



## Part B – Representation

### 1. Which document does the comment relate?

*Tick one box only.*

X	Neighbourhood Plan – Submission version
	Neighbourhood Area Map (included within the neighbourhood plan document)
	Consultation Statement
	Basic Conditions Statement
	Strategic Environmental Assessment and Habitats Regulations Assessment Determination Notice
	Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report
	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	Sections 6, 7, 8 & 12
Policy	
Page	

### 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.

Without taking into consideration of the up-to-date assessment of housing need in Gillingham contained within the more recent Local Plan Review evidence base, the GNP cannot be considered to be robust or to be appropriately and positively contributing to sustainable development in Gillingham. Accordingly, at present, the GNP is contrary to the basic conditions, as specified in legislation for new NP's.

In addition, whilst we acknowledge the Council's intention to develop a new Local Centre to support the southern extension, it is considered that the GNP should also include support for additional facilities and services, including a discount foodstore, to support the existing residents, the southern extension area, and additional housing to assist in meeting the day to day needs of the existing and new population. This is particularly the case as the Local Plan Review suggests a need for an increase in the number of additional dwellings required.

Please see attached cover letter for further details.

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

The updated Bournemouth, Dorset and Poole Workspace Strategy (Workspace Strategy) 2016, demonstrates that the amount of employment land available in Eastern Dorset, which includes Gillingham, exceeds the employment land demand requirements up to 2033. As a result, it is considered that the loss of a limited extent of allocated employment land to an alternative employment generating use would not impact on the overall employment provision in the area, and would contribute to achieving sustainable development, which accords with planning policy at all levels.

Therefore, in order to satisfy the basic conditions for a NP it is considered that proposed Policy 5 *The loss of employment sites outside the Town Centre* of the GNP should be revised to facilitate alternative uses on employment sites in locations where other uses would provide local employment, and facilities that support existing and future housing development in the town.

Similarly, it is considered necessary to amend Policy 9 *Town Centre uses outside of the Town Centre* of the GNP to facilitate retail development in a broader range of locations than those identified in the GNP, which are currently limited to land within or adjoining the local centres in Milton on Stour, Lodbourne, Broad Robin and the new southern neighbourhood centre.

The broadening of Policy 9 to allow facilities that will support the existing and additional housing requirement above the existing Local Plan target as identified in the Local Plan Review Issues and Options consultation document and the Eastern Dorset 2015 SHMA, ensures that the GNP does not restrict future sustainable growth in the town.

Please see attached cover letter for further details.

*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

Signature: \_\_\_\_\_

Date: 14.02.2018

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

Planning Policy  
North Dorset District Council  
South Walks House  
South Walks Road  
Dorchester  
DT1 1UZ

14<sup>th</sup> February 2018

Our Ref: 18/3152M

Dear Sir or Madam,

### Draft Gillingham Neighbourhood Plan - Regulation 16 Consultation

This representation is submitted by Planning Potential, on behalf of ALDI Stores Limited, in response to North Dorset District Council's Regulation 16 Consultation on the Gillingham Neighbourhood Plan (GNP). Our comments relate specifically to the housing, employment, retail and design sections within the consultation document.

The purpose of this representation is to provide comments on the scope and content of the GNP, and the compliance of the proposed Plan with national and local policy, in order to ensure that ALDI's interests at Land at Park Farm, Shaftesbury Road, Gillingham are represented through the GNP process.

Please note that a representation was submitted to North Dorset District Council in response to the North Dorset Local Plan Review Regulation 18 Issues and Options Consultation on 22<sup>nd</sup> January 2018.

Our comments in relation to the GNP Submission Version (June 2017) are set out below.

### Section 6: Housing

We welcome the consideration within the GNP of where new housing should be located within the Plan Area.

However, we note that Paragraph 6.1 of the GNP advises that the North Dorset Local Plan Part 1 2016 has set a housing target of at least 2,200 homes over the plan period. Whereas, the recent North Dorset Local Plan Review Issues and Options consultation document (November 2017) acknowledges that additional land is likely be required in Gillingham to assist in delivering the uplift in housing need, over and above the 2016 Local Plan target.

Specifically, Paragraphs 5.7 and 5.8 of the recent Local Plan Review Issues and Options consultation document outline that the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA), which includes Gillingham, gives an objectively assessed need (OAN) for housing in North Dorset of 330 dwellings per annum up to 2033. This represents an increase of 45 dwellings per annum compared with the adopted Local Plan Part 1 (2016). Moreover, the Local Plan Review Issues and Options consultation document confirms that the most appropriate housing need figure on which to progress the Local Plan Review is 366 dwellings per annum based on the standardised methodology for assessing housing need set out in the 'Planning for the right homes in the right places: consultation proposals' (September 2017). This represents an increase of 81 dwellings per annum over the plan period.

Therefore, without taking into consideration the up to date assessment of housing need in Gillingham contained within the more recent Local Plan Review evidence base, the GNP would not be up to date or robust, or appropriately and positively

**Directors**  
Helen Cuthbert | Stuart Slatter | Claire Temple | Alastair Close  
Dan Templeton  
**Associate Director**  
Katie Turvey

**Consultant**  
Caroline Dawson

**Associates**  
Sally Arnold | Rob Scadding | Heather Vickers | Alan Williams | David Williams

prepared to contribute towards sustainable development in Gillingham. Accordingly, at present, the GNP is considered contrary to the basic conditions, as specified in legislation for new NP's.

