

**For office use only**

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Representation # \_\_\_\_\_



# 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](http://www.dorsetforyou.com/planning/north-dorset/planning-policy)

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto: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](http://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)*
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## 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:	Policies map:
Please see attached report		

### 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.

Please see attached report

*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.

Please see attached report

*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.

Please see attached letter

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: 24 January 2013

*If submitting the form electronically, no signature is required.*

24 January 2014  
North Dorset LP reps covering letter 21.01.14

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Dear Sir / Madam

**COMMENTS ON THE NORTH DORSET LOCAL PLAN – 2011 TO 2026 PART 1 SUBMITTED ON BEHALF OF THE SOUTH GILLINGHAM CONSORTIUM**

Please find attached representations on the North Dorset Local Plan 2011 to 2026 Part 1 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 95 hectares of land to the south of Gillingham, comprising 80% 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). These representations have been prepared jointly by the professional advisors of these companies and landowners.

The consortium welcomes the significant progress on the plan which has been made since the publication of the draft New Plan for North Dorset in March 2010 and the Key Issues consultation in October 2012. In particular, we support the Council's continued commitment to an urban extension to the south of Gillingham, which we agree represents the most sustainable option for the future growth of the town.

In parallel to the emerging policy formulation significant progress is being made by the consortium to progress detailed proposals for the site. The consortium has been and will continue to remain pro-actively involved in the Plan making process. A range of technical studies have been undertaken by the consortium to inform their emerging master plan proposals for the SSA which we have been sharing with the Council. This work helps demonstrate the suitability and delivery of the site and its associated infrastructure requirements. In parallel with this policy formulation process the Consortium are engaging with the Council on the Master Plan Framework and associated strategic infrastructure delivery as required by emerging policy. This will allow early pursuit of planning applications for first phases of development which in turn gives the Council comfort on the deliverability of this SSA.

The consortium is generally supportive of the policy principles within the emerging Plan insofar as they relate to the Gillingham SSA and look forward to continuing to work closely with the Council to develop the proposals for the site to ensure that this critical component of the new plan is sustainable and deliverable. For ease of reference our representations are presented in the order they appear in the Plan. Where concerns over soundness have been identified, we consider that these can be satisfactorily addressed by the changes that we have proposed. The suggested changes would in our opinion improve the clarity, flexibility and deliverability of the plan. The consortium members welcome the opportunity to participate at the examination, either jointly or individually.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Adventis Plc. Chartered Surveyors. A subsidiary of Savills plc. Registered in England No. 2805138.  
Registered office: 33 Margaret Street, London, W1G 0JD





Yours sincerely



Tim Hoskinson  
Associate

Encl. Comments on the North Dorset Local Plan – 2011 to 2026 Part 1 submitted on behalf of the South Gillingham Consortium

Representation form

Cc David Lohfink – CG Fry & Son  
Mark FitzGerald - Taylor Wimpey  
Richard Thomas - Welbeck Land  
Nigel Jones - Chesterton Humberts  
Simon Coles – White Young Green  
Will Edmonds – Montagu Evans

# Comments on the North Dorset Local Plan – 2011 to 2026 Part 1 submitted on behalf of the South Gillingham Consortium

January 2014

## Introduction and Summary

These representations are 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 95 hectares of land to the south of Gillingham, comprising 80% 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). These representations have been prepared jointly by the professional advisors of these companies and landowners

The consortium welcomes the significant progress on the plan which has been made since the publication of the draft New Plan for North Dorset in March 2010 and the Key Issues consultation in October 2012. In particular, we support the Council's continued commitment to an urban extension to the south of Gillingham, which we agree represents the most sustainable option for the future growth of the town.

In parallel to the emerging policy formulation significant progress is being made by the consortium to progress detailed proposals for the site. The consortium has been and will continue to remain pro-actively involved in the Plan making process. A range of technical studies have been undertaken by the consortium to inform their emerging master plan proposals for the SSA which we have been sharing with the Council. This work helps demonstrate the suitability and delivery of the site and its associated infrastructure requirements. In parallel with this policy formulation process the Consortium are engaging with the Council on the Master Plan Framework and associated strategic infrastructure delivery as required by emerging policy. This will allow early pursuit of planning applications for first phases of development which in turn gives the Council comfort on the deliverability of this SSA.

