

**Persimmon Homes South West Ltd
Respondent No. 1578**

Hearing Session : Issue 8 – 18th March 2015

NORTH DORSET LOCAL PLAN EXAMINATION

**ISSUE 8: GILLINGHAM, INCLUDING GILLINGHAM SOUTHERN EXTENSION
(POLICIES 17 AND 21)**

Inspector’s Key Issues and Questions in bold text.

Gillingham Town (policy 17)

8.1 Is there any evidence that the proposed residential development sites in Gillingham, including the development of land east and south of Ham; Station Road; and south and south-west of Bay, are not available, sustainable or deliverable? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?

The Company has highlighted through its representations to the Local Plan pre-submission consultation the over-reliance which the Council has placed upon the delivery of housing growth in Gillingham through the allocation of the southern extension alone, notwithstanding the wider concerns that this raises in the context of this allocation being the only strategic site identified in the Plan as a whole.

Persimmon Homes controls land south of Bay (Land at Windyridge and Woodwater Farms) which is immediately available and deliverable for development. It is noted that para 8.55 of the Plan 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*”. The Company considers that, in a similar vein, additional housing sites should be identified in the Town to provide competition and choice, and to provide greater certainty to the delivery of housing, and more importantly affordable housing, in the Town.

The Dorset LEP Strategic Economic Plan states at Page 173 that “Gillingham has the highest level of need for affordable housing in North Dorset... 128 of the 387 affordable units required annually were at the town. However, the viability of affordable housing provision is an issue since residual land values are lower in Gillingham than elsewhere in North Dorset at a range of different housing densities and levels of affordable housing provision, as set out in the District wide viability report.” The LEP Plan goes on to state that “In order to deliver a sustainable urban extension, support is required both to deliver the infrastructure needed to support growth (in particular the transport improvements and the local centre) and the affordable homes required to meet high levels of need identified.”

The Company considers that potential exists for the level of affordable housing secured through the Southern Extension to be sacrificed in order to fund the required level of infrastructure needed to support the development, indeed the Dorset LEP Strategic Economic Plan at Page 175 identifies in a total of £10.5 million of required funding from the Local Growth Fund (see Table extract below). If all or part of this funding is

not forthcoming, and the responsibility of delivering this infrastructure is to rest solely with private investment then it is considered that this may lead to a reduction in the provision of affordable housing.

| SUMMARY OF INVESTMENTS | | | | | | |
|--|---|------------|------------|------------|--------------|----------------------------------|
| | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | Is the funding secured / agreed? |
| Support Required from Local Growth Fund | £0 | £3 million | £3 million | £3 million | £1.5 million | N/A |
| Pre-committed Local Growth Fund (transport only) | £0 | £0 | £0 | £0 | £0 | N/A |
| Local Authority | £0 | £0 | £0 | £0 | £0 | N/A |
| Private Investment | To be determined: The build out of Gillingham Southern Extension will be supported by private investment from the consortium of developers with an interest in the site | | | | | |

Given the significant affordable need in the Town, the 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. 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 submitted as part of the representations to the Local Plan pre-submission consultation demonstrated 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. 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.

The 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 Bowbridge Hill (to the north of Bay). These two areas (north and south of Bay) should have been clearly defined and assessed separately, but it appears the SA assessment was confined to assessing locations of a similar scale to the proposed southern extension. Rather, all sites should have been assessed in the SA and the conclusions in the SA are flawed as they are predicated solely 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 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.

8.2 Is there any evidence that the proposed economic development sites in Gillingham, including in Station Road; south of Brickfields Business Park; at Kingsmead Business Park; and at Neal's Yard Remedies, Peacemarsh; are not available, sustainable or deliverable? If such evidence exists what alternatives are available to the Council?

No specific comments.

8.3 Can the proposed development be satisfactorily assimilated into the town without significant detriment to the character of the environment and the living conditions of nearby residents?

No specific comments.

8.4 Are all the infrastructure requirements listed in policy 16 justified and deliverable?

No specific comments.

8.5 Is the development of land at Neal's Yard Remedies, Peacemarsh, for high value business use justified (criterion m)?

No specific comments.

8.6 Is the Council's approach to retail development in Gillingham justified and will it result in appropriate regeneration of the town centre?

No specific comments.

