

Annex A – Consultation comments received on the Blandford + SA/SEA Scoping Report

Consultee	Date of contact	Date of response	Comments received	How comments taken on board
Dorset County Council	18/9/15	22/10/15	<p>Thank you for consulting Dorset County Council on the SA/SEA scoping letter for the Blandford + Neighbourhood Plan. I have consulted colleagues around the Council and we would offer the following comments which we hope you will find useful.</p> <p>Minerals Planning comments: The Scoping Report does not seem to mention minerals or mineral safeguarding. There is an area of safeguarded mineral around the Stour as it passes through the proposed Neighbourhood Plan area - perhaps unlikely to be built on, but the Neighbourhood Plan should refer to it.</p> <p>Flood Risk Management comments: Scoping Letter Bullet point 12 of the section entitled Sustainability Issues (Stage A3) could / should be extended to include reference to flood risk associated with surface and ground water. We suggest the following: <i>The River Stour has an associated floodplain and area at risk of fluvial flooding. Other parts of the plan area are thought to be at risk of surface or ground water flooding. Therefore, appropriate flood risk and surface water management measures will be necessary to mitigate against such risk, which should include due allowance for climate change.</i></p> <p>Secondly, paragraph 5 of the section entitled Appraisal Framework (Stage A4) would benefit from minor amendment. A reference to ground water flooding should be added to section (a). Section (b) should acknowledge existing surface water risk on the nominated site, as well as off-site risk or worsening.</p>	<p>Noted and baseline updated</p> <p>Noted and updated</p> <p>Changes incorporated into revised appraisal framework</p>

		<p>Appendix A - Blandford + Visioning Document No comment</p> <p>Appendix A - Blandford + NP Proposed Policies Items 2 – 7 are site specific, and so ideally should emphasise the need to consider (any) prevailing flood risk and appropriate surface water management.</p> <p>Item 2 – East of Blandford Forum; does include specific reference to flood risk within bullet point 3. As per the previous comment we suggest that surface water management be added to this list of principles / considerations.</p> <p>Appendix B – Baseline Data Whilst we are pleased to see the inclusion of a Climate Change, Water and Flood Risk section (page 15), the text within the Data box requires correction, whilst text within the Trends and consequences box requires some amendment.</p> <p>The third and fourth sentences of the Data section could / should read;</p> <p><i>The designated area contains fluvial floodplains (Flood Zones 2 & 3) that principally separate Blandford Forum from Blandford St Mary (River Stour), and follow the alignment of the Pimperne Brook to the north-east. In addition, there are areas at risk from surface and ground water flooding, which are largely low lying or areas in proximity to watercourses, or overland flow routes.</i></p> <p>We suggest the following wording for the three short paragraphs shown within the Trends and consequences box;</p> <p><i>Climate change is predicted to exacerbate flood risk associated with watercourses, surface and ground water sources.</i></p> <p><i>Development proposed by the Neighbourhood Plan should avoid areas within Flood Zones 2 and 3 in accordance with Environment Agency and</i></p>	<p>Issues to be taken into account in drafting site based policies and in the SEA/SA assessment</p> <p>Noted</p> <p>Baseline amended</p> <p>Baseline amended</p>
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		<p><i>NPPF guidance, and should consider all sources of potential flooding as shown by indicative mapping, including surface and ground water risk.</i></p> <p><i>New development in areas susceptible to either surface or ground water flooding will need to demonstrate that such risks can be mitigated against, and any off site worsening avoided. This will be achieved via a good understanding of the site and prevailing risk, and will include the adoption of suitable SuDS techniques and allowance for climate change.</i></p> <p>Transport Planning comments: DCC Transport Planning officers welcome the opportunity to comment on the Blandford + Neighbourhood Plan Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Scoping letter and Appendices and are pleased to see that the need for sustainable transport, connectivity and self-containment are recognised. However, the documents make a number of assertions about the relative suitability of the alternative proposed sites which need to be tested through the SEA. Currently available evidence, particularly the <i>North and North East Dorset Transport Study 2010</i> produced by Buro Happold on behalf of Dorset County Council for the purpose of informing the development plan, should be referred to.</p> <p>Appendix A (Blandford + Visioning Document) para 4.2 asserts that only sites beyond the bypass will provide sufficient housing and employment growth to encourage self-containment. However, since North Dorset Local Plan Part 1 already makes provision for employment land, it may not automatically follow that providing more will increase self-containment reducing the need to travel and hence the impact of increased trip making on the highway network. This ambition will therefore need to be tested through the SEA. Although shuttle buses are proposed to connect the sites to the town centre, the study needs to consider what proportion of trips can be realistically absorbed and also the impact of the severance that may be caused by the A350 bypass, notwithstanding any mitigation proposals contained within the plan.</p>	<p>Baseline amended</p> <p>Noted and included in evidence base</p> <p>Issues to be taken into account in drafting site based policies</p>
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<p>Environment Agency</p> <p>Reference: WX/2006/00 0033/OR- 07/PO1-L02</p>	18/9/15	23/10/15	<p>Thank you for consulting the environment Agency on the above mentioned document. We have reviewed the document and have the following advice.</p> <p><u>Scoping - Appraisal Framework</u></p> <p>We support the natural environment and climate change are part of the appraisal and the relevant objectives have been selected for these areas. We therefore have no further comments in regards this document.</p>	<p>Noted</p>

