

Gillingham Neighbourhood Plan 2016 to 2031

Submission Consultation

North Dorset District Council Response

9 February 2018

North Dorset District Council welcomes receipt of the submission version of the Gillingham Neighbourhood Plan (June 2017) and the significant amount of work that has been undertaken by the local community in its production. NDDC is aware of the various consultation events held within the local community to identify issues, gain consensus and draw conclusions. In this context NDDC seeks to provide constructive comments on the finalisation of the Plan.

This response incorporates comments from North Dorset District Council Planning Policy. Comments are set out in the order that they relate to sections in the Neighbourhood Plan. Some comments may cover more than one topic or section and should be seen in this context. The comments made in this response should not be seen as exhaustive and the officers continue to encourage an on-going dialogue with the Town Council and the Neighbourhood Plan Group.

General

The Submitted Plan appropriately seeks to deal with issues of a local nature including housing, employment, retail and the town centre, transport, community facilities, green space, design and heritage. The draft Plan does not extend to allocating sites for development.

The proposed neighbourhood plan contains a number of maps that illustrate the spatial extent of its policies. In order to provide clarity and certainty, these maps should be drawn at an appropriate size and scale, on an appropriate basemap (ideally OS Mastermap lines), and include a suitable key/legend. As with the written policies, the maps should provide a clear guide to the decision maker.

In addition, it should be noted that some of these spatial policies overlap extant Local Plan policies. Examples include LP policies GH21, GH22 and GH23. The Examiner should compare the proposals to the current Proposals Map to be aware of these and determine the potential level and extent of conflict between Neighbourhood Plan and Local Plan policies.

Section 4. The Planning Framework

4.3 Suggest amending the first sentence to read “A Neighbourhood Plan has to be in general conformity to the strategic policies of the local plan – but it can change and influence things.” to make it consistent with paragraph 184 of the National Planning Policy Framework (NPPF).

4.5 The dates on the diagram below have slipped. E.g. Examination likely to start Feb/March 2018, etc.

Section 5. Vision and Objectives

Figure 5.1 We note that the map is described as “not definitive and the symbols are not to scale.” As it is diagrammatic it could be called a Key Diagram or Strategic Diagram to distinguish it from a Policy Map.

Section 6. Housing

6.10 This paragraph should refer to the numbers registered on the North Dorset Self/Custom Build Register which has been in operation since April 2016. The North Dorset Annual Monitoring Report 2017 records that 36 people have expressed an interest in custom and self-building housing in the Gillingham/Shaftesbury area as of 30 October 2017.

6.11 This paragraph makes a number of specifications (sites of 20+ homes, 5% plots, affordable housing, 12 months’ marketing). We note although many of these are described as a “guide”, no evidence or justification has been provided. They appear to be the same as Teignbridge, which at least suggests that the requirements have already been tested and implemented, although obviously in respect of a different plan area. A supporting paper that considers the anticipated impact of these requirements in Gillingham might be useful. In particular, the requirements could have an impact on development viability.

6.12 We note that this paragraph suggests that that the southern extension is anticipated to be the main source for self build units (1800 x 5% = 90).

Policy 1 is vague and so doesn’t provide a clear guide to the decision maker. Without further information, it is assumed that the policy seeks to implement the requirements of paragraph 6.11 – if so then this should be made clear.

Policy 2 provides no clear guide to the decision maker in determining planning applications. NPPF para 154 states: “Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan;” and para 183 states: “Parishes... can use neighbourhood planning to set planning policies through neighbourhood plans to determine decisions on planning applications.” Unless there is clear evidence to make this policy a requirement, the policy should be deleted.

Section 7. Economy

7.15 It is assumed that this sentence is stating that vacant sites should be marketed for 12 months before an application for change of use is submitted, but as drafted, this is not clear. If this is the case, then as it currently sits in supporting text it is unenforceable.

Policy 5. The criteria should: be labelled e.g. a) b) c), for ease of reference in the use of the policy when taking decisions.

It is noted that Policy 5 is basically a re-wording of LP1 Policy 11, with the addition of “transport infrastructure improvements” in the list of exceptions. The supporting text clarifies that this is likely to mean parking provision to relieve congestions in and around the town centre.

7.16 refers to a policy under the previous Local Plan (adopted 2003). The Gillingham Royal Forest policy GRF1 has been ‘saved’ and the correct reference to this policy should be reflected in the submission version of the Plan.

