

Blandford+ Neighbourhood Plan
Town Clerk's Office
Church Lane
Blandford Forum
Dorset

(Representations submitted by email to admin@blandfordforum-tc.gov.uk)

31st March 2016

Re: Blandford+ Pre-Submission Neighbourhood Plan

Introduction

This letter provides Gladman Developments Ltd (Gladman)'s representations on the Pre-Submission Blandford+ Neighbourhood Plan on which we understand the Neighbourhood Plan Steering Group is currently seeking comments. Through this response we have sought to clarify the role that the Neighbourhood Plan should play in supporting the wider development needs and strategic policies for the local area set out in the adopted North Dorset Local Plan, whilst highlighting areas where the draft document's proposals would benefit from further work or justification. Gladman would like to offer their assistance through the preparation of the neighbourhood plan and invite the Parish and Town Councils to get in touch regarding this.

Gladman would like to remain involved throughout the preparation of the Blandford+ Neighbourhood Plan and therefore request to be added to the consultation database.

National Planning Policy

The National Planning Policy Framework (The Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out requirements for the preparation of neighbourhood plans and the role they must play in meeting the development needs of the local area. The guidance set out in the Framework has now been supplemented by the recently published Planning Practice Guidance (PPG) on Neighbourhood Plans.

Paragraph 16 of the Framework specifically sets out the positive role that Neighbourhood Plans should play in meeting the development needs of the local area. It states that:

“The application of the Presumption (In Favour of Sustainable Development, set out in paragraph 14 of Framework) will have implications for how communities engage in neighbourhood planning. Critically it will mean that neighbourhoods should:

- *Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *Plan positively to support local development, shaping and directing development in their area that is outside of the strategic elements of the Local Plan”*

Further guidance on the relationship between Neighbourhood Plans and the strategic policies for the wider area set out in a Council’s Local Plan is included in paragraph 184 of the Framework:

“The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them”.

Before a Neighbourhood Plan can proceed to referendum it must be tested against the Neighbourhood Plan Basic Conditions, set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended by section 38A of the Planning and Compulsory Purchase Act 2004) and detailed in paragraph 065 of the Neighbourhood Plan PPG. These Basic Conditions are:

- *(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order*
- *(b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order*
- *(c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order*
- *(d) The making of the order contributes to the achievement of sustainable development*
- *(e) The making of the order is in general conformity with the strategic policies contained within the development plan for the area of the authority (or any part of that area)*
- *(f) The making of the order does not breach, and is otherwise compatible with, EU obligations*
- *(g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order*

It is clear from the above requirements that Neighbourhood Plans must conform to national planning policies (basic condition (a) “appropriateness”) and up-to-date strategic policy requirements (basic condition (e)) set out in adopted Local Plans. Neighbourhood Plans must take a positive approach to new development and should not be used to prevent growth from going ahead.

Relationship to the North Dorset Local Plan Part 1

In the first instance Gladman would like to take the opportunity to comment on the current Blandford+ Neighbourhood Plan consultation to highlight our concerns over the relationship between Steering Group’s draft proposals and the adopted policies of the North Dorset Local Plan. Whilst recognising that Neighbourhood Planning provides communities with the opportunity to shape the future of their

towns and village, it is clear that this should not be to the detriment of delivering the overarching growth strategy for the wider authority area.

The North Dorset Local Plan Part 1 was adopted in January 2016 and sets out the strategic development framework for the North Dorset District area. Containing a series of proposals aimed at delivering sustainable social, economic and environmental growth within the authority as a whole, Policy 6 of the Local Plan identifies how the Council will seek to deliver a minimum of 5,700 net additional dwellings over the Local Plan period 2011-2031, and that at least 1,200 homes should be provided in the Blandford settlement area.

Policy 16 of the Local Plan sets out the District Council's specific proposals for the future direction of development within and adjacent to the existing Blandford town area. Informed by the overall housing requirements for the district, it highlights the Council's preference to develop land to south east and south of Blandford St Mary to meet town's future housing needs, describing how development in these locations would be *'more accessible to facilities and services and would have less impact on the natural and historic environment than the other option'*. The Local Plan's proposals identify how *'about 300 homes'* should be provided to the south of Blandford St Mary, beyond the A354 bypass.

Whilst acknowledging that the Neighbourhood Plan Steering Group have been reluctant to accept the development proposals formulated by the District Council, Gladman question whether the express lack of support for the strategic policies of the Local Plan (as set out in the Neighbourhood Plan Vision) is consistent with the requirements of national planning policy and the role that Neighbourhood Planning is expected to play in supporting the strategic policies for the wider area. Although the principle of ensuring the sustainable expansion of Blandford is supported, and identifying additional housing sites through the Neighbourhood Plan process and beyond the A354/A350 bypass is recognised through the Local Plan's proposals, we particularly query whether the ambition to allocate land for an additional 400 homes to the north and east of Blandford Forum represents the most suitable and appropriate solution to meeting the area's future and full housing needs.

To compliment the long-term expansion of the Blandford settlement area, the Steering Group should ensure that it pays sufficient regard to the potential to develop land to south east and south west of Blandford St Mary as a future direction of growth to meet the town's and district's housing needs. In order to meet the Neighbourhood Plan Basic Conditions (Basic Condition (e)), it should ensure that the adopted proposals of North Dorset Local Plan are given sufficient prominence and significance in preparing its Neighbourhood Plan policies. Gladman remind the Steering Group that its Neighbourhood Plan proposals should not seek to undermine or constrain the adopted development strategy for the wider district area (PPG ID: 41-044).