The consortium is generally supportive of the policy principles within the emerging Plan insofar as they relate to the Gillingham SSA and look forward to continuing to work closely with the Council to develop the proposals for the site to ensure that this critical component of the new plan is sustainable and deliverable. For ease of reference our representations are presented in the order they appear in the Plan. Where concerns over soundness have been identified, we consider that these can be satisfactorily addressed by the changes that we have proposed. The suggested changes would in our opinion improve the clarity, flexibility and deliverability of the plan. The consortium members welcome the opportunity to participate at the examination, either jointly or individually.

At over 400 pages, the Local Plan Part 1 is an unnecessarily lengthy document, with a separate Site Allocations document to follow. Having reviewed the draft Plan in detail, there is a lot of unnecessary repetition between different sections of the plan, and many of the policies and supporting text are unnecessarily wordy. We would encourage the Council to consider revisions to the plan to address this in order to make it a more concise and user friendly document.

## Chapter 1. Introduction

### Paragraphs 1.3 - 1.5, 1.14-1.22, 1.35 and 1.37

The following changes are proposed to add clarity and focus to the introductory chapter of the plan.

#### *Changes required*

- Paragraphs 1.3 – 1.5 should be included in the glossary instead of the main text.
- Paragraphs 1.14 – 1.22 add little to the plan and should be included in the background papers or as a separate advice note on neighbourhood planning
- Clarify the requirements for neighbourhood plans by deleting the words 'be prepared to' from paragraph 1.15.
- If it is unclear within the policy whether all criteria of that policy are met, it does not provide a clear indication of how a decision maker should react and does not provide certainty in the planning system. Therefore we recommend deleting from paragraph 1.35 the sentence: *'Many of the policies are criteria based ... from the wording that there are alternatives'*.
- The weight to be given to emerging policy is set out at para 216 of the NPPF and 'whether or not the issue is contentious' is not a test of para 216. Therefore we recommend deleting from paragraph 1.37 the sentence: *'The weight given ... with policies in the NPPF'*



## Chapter 3. Sustainable Development Strategy

### Paragraphs 3.4 to 3.32

In large measure the supporting text to Policy 1 simply repeats various passages of the National Planning Policy Framework, with little changes in wording. The policy accompanying 7 pages of text is considered unnecessary. Indeed their inclusion could have the effect of diluting rather than clarifying the intentions of the NPPF.

#### *Changes required*

- Replace at bullet 6 of paragraph 2.46: “~~have more housing..~~” with “Have more housing through the development of key sites which are critical to the delivery of the housing strategy ...”
- Remove unnecessary supporting text and replace it with a short explanatory passage cross referring to the NPPF, rather than repeating or re-interpreting it.

### Policy 2 - Core Spatial Strategy

***Object: the policy is unsound as it is not justified.***

The identification of the four main towns as the main focus for growth is supported; these towns represent the most sustainable locations for growth. The reference to the strategic site allocation at Gillingham (Policy 21) is also supported.

The last paragraph of Policy 2 states that ‘*the settlement boundaries around the four main towns in the North Dorset District Wide Local Plan 2003 are retained and will continue to be used for development management purposes until reviewed either: through the North Dorset Local Plan – Part 2: Site Allocations or a neighbourhood plan.*’

This aspect of Policy 2 is considered unsound; the existing settlement boundaries around the four main towns in the North Dorset District Wide Local Plan 2003 are out of date, and their continued use for development control purposes would restrict opportunities for sustainable development and would therefore be contrary to the NPPF.

#### *Changes required*

In order to provide a supply of specific, deliverable sites to meet housing requirements, revised settlement boundaries for the four main towns should be included in the plan reflecting SSA allocations. In the absence of revised settlement boundaries, the following amendments should be made:

- Modify the text of Policy 2 as follows: “*The settlement boundaries defined around the four main towns in the North Dorset District-wide Local Plan 2003 are retained and, in conjunction with Policies 16, 17, 18, 19 and 21 of this document, which identify the locations for expansion of settlement boundaries at the four main towns, will continue to be used for development management purposes, until reviewed either through site allocations in Part 2 of the Local Plan or a neighbourhood plan.*”

## Chapter 4. Environment and Climate Change

### Policy 3 – Climate change and paragraphs 4.14 and 4.18

**Object: the policy is unsound as it is not justified**

Although the principle of mitigating climate change is accepted, various requirements in this policy are either unclear, unjustified, duplicate Building Regulations, or are at risk of becoming out-dated within a short timeframe. Likewise as currently worded the draft policy and supporting text lack the perspective of deliverability and viability. Various amendments to the policy and supporting text are proposed to address this.

