

**CLEMDALL LIMITED**  
**APPENDICES**  
**TO BLANDFORD+ NEIGHBOURHOOD PLAN**  
**SUBMISSION**

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## Comments on the Draft Blandford+ NDP

**NOTE** - Comments are offered from a Planning Policy perspective only - officers dealing with particular aspects (eg conservation) have not contributed at this stage. For ease of reference, comments are set out according to the sections of the Draft Neighbourhood Development Plan. Some comments may run over more than one topic or section and should be seen in this context. Comments are intended to be constructive to improve the NDP before submission and it may be that a revised draft is needed before the submission version is confirmed.

### 1. INTRODUCTION & PURPOSE

1.2 The wording of this paragraph gives the impression that only NDP policies determine planning applications. Reference is made later in the document to other policies and determinants and at paragraph 4.3 but in this early paragraph it should be made clear that a whole range of considerations (NPPF, Local Plan etc) have to be taken into account when planning decisions are being made by the District Council. It should also be pointed out that those decisions will be made by the District Council. In this respect, it might be helpful if paragraph 1.2 were to tie in more closely with statements in 1.3.

1.7 Reference is made to *'the Councils'* but *'It has...'* - this is confusing - what is the *'It'*?

1.8 If Blandford and Blandford St Mary *'effectively function as a single settlement'*, how can the statement in 1.12 be true - *'the village has remained a distinct settlement'*? Appendix A to Blandford+'s submission to the Local Plan Examination in Public (EiP) also said *'The village has never regarded itself as part of a single town with Blandford Forum and it does not function as such'*.

1.11 It is unclear how allocations in the Local Plan already place pressure on schools and GP surgeries as the allocations have not yet been built out. The last sentence is confusing - is this no further growth at all or from the proposed 1200 homes?

1.12 Blandford St Mary is again called a distinct settlement and has *'never regarded itself as a single town with Blandford and it does not function as such'* but this seems to be contradictory as it has previously been stated that it *'functions as a single settlement'* (para 1.8).

If Bryanston PC objects to *'further development creeping into the AONB'*, what is different to development in the north proposed by NDP which does more than creep into the AONB?

1.14 It is not sufficient to say that *'The final version of the Plan will not only contain the preferred policies but it will also explain in more detail the background to the Plan, it will provide a profile of the area and it will describe the key planning issues in the area, to which the Plan is aiming to respond'* in light of the statement in 1.13 that *'It is especially important to understand the preferences for the options that are presented in the document.'* How can the reader understand the preferences for the options if he/she is not provided with the background to the plan?

1.15 The presentation of Town Growth and Village Growth is judgmental and could bias responses.

Also, Q3 is based on impact on the AONB and heritage - *'Any development will inevitably have some landscape impact on an Area of Outstanding Natural Beauty as well as impact on our heritage. Providing that the provision of green space and new landscaping minimises this impact as far as is possible, **which option will have the least impact?**'* As this has nothing to do with infrastructure it is rather misleading. Similarly, Q1 was really to do with where people live. The NPD needs to have correct references to avoid any confusion. Q4 seems rather biased in referring to options not being available under 'Village Growth' as there is no commitment to these in 'Town Growth'.

## 2. DRAFT VISION, OBJECTIVES & SPATIAL STRATEGY

There is a spelling error in the title which has probably been spotted already.

2.5 There is a fundamental concern regarding this paragraph which states unequivocally that *'this Vision does not accord with that of the emerging North Dorset Local Plan (NDLP1), at least in respect of the spatial implications of growth'*. Consequently, the policies which flow from this, notably in respect of development proposals to the north and north east of Blandford do not accord with the Local Plan. The Government's Planning Practice Guidance (Paragraph: 065 Reference ID: 41-065-20140306) clearly sets out the basic conditions which a Neighbourhood Development Plan must meet if it is to proceed to a referendum. These include the relationship between a NDP and a Local Plan (the NDP must be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)).

