



Ref: A055606

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FAO Planning Policy (North Dorset)  
South Walks House  
South Walks Road  
Dorchester  
DT1 1UZ

22<sup>nd</sup> January 2018

Dear Sir/Madam

## **North Dorset Local Plan Review Issues and Options and Sustainability Appraisal consultation**

We are pleased to enclose representations submitted on behalf of C G Fry & Son Ltd in response to the Local Plan Review Issues and Options consultation draft and its associated Sustainability Appraisal (SA). We wish to make the following comments in respect of the above consultation documents:

### **Local Plan Review Issues and Options**

#### Question 1 – Housing Need

We support the proposal to increase housing supply from 285 dwellings per annum to 366 dwellings per annum. This approach supports the objectives of NPPF paragraph 47 to boost significantly housing supply and reflects the standardised approach for calculating Objectively Assessed Housing Need contained within the Governments consultation paper "Planning for the Right Homes in the Right Places" published in September 2017.

#### Question 9 – Areas of Search in Gillingham

We do not agree with the conclusions regarding areas of search because we consider that they are not based upon a sound and robust SA. Our specific comments on the SA are contained later in this representation. In particular, we consider that Areas of Search C and D perform better against the sustainability criteria for the SA and should therefore be shown to have "possible development potential" within the Local Plan Review process going forward.

### **Sustainability Appraisal (SA)**

#### Methodology

We consider that the methodology for the SA, particularly in respect of the measurement of impacts, does not provide a consistent and systematic process for delivering sustainable development. Whilst there has been assessment of scenarios in respect of housing supply, spatial strategy and areas of search carried out at Appendix A,



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there is no evidence to link the performance of scenarios against the sustainability criteria contained in Figure 2.1 with the preferred approach or possible development areas in the Issues and Options consultation. To take one example, the impacts of Areas of Search C and D at Gillingham against the sustainability criteria are identical in terms of weighting within Appendix A, and yet one area is to be taken forward, and the other not within the Issues and Options consultation document itself.

Specifically, we recommend the following to address the comments made above:

1. Within Figure 2.2 impacts (from "strong positive" through to "strong negative") should be scored/weighted. This can include minus scoring for negative impacts. This would result in proposals and their alternatives being given an overall "scoring" which would then clearly and objectively demonstrate the most sustainable option. Currently, the assessments at Appendix A appear to be reasonably comprehensive, but it is difficult to see which option performs best against the sustainability objectives overall and therefore why one option may be preferred over another.
2. For the SA of areas of search within the 4 main towns at Appendix A, it would be beneficial to include an additional table/figure for each town with the following headings: Area of search (A-K, for example), overall score when assessed against sustainability criteria, summary of issues/opportunities). This would allow a straight-forward comparison of areas of search against each other and again, would make the process of determining preferred sites more transparent.

Appendix A – Development at Gillingham

In relation to **Area of Search C** we have the following comments:

We disagree that the short, medium and long-term effects of development will have a strong negative impact on biodiversity. Development proposals of this scale are likely to offer opportunities for new habitat and improve existing ecological networks, which are included as sustainability criteria within Figure 2.1 of the SA. Kings Court Wood and Palemead Coppice Sites of Nature Conservation occupy very small margins of the southern and western boundary of the area of search. Whilst a suitable buffer may be required to ensure protection of these assets, we consider that development could reasonably come forward without strong negative impacts. Such proposals may secure the protection of the SNC into the future by providing a designated buffer and management of adjacent uses. We consider that the impact on biodiversity should be adjusted to "neutral/negligible" which would appear to be a justifiable balance between effects from disturbance and opportunities for biodiversity enhancement through development. This also reflects the conclusions of an Environmental Statement prepared in connection with the Gillingham Strategic Site Allocation (Policy 21 of the adopted NDLP).

We disagree that the short, medium and long-term effects of development will have a strong negative impact on water. The criteria in Figure 2.1 of the SA cites protection and improvement of the ecological and chemical status of the aquatic environment, and impacts on Groundwater Protection Zones. We cannot see why the presence of the Fern Brook would be a reason to assume strong negative impacts. A current planning application for residential development at Park Farm on the western side of the Fern Brook has demonstrated that the ecological status of the Fern Brook can be enhanced through careful design of a wildlife corridor adjacent to the river. Furthermore, any development would need to be set back from the Fern Brook to





avoid building in the floodplain. This, together with treatment measures to manage the quality of surface flows during construction and operational phases, would ensure that there are no negative impacts on the chemical status of receptors. The site is not located within or near any SPZ. Taking this into account, we consider that the impacts on water would be neutral/negligible.