**Changes required**

- The first sentence of Policy 3 is unclear, provides no guidance to decision makers, and should be deleted.
- The second sentence of Policy 3 should be modified as follows: *"Where the proposal includes new buildings they should, wherever it is appropriate and viable to do so, [...]"*
- Criteria a to d of Policy 3 are all 'and' requirements i.e. all of them are required. This is considered unreasonable and overly prescriptive. Criterion a is a repetition of Policy 2 and should be deleted. The requirement in criterion c to exceed national targets is not justified, and should be amended to read *'to meet or exceed the current ....'* Criterion d is unclear, is not justified and should be deleted.
- Delete the following text in Policy 3, to remove an overly prescriptive element: *"Detailed energy statements should be submitted to support development proposals setting out the expected level of greenhouse gas emissions that will arise from the development and measures incorporated to minimise emissions."*
- Delete the following text in Policy 3, to remove wording that is framed vaguely and which has little obvious purpose.: *Many features of a development will be multi-functional and help to adapt to a range of climate change impacts. Multi-functional elements should be considered as part of development proposals ensuring that the primary function of the feature is not lost*
- Modify paragraph 4.18 as follows to remove superfluous cross-reference to separate policy: *"In certain circumstances, on-site measures to attain the requirements of Zero Carbon policy may be difficult to achieve due to for example, the physical characteristics of the site, the location of the site or for viability reasons. In these instances, contributions towards near-site or off-site measures will be acceptable. in line with emerging policy on Allowable Solutions. Where the Allowable Solutions route is appropriate, contributions will be put towards projects on a prescribed list of local projects. If no up to date local list is available, contributions will be put towards national Allowable Solutions projects."*
- Modify paragraph 4.14 by removing the text "such measures include" and the following sequence of three bullet points.
- The fourth paragraph of paragraph 4.8 is unclear and should be deleted or modified to refer to evidence or specific standards
- The last sentence of paragraph 4.16 is not justified and should be deleted.
- Paragraph 4.17 is overly prescriptive, unnecessary, and should be deleted.

- Paragraph 4.19 indicates that detailed energy statements be required for all planning applications. This is unnecessary and overly prescriptive and should be deleted.

## **Policy 4 – Natural Environment and paragraph 4.105**

***Object: the policy is unsound as it is not justified***

The key principles of this policy are supported however we consider certain passages to be unnecessary, imprecise, or overly prescriptive. Changes are proposed below to address this.

### ***Changes required***

- Amend second paragraph of Policy 4 as follows: 'Developments that offer gains in biodiversity whether through the restoration of habitats or the creation of linkages between existing sites, will be ~~looked on favourably in the decision making process~~ encouraged.'
- Amend second paragraph of Policy 4 as follows: "*The landscape character of the district will be protected through identification and where possible retention of the important features that characterise the area. The loss of important features will only be supported with suitable mitigation.*"
- The first sentence of paragraph 4.41 is unclear, does not accord with the NPPF, and should be deleted.
- Amend the last sentence of paragraph 4.42 to state: ~~*The landscape of North Dorset is second to none with Almost 40% of the District is covered by ....*~~
- Paragraph 4.105 attempts to apply national policy on Green Belt to local green space. This is unsound, unjustified, and not in accordance with the NPPF. Paragraph 4.105 should be deleted.

## Chapter 5. Meeting Housing Needs

### Policy 6 – Housing Distribution

**Object: the policy is unsound as it is not justified**

The proposed level of housing of at least 4,200 net additional homes between 2011 and 2026 (280 per annum) is in line with the household change projections contained in the 2011 Strategic Housing Market Assessment Update (SHMA). This figure represents a substantial *drop* from the housing provision of 350 dwellings per annum proposed in the March 2010 draft Core Strategy, and would be well below the average build rate for North Dorset between 2000 and 2011, which has averaged 370 dwellings per annum. This lower annual target figure therefore departs from the national objective (expressed in paragraph 47 of the NPPF) of significantly boosting housing supply, and other factors such as housing need, affordability and economic growth that would all support a higher level of housing provision. The expression of the housing target as a minimum figure through the words “at least” in policy 6 does address this to some extent, however the words “at least” should also be repeated against individual sub-targets.

