

**Cranborne Chase  
Area of Outstanding Natural Beauty**



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Dear Sara

**Pre-submission Plan Blandford Neighbourhood Plan 2015 – 2031**

Thank you for the opportunity for the AONB to comment on the Pre-submission Plan prepared by your Group. I note that since our meeting before Christmas you have been provided with a number of supporting documents commissioned by the land owners for the land north and east of the Bypass. Nevertheless, the main strategy and details of the Plan remain the same; namely additional development to the north and east of the Bypass. The concerns of the AONB expressed at that meeting, and in our letter of 27<sup>th</sup> October 2015, have not been overcome. You may, therefore, wish to look again at that letter in connection with this Pre-submission version of your Plan.

Looking at your Pre-submission Plan I note that the North Dorset Local Plan has now been adopted by the Council. The proposals within your Blandford Plus Neighbourhood Plan appear, therefore, to **conflict** with the recently adopted policies of the Local Plan.

**POLICY 1**

I see that the order of the policies has changed and that Policy 1 now relates to land north and east of the Bypass implying development there is the primary aim of the Neighbourhood Plan. I note, crucially, that the area east of the Bypass, identified in many of the supporting documents provided by agents for the land owners, shows a significantly larger site than would exist within the boundary of the Neighbourhood Plan. Furthermore, a key access to the site would be from the Salisbury Road, again, outside of the boundary of your Neighbourhood Planning Area.

It appears that only 50% of the proposed eastern housing area would be within the Neighbourhood Plan Area. This significant extension outside of the Neighbourhood Plan Area, and the number of documents provided by agents for the land owners, suggests that this development proposal is being led by the land owners rather than the community.

The land identified in Policy 1 to the north of the Bypass is within this AONB. The land to the east of the Bypass abuts the AONB boundary and, as many of the photographs within the Landscape and Visual Appraisal demonstrate, it is visible from significant areas within this AONB. Other photographs within that Appraisal demonstrate the open and exposed nature of the northern site and that development there would appear as skyline development from a number of positions. I note, however, that Section 3 of your document, page 15, claims that the proposed development is in accordance with Paragraph 116 of the NPPF without setting out the criteria that are clearly identified in that crucial paragraph. Without that analysis in relation to the site the Neighbourhood Plan **fails** to satisfy the tests set out in paragraph 116. The existence of another development of the town side of the Bypass within the AONB is not a justification for additional development in the AONB on the countryside, rural side, of the Bypass.

The Framework Masterplan in your evidence base relates only to the land outside the Bypass to the north and east. It is dated 3<sup>rd</sup> February 2016 and includes significant areas outside the boundary of your Neighbourhood Plan. It is simply an argument, largely based on assertions, in support of a particular proposal. It is not an independent and objective assessment of the potential options. That independent appraisal was part of the evolution of the North Dorset Local Plan and neither the northern or eastern development areas, outside of the Bypass, are in that adopted Plan.

The Framework Masterplan fails even to acknowledge the existence of this Area of Outstanding Natural Beauty despite proposing development within it and adjoining its boundary. That appears to be a **fundamental flaw**, failing to follow the statutory duty to conserve and enhance the natural beauty of the AONB. It also fails to address the criteria in Paragraph 116 of the NPPF. Nevertheless the actual Masterplan itself is attached to a couple of the other documents thereby providing misleading information about proposals within the Neighbourhood Plan boundary.

Despite previous comments from this AONB I note that the list of supporting documents for the Neighbourhood Plan identifies the AONB Management Plan but the link goes to the previous 2009 -2014 Management Plan. It is also noticeable that a number of supplementary supporting reports link to that out of date Management Plan. Supporting documents **fail** to acknowledge the existence of the AONB and the responsibility the designation puts on consultants. Indeed, conclusions and policies based on out of date documentation will be **fundamentally flawed**.

Returning to the substantial matter of the large area of land to the east of the Bypass, which is outside of the boundary of the Neighbourhood Plan, I see that the Access Report bases its argument for an access roundabout onto the A354 / A350 on the whole of that site, not just the half of it within the Neighbourhood Plan Area.

There is no evidence within the documentation that the requirement to co-operate and consult with neighbouring authorities has been carried out in bringing forward this particular housing proposal. Without that evidence it is highly likely that an Examination of the Neighbourhood Plan will find it to be **lacking** in that aspect of consultation and co-operation.