Gladman note that the issue of adopting minimum housing targets in respect of Neighbourhood Plan preparation has now been considered in the Examiners Reports for 'made' Neighbourhood Plans in Slaugham¹ and Billesdon². In Slaugham the Inspector specifically stated that *'given the strategic objective of the (Neighbourhood) Plan refers to 'at least 130' I assume it (the housing target in the Neighbourhood Plan) is to be a minimum. If it were to be a maximum this would not allow for the flexibility the Framework seeks in responding to changing conditions'*. In Billesdon the Inspector further outlined how *'Core Strategy Policy CS2 (for Harborough) refers to the overall housing provision for the District as a minimum, using the wording 'at least'. I recommend that the reference to a target of 45 dwellings in (Neighbourhood Plan) Policy BP2 be stated as a minimum'*. In light of these cases Gladman support the Neighbourhood Plan Steering Group's reference to providing 'at least' 1,700 homes in Blandford over the period 2011-2031.

¹ Slaugham Neighbourhood Plan Examiner's Report (January 2014), para 9.13

² Billesdon Neighbourhood Plan Examiner's Report (May 2014), para 24

Neighbourhood Plan Policies

Gladman have reviewed the suite of draft policies contained within the emerging Neighbourhood Plan and their consistency with national and local policy guidance. Whilst the Steering Group's proposals have resulted in a reasonably clear and coherent set of policies, some aspects of the Neighbourhood Plan would benefit from further clarity and justification, to enable the document to be applied consistently and with confidence by decision makers when determining planning applications (PPG ID: 41-041).

Neighbourhood Plan Policies 11 - 13 seek to establish a series of design principles for Blandford Forum, St Mary and Bryanston, applicable to proposals within or affecting the setting of the Blandford Forum Conservation Area. Whilst the spatial application of these policies is identified on the accompanying Neighbourhood Plan proposals maps, we suggest that the corresponding designation should be titled 'Blandford Forum Conservation Area (Policies 11-13: Design Principles)'. This would make it more apparent that the Design Principles are applicable both outside and within the conservation area.

Whilst Gladman support the principle of achieving high quality design, we would be opposed to the adoption of design policies that would contain unnecessary prescription or detail. In this respect we submit that design policies should not be used inflexibly to impose architectural styles or particular tastes which can stifle innovation or originality through unsubstantiated requirements to conform to certain development styles. Any design policies proposed should be made with strict accordance to paragraphs 59 and 60 of the Framework.

As currently prepared Neighbourhood Plan Policies 11-13 outline how development proposals that are likely to have an adverse impact on the character and appearance of the Blandford Forum conservation area will not be supported. Whilst recognising the importance of conserving and enhancing the significance of this heritage asset, we submit that these policies should also recognise the ability for new development to make a positive contribution to local character and distinctiveness, and allow for the balancing of any harm to the conservation area to be weighed against the public benefits of development proposals. These principles are established in paragraphs 126-141 of the Framework.

Neighbourhood Plan Policy 9 defines a series of green infrastructure assets in and around Blandford Forum, St Mary and Bryanston, as a means of promoting walking, cycling and recreation, and improving biodiversity. In this regard Gladman note the identification of Ward's Drove as a part of the area's green infrastructure network, and the reference to the current lack of pedestrian access from Stour Meadows to the Sturminster Newton/Spetisbury Trailway to the south. Gladman submit that a safe and convenient Trailway route could be incorporated into development proposals relating to land to the south of the A354 bypass, to the north of Ward's Drove, helping to extend and improve the town's green infrastructure assets, in accordance with the Neighbourhood Plan's proposals.

Neighbourhood Plan Policy 10 seeks to designate a series of Local Green Spaces in accordance with paragraphs 76-77 of the Framework. In this respect we remind the Neighbourhood Plan Steering Group that Local Green Space designations should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.

Further guidance on the use of Local Greenspace Designations is provided in the PPG on the Natural Environment. In this regard the PPG (ID: 37-015) specifically advises that:

“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space Designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new are of Green Belt by another name.”

The Neighbourhood Plan Steering Group should ensure that it’s proposed Local Green Space designations are supported by a robust and adequate evidence base, taking account of the criteria for defining Local Green Spaces contained in national planning policy. Gladman would be opposed to the use of Local Green Space designations where these would be solely intended to prevent otherwise sustainable development from going ahead.

Site Submission

Gladman have previously promoted a site to the north of Ward’s Drove, Blandford St Mary, for future development through the North Dorset Local Plan Part 1 process. Situated within a recognised area of growth as part of the Local Plan’s adopted proposals, the merits of developing this land for housing have now been acknowledged by the district Council in both their Local Plan Mid Hearing Document and Main Modification consultations.



Figure 1 Land to the North of Ward's Drove, Blandford St Mary

Land to the north of Ward’s Drove represents an appropriate and suitable location to provide further housing development and could contribute to Blandford’s and the district’s future housing needs up to 2033. The site could be sensitively developed to reflect the character of its setting and surroundings, whilst there are no known constraints, infrastructure, land ownership or viability issues that would preclude a sustainable housing proposal from coming forward on the land. An acceptable site access could be achieved, whilst pedestrian and cycle links could be provided to Blandford’s good range of services and facilities to the north.

Land to the north of Ward's Drove is considered to deliverable, as it is available now, offers a suitable location for development, and is achievable. Gladman and the land owners are keen to develop a high quality residential development in this location, and would welcome further discussions with the Neighbourhood Plan Steering Group regarding this.

I hope you have found these representations constructive, if you require any further information or wish to meet with one of the Gladman team then please do not hesitate to contact me.

Yours faithfully

Peter Dutton
Strategic Land Team
Gladman Developments