The approximate scale of housing development for Gillingham in the period 2011 – 2026 is “about 1,490 homes”. However, the level of housing provision for Gillingham does not reflect the full potential of the strategic site allocation, which will extend beyond the plan period.

The policy also sets out ‘the approximate scale of affordable housing development that will be sought at the four main towns.’. However, the criteria-based approach to affordable housing delivery is set out in Policy 8, including a target of 35%. There is no strategy within Policy 6 for achieving the ‘approximate scale’ of affordable housing identified and how the per-town targets for affordable housing might be used in terms of decision making is not clear.

#### **Changes required**

- Before each numerical housing target, place the words “at least”.
- Remove the following passage of Policy 6: “*The approximate scale of affordable housing development that will be sought at the four main towns during the period 2011 - 2026 will be as follows: (e) Blandford (Forum and St. Mary) – about 380 affordable homes; (f) Gillingham – about 500 affordable homes; (g) Shaftesbury – about 450 affordable homes; (h) Sturminster Newton – about 150 affordable homes.*”

### Policy 7 – Delivering homes

**Object: the policy is unsound as it is not justified**

As regards housing mix the policy acknowledges that housing mix may be varied ‘if it can be soundly justified by local circumstances’. The unit mix within a residential scheme might have a significant impact in terms of viability. NPPF para 173 acknowledges that ‘pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking’. The policy is not in accordance with the NPPF in this regard unless greater reference is made to viability. Amendments to the policy wording are thus proposed. The policy also states:

*In the period to 2026, the Council will seek to deliver 40% of market housing in North Dorset as one or two bedroom properties and 60% of market housing as three or more bedroom properties, with an emphasis on the provision of two and three bedroom properties*

From the above, there is a contradiction between the target of 60% of market homes being 3+ bedroom, and the reference to an 'emphasis' on smaller units. We therefore propose the omission of the latter reference.

#### **Changes required**

- Amend wording of Policy 7 as follows: *These proportions will be the starting point for negotiations on the mix of house sizes on all sites where 10 or more dwellings are proposed, although a different mix may be permitted if it can be soundly justified by local circumstances or on grounds of viability.*
- Amend wording of Policy 7 as follows: *"In the period to 2026, the Council will seek to deliver 40% of market housing in North Dorset as one or two bedroom properties and 60% of market housing as three or more bedroom properties, ~~with an emphasis on the provision of two and three bedroom properties.~~"*

### **Policy 8 – Affordable Housing and paragraph 5.93**

**Object: the policy is unsound as it is not justified.**

It should be noted that the viability study used to support the affordable housing target proportions was prepared by Three Dragons in June 2009. Given the age of this document a detailed review of the approach used should be undertaken. More specifically with regards to viability, it may not be satisfactory for an applicant to 'rely upon the conclusions of the District Valuer' as this reduces any certainty in the decision making process for the developer. It is normal practice that the Council may seek a second opinion in terms of viability (and often for this to be paid for by the applicant), though viability is a subjective matter and it may not always be possible to rely on the conclusions of the third party. The policy indicates that where the level of affordable housing proposed is below the target, 'the developer may be offered an opportunity (subject to certain requirements) to involve the District Valuer with a view to securing a mutually agreed level of affordable housing provision'. This does not give a clear indication of how a decision-maker should approach issues of viability, not least because the criteria for referral to the District Valuer are not specified.

#### **Changes required**

- Amend wording of paragraph 5.93 as follows: *"The parties ~~would~~ may agree to rely upon the conclusions of an independent assessor ~~the District Valuer~~ for the purposes of the application"*
- Replace 4<sup>th</sup> paragraph of Policy 8 to read: *"In exceptional circumstances where it is demonstrated to the Council's satisfaction through an independent 'open book' assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be accepted."*

## Chapter 6. Supporting Economic Development

### Policy 11 – Economy

Paragraph 6.27 states (emphasis added):

*Uses on employment sites are often limited to those that fall within Class B1 (business), Class B2 (general industrial) and Class B8 (storage and distribution). However, **since the level of supply is above the projected level of future need**, the Council has adopted a more flexible approach and will permit other uses that provide employment, but do not fall within the B-Class use definitions.*

The table at 6.1 underlines this with figures to indicate an oversupply of almost 90%. This appears to contradict the requirement under Policy 11 for: '*the development of key strategic sites to meet the identified need for employment land*'. Given such an oversupply of employment land, the policy would benefit from clarification as to the nature of the need for further employment land, including that proposed as mixed-use urban extensions.