In connection with the Access Report by PFA Consulting for Savills, acting on behalf of the land owners, I note that there is no reference whatsoever to the AONB designation. Clearly the consultants are either putting forward proposals in complete

ignorance of the existence of the AONB or are choosing to ignore it and the duties that designation puts on all consultants to consider the effects of their proposals on the statutory duty to conserve and enhance natural beauty.

The suggestion to change the Salisbury Road roundabout to a signalled junction would further urbanise the current edge of town location. The imposition of an additional roundabout to access the eastern site, along with an additional arm to the Higher Shaftesbury Lane Roundabout, would exacerbate that urbanisation.

The plausible Landscape and Visual Appraisal refers to the AONB Management Plan for the period 2009 – 2014. Therefore its conclusions in relation to AONB matters have to be regarded as **suspect**. In the policy section it is noticeable that paragraph 109 of the NPPF is bypassed. That, of course, refers to the planning system contributing to the enhancement of the natural and local environment, particularly by protecting and enhancing valued landscapes. The LVA also **fails** to focus on the fact that paragraph 115 emphasises that Areas of Outstanding Natural Beauty '*have the highest status of protection in relation to landscape and scenic beauty*'. Clearly converting designated land to urban development is not protecting that landscape. The tests in paragraph 116 are not fully addressed, possibly because Appeal decisions have indicated that a general countryside need for housing does not constitute a national need for development in any particular location.

The LVA does provide useful photographs at the appropriate time of year that should, nevertheless, be used as supplementary to site visits because the creation of panoramic photographs by joining individual pictures has the effect of making the site retreat into the distance and appear less significant than it actually is. The tables of value, susceptibility and sensitivity show that the northern and eastern sites score high-medium in these categories or high across all of the categories. The views of the northern site demonstrate the openness and potential skyline position of the development. The photographs of the eastern site show that the land which adjoins and is in the setting of the AONB is tilted towards to the AONB and therefore is an integral part of the scene. The photographs of the south eastern quadrant from roads and public Rights of Way are representative of many other positions and show that the site would be clearly visible in the view and would be a clear and obvious urban intrusion into the rural scene.

The conclusions to the LVA rely on very generalised descriptions of the proposed development and therefore the potential effects of the development are not clearly identified. In turn that means that mitigation is only set out in very generalised terms.

I note that an Ecological Report has been prepared and it would appear that the Masterplan relies upon it. The field survey work was carried out on the 8<sup>th</sup> January which is clearly not a good time to get anywhere near a realistic understanding of the ecological interests of the site. Past records can only be an indicator of what may be found and winter surveys are notoriously fraught when it comes to providing realistic indications of species and populations present. The Bat Survey does, however, indicate that there may well be significant bat populations within the area and the steps to protect those animals seem to be rather basic and less than generous.

Policy 1 of the Pre-submission Neighbourhood Plan proposes major development within the AONB and on land adjacent to the AONB in conflict with the recently adopted North Dorset Local Plan. The tests set out in paragraph 116 of the NPPF

have not been satisfactorily addressed and the AONB therefore **OBJECTS to Policy 1** of the Blandford Plus Neighbourhood Plan.

## **POLICY 2**

In connection with Policy 2 the Neighbourhood Plan only gives part of the history to the site. The site is on the town side of the Bypass and the AONB team inherited a permission for commercial development on the site. When the proposal for a supermarket came forward a Landscape and Visual Impact Assessment was commissioned and a scheme put forward that limited the heights of the buildings, lowered the ground level, retained existing hedging, and raised bunds around the site to provide an elevated base for significant semi-mature tree planting. The AONB came to the conclusion that those landscape features were a considerable improvement on the previous planning approval and therefore would be significantly less damaging to the AONB than the permission that was extant at that time. The AONB would be unlikely to object to uses on the site that achieve similar or better landscape treatments.

## **OTHER MATTERS**

This AONB is not commenting on the other policies in the Blandford Plus Neighbourhood Plan. I would, however, point out that Dark Night Skies are a feature of this Area of Outstanding Natural Beauty and lighting associated with any approved development should not allow light to escape sideways or upwards and the light source should only be visible from the surface intended to be illuminated. Guidance on lighting and light pollution can be found on this AONB's website.

Including a commitment to reducing light pollution and protecting the Dark Night Skies in the Neighbourhood Plan would be appreciated.

I hope these comments are helpful to you.

Yours sincerely

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