Guidance (Paragraph: 074 Reference ID: 41-074-2014030) is very clear on the matter of conformity with the strategic policies in the development plan. In particular, *'whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy **without undermining that policy** ' and 'the rationale for the approach taken in the draft neighbourhood plan or Order **and the evidence to justify that approach**'*.

The Basic Conditions also refer to the need to help achieve sustainable development (Paragraph: 072 Reference ID: 41-072-20140306). Guidance says that *'In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, **sufficient and proportionate evidence should be presented on how the draft neighbourhood plan ... guides development to sustainable solutions**'*. Comment made in respect of paragraph 1.14 above is pertinent here.

2.6 It is useful having the key objectives summarised clearly but is the conclusion that growth to the north as well as to the south of Blandford is needed? The proposed number of dwellings is 1200 in LP1 but the total number of dwellings proposed in the Draft NDP is not clear. Policy 2 mentions approximately 500 east of the by-pass but Appendix A in Blandford's submission to the Local Plan EiP said *Up to approximately 1,000 new homes (800 on NE and 200 on N) to contribute to the current plan period and to 2030*.

There seems to be less growth proposed in the Draft NDP than in LP1 if the sites in the Local Plan are not to be progressed, as implied in the NDP. There is no reference to any evidence to support this approach - has any viability work been carried out as there could be significant S.106 costs involved on top of CIL liability? The Planning Advisory Service Neighbourhood Planning Advice Note 'Housing Needs Assessment for Neighbourhood Plans' says that *'neighbourhood plan housing policy needs to*

*be underpinned by robust, objectively assessed data providing a picture of housing need at the level of the neighbourhood plan area'. That advice has been ignored in the Draft NDP. Does a Housing Needs Assessment (as recommended as good practice by the Planning Advisory Service) underpin the proposals? There is no reference to this if it exists. National Guidance (Paragraph: 006 Reference ID: 2a-006-20140306) sets out that 'The neighbourhood plan should support the strategic development needs set out in Local Plans, including policies on housing and economic development. The level of housing and economic development is likely to be a strategic policy'. There is a clear implication that, since the housing needs underpinning LP1 are evidence based, any variation needs to be similarly evidence base.*

Government guidance on preparing neighbourhood development plans clearly states (Paragraph: 040 Reference ID: 41-040-20140306) that *'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 or the proposals in an Order'*. It goes on to say (Paragraph: 042 Reference ID: 41-042-20140306) *'A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria'*. There is no indication in the Draft NDP that this work has been done. Finally, it points out that policies should be clear and unambiguous and *'should be concise, precise and supported by appropriate evidence'*.

Dave Chetwyn, planning adviser to Locality, has said neighbourhood plans *"have to be evidence-based, have regard to national policy, strategic local policy, EU obligations, and deliver sustainable development. They have to stack up."*

The Council is quite happy to share and discuss the Local Plan evidence base if it would help the NDP process.

### **3. LAND USE PLANNING POLICIES**

As a point of clarification, the term 'Development Plan' is used in the third paragraph but separate reference is made to the LP1 and NDP in the second paragraph. For non-professional readers of the NDP this could be puzzling.

3.1 This paragraph refers to 'use of land' but some policies almost refer to specific users - eg pre-school and childcare within D.1.

#### **Policy 1.**

If tourism growth is directed to town centre then why does Policy 14 seek to allow it in villages?

3.8 This is an unsubstantiated statement: *'To deliver such crucial investment in a new primary school, a GP surgery, a new convenience store, additional employment land, a new household waste recycling centre, new public transport services and new public open space, it is necessary to use available and suitable land on the northern and eastern edges of the town'*. Nothing is presented to show that the proposals to the north of Blandford are any more sustainable than to the south, as proposed in LP1. For example, walking distances to town centre are no more from Ward's Drove than from the A350/A354 Salisbury Road roundabout.

Why are infrastructure problems most acute in north? Is there any evidence of this?

Plan B - what is the basis / purpose of arrows? Why do not both areas show the same inward / outward aspects? It is not clear from the diagram or the text and could be seen as biasing responses.