		<p><u>Flood Risk</u></p> <p>Consider whether there is any desire for growth in areas known to be at risk of fluvial, tidal, surface water, or groundwater flooding. If there is development proposed in any area of risk then the Sequential Test / Approach need to be considered, and only water compatible uses considered in the high flood risk areas in accordance with the NPPF and NPPG.</p> <p><u>Surface Water</u></p> <p>Surface water run-off should be controlled as near to its source as possible with sustainable drainage systems (SuDS). This reduces flood risk through the use of soakaways, infiltration trenches, permeable pavements, grassed swales, ponds etc. SuDS can also increase groundwater recharge, improve water quality and provide amenity opportunities. A SuDS approach is encouraged by the Building Regulations.</p> <p>We support the planting of trees within catchments, especially headwaters, to reduce surface water runoff. Therefore, opportunities for increasing the amount of tree planting, in appropriate locations, is considered beneficial.</p> <p>There should also be consideration of the foul drainage network in the area to understand if there may be existing capacity constraints on the system.</p> <p><u>Biodiversity / Green Space</u></p> <p>The Neighbourhood plan should acknowledge the need for green spaces to be preserved and enhanced to improve the rich biodiversity of the area. Especially any area that includes wetlands or water bodies (e.g. rivers, streams, ditches) as these provide ecological interest and diversity. Opportunities to enhance any wetland feature should be identified and delivered through development, as this approach is promoted in the National Planning Policy Framework and is desired outcome of the Water Framework Directive.</p>	<p>Issues to be taken into account in drafting site based policies and in the SEA/SA assessment.</p> <p>Issues to be taken into account in drafting site based policies and in the SEA/SA assessment</p> <p>Draft NP contains green infrastructure policies and site based criteria – no action necessary.</p>
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<p>Natural England</p> <p>Ref: 166265</p>	18/09/15	5/11/15	<p>Thank you for consulting Natural England Blandford, Blandford St Mary and Bryanston Draft Neighbourhood Plan and apologies for the delay in our response.</p> <p>It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are likely to be significant environmental effects from the proposed plan.</p> <p>We have checked our records and based on the information provided, we can confirm that in our view the allocations contained within the draft plan will have significant effects on the Cranborne Chase AONB, which Natural England has a statutory duty to protect. As we have no evidence of these effects having been previously assessed within a Local Plan, we consider that there should now be an assessment in order to determine the potential</p>	<p>Noted, and SA/SEA progressing</p> <p>Issues to be taken into account in considering site based policies and in the SEA/SA assessment</p>