7.17 It should be noted that a large proportion of the Gillingham Royal Forest Area

sits inside Motcombe parish, which is outside the neighbourhood plan area. The two policies (Policy 6 and GRF1) appear to be very similar so NDDC is not concerned that potential conflict between the two is likely. However, for clarity it might be useful to state here that the GRF area spans across the parish boundary, and that in Motcombe Policy 6 does not apply.

Section 8. Retail and Town Centres

8.6 Ideally the Primary Shopping Area should be defined in addition to the Primary and Secondary Shopping Frontages and the Town Centre Boundary, in accordance with Policy 12 of LP1.

A Retail Study has been commissioned and is nearing completion (February 2018). A draft version exists which identifies Primary and Secondary Shopping Areas, a Primary Shopping Area, and a Town Centre Boundary for Gillingham. NDDC acknowledges that the findings of the Retail Study may be too late for consideration in respect of the Neighbourhood Plan. However, the examiner will be able to take a view on this matter. If the findings from the Retail Study are not incorporated into the Neighbourhood Plan then they will be considered as part of the North Dorset Local Plan Review.

Figure 8.1 should be labelled as a Policy Map and be of a sufficient size, scale and clarity to be used in the decision taking process. The base map should be clear and not opaque. All lines on the map should be annotated in the legend – it appears that the different coloured pedestrian/cycle links are only identifiable from Figure 9.5.

Policy 7. The line “General industrial and storage / warehouses are encouraged to relocate to more suitable employment sites outside of the town centre area.” does not give clear steer to a decision taker in determining planning applications and should either be deleted or moved to supporting text.

8.11 The correct title of *The Gillingham Growth Study undertaken by Atkins (2009)* is ‘Assessing The Growth Potential of Gillingham, Atkins (2009)’.

Policy 8. The first line “Development in this area should be compatible with the main aims for its mixed use regeneration, i.e.:" is not clear. Perhaps revise to “Mixed use redevelopment will be supported in the Station Road Area (as shown on Figure 8.1) and should be compatible with the following aims:”?

The final sentence of the policy does not guide a decision maker and so should be deleted / moved into paragraph 8.12.

8.15 reference to a Conservation Enhancement Plan should include the author/body responsible and directions as to where the plan can be accessed. See comment to para 13.9.

8.16 Refers to a “new local centre planned to serve the southern extension to the town” but Policy 9 and Figure 9.5 describe it as a “New Southern Neighbourhood Centre” – the terminology needs to be consistent.

Policy 9. The new southern centre should be described as a local centre, not neighbourhood centre (see LP1 Policy 21(z)).

The last sentence is negatively worded. Policy should be positively worded where

possible and an alternative wording is suggested 'The retention of town centre uses in the defined local centres will be supported'.

Section 9. Transport

Figure 9.1 should be labelled as a Proposal Map, be of a sufficient size, scale and clarity to be used in the decision taking process and include a legend. The base map should be clear and not opaque.

Policy 10 As with Policy 8, the first line is poorly worded. Perhaps rephrase to "Redevelopment of sites within the Station Hub area (as shown on Figure 9.1) should support its use as an integrated transport hub by being compatible with the following aims:"

The final paragraph appears to be instructing applicants to seek pre-app advice from various bodies/organisations, in which case it should be in the supporting text.

Section "The road network, and alternative pedestrian and cycle links" – the term "alternative" is used throughout this section, which is unnecessary and confusing. Whereas NPPF para 29 states: "The transport system needs to be balanced in favour of sustainable transport modes...", referring to walking and cycling routes as "alternative" appears to give them secondary importance. Table 9.3 states that "routes are indicative only" and "alternative routes may be preferable" – so by Policy 12 it is unclear what is meant by "The provision of the alternative pedestrian and cycle network". Suggest deleting the word "alternative" from this section apart from when strictly necessary to give clarity.

9.13 This paragraph is the final reference in the document to Figure 9.5. It then states that Table 9.3 and Figure 9.4 show routes in more detail. Although it would require some renumbering it would seem logical to place Fig 9.5 before Table 9.3 and Fig 9.4. That would allow Fig 9.4 to be nearer to Policy 12 (which makes reference to it).

Figure 9.4 Title of map (in bold and underlined) "Neighbourhood Plan Policy Suggestions" is confusing as these are not proposed as neighbourhood plan policies. Suggest deleting this title and adding the line "Note: These routes are indicative only and alternative routes may be preferable" to be consistent with Table 9.3.

Figure 9.5 The New Southern Local/Neighbourhood Centre should be consistently referenced (see comments on Figure 8.16 and Policy 9 above).

Policy 12 See comments above regarding use of the word "alternative" – recommend deleting this word from the policy as it appears to be unnecessary and misleading.