## Policy 2.

Inset 1 shows the boundary of development land east of Blandford as not running up to the proposed settlement boundary. Why is this? Has it been artificially stopped short of the AONB boundary to avoid intruding? If so, that is fairly irrelevant since the NPPF is clear that the setting of an AONB is very important. However, this seems to be ignored: *'The land falls within the setting of the Cranborne Chase AONB but does not lie within it'*. The NPPF sets out 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 overall implication from the Policy wording appears to be that any impact on the AONB can be satisfactorily mitigated.

Is there more to come - Policy 2 ix concludes *'and'*?

Planning Practice Guidance (ID 8-001-20140306) says: *'This duty [to have regard to the purposes of AONBs] is particularly important to the delivery of the statutory purposes of protected areas. The duty applies to all local planning authorities, not just national park authorities. The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas'*. DeFRA guidelines on 'The Duty to Have Regard To' includes parish and town councils.

National guidance says that *'National Parks and Areas of Outstanding Natural Beauty management plans do not form part of the statutory development plan, but may contribute to setting the strategic context for development by providing evidence and principles, which should be taken into account in the local planning authorities' Local Plans and any neighbourhood plans in these areas'*. There is no real indication that this has happened in the Draft NDP.

## Policy 3.

There is no reference to housing and number of dwellings but Blandford+'s submission to the Local Plan EiP quoted 200. As mentioned above, there does need to be clarity about housing numbers.

Comment on the AONB is similar to that under Policy 2.

3.10 Where is the evidence that safe access can be put into place from the bypass to the proposed development? Have the costs of bridging the bypass been taken into account, given the fact that the A354 has extensive verge areas along this section which will add to those costs?

3.13 *'This allocation will be expected to provide financial contributions to meeting all infrastructure requirements and other provisions of the Neighbourhood Plan'* - does this mean all for the Draft NDP area or just the site? If it is the former then contributions can only come via CIL as S.106

contributions relate only to the site directly. If the reference is site specific then it should say so for clarity.

3.14 It should be stated explicitly that this land lies within the AONB - '*on the edge of and adjacent to*' implies not actually within. The statement is made that development '*can be contained within the landscape*' - is this based on the Cranborne Chase and West Wiltshire Downs AONB Partnership's view?

#### Policy 4.

3.19 The view is presented that the north of Blandford is poorly served by convenience shops so the NDP seeks to retain the ASDA site for '*out of centre retail uses*'. Convenience shops tend to be smaller than the present 3,900 sq m consent granted to ASDA - is the proposal for a number of convenience shops or just one?

Where does 120 car parking spaces for up to 2,500 sq m come from? It will be difficult to justify this level of parking provision for a small store. (ASDA's original application embodied 210 spaces for 3,900 sq m.)

A large part of this policy seems to emerge from nowhere. Is there support for D1 use for FE? Has there been any discussion with providers or exploration of funding? This proposal does not appear to have been covered in the public consultation earlier in year.

There is a significant lack of text associated with this policy, especially in respect of the need for B1, B2 and B8 development.

#### Policy 5.

The strength of proposed Policy 5 is questionable since Class D.1 is any non-residential institutional use. Consequently, any planning consent for an application for the Nordon site which included 'the provision of a D1 childcare nursery building' would include reference to a D.1 use rather than specifically to a childcare facility. It would thus be open to future change to any other D.1 use. Pre-school provision is market driven and there is no certainty that Larksmead Pre-School would be the occupier of a D.1 building if the owner found a more profitable user. For example, the Council is aware that there is pressure on GP surgeries in Blandford – use as a health centre might prove to be a more attractive option than a pre-school facility.

The car parking standard proposal of a minimum of 2 spaces per dwelling is likely to conflict with the parking policy in the Local Plan, which refers to the provisions based on the Dorset Residential Car Parking Study, and which includes parking provision for motorcycles.

#### Policy 6.

Should not the FRA have been done before putting forward the proposals?