		<p>impact on the AONB and what possibilities exist for the avoidance / mitigation of the effects.</p> <p>Nationally Designated Landscapes – Cranborne Chase Area of Outstanding Natural Beauty (AONB).</p> <p>The draft Neighbourhood Plan includes significant urban extensions beyond the bypass within and within the setting of the Cranborne Chase AONB, a designation of national importance with the highest status of protection in relation to landscape and scenic beauty. In exercising or performing any functions in relation to, or so as to affect, land in an AONB, all public bodies, local planning authorities and Natural England, have a duty to have regard to the statutory purpose of AONBs, which is the purpose of conserving and enhancing the natural beauty of the area (Section 85 Countryside and Rights of Way Act, 2000). Local planning authorities are required to take such action as appears to them to be expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty and amenity of an AONB to the extent that it lies within their area (Section 84(4) Countryside and Rights of Way Act, 2000). It is against this duty, and with regard to national and local planning policy, that the proposals must be measured.</p> <p>In weighing up the benefits of any policy against the impact to the AONB your authority should have particular regard to the provisions of the National Planning Policy Framework (NPPF). In particular, Paragraph 115 which states that, "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."</p> <p>Paragraph 116 further states that planning permission should be refused for major developments in these designated areas except in exceptional</p>	<p>Noted and baseline amended.</p> <p>Issues to be taken into account in considering site based policies and in the SEA/SA assessment</p>
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			<p>The policy provides for a significant urban development within the Cranborne Chase AONB but is contained within the A354 Blandford bypass. Natural England advises that the current proposals should be considered as “major” in the context of NPPF paragraph 116 and so any development proposals should be required to meet policy’s “exceptional circumstances” test. Exceptional circumstances will not exist unless all three criteria (i.e. the national and local need, cost and scope for developing elsewhere, and the environmental effect and scope for moderating it) can be satisfied.</p> <p>In this case, however, the principle of development in this locality has previously been considered by the adopted local plan and is currently being reconsidered by the emerging local plan process. Given the locality within the bypass and its close association with existing developed areas Natural England considers that the allocation with appropriate biodiversity and landscape mitigation measures are unlikely to have a detrimental effect on the environment, landscape or recreational opportunities. Indeed, with appropriate landscape mitigation measures the allocation is likely to have the potential to help improve the appearance of the existing development from the wider views within the AONB. On this basis Natural England has no objection to the draft policy.</p> <p>Comments on draft Policy 9. Green Infrastructure Network</p> <p>Natural England supports the principle of draft Policy 9. You may wish to consider using the policy to encourage development to make additional provision for new green infrastructure, including new allotments and or community orchards.</p> <p>Comments on draft Policy 10. Local Green Spaces</p> <p>Natural England supports the principle of draft Policy 10.</p> <p>Other Comments</p>	<p>based policies and in the SEA/SA assessment.</p> <p>No objection – mitigation noted</p> <p>Support noted</p> <p>Support noted</p> <p>No action needed</p>
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			<p>Internationally and Nationally Designated Wildlife Sites</p> <p>Based on the information provided, we can confirm that the plan is unlikely to harm any Site of Special Scientific Interest (SSSI), or Special Area of Conservation (SAC), Special Protection Area (SPA), or Ramsar Site and is not likely to significantly affect the interest features for which they are notified. I can therefore confirm that Natural England has no concerns regarding this aspect of the proposals.</p> <p>Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010</p> <p>We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected. Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should therefore be sought from the Dorset Environmental Records Centre.</p> <p>Habitats and Species of Principal Importance</p> <p>The SEA should thoroughly assess the potential impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.</p>	<p>Noted, HRA Screening request submitted to NDDC</p> <p>Issues to be taken into account in considering site based policies and in the SEA/SA assessment.</p> <p>Issues to be taken into account in considering site based policies and in the SEA/SA assessment.</p>
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North Dorset District Council	18/9/15	23/10/15	<p>...given the numerous environmental constraints including landscape designations and the historic environment relating to the plan area and that the plan proposes to allocate land, I confirm that an SEA will be required</p> <p>...with regard to the Habitats Regulations Assessment under the Habitats Regs. (92/43/EEC) the council considers it unlikely that a HRA will be required</p>	Noted and actioned

