have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the documents it is likely that your comments or objections relate to the **soundness** of the plans and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at one of the consultation exhibitions or call 01258 484201.

1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1 (please complete Questions 2 to 9)
- Final Sustainability Appraisal Report (please complete Questions 2 and 10)
- Habitats Regulations Assessment (please complete Questions 2 and 10)

2. Please state the part of that document you are commenting on:

| | | |
|-------------------|------------------------|---------------|
| Paragraph Number: | Policy/site: Policy 17 | Policies map: |
|-------------------|------------------------|---------------|

3. Do you consider the Local Plan to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

- Yes No

4. Do you consider the Local Plan to be 'sound'?

- Yes No

5. If you consider the Local Plan to be unsound please specify your reason(s) by ticking the box(es) that apply below

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy

6. Please give specific details of why you consider the Local Plan has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

Policy 17 Gillingham

Whilst the principal of growth at Gillingham is supported, it is considered that the strategy should not rely on the development of one strategic urban extension to the south of the town to meet its future housing needs.

It is noted that para 8.55 states that the key spatial aspects of the strategy are the strategic site allocation to the south of the town, but also that *"a range and choice of employment sites in various locations around the town to support a more diverse economy"*.

An additional site, land at Windyridge Farm should be identified as an additional release of land in the short term to proposals for the southern extension to Gillingham.

It can be seen that the land at Windyridge Farm has been considered in the 2009 Growth Study and whilst the growth of Gillingham is not being pursued as envisaged when the Atkins Report was commissioned, it nevertheless provides a useful context in which to consider the long term directions of growth and the potential development opportunities that could be identified in the Local Plan.

The Initial Sustainability Report dated March 2010 stated that one of the benefits that can be capitalised upon if additional growth at Gillingham is realised is that it is the only town in the district which has direct access to the rail network. The Initial Sustainability Appraisal Report to accompany the Core Strategy in March 2010 also stated that given the unconstrained nature of the town and its good public transport links and its potential to accommodate additional growth, Gillingham was considered likely to be able to experience a high level of growth over the plan period. The regeneration of the town centre was considered to be a priority. In the 2010 version of the emerging Plan, after 2016 the intention then was that the development rate would be increased to deliver growth to the town but this would need to be matched with employment and infrastructure development in order to increase the self-containment of the town. The preferred approach to the town is the extension to the south and south east. It is this strategy which is continued in the latest consultation.

It is noted that Addendum to the Sustainability Appraisal (October 2012) assessed options in Gillingham that were not appraised previously with the Preferred Option. Land to the northeast (Bay and Bowridge Hill area) was subsequently compared to the Preferred Option of land to the south and south east (Ham area). However, no plans exist to show the extent of the area assessed, but from the text it appears that the area assessed extends north and south of Bay Road and includes Windyridge Farm (to the south of Bay Road and nearest to the town) and land between Shreen Water and Bowridge Hill (to the north of Bay). According to the Addendum to the SA the whole site is predominately in agricultural use and includes the floodplain of Shreen Water immediately to the east of the built up area of the town and the western slopes of Bowridge Hill.

Land to the south of Bay Road should have been assessed separately from the wider Bowridge area. The SA assessment should not have been confined to assessing locations of a similar scale to the proposed southern extension. All sites should have been assessed in the SA. The conclusions in the SA are flawed as they are predicated on a larger site.

The SA Addendum at paragraph 3.29 acknowledges that *"Land to the south of Bay is closer to schools and the town centre, but is poorly located in relation to employment sites"*. The site is considered to be well positioned in terms of local facilities with good connections to the High Street and the retail and employment opportunities it offers, together with the school and leisure centre located to the south west of the site. It should also be noted that there is a higher density of jobs in the town

centre location as opposed to the designated employment sites on the periphery which tend to be B8 and lower density.

The SA assessment shows in actual fact that there is very little difference between the Preferred Option and Land to the North East. Of the 16 SA objectives there are only differences on 5 of the Objectives which are set out below:-

- SA 2 - in respect of whether the development will create balanced communities and where housing, employment and community facilities are delivered to meet needs, improving access to essential services. The assessment concludes that there is neutral or no impact for land to the North East where as the Preferred Option has a strong positive impact. Persimmon considers that the site at Windyridge Farm has a positive impact, given its proximity to the town centre, local schools, and leisure, sports and recreation opportunities. Indeed the site offers the opportunity to provide land to facilitate the required expansion to Gillingham High School which adjoins the site.
- SA 10 - In terms of impact on the environment - the assessment concludes that the Preferred Option will have a positive impact whereas land to the North East has a negative impact. As no plans of sites are included and as the North East includes land at Bay and Bowridge area it is not clear on what basis this conclusion is made. Land to the south and south east will have an impact on the environment. Land at Windyridge Farm can be developed whilst respecting the Royal Forest Project Area and development would not have an adverse impact on the river valley area. Indeed, an opportunity exists to facilitate the creation of a community park which would be entirely consistent with the objectives of the Royal Forest Project.
- SA 12 - Promote energy and resource efficiency, encouraging clean energy production – land in the Preferred Option is assessed as having a neutral or no impact whereas land to the North East is assessed as having a negative impact. Again it is not clear on what basis this assessment is made.
- SA 13 - Improve the competitiveness of the district's economy through provision of the necessary infrastructure for a more sustainable economy. The Preferred Option is assessed as having a very positive impact whereas land to the North East is considered as having a negative impact. Given that the rate of development is dependent on the provision of the infrastructure and that this is not identified in the IDP, it is not clear how development at the south and south east can be assessed as having a very positive effect. Paragraph 11.20 indicates that the site is likely to be developed at a slower rate over a longer period. The land south of Bay Road is within the closest proximity to the Town Centre of any strategic growth option considered for the town, and would therefore be best placed to deliver the corresponding objectives within the Plan to support the regeneration of the Town Centre, and therefore improve the competitiveness of the district's economy.
- SA 14 – enable local needs to be met locally encouraging more sustainable forms of travel. The Preferred Option is assessed as having a positive impact whereas the Land to the North East as a negative impact. Persimmon considers that development on land at Windyridge Farm would have a positive impact; it is close to schools, leisure facilities and the High Street. Local needs can be met locally and well related to the town enabling pedestrian and cycling access. The site is not severed from the town by the railway line and therefore offers the greatest potential to support non-car based trips.