**Policy 7.**

This policy helpfully moves things on in respect of this site which, as the NDP notes, is prominent and part of the gateway into Blandford. A retail use might be difficult to deal with as shops tend to want prominent fascias but a carefully designed scheme would certainly enhance this part of the town.

**Policy 8.**

3.31 It is difficult to understand why the secondary frontage along Salisbury Street has been extended so far to the north when the proportion of non-residential uses is very low.

3.33 The 'Town Centre Area' is not a transition between charging areas but a means of identifying where the retail Levy will be charged. There is still the residential charge in the town centre. Reference to 'the Town Centre Area' implies that the CIL Charging Schedule will use the NDP town centre definition but that is not the case – the CIL Charging Schedule will use NDDC's town centre definition which may or may not be same as the NDP definition. The District Council is currently reassessing town centre area definitions relating to the towns within the District.

Also, many changes of use which are now permitted development (eg retail to residential - premises designated for A1 retail and A2 financial and professional service uses can be converted to a single house or a building containing up to 4 flats, with an upper size limit of 150 sq m, without the need for a full planning application).

The Draft NDP should not include traffic management as an issue if there are no proposals in the document.

**Policy 9.**

While it is good to see a focus on green infrastructure, use of the term 'network' as a description for the assembly of 'green' elements in the Draft NDP may not be appropriate. 'Network' usually implies a system of lines or channels that cross/interconnect over an area. Allotments and children's play areas, for example, do not fit into this interpretation of the term.

This comes across as a rather neutral policy - what about including improvements to green spaces and new ones?

**Policy 10.**

3.41 If the Local Green Spaces listed are to be designated then they should have been assessed against the NPPF before inclusion. The policy is rather confusing in that it is not clear whether or not the green spaces listed are to be designated in the Draft NDP or are there simply for consultation. If the latter is the case then they should be removed as the Draft NDP is the precursor to the submitted version.

**Policies 11/12/13.**

There is an understandable focus on the Conservation Areas but it might be useful to widen out the consideration of design to the wider area. Some of the policy wording might be a little more consistent - Policy 13, for instance, at e. simply refers to '*unsightly and inappropriate features or*

*details'* whereas f. actually give some examples of original features. Examples of unsightly and inappropriate features would be helpful to developers looking at the NDP.

#### **Policy 14.**

What is sufficient off-street parking - that it meets LP1 standards? How is the closure of a B&B establishment to be prevented?

#### **Policy 15.**

The protection of community facilities is important and this policy should assist in this. The status of the Bryanston Estate Club perhaps needs to be clarified. Also, the last part of the policy refers to extending the viability of existing community facilities - how is this different to sustaining viability? It might also be better to deal with new facilities in a separate clause.

#### **Implementation**

Does this refer to the 25% allocated to Blandford+ by NDDC?

4.5/6/7 Who will prioritise? Has any calculation been done to estimate the amount of income from CIL? There appears to be potentially an extremely large funding gap (eg, Fording Point's own estimate is £718,800.) If a large proportion of new housing is designated affordable (under the new definition) then reduced CIL levies will be payable (eg ignoring 5% admin top slice and exemptions, 1200 new houses with 50% affordable = 600 houses @ 76 sq m (RIBA) x £35 x 25% = £399,000 over 15 years = £26,600 p/a. Even if no affordable, only about £53,200 p/a). Blandford+ submission to the Local Plan EiP suggested 440 affordable in Blandford (before the recent redefinition of affordable).

4.6 This paragraph refers to '*the Parish*' - should this be the Blandford+ area?

#### **General**

The Inset Plans are generally clear and well referenced. The only points which do stand out are that the boundary of the secondary shopping area is not very clear on Inset 1 and the AONB is not shown on Inset 1.