Paragraph 6.1 of the GNP also confirms that the majority of new housing required in Gillingham to meet the required number of houses over the Plan period will be located in the southern extension of the town. Furthermore, the Local Plan Review Issues and Options consultation document analyses possible additional sites to deliver the increase in the housing requirement. These include further sites to the south of Gillingham.

It is considered that the GNP should include provision for additional facilities and services, including a discount foodstore, to support the existing residents, the southern extension area, and additional housing to assist in meeting the day to day needs of the existing and new population. This is particularly the case as the Local Plan Review suggests a need for an increase in the number of additional dwellings required.

## **Section 7: Economy and Section 8: Retail and Town Centre Uses**

We support the aspiration set by Paragraph 7.3 of the GNP, which states that maintaining and growing local employment is a key factor in supporting the attractive character and economic health of the town.

However, it should be noted that Paragraph 22 of the NPPF states that planning policies should avoid the long term protection of sites allocation for employment use where there is no reasonable prospect of a site being used for that purpose, and land allocations should be regularly reviewed.

Paragraph 6.1 of the GNP confirms that the majority of new housing required in Gillingham to meet the Development Plan housing target over the Plan period will be located in the southern extension of the town. In addition, land south of Park Farm is being considered as a location for additional housing in the recent Local Plan Review Issues and Options consultation document.

However, maintaining the allocation of the land at Park Farm as an employment site within the Development Plan could restrict the ability for the site to provide local services to support existing and future housing.

In this context, whilst we acknowledge the Council's intention to develop a new Local Centre to support the southern extension, it is considered that the GNP should also include support for additional facilities and services, including a discount foodstore, in locations that will assist in meeting the day to day needs of the existing residents of Gillingham, and the new population of the southern extension and additional housing developments. An ALDI discount foodstore on land at Park Farm would be well located to improve the retail offer of the area and choice for customers in south Gillingham, as well as provide local employment opportunities. Furthermore, it would represent sustainable development that will benefit the local economy, and the existing and future residents, particularly in south Gillingham.

The updated Bournemouth, Dorset and Poole Workspace Strategy (Workspace Strategy) 2016, demonstrates that the amount of employment land available in Eastern Dorset, which includes Gillingham, exceeds the employment land demand requirements up to 2033. As a result, it is considered that the loss of a limited extent of allocated employment land to an alternative employment generating use would not impact on the overall employment provision in the area, and would contribute to achieving sustainable development, which accords with planning policy at all levels. Therefore, in order to satisfy the basic conditions for a NP it is considered that proposed Policy 5 *The loss of employment sites outside the Town Centre* of the GNP should be revised to facilitate alternative uses on employment sites in locations where other uses would provide local employment, and facilities that support existing and future housing development in the town.

Similarly, it is considered necessary to amend Policy 9 *Town Centre uses outside of the Town Centre* of the GNP to facilitate retail development in a broader range of locations than those identified in the GNP, which are currently limited to land within or adjoining the local centres in Milton on Stour, Lodbourne, Broad Robin and the new southern neighbourhood centre. The broadening of Policy 9 to allow facilities that will support the existing and additional housing requirement above the existing

Local Plan target, as identified in the Local Plan Review Issues and Options consultation document and the Eastern Dorset 2015 SHMA, ensures that the GNP does not restrict future sustainable growth in the town.

We note that Paragraph 13.10 of the Local Plan Issues and Options consultation document states that a new retail study for North Dorset is being prepared, in conjunction with West Dorset and Weymouth & Portland Councils, which will form the retail evidence base for the Local Plan Review.

Although, we reserve judgement on the issue of the vitality and viability of the Town Centre until the new retail evidence base has been published, it is considered that the NP should reflect the findings of the new retail study to be robust and up-to-date.

## Section 12: Design, Climate Change & Renewable Energy

Figure 12.1 of the GNP confirms that the land to the south east of Gillingham at Park Farm is within the Ham Character Area. Table 12.5 of the document advises that the Ham Character Area is dominated by the main road to Shaftesbury. At present it is bounded by open countryside, but importantly, it is acknowledged in the document that this area will change with the development of the Southern Extension.

Policies 24, 25 and 26 of the GNP relate to design matters. Policy 25 *Plots and buildings* advises that a limited number of landmark buildings of increased height may be permissible in locations which represent a key view or junction on an important route through the area. The proposed development of an ALDI foodstore on land at Park Farm, adjacent to the B3081 Shaftesbury Road, could meet these criteria, and deliver beneficial economic development.

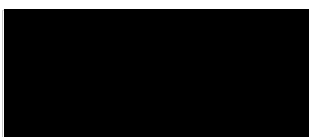
## Conclusions

This representation is submitted by Planning Potential, on behalf of ALDI Stores Limited, in response to North Dorset Council's Regulation 16 consultation on the Gillingham Neighbourhood Plan Submission Version.

This representation provides comments on the GNP Submission document (specifically relating to housing, economy, retail and design), in order to ensure that ALDI's interests at Land at Park Farm, Shaftesbury Road, Gillingham are represented through the GNP process, and to assist in the preparation of a sound and robust Neighbourhood Plan.

We trust you will give this representation due consideration. Should you have any questions or queries, please do not hesitate to contact us.

Yours faithfully,

A solid black rectangular box used to redact the signature of Alan Williams.

Alan Williams

Associate

**Planning Potential**

Bristol

Enc.