The Sustainability Appraisal accompanying the Pre-Submission Plan Part 1 states at para 5.17 that there are additional issues of flooding from neighbouring rivers and landscape constraints due to the topography of the site. However, these issues relate to a much larger site. The Council's evidence base includes a Strategic Flood Risk Assessment - the site is not affected by flooding (please see attached extract from the SFRA) and neither is it affected by wider landscape constraints. In fact the proposed development will be complimentary to the Gillingham Royal Forest Project Area and can also provide an opportunity for new or relocated sports pitch provision (as shown on the Concept Phasing Plan accompanying these representations), a new community park, as well as providing land for the required expansion of Gillingham High School.

The SA states that the potential of the area is reported as less than that proposed for the town as a whole and hence would necessitate further development elsewhere in the town or at an alternative settlement. This is not a sound reason for dismissing a potential development site. Land at Windyridge Farm has been assessed in the SHLAA and recognised as a site with housing potential. It is available and deliverable and could complement development taking place elsewhere in the town and in particular meet short term to medium term needs while the urban extension is in preparation.

I have attached a concept plan which illustrates how the development at Windyridge Farm could be phased and can be

brought forward to meet housing needs. It also shows how well the site is related to the town centre including the facilities and services.

In addition it is noted that the Infrastructure Delivery Plan (IDP) Nov 2013 para 3.37 states that development in the market towns will lead to an increased demand for additional secondary school places, this will largely be met by extensions to the Gillingham School, Shaftesbury School and Sturminster Newton High School. No new secondary schools are proposed. Land adjacent to the site at Windyridge Farm can assist in the expansion of Gillingham High School as it can provide the opportunity for new/relocated sports provision.

The site is considered to be well positioned in respect of key facilities and amenities provided at or close to the High Street, and these can be easily accessed by sustainable modes of travel. Due to this excellent potential for sustainable travel patterns, the site is not anticipated to generate a significant level of vehicular traffic. The concept strategy shows that an appropriate site access junction can be achieved on Bay Road. It also includes a concept scheme which is designed to provide a safer environment for the limited number of pedestrians that would be likely to route along Bay Road. The main pedestrian desire lines are likely to be to the south-west of the site towards the Harding's Lane area and the High Street, so it is also proposed that improvements to the existing footpath network in this area will be investigated.

Overall it is concluded that, subject to a full assessment including the preliminary design of the access strategy components, the site represents an opportunity to deliver a sustainable site within walking distance of the centre of Gillingham. It is considered that the key issue involving the current lack of footways along Bay Road can be overcome through implementation of a pedestrian enhancement scheme. It is therefore considered that there are no in-principle highways or transport related reasons to prevent this site from coming forward for an initial phase of residential development.

It is considered that given Gillingham's role in the Plan in terms of accommodating development needs, that additional development sites should be identified in the Local Plan in order to meet development needs consistent with the NPPF.

Continue on a separate sheet if necessary

7. What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound? It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

An additional allocation on land at Windyridge Farm should be included in the Plan in order to meet housing needs and ensure a 5 year housing land supply.

It is noted that the Council are not adverse to higher levels of growth in the four main towns, as stated in the Background Paper Sustainable Development Strategy at para 7.6. If neighbourhood plans are prepared they cannot promote less development than is identified in the Local Plan Part 1, but they can allow greater levels of growth (by allocating additional sites for development) or include specific policies or guidance on how new development should be designed.

However, it is considered that in order to ensure a 5 year housing land supply and to provide greater choice and flexibility an additional strategic allocation should be included in the Local Plan Part 1. Such an allocation at Land at Windyridge Farm is consistent with the strategy of the Plan.

Continue on a separate sheet if necessary

8. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No, I do not wish to participate in the oral examination

Yes, I would like to participate in the oral examination

9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary. Please note that the Inspector determines who is heard at the examination.

Persimmon Homes South West has concerns about the soundness of the plan in respect of the plan period and the housing requirement and the deliverability of the urban extension to Gillingham.

10. Please outline your comments on the Final Sustainability Appraisal Report or Habitats Regulations Assessment. Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

11. Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.

That the Local Plan Part 1 has been submitted for independent examination

The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1

The adoption of the Local Plan Part 1.

Signature _____

Date: 23rd January 2014

If submitting the form electronically, no signature is required.