## **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.

# **STATEMENT TO THE INDEPENDENT EXAMINATION OF THE NORTH DORSET LOCAL PLAN PART 1 2011- 2026**

**BY THE BLANDFORD PLUS NEIGHBOURHOOD PLAN  
STEERING GROUP**

**ON BEHALF OF BLANDFORD FORUM TOWN COUNCIL,  
BLANDFORD ST MARY PARISH COUNCIL & BRYANSTON  
PARISH COUNCIL**

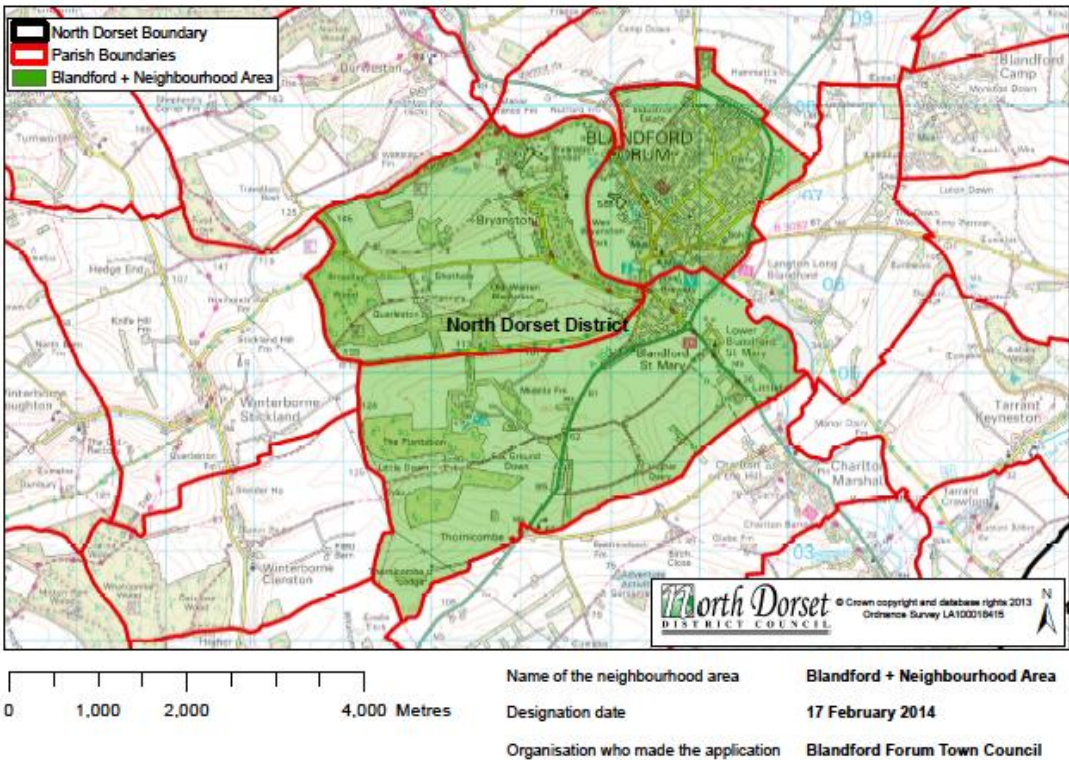
**20 FEBRUARY 2015**

**PREPARED BY NEIL HOMER MBA MRTPI BSC (HONS) DIP TOWN PLANNING OF  
RCOH LTD**

1. INTRODUCTION

1.1 This Statement has been approved by the Blandford Plus Neighbourhood Plan Steering Group for submission to the independent examination of the North Dorset Local Plan Part 1 2011- 2026.

1.2 It is made on behalf of Blandford Forum Town Council, Blandford St Mary Parish Council & Bryanston Parish Council, each of which is a Qualifying Body to make a Neighbourhood Plan (B+NP) under the Neighbourhood Planning (General) Regulations 2012. The three bodies have agreed to prepare one neighbourhood plan and this area was designated for this purpose by North Dorset District Council (NDDC) on 17 February 2014 (see Plan A below).



1.3 The Statement has been prepared by Neil Homer MBA MRTPI BSc (Hons) Town Planning, the Planning Director of RCOH Ltd, who has been appointed by the Steering Group to advise on the preparation of the B+NP and to make its representation to the Examination Hearing on 18 March 2015.