## Chapter 7. Infrastructure

### Policy 13 - Grey Infrastructure, and supporting text

**Object: the policy is unsound as it is not justified.**

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'.

The evidence to support the statements in paragraphs 7.29 and 7.30 is unclear.

#### **Changes required**

- Delete policy
- If this policy is retained, amend the first sentence of the final paragraph as follows: 'For all major developments proposals, and proposals on prominent sites, Where viable the Council will encourage public art in the interests of good urban design and enhancement of the public realm...'

### Policy 14 – Social infrastructure

**Object: the policy is unsound as it is not justified**

This policy addresses a range of matters that are not land-use related and/or cannot be controlled through a Local Plan. Examples of this include "ensuring" that hospitals are "retained and enhanced", whereas 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.

#### **Changes required**

- 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"*

## **Policy 15 – Green infrastructure**

***Object: the policy is unsound as it is not justified***

Again we consider that this is not required. Rather, any assessment of what green infrastructure is required 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.

### ***Changes required***

- 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. Subsequent sections of this plan outline key Green Infrastructure considerations for individual parts of the district.”*



## Chapter 8. Market Towns and the Countryside

### Policy 17 - Gillingham

#### Support, subject to clarifications

Key issues we raise with this policy and supporting text are that:

- Planned growth targets should be expressed as minimum levels to accord with the NPPF;
- The evidence base for employment allocations in Gillingham is lacking;
- The policy requires a new school to be sited as part of the new local centre. This may not be necessary or practical and it is unclear on what basis this requirement has come about. The location of the school should be formalised through the masterplanning exercise set out in Policy 21. Alternative wording to enable this is set out.
- The need for contributions towards the facilities at RiversMeet and the provision of a new community centre is questioned because it is 'unlikely' to meet the needs of the growing community. The most appropriate solution may in fact be on-site / alternative provision once need has been established;
- Likewise the need for a nursery school has not been objectively assessed. The Childcare Sufficiency Assessment did not identify any gaps in existing provision (see para 7.78) and did not comment on the need for further facilities to meet nursery needs
- No objective assessment of demand appears to have been carried out in relation to allotments.
- The requirements for Grey Infrastructure at paragraphs 8.85-8.87 and social infrastructure at paragraphs 8.89 - 8.91 are not evidenced.
- It is unclear what is meant by "enhancement" at paragraph 8.91.

#### Changes required

Make the following amendments to the text of policy 17:

- *"About At least 1,490 homes will be provided at Gillingham over the Plan period, with additional provision at the SSA extending beyond the plan period."*
- Amend *crit* (v): *"A new local centre to be provided as part of the SSA to the south of the town to include community and health facilities as required to support the new population"*
- Amend *crit* (w) to read: *"provision of new primary school capacity within the Gillingham SSA and/or expansion of the St Virgin Mary Primary School and extension of the existing secondary school"*
- Amend *crit* (z) to remove reference to new allotments.
- Amend paragraph 8.55

*"The key spatial aspects of this strategy will be:*

- *a strategic site allocation (SSA) to the south of the town delivering the majority of the town's housing and employment growth along with supporting infrastructure. Proposals for the SSA are set out in more detail in Policy 21 – Gillingham Strategic Site Allocation"*

- Amend paragraph 8.64:

*Policy 2 - Core Spatial Strategy identifies Gillingham as one of the four main towns at which the vast majority of growth will be delivered. Policy 6 – Housing Distribution sets out that the four main towns will deliver housing to meet the district wide need, and that Gillingham will deliver about at least 1,490 dwellings over the plan period. It also identifies Gillingham SSA as a key strategic delivery mechanism to deliver housing up to 2026 and beyond.*

- Amend last sentence of para 8.89:

*Following an assessment of viability and demand, the need for improved facilities, developers will be expected to make reasonable and proportionate contributions to the further improvement and/or expansion of the existing facilities at RiversMeet and the provision of a new community hall*

- Amend para 8.90 to read:

*The scale of development to the south of the town will require a new local centre to be provided. This might include new primary school accommodation and a doctor's surgery for about 2.5 full time equivalent General Practitioners. The local centre should also include other essential local facilities such as a community hall, local shops and a pre-school nursery*  
*"Assessment should be undertaken of the needs for a doctor's surgery and other local facilities such as a community hall, local shops and pre-school nursery. These facilities should be provided as necessary"*