The title of the policy is "The road network, and alternative pedestrian and cycle links" however policy text refers solely to the pedestrian and cycle network. Consider changing the policy title to "Pedestrian and cycle network" for clarity.

Section 10. Community Facilities

Policy 14 the final sentence is inconsistent with Policy 21(z) of LP1 by introducing inflexibility to delivery methods whilst not recognising the broad scope of the proposed provision of services. Suggested re-wording 'Health facilities (including a doctors' surgery, a dentist and a dispensing pharmacy) will be delivered in the local centre of the Southern Extension.'

Policy 15 The criteria should be labelled e.g. a) b) c), for ease of reference in the use of the policy when taking decisions.
Table 10.1 should have a title that explains what it is.
10.12 The consultations referred to should be accurately cross referenced and identified.
Figure 10.2 should be labelled as a Policy Map, if this is the case (or, if not, be labelled as an extract from a different map) be of a sufficient size, scale and clarity to be used in the decision taking process and include a legend.
Policy 16 The criteria should be labelled e.g. a) b) c), for ease of reference in the use of the policy when taking decisions. In the final sentence change “strategic southern extension” to “southern extension” for consistency.
Policy 17 relates to community facilities, but is unclear whether this policy applies to the specific facilities shown on Figure 10.3 or to potentially new sites falling within the general categories listed in para 10.15. It is unclear how the criteria set out in para 10.16 relate to this policy. If a proposal has the community’s backing, does it still need to provide clear evidence on the factors listed in (a), (b) and (c)?
Figure 10.3 Map illustrates that there are community facilities in Gillingham, but due to the scale it is impossible to make out what or where they are (many are overlapping). If the map is to be used as part of the decision making process in support of Policy 17 then it needs to be a lot clearer. Otherwise mark it for illustrative purposes only.
Section 11. Green and Urban Spaces
Table 11.1 should have a title explaining what it is.
Figure 11.2 should be labelled as a Policy Map, be of a sufficient size, scale and clarity to be used in the decision taking process and include the neighbourhood area boundary and a legend.
Table 11.3 should have a title description that encapsulates what is set out in the table. Numbering of figures/tables appears to be out of order in the document.
Figure 11.4 should be labelled as a Policy Map, be of a sufficient size, scale and clarity to be used in the decision taking process. Some of the allocations on this map overlap policies from the Local Plan (2003). As the Neighbourhood Plan cannot delete Local Plan policies, the Examiner should be aware of the Local Plan allocations in order to determine whether any potential conflicts are likely to arise.
Figure 11.5 should be labelled as a Policy Map, be of a sufficient size, scale and clarity to be used in the decision taking process. The base map should be clear and not be opaque.
Section 12. Design
Policy 26: 2 nd para. The sentence that begins “Existing trees other landscape features...” perhaps should read “Existing trees and other landscape features...”

Section 13. Heritage
13.6 and 13.7 There are now four designated conservation areas in the parish as Colesbrook Conservation Area was officially designated 26/09/2017.
13.9 The 'At Risk Register' is now maintained by Historic England. Details of the 'Conservation Enhancement Plan' should be listed in Section 15 'Useful Documents' – especially as it is relied upon by Policy 27.
Figure 13.1 The supporting text does not discuss this map at all. The Conservation Enhancement Area appears to have been lifted from the Conservation Enhancement Plan. It would help if the supporting text above this map gave some sort of introduction/explanation.
Policy 27. This policy relies upon the 'Conservation Enhancement Plan' for implementation. At the least, details of the 'Conservation Enhancement Plan' should be listed in Section 15 'Useful Documents'. However, it is noted that the Conservation Enhancement Plan submitted alongside this plan is watermarked as "Draft" – bearing in mind the document is dated October 2015, is this correct, and if so is there any chance it could change? It is unreasonable to base a policy on a document that has not been finalised.
Figure 13.2 As noted above, the Colesbrook Conservation Area was officially designated 26/09/2017. It perhaps worth stating that this map is for illustrative purposes since the conservation designations can change at any point (as noted by para 13.7).
13.18 The separate report should be clearly referenced so it can be obtained if needed.
Below Policy 28, in the list of Listed Buildings in the Historic Town Centre, it might be worth indicating that The Parish Church of St Mary the Virgin is Grade I, as opposed to others which are all Grade II. Accept that it is noted in para 13.4 but for clarity it might be worth stating it here as well.
Section 14. How the plan works
14.4 The phrase "taking forward" is ambiguous. Perhaps change to "...implementing this neighbourhood plan...".