



Ref: A055606

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

14th February 2018

Dear Sir/Madam

**Gillingham Neighbourhood Development Plan
Regulation 16 Consultation Draft
Representations on Behalf of C G Fry & Son Ltd**

Introduction

We enclose representations submitted on behalf of C G Fry & Son Ltd (C G Fry) in response to the Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 consultation for the proposed Gillingham Neighbourhood Development Plan (NDP).

C G Fry has applied for planning permission for residential-led mixed-use development on land at Park Farm Gillingham, within the allocated Gillingham Strategic Site Allocation (SSA). The planning application has been registered (ref: 2/2018/0077/OUT) and the proposed development comprises:

- Up to 634 dwellings (Use Class C3)
- Primary school (Use Class D1)
- Sports pitches with floodlighting
- Informal public open space
- Play facilities
- Access
- Internal estate roads
- Internal footpaths and cycleways
- SuDs with ponds
- Landscaping
- Utility connections
- Associated ground works
- Infrastructure works.



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C G Fry welcomes the opportunity to work with the Town Council in respect of its development proposals the preparation of the NDP.

Representations

We make the following representations:

Site Allocations

The strategy of limiting development allocations to those identified in the adopted North Dorset Local Plan is supported.

Vision

The vision set out at paragraph 5.2 is supported.

Policy 1 – Custom and Self Build Housing

We note that the Town Council has collected evidence showing potential demand for 30 self-build plots within Gillingham (NDP, paragraph 6.10). As noted at paragraph 6.11 of the NDP, delivery of 5% custom-build plots on the Gillingham Strategic Site Allocation would provide 90 plots, three times the need identified by the Town Council.

It is considered that the 5% provision sought by the NDP should not simply replicate approaches in other parts of the Country, as suggested in paragraph 6.11. It should more appropriately be based on robust, local evidence of demand. The flexibility provided by paragraphs 6.11 and 6.13 is welcomed (demand/viability etc). However, it should also be acknowledged that the nature of the site and its access will also influence the ability of a scheme to support custom-built housing. It would also be helpful for terms such as "...*marketed appropriately...*" to be defined, so as to avoid uncertainty.

Policy 2 – Flexible living accommodation to suit all needs

Policy 2 is supported.

Figure 5.1 – Overview of Neighbourhood Plan area strategy

In respect of the strategy for Park Farm, the annotation for the *Alternative pedestrian/cycle network* on Figure 5.1 is noted. It is suggested, however, that the alignment follows more closely that shown on the Illustrative Framework Plan submitted in connection with the above application (see comments and Framework Plan below).

Footpath/Cycle network

It is considered that the cycle network connection shown on Figure 9.5, where it relates to Park Farm, should follow the western boundary of the site, as it does on Figure 9.4.

Policy 13 Road designs in new development

We suggest the following additional text to the final sentence of Policy 13 to provide flexibility where hard surfaces are justified as part of great placemaking design:

██
██
██
██





Excessive Large areas of hard shared surfacing and narrow winding roads should be avoided unless these can be justified on urban design or placemaking grounds.

Policy 21 – Accessible Natural Green Space and River Corridors

NDP Figure 11.4 Green Spaces and paragraph 11.20 identifies Fern Brook, Ham (No. 7) as Accessible Green Space. It should be noted that Site 7 is not publicly accessible currently. Figure 11.4 also identifies an area of “Additional informal recreation”. This land follows broadly the open space strategy proposed in the above application (Illustrative Framework Plan reproduced below).



Paragraph 11.20 and Policy 21 confirm that the Town Council will work with private landowners to increase public access to these areas, which is a laudable aspiration. However, land that is not currently accessible to the public - such as Site 7 - cannot *"...be safeguarded as an important green infrastructure resource for local residents"*. (Policy 21, 2nd paragraph, 1st sentence). Policy cannot be used to force landowners to make their land publicly accessible, when it is not accessible at the current time. It is considered that Area 7 should be deleted from Figure 11.4 and paragraph 11.20.



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The Illustrative Framework Plan that is submitted in connection with the above planning application is reproduced above. The land identified as Area 7 and the "Additional informal recreation" land identified on Figure 11.4 are very broadly contiguous with the open space/recreation strategy on the Illustrative Framework Plan. However, it should be noted that this is application is in outline only at this stage, with layout reserved for future consideration. While it is the case that under the Illustrative Framework Plan, land in the broad areas identified on Figure 11.4 will be made publicly accessible in the event that the current planning application is approved and developed out, they are not public now. In the event that these areas are not deleted as suggested above, the NDP should at the very least make this distinction and should also ensure that the designations on Figure 11.4 are referred to as *Areas of Search*, with the accompanying text explaining that the precise areas stand to be agreed under the planning application process.

The following amended wording for Policy 21, 2nd paragraph, 2nd sentence is also proposed:

Where possible, development proposals on land identified on Figure 11.4 should consider the potential to provide for new or enhanced public access.

Policy 23 – Protecting Important Green Spaces

Policy 23 refers to "Existing areas of green space (as shown in Figure 11.4)..." It is not clear to which areas of land this refers as there is no annotation in the key indicating *existing* green space.

If *existing* includes Area 7, this is considered inappropriate for the reasons expressed above. It is considered that Area 7 should therefore be deleted from Figure 11.4 and paragraph 11.20. It is considered that there is no evidence to suggest that this is an important green space and this designation is therefore unsound.

Conclusions

We trust that these representations will be considered as part of the positive approach being taken by the Park Farm applicant to the future development of the Strategic Site Allocation.

Please notify us of any decisions or further consultation in respect of the proposed NDP and any of its associated evidence base and submission documents.

We welcome any further discussion on the points raised in our representations and look forward to hearing from you with regards to the progress of the proposed NDP. In the meantime, should you have any queries please do not hesitate to contact us.

Yours faithfully



Simon Coles
Director
 For and on behalf of WYG



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