Gillingham Strategic Site Allocation SSA (policy 21)

8.7 Is there any evidence that the proposed Gillingham Strategic Site (or any part of it) is not available, sustainable or deliverable? If such evidence exists what alternatives are available to the Council? Is the proposed boundary of the SSA justified?

No specific comments.

8.8 Are all the infrastructure requirements related to the southern extension (as set out in policy 21) justified, viable and deliverable? For example the off-site highway improvements; other off-site measures and the improvements relating to social infrastructure, including the proposed local centre. Is it sufficiently clear how a decision maker should re-act to a proposal – the 'what, where, when and how' .

The Dorset LEP Strategic Economic Plan at Page 173 identifies that, for the Gillingham Southern Extension, "in order to deliver a sustainable urban extension, support is required both to deliver the infrastructure needed to support growth (in particular the transport improvements and the local centre) and the affordable homes required to

meet high levels of need identified. Early delivery of the required transport improvements would enable the further employment development (over and above the Sigma Aldrich UK HQ) and the proposed housing to come forward more quickly."

As set out in response to question 8.1, this raises concerns over the potential conflict between the delivery of policy compliant levels of affordable housing and the requisite transportation and other social infrastructure necessary, particularly in the absence of any Local Growth Fund funding. At Page 173 the Dorset LEP Strategic Economic Plan highlights that "there is some flexibility with regard to affordable housing, since the level of provision will be subject to a site-based viability assessment", acknowledging that the "delivery at a percentage significantly below the target of 35% could result in some of the high level of need for affordable housing not being met."

Given the acknowledged concerns highlighted through the Dorset LEP Strategic Economic Plan, the Council should seek to identify additional housing sites in Gillingham to address the significant affordable housing need.

8.9 Are the proposals identified on the Concept Plan (Fig 9.3) justified and sufficient to ensure the provision of a sustainable development?

No specific comments.

8.10 Are the contents of the Concept Statement (Fig 9.2) and the Design Principles (Fig 9.4) justified?

No specific comments.

8.11 What are the risks to the delivery of the southern extension at Gillingham and does the Council's approach ensure that they are, as far as possible, minimised? What is the trajectory for the provision of the housing and what is the Council's fall-back position should the southern extension not deliver housing at the rate currently anticipated?

See comments in respect of question 8.1 and 8.8.

8.12 What is the relationship between LP1, the Neighbourhood Plan (paragraph 9.7) and the Master Plan Framework? Should it be made clearer? Are the requirements set out in paragraph 9.20 (including a Habitats Regulations Assessment), and in paragraph 9.57 (alternative use for the local centre site) justified?

No specific comment.

8.8 – Are all of the infrastructure requirements related to the southern extension (as set out in policy 21) justified, viable and deliverable? For example off-site highway improvements; other off-site measures and the improvements relating to social infrastructure, including the proposed local centre. Is it sufficiently clear how a decision maker should re-act to a proposal 0 the 'what, where, when, and how'.

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. In the context of Gillingham, the IDP states that the expansion of Gillingham High School will be required after 2016 at a cost of £5,400,000 and the main source of funding will be derived through developer contributions. However, to date no evidence has been provided by the Council or County Council as Local Education Authority to demonstrate whether the Secondary School site in Gillingham is capable of being further expanded within its current campus to meet all of the increase in pupil numbers forecast as a result of the southern extension development.

In considering this matter, it would appear that no assessment of the existing Secondary School campus has been undertaken to determine whether the existing campus site is sufficiently landed in order to accommodate the additional pupil roll and comply with the Government's guidelines setting out the space standards for mainstream schools, namely the *Building Bulletin 103 – Area Guidelines for Mainstream Schools (June 2014)*.

Land controlled by the Company at Windyridge Farm which is located adjacent to the existing boundaries of the Secondary School campus (to the north and east of the School) are immediately available and deliverable for an early residential led development and, if required, could facilitate the release of land to facilitate the physical expansion of the Secondary School through the provision new additional areas of sports pitches and external play spaces to meet the corresponding requirements of a growing school roll, or indeed, by offsetting any loss of existing external play spaces brought about through the School's need to expand the quantum of built classroom floorspace on the existing campus.

Clarity should be sought from the Council and County Council, as Local Education Authority, to confirm whether the existing Secondary School campus is capable of accommodating additional pupil numbers within its current site and whether any such expansion would lead to a nil net detriment to the quantum of external play spaces in the context of meeting the Government's standards set out in Building Bulletin 103.

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Word count excluding bold text – 1,529