2. BACKGROUND

2.1 The parish councils have consistently objected to the growth strategy proposed in the Draft New Local Plan of 2010 and now the North Dorset Local Plan Part 1 2011-2026 (NDLP1). They have long regarded the strategy as unjustified and inconsistent with national policy by choosing to direct growth to the small village of Blandford St Mary rather than to the north and north east of the main town, Blandford Forum.

2.2 The decision of NDDC in the Focused Amendments to the NDLP1 to delete the proposed broad location West of Blandford Forum (Crown Meadows), although welcomed, has not resolved the objection as the previously rejected South of Blandford St Mary is now proposed. In their view, NDDC has consistently failed to justify its choice of growth strategy against the reasonable alternatives, both in the Sustainability Appraisal and in other evidence base reports.

2.3 With hindsight, the parish councils should have articulated their case more effectively during previous consultations and they regret not appointing professional planning advice earlier for that purpose. However, the work undertaken on their behalf by the Steering Group on the Neighbourhood Plan since late 2014 has benefited from professional planning support and this has enabled a clearer vision of the future of the area to emerge. Not only is that vision supported by a significant majority of the local communities – as may be reported to the Hearing - but it is very different to that of the NDLP1 (see Appendix A for a separate summary of the 'A Vision of the Blandford Plus Neighbourhood Plan in 2031').

### 3. EXAMINER ISSUES & QUESTIONS

#### Question 7.1

***Is there any evidence that the proposed residential development sites at Blandford Forum, including the development of land to the south-east and west of Blandford St Mary, is not available, sustainable or deliverable? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?***

3.1 It is contended that had a proper Sustainability Appraisal process been followed from 2010, and especially in late 2014, it would have clearly demonstrated that the combination of sites around Blandford St Mary were unsustainable when compared to the reasonable alternatives.

3.2 However, the Initial Sustainability Appraisal of 2010 was too quick to dismiss the options of growing Blandford Forum to the north and north-east and relied upon poor quality analysis of the data to do so. Had the land promoter there been offered the same opportunity afforded to the land promoter of the new South East of Blandford St Mary site to present its case, then the relative sustainability attributes of that land would have been as obvious to NDDC and they are to the Steering Group and local community.

3.3 Rather, the Appraisal dismissed the option on the grounds that, although the larger north-east site lies entirely outside the AONB, its development would have an adverse impact that could not be mitigated. It also identified flood risk and highways impacts that could also not be mitigated. These inconsistencies are addressed in answering Question 7.2 below and see also a separate report attached as Appendix B ('A Sustainable Appraisal of Land North of Blandford Forum').

3.4 Its conclusions were summarised in Section 5 of the NDDC 'Market Towns Site Selection' Background Paper of 2013, along with those of the North and North East Dorset Transport Study ('Towards a Transport Strategy') of 2010, which assessed the relative accessibility of the ten SHLAA sites in and around Blandford.

3.5 The most relevant sites were identified as BLAN 2 (the N land for 400 homes), BLAN 5 (the NE land for 500 homes), BLAN9 (the Lower Bryanston Farm/Dorchester Hill site for 150 homes) and BLAN 10 (the SE Blandford St Mary site for 360 homes). The assessment measured the distance of each site to a number of facilities. Its results are shown in the table below. It concluded that on these measures the Blandford St Mary sites were more accessible than those to the north of Blandford Forum.

Site	Food Shop	Primary School	Bus Stop
BLAN 2 (N BF)	1100	2700	300
BLAN 5 (NE BF)	1100	600	300
BLAN 9 (W BSM)	500	800	200
BLAN 10 (SE BSM)	300	600	100

3.6 However, the 2013 Background Paper should at least have noted much of this assessment was out-of-date and misleading, especially in respect of the BLAN2 and BLAN5 sites. By that time, and indeed much earlier, a concept masterplan had been prepared for the NE site (BLAN5) showing the provision of a new primary school and local shops on the site, with the assumption that new bus services would be provided within the site, not just connecting the N and NE sites to the town centre but to other destinations in the town, for the wider benefit of the northern half of the town.

