

## **NDDC Response to Blandford+ Neighbourhood Plan 2015-2031 (Pre-Submission Plan)**

Thank you for consulting North Dorset District Council (NDDC) on the pre-submission version of the Blandford+ Neighbourhood Plan 2015-2031. It is clearly evident from the pre-submission plan, and all the supporting documentation, that a huge amount of work and effort has gone into producing the plan which is highly commendable. A number of the policies within the plan are broadly supported. However, please find below Officer comments/concerns in respect of some of the policies that are contained within the neighbourhood plan. These comments/concerns aim to be constructive and it is hoped that they will assist the Blandford+ Neighbourhood Plan Group as it continues to progress work on the neighbourhood plan.

### **Introduction & Purpose**

Paras 1.7 & 1.19 - Details regarding the responses to the Informal Draft Plan will need to be set out in the Consultation Statement that is required to be submitted alongside the Submission Plan. It would be useful if all of the responses received to the Draft Plan were available to view in full on the Blandford+ website.

Para 1.13 – In terms of the Eastern Dorset Strategic Housing Market Assessment (2015) the objectively assessed housing need figure of 330 dwellings per annum for North Dorset has not been tested. Given the environmental constraints associated with North Dorset it may be the case that it will not be possible to meet the need of 330 dwellings per annum within the North Dorset Plan Area. This is a matter that will be tested through the North Dorset Local Plan Review.

Para 1.20 – NDDC's conclusion that an Strategic Environmental Assessment (SEA) of the Blandford+ Neighbourhood Plan will be required is based on a number of different factors as set out in a letter dated the 23 October 2015. This includes the fact that it is proposed that the neighbourhood plan will allocate large areas of land for development.

### **Vision & Objectives**

Paras 2.1 to 2.4 – It is interesting to note the history regarding the vision of the emerging neighbourhood plan and the fact that the vision for growth to the north and east of Blandford Forum was previously presented as an alternative vision to the spatial growth strategy set out in the North Dorset Local Plan Part 1.

Meeting Local Housing Needs – Part h makes reference to the development of land to the north and east of Blandford Forum. Please see the comments below in relation to Policy 1.

Creating and Supporting Jobs and Cherishing our Town Centre – Part j makes reference to the extension of Sunrise Business Park. Please see the comments below in relation to Policy 1.

### **Policy 1 – Land north & East of Blandford Forum**

It is acknowledged that a significant amount of background work has been carried out to support Policy 1. The Neighbourhood Plan Group's rationale for supporting large scale strategic growth to the north and east of Blandford is also noted.

However, it is considered that Policy 1 in the emerging Blandford+ Neighbourhood Plan (NP) does not conform with the strategic policies of the recently adopted North Dorset Local Plan Part 1 including Policy 16 (Blandford). On this basis it is deemed that Policy 1 in the pre-submission neighbourhood plan does not meet one of the basic conditions relating to the preparation of a neighbourhood plan.

Paragraph 184 of the National Planning Policy Framework (the Framework) states, amongst other things, that 'Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan'. The Government's Planning Practice Guidance sets out that the basic conditions, as outlined in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, which a neighbourhood plan must meet. This includes the requirement that 'the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).'

Policy 16, and the accompanying Figure 8.1 of the Local Plan Part 1, set out the spatial strategy for the future growth of Blandford over the plan period up to 2031. The large areas of land identified for large scale development in Policy 1 of the emerging NP are not identified for development in the North Dorset Local Plan Part 1. Therefore, it is considered that Policy 1 is not in general conformity with Policy 16 of the Local Plan Part 1. The large scale development proposals set out in Policy 1 of the NP should be assessed as part of the review of the Local Plan Part 1 rather than through the NP.

It is noted that the supporting text to Policy 1 refers to the policy in the NP as being supplementary to the Local Plan Part 1. Nevertheless, the background document to the NP, titled 'Blandford+ Visioning Document', refers to the spatial approach being promoted through the NP as being alternative to the spatial strategy detailed in LP1. A previous version of the NP, which was consulted on in 2015 also referred to the spatial strategy as being an alternative strategy.

### **Policy 2 – Land at Shaftesbury Lane, Blandford Forum**

The reasoning behind seeking an A1 retail use on this site is understood and it is accepted that a retail use has been granted planning permission on the site. However, the retail use which has been granted planning permission has not been implemented and it is understood that the planning permission which has been granted is likely to lapse without being implemented.

Officers recommended that the original planning application for A1 use on the site should be refused planning permission and one of the main reasons for this recommendation was the likely detrimental impact that a retail use on this site would have on Blandford Forum Town Centre. Nothing has changed Officers' opinion in respect of the detrimental impact that would result on the vitality of Blandford Forum Town Centre as a result of retail use on this site. On this basis it is Officers' view that none of the site should be allocated for retail use but rather the whole site should be allocated for employment use.

### **Policy 3 – Land at Salisbury Road, Blandford Forum**

With regards to point (iii) it is deemed that parking provision in respect of future development on the site should be in line with the parking standards that are detailed in the North Dorset Local Plan Part 1. The provision of a minimum of two car parking spaces per dwelling may not be appropriate in some instances.

