

**DRAFT BLANDFORD + NEIGHBOURHOOD PLAN 2015-2031
FURTHER COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC
MARCH 2016**

On behalf of Wm Morrison Supermarkets Plc, we thank you for the further opportunity to comment on the draft Neighbourhood Plan. We do not intend to respond to all the draft policies and questions; however we set out below our further comments in respect of draft Policies 4, 5 and 8.

Policy 4 – ‘Land at Shaftesbury Lane, Blandford Forum’

The draft Neighbourhood Plan allocates land at Shaftesbury Lane, Blandford Forum, as shown on the Policies Map, for a mix of A1 retail and B1/B2/B8 business uses. The draft Policy confirms the following proposals will be supported:

- “i. The retail use comprises land of no more than 0.9 Ha to accommodate a building of a gross floor area of up to 2,500 sq.m. and at least 120 car parking spaces;*
- ii. The business land comprises land of at least 1.5 Ha to accommodate buildings of a total gross floor area of at least 5,000 sq.m.;*
- iii. The schemes include a landscape buffer to the A350 Blandford Forum Bypass and to the residential area to the east;*
- iv. One or both schemes make provision for a footpath and cycleway link from the site to land north of the A350 Blandford Forum Bypass.”*

The draft Neighbourhood Plan refers to the Joint Retail Study (2008) which identified a need for additional convenience goods floor space in Blandford. It also confirms that planning permission was granted in 2013 for a 2,300 sq m [3,860 sq m gross) supermarket and filling station on land off Shaftesbury Lane. Subsequently Asda has advised that they no longer intend to develop this site for a new supermarket.

At paragraph 3.17 the draft Neighbourhood Plan maintains that the town is currently poorly served by convenience shops and on the basis of the growth strategy and allocations to the north and east it is considered ‘prudent to retain this land for out of centre retail uses’.

Paragraph 3.18 confirms that representations were received indicating at the Draft Plan stage and this states:

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*"representations were received indicating that the need identified in the Retail Study could be met in full if the Morrisons store, which at that time stood empty were to re-open. The store has since re-opened. **However, the neighbourhood plan has to balance this matter with the democratic element to neighbourhood planning in that to be 'made' the plan has to pass a referendum.** [our emphasis] Residents to the north of the town have made it very clear to the Steering Group the importance of convenience store provision currently lacking in the north of the town, and with further allocations proposed in the north of the town this pressure is likely to increase over the plan period."*

In the first instance, we have highlighted the above sentence in **bold** as it has been poorly drafted and does not make sense. It would be helpful if this could be corrected and / or expanded so that point being made here is as clear as possible. Whilst that is the case we acknowledge the latter part of the paragraph, in that residents have highlighted the lack of convenience store provision in the north of the town.

The National Planning Practice Guidance provides clear advice on neighbourhood planning and preparing a neighbourhood plan. We set out below a relevant extract from Paragraph: 040 Reference ID: 41-040-20160211.

"What evidence is needed to support a neighbourhood plan or Order?"

*While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. - **Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan** [our emphasis] or the proposals in an Order."*

The Neighbourhood Plan provides no evidence in support of the retail allocation, let alone any robust evidence. The lack of any evidence is very concerning given the potential implications and impacts of the above policy.

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We previously highlighted the key evidence and facts in respect of future retail requirements. The emerging North Dorset Local Plan Part 1 refers to the Joint Retail Study (2008) which identifies a need for additional convenience goods floorspace in Blandford, but recognised that this need could be met in full if the store now occupied by Morrison's supermarket were to re-open. Since the study was undertaken this store has re-opened and Iceland and the Co-op have also opened new stores in the town, *"providing adequate additional floor space to meet the town's convenience shopping needs up to 2031"* (Paragraph 8.34 North Dorset Local Plan – Part 1).

The National Planning Practice Guidance (Paragraph: 004 Reference ID: 41-004-20140306) confirms that *"a neighbourhood plan should support the strategic development needs set out in the Local Plan"*. Furthermore, the guidance also states *"the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested."* (Paragraph: 009 Reference ID: 41-009-20160211)

The current draft Neighbourhood Plan fails to follow this advice and appears to completely ignore the North Dorset Local Plan Part 1 and the Joint Retail Study (2008).