3.7 These proposals, and those for additional employment land, a potential recycling centre on BLAN2 and the consented food store scheme at Higher Shaftesbury Road, were also known by NDDC at the time of the Focused Amendments to the NDLP1 in late 2014 and were still not considered important enough to take into account, or even to report, in the final document or in the revised Sustainability Appraisal.

3.8 The table below shows the results of an objective re-assessment of these proposals on the relative accessibility of the N and NE sites. This contrasts markedly from the 2010 assessment and shows both the N and NE sites in a far more favourable light. In which case, neither the Transport Study nor Market Town Study of 2010 can be considered up-to-date and relevant evidence.

Site	Food Shop	Primary School	Bus Stop
BLAN 2 (N BF)	300	400	100
BLAN 5 (NE BF)	On Site	On Site	On Site
BLAN 9 (W BSM)	500	800	200
BLAN 10 (SE BSM)	300	600	100

3.9 The NDLP1 cannot therefore be shown to be based on a sound process of sustainability appraisal and testing of reasonable alternatives and nor does it represent the most appropriate strategy in the circumstances. The strategic site selection process has not been objective, nor based on accurate criteria. As result, there is no clear evidence demonstrating how the preferred strategy was selected.

## **Question 7.2**

### ***Can development at Blandford St Mary be satisfactorily assimilated into the existing settlement and the wider setting, including the AONB?***

3.10 The various evidence base studies on the effects of developing land around Blandford St Mary have all identified serious landscape impacts and connectivity issues to overcome if the development of each site was to be made satisfactory. Importantly, none have sought to quantify the cumulative impacts of these schemes of 500+ total new homes around the village edge.

3.11 The Landscape Character Assessments of the Lower Bryanston Farm/Dorchester Hill site have acknowledged serious impacts of development on the Dorset AONB but have gone to great lengths to demonstrate mitigation measures are possible. Neither site assessment refers to the other site, although they will clearly appear as one major housing scheme in the landscape in views from the village, from the town and from Bryanston. Both assessments make it clear that it will not be possible for any future expansion at this location.

3.12 Given half of this scheme lies within the AONB, there ought to have been evidence presented to justify this scale of major development in relation to the tests of Para 116 of the NPPF, which require decision makers to show “exceptional circumstances ... where it can be demonstrated (major developments) are in the public interest”.

3.13 Such evidence could not be provided as the same housing need can be met and exceeded by other available land on the edge of the main town that either lies outside the AONB altogether or lies within it but can provide much needed additional employment, public transport, recycling and green infrastructure benefits in addition to new homes. By contrast, the land at Lower Bryanston Farm/Dorchester Hill cannot demonstrate any such case other than providing new homes.

3.14 The Landscape Character Assessment of Land South of A350/A354 states that, “due to the sensitivities and vulnerabilities ... any form of mitigation would be limited in reducing ... identified impacts ... Development here would ... impact negatively on the setting of the town when viewed from this location”.

3.15 The review of this site by NDDC in the light of the decision to delete the Crown Meadows location is unconvincing. The combination of a 300 home scheme and the need to realign the land safeguarded for the A350 Charlton Marshall/Spetisbury bypass scheme – with the objection of the Highways

Authority to this seriously questioning its delivery - cannot possibly make mitigation of their cumulative impact any easier since the original assessment conclusions. And like the Lower Bryanston Farm/Dorchester Hill site, the assessment makes it clear that there is no scope for any future growth beyond the proposed site.

3.16 A more significant problem for this location is the practical impossibility of connecting it to the existing village in a way that will encourage walking and cycling to the local school and other facilities. The housing developments that have completed the village up to the A354 have left no opportunity to bridge the road at any point other than at the busy A350/A354 roundabout. The roundabout is of great significance to the efficient operations of the strategic highway network.

3.17 The only option will be to install a series of pedestrian footbridges across the roundabout to join the site to land north of the roundabout. The user experience of such bridges is known to be poor and most pedestrians and cyclists will attempt to cross the roads at grade unless physically prevented. With the bridges having to meet gradient specifications they are likely to be substantial structures in the landscape. And in any event pedestrians will still have to walk alongside the busy Bournemouth Road from the roundabout to enter the village or to walk to the town centre.