			<p>given the distance between the plan area and areas of land that are subject to international nature conservation designations</p> <p>Comments on SEA Stages:</p> <p>A1 – Noted that it's not the intention of the scoping exercise to review every high level plan in line with the 'proportionate approach' set out in national planning guidance and acknowledges that the B+NP will consider the most up-to-date evidence informing the emerging North Dorset Local Plan</p> <p>A2 - ...baseline data related to air and soil is not provided.</p> <p>A3 - ...supports reference to the Blandford Forum Town Profile and NDLP Background papers consideration should be given within the plan on the Dorset Heathlands located outside North Dorset which are subject to international nature conservation designations</p> <p>A4 - ...reference to Dorset AONB excluded from appraisal framework given there are polices related to Bryanston</p> <p>A5,...consideration of alternative options will be particularly important given the emerging policies promote large scale growth to the north east of Blandford Forum</p>	<p>Noted HRA screened out</p> <p>Noted</p> <p>Noted and baseline updated</p> <p>Noted, NE confirmed effects are unlikely to be significant</p> <p>Incorporated into the revised appraisal framework</p> <p>Issue taken into account when undertaking the assessment</p>
CC and WW AONB (by email)	23/11/15	30/11/15	Those who instructed you may wish to reflect on the discrepancies between documents, the shortage of supporting evidence for the Plan, and the legal duty to the purposes of AONB designation on councils and councillors in the CRoW Act 2000.	Noted

			<p>Regarding the scoping letter, it implies that the AONBs surround the town. That appears to me to be misleading as, in fact, parts of the town are within this AONB. The letter also fails to mention the adopted AONB Management Plans and therefore is, I suggest, fundamentally flawed.</p> <p>The Appendix A, relating to the visioning process in February 2015, has no evidence of landscape character appraisals or landscape and visual impact assessments or comparative landscape assessments to justify the comments about the landscape and this AONB, notably those in paragraphs 4.3 and 4.6. Furthermore, the acknowledgement that the land north of the bypass near Sunrise Business Park is within this AONB highlights the inaccuracy of the circulated Neighbourhood Plan.</p> <p>Appendix B appears to be the baseline data on which the Neighbourhood Planning process has been based. I note the adopted AONB Management Plans, clearly material planning matters according to the national Planning Practice Guidance, are not referred to or used as source documents. The statement about the AONBs not being under heavy pressure for development fails to take account of the opposite view in this AONB's adopted Management Plan.</p> <p>The quote from paragraph 116 of the NPPF [page 11] is incomplete and hence gives an inappropriate message. Para 116 is clear that within an AONB 'planning permission for major development should be refused...' Any exception would have to demonstrate an explicit assessment of a number of criteria, including national considerations.</p>	<p>Noted and baseline updated. AONB plans part of NDLP evidence base to which the NP has regard.</p> <p>Noted and landscape and visual impact baseline updated.</p> <p>Noted and landscape baseline updated. AONB plans are part of NDLP evidence base to which the NP has regard.</p> <p>Noted, neighbourhood plans must have regard to the NPPF as a whole including paragraph 116.</p>
Dorset AONB (extract from response to B+ NP)	18/9/15	29/10/15	I note that your SEA Appraisal Framework includes a question as to the Plan's justification of the exceptional circumstances that would support the alternative growth strategy that appears likely to include major development within the Cranborne Chase AONB, i.e. as proposed by policies three and four. With regard to such development within an AONB, the provisions of NPPF paragraph 116 are highly relevant. Here it is stated that: "Planning permission should be refused for major developments in these designated areas except	<p>Noted and landscape and visual impact baseline updated.</p> <p>Issues to be taken into account in considering site</p>

			<p>in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> • the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; • the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated." 	based policies and in the SEA/SA assessment.
Historic England Ref: 2317	18/9/15	03/11/15	We are aware from separate correspondence that a Strategic Environmental Assessment of the neighbourhood plan is being prepared and this will no doubt need to embrace a site options evaluation exercise to a methodology consistent with that which has previously been used for the Local Plan.	Noted and appraisal framework indicates relationship to NDDC SA framework