Turning to point (iv) it is considered that this point should be more flexible. There may be a better opportunity for NDDC to provide a community hub in another part of Blandford Forum, possibly the

town centre. Therefore, the policy wording should be less restrictive in terms of the location of a community hub.

#### **Policy 5 – East Street/Langton Road, Blandford Forum**

It is difficult to see how development would be able to take place without a loss in the total number of existing car parking spaces. Consideration should be given to what realistic options there are for allowing development on the site whilst retaining the existing parking provision.

Comments from the Environment Agency are likely to inform the most appropriate way forward in terms of limiting the risk posed by potential flooding. If the Environment Agency (EA) does not provide any comments as part of the consultation it is advised that comments are sought from an EA Officer in respect of this policy.

#### **Policy 7 – Housing to meet Local Needs, Bryanston**

Whilst the Policy is titled ‘Housing to meet Local Needs’ as currently worded there is nothing to prevent the new dwellings proposed being developed and sold on the private market. Such a scenario would do little to meet the needs of local people who are unable to afford to buy a dwelling on the open market. If the aim of the policy is to meet local needs then the policy should require the new dwellings to be affordable (e.g. social rented, affordable rented or intermediate housing).

With regards to point (ii) Officers consider that parking provision in respect of future development should be in line with the parking standards that are detailed in the North Dorset Local Plan Part 1. The provision of a minimum of two car parking spaces per dwelling may not be appropriate in all instances.

#### **Policy 8 – Blandford Forum Town Centre**

The proposed Town Centre Area and Primary and Secondary Shopping Frontages are noted. Although the reasoning for identifying the building currently occupied by Morrisons as a secondary frontage is understood it is considered that on balance the building should continue to be identified as a primary shopping frontage. The continued occupation of the building by an A1 retail use is deemed to be integral to the future vitality of Blandford Forum Town Centre.

#### **Policy 10 – Local Green Spaces**

Paragraph 77 of the National Planning Policy Framework (the Framework) details that the Local Green Space designation will not be appropriate for most green areas or open space. It goes on to state that ‘The designation should only be used:

.....

- where the green area concerned is local in character and is not an extensive tract of land.’

Given the size of the area covered by Policy 10.4 (Crown Meadows) it is Officers’ view that there is a conformity issue with the Framework in respect of identifying Crown Meadows as a Local Green Space.

In addition to the above the policy would also benefit from an example or examples of specific exceptional circumstances that may allow for development on a Local Green Space.

## **Policy 15 – Community Facilities**

Some of the community facilities listed in the policy, particularly given that they are not identified on the Policies Map, would benefit from further information regarding their location e.g. what road the facilities are located on.

## **Policies Map**

It is noted that the Policies Map does not show settlement boundaries for Blandford Forum or Blandford St Mary. Consequently, it is assumed that those references to settlement boundaries in the NP are to the existing development plan settlement boundaries.

## **Associated Documents**

It is acknowledged that a Draft Sustainability Appraisal Report, incorporating Strategic Environmental Assessment, (SA/SEA Report) has been produced. This is welcomed. Paragraph 7.27 (Summary of Assessment) of the SA/SEA Report details that none of the reasonable policy alternatives are considered to lead to a better policy outcome than the proposed policies when assessed against the SA/SEA framework. Furthermore, paragraph 7.27 of the SA/SEA Report states that the sustainability effects of the Neighbourhood plan are generally assessed as positive or, at worst, neutral.

Whilst not wanting to go into detail about the exact scoring set out in the SA/SEA it is clear from the comments set out hitherto that there is a basis for re-considering the scores against some of the policies that have been assessed. For example, in respect of Policy 2 it could be argued that the proposed policy would have a negative impact on SA/SEA Objective 7 (Vitality and viability of the town) and a neutral or negative impact on SA/SEA objective 6 (Employment). It could also be argued that Policy 8, given the proposals to identify the building currently occupied by Morrisons as a secondary shopping frontage, could have a negative impact on SA/SEA Objective 7 if the building was to become occupied by a non-retail use. Furthermore, in terms of Policy 7 given that there is nothing in the policy to require that any future dwellings are affordable it could be questioned whether the policy should receive a positive score when assessed against SA/SEA Objective 2 (Housing).

With regards to the assessment of Policy 1 and potential reasonable alternatives the scoring is noted. Whilst it is clearly possible to question and probe some of the scoring set out in Table C of the SA/SEA it is considered that there is little to be gained from such an exercise given the fundamental view set out above that Policy 1 in the emerging Blandford+ Neighbourhood Plan (NP) does not conform with the strategic policies of the recently adopted North Dorset Local Plan Part 1, including Policy 16 (Blandford). As previously stated, given the NP does not conform with the strategic policies in the Local Plan Part 1, it is considered that Policy 1 in the pre-submission neighbourhood plan does not meet one of the basic conditions relating to the preparation of a neighbourhood plan.