We disagree that the short and medium and long-term effects of development will have a negative impact on climate change and that the long-term impacts will be strong negative. Development sites are required to take a sequential approach by locating new buildings and infrastructure outside of the floodplain. Only a limited area adjacent to the Fern Brook is located within Flood Zone 3 (high risk) and therefore it is possible to follow this sequential approach. The surface water drainage strategy for development proposals at Park Farm ensures that surface flows are actively attenuated safely on site back to Greenfield rates for the 1 in 100-year event with an allowance for climate change. This offers a positive impact by taking into account increased rainfall through climate change. Left undeveloped, run-off rates would be greater in this climate change scenario. The area is likely to have to be accessed over the Fern Brook and via the floodplain. Therefore, balancing this negative impact with the positive impacts of directing development to Flood Zone 1 and improvements to surface water drainage arrangements into the future, we consider that the area should be considered to have a "neutral/negligible" impact based on the sustainability criteria within Figure 2.1 of the SA.

We disagree that the short, medium and long-term effects of development will have a strong negative impact on the historic environment. The Environmental Statement submitted with the application at Park Farm which assessed environmental effects from the Policy 21 allocation as a whole (excluding the employment land) indicated that with the provision of suitable mitigation measures, the impact of development on the Kings Court Palace Scheduled Monument will be "less than substantial harm". We therefore consider that it would be more appropriate to determine a negative (as opposed to strong negative) impact on the historic environment in relation to this area of search.

Anticipated impacts on community and economic sustainability objectives are deemed to be neutral/negligible in the short, medium and long-term. This is based on a balance between the provision of growth and services (positive impact) and the remoteness of the area of south particularly on the southern portion. We disagree with this assessment because the area will be well linked to the town via the allocated development at Park Farm. New cycle and pedestrian links will also be provided through this allocation to the town centre. This will certainly ensure that the area of search is no further in terms of travel time than those areas shown to the north and west of Gillingham on Map 7.2. In addition, the land will be well served by the new local centre at Shaftesbury Road through the south Gillingham strategic allocation, which is included as sustainability criteria within Figure 2.1 of the SA. Development to the south should also reduce pressure at Le Neuborg Way where the highway crosses the railway which is a known pinch point. Overall, the community and economic impacts should be positive when viewed against the sustainability criteria.

With regards to **Area of Search D**, we offer the following comments:

We disagree that the short, medium and long-term effects of development will have a strong negative impact on biodiversity. Development proposals are able to offer opportunities for new habitat and improve existing ecological networks, which are included as sustainability criteria within Figure 2.1 of the SA. Palemead Coppice Site of

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Nature Conservation is located adjacent to (and not within) the area of search. Whilst a suitable buffer may be required to ensure protection of this asset, we consider that development could reasonably come forward without strong negative impacts. Such proposals may secure the protection of the SNC into the future by providing a designated buffer and continued management of adjacent uses. We consider that the impact on biodiversity should be adjusted to "neutral/negligible" which would appear to be a justifiable balance between effects from disturbance and opportunities for biodiversity enhancement through development.

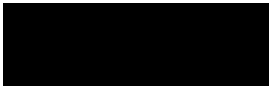
We disagree that the short, medium and long-term effects of development will have a strong negative impact on water for the same reasons referred to under Area of Search C.

We disagree that the short and medium and long-term effects of development will have a negative impact on climate change and that the long-term impacts will be strong negative for the same reasons referred to under Area of Search C.

Anticipated impacts on community and economic sustainability objectives are deemed to be neutral/negligible in the short, medium and long-term, for the same reasons noted above.

We welcome any further discussion on the points raised in this letter and look forward to further consultation of the Local Plan Review as more evidence is produced and the proposed housing supply and allocations are defined. In the meantime, should you have any queries please do not hesitate to contact me.

Yours faithfully



Simon Coles  
**Director**  
For and on behalf of WYG



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