Whilst it is proposed the alternative growth strategy may deliver future housing to the north and east and there is limited convenience offer to the north of the town, the Neighbourhood Plan acknowledges that it should direct retail, leisure and tourism to the town centre (as required by the NPPF). Furthermore, both draft allocations, under Policies 2 and 3, are only 1.5 miles from the town centre. We accept that planning permission exists for a 3,860 sq m gross foodstore on the Shaftesbury Lane site, however Asda have confirmed they do not intend to develop this out and it appears that the planning permission will expire in 2016.

The MWA review of the Asda application concluded that the proposed store would have a 'significant' impact on the Morrisons store and the wider town centre due to the potential loss of linked trips. Understandably, we are concerned that the proposed retail allocation could also result in a significant impact on the town centre. The draft Neighbourhood Plan confirms the importance of the survival and success of the town centre as the commercial, cultural and tourism heart of the local area (paragraph 1.14). However, it seeks to allocate a site outside of the town centre, for a significant level of retail floorspace with no evidence in support and no commentary or assessment on its potential impact on the town centre.

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We accept the potential need for convenience retailing in the north part of the town to meet 'day to day' needs, should the alternative growth strategy be adopted. However, local 'day to day' needs are usually met by convenience stores of around 500 sq m, not 2,500 sq m, as is being suggested by the Neighbourhood Plan.

As the site remains 'out-of-centre' any future retail allocation, for any convenience retail over 500 sq m, should be subject to the usual retail tests of sequential and impact. We maintain our suggestion that draft Policy 4 is amended accordingly.

Policy 5 'East Street/Langton Road, Blandford Forum'

The Neighbourhood Plan seeks to allocate land at East Street/Langton Road, Blandford Forum, as shown on the Policies Map, for a mixed use development scheme. The current draft confirms that proposals for visitor centre (D2/A1/A3), retail (A1) and childcare (D1) uses will be supported (subject to satisfying 4 criteria). As per our request, we note that the fourth criterion states that "*iv. Any proposed additional retail use is to be ancillary to the visitor centre.*" We therefore have no further comments to make in respect of this draft policy.

Policy 8 'Blandford Forum Town Centre'

The draft Neighbourhood Plan seeks to define the Town Centre Area and the Primary and Secondary Shopping Frontages, as shown on the draft Policies Map (defined as 'Retail Frontages'). We note that this policy seeks to make 'minor changes' to the primary and secondary shopping frontages, as set out in the Local Plan 2003, as follows:

- *"extending the Primary Shopping Frontage northwards to 51/52 Salisbury Street*
- *adding the food store at the Marsh and Ham car park as a secondary frontage"*

We note that Morrisons store is to become Secondary Retail Frontage and our client is understandably concerned given the stores important role and function in the town centre. Furthermore, there appears to be no justification for the extension of the primary shopping frontage northwards along Salisbury Street.

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The NPPF sets out clear guidance on 'Ensuring the vitality of town centres' including at paragraph 23 which confirms that planning policies should be positive, promote competitive town centre environments. The Annex 2 to the National Planning Policy Guidance defines 'Primary and secondary frontages' i.e. Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

The draft Neighbourhood Plan explains that the reason behind defining the Morrisons store as secondary frontage is to provide the foodstore with "*greater flexibility for reuse*" as a "*primary frontage definition maybe too inflexible*" should the store close in the future. This logic behind this change is flawed and fails to follow the clear guidance set out in the Annex 2 of the National Planning Policy Guidance.

It is very clear that the Morrisons store acts as an 'anchor' to the town centre as it attracts a significant number of customers to the store. It also promotes opportunities for linked trips to the rest of the town centre for customers using the store and car park. It therefore should be retained as Primary Shopping Frontage (as shown on the 2003 Local Plan).

In respect of extending the Primary Shopping Frontage northwards along Salisbury Street, it is unclear why this is being proposed given that it contradicts the recommendations of the 2008 Joint Retail Study. The draft Neighbourhood Plan seeks to explain the change at paragraph 3.44

"The extension of the Primary Shopping Frontage northwards in Salisbury Street reflects the importance of trading shops on Salisbury Street and their contribution to the town centre and local economy."

As outlined above, primary frontages are likely to include a 'high proportion of retail uses' which does not reflect what exists along this section of Salisbury Street. Indeed we note that the District Council has also expressed concern about this change given that the "*proportion of non-residential uses is very low*" (NDDC letter and comments dated 23 October 2015). The draft Neighbourhood Plan therefore fails to provide any justification / reasoning behind the proposed policy to change the primary and secondary frontages.