3.18 This is simply not good town planning. The result will be a remote housing estate segregated from the village with no local facilities and entirely reliant on using private cars to access even the services in the village, with all the problems that will result from extra traffic on the roundabout and in the village.

### **Question 7.3**

***Is there any evidence that the proposed economic development sites in Blandford Forum are not available, sustainable or deliverable? If such evidence exists what alternatives are available to the Council?***

3.19 The consent for a major superstore development on one of the major employment locations at Shaftesbury Road in 2013 resulted in the loss of a most significant opportunity to boost higher value added business growth in the town. The consented Brewery scheme in Blandford St Mary is welcomed and will hopefully deliver sustainable new jobs for the area.

3.20 However, more land is required to replace the loss of the Shaftesbury Road land, especially beyond 2026 and if the alternative spatial strategy preferred by the Steering Group increases the provision of new homes. The only practical option available is to extend the well-established and successful Sunrise Business Park on the northern edge of the town.

3.21 There is adequate land available that can be accessed from the existing Business Park of an equal area to that lost. Furthermore, this extension will also allow for the establishment of a new Household Waste Recycling Centre to

replace the existing facility on the Blandford Heights Industrial Estate. That facility is inadequate to meet the growing demands for recycling in the town and is not capable of extension. The Dorset Waste Partnership and the landowner are already discussing the new proposal, which will provide modern recycling facilities on land adjoining the extended Business Park with access either from the Business Park or directly from the A350 bypass.

#### **Questions 7.4 and 7.5**

***Can it be demonstrated that the proposed development in Blandford Forum and Blandford St Mary would not have a significant adverse effect on highway safety or on the ability of other infrastructure to satisfactorily accommodate the growth? Are all the infrastructure requirements listed in policy 16 justified and deliverable?***

3.22 The fundamental weakness of the proposed sites around Blandford St Mary is that they are intended only as housing sites, which will deliver no improvements to the types of infrastructure that are required to accommodate growth. At best, they will make financial contributions through the Community Infrastructure Levy towards the costs of providing such infrastructure.

3.23 Policy 16 (and thereby Policy 14) assumes that the additional two forms of entry required to support growing Blandford St Mary by 800 new homes over the plan period can be supported by “careful use of the existing capacity in the school pyramid and by extending the existing primary school capacity in the town” (Para 7.81, p168). It notes that the Pimperne Primary School beyond the northern edge of the town is in the Blandford pyramid and also that it is possible that a new 2FE entry school in the town may be required instead.

3.24 In practice, there is no capacity to extend the Blandford St Mary Primary School, which is by far the closest school. The Archbishop Wake Primary School, already a 2FE school is not remotely within walking distance of Blandford St Mary. The only other school – Milldown Primary School – is on the north-western edge of the town and although capable of extension is the furthest from Blandford St Mary and the most difficult to access.

3.25 Given the close proximity of the existing school in Blandford St Mary, the constraints to any growth beyond 2026 in this location and the remoteness of the village to the main town, it is inconceivable that one of the proposed sites should accommodate a new school. The only practical option for the long-term provision of primary school places for the period to and beyond 2026 is on the northern edge of the town to serve the new school population and the under-served existing population of the northern half of the town.

3.26 Similarly, Policy 16 (and Policy 14) indicates that additional GP surgery capacity will be required to meet the needs of a larger population, in the light of capacity constraints at the two existing surgeries in the town centre. None of the Blandford St Mary sites offers a realistic opportunity to provide such a facility. By contrast, the N or NE sites are available for a new facility

that will serve the new population but also, crucially, the northern half of the town.

## 4. CONCLUSIONS

4.1 It is inevitable that Blandford Forum will want to and have to continue to grow beyond 2026 to remain a viable service centre and community hub for this part of the district. The town is now in the final stages of completing an era of growth begun in the 1980s with the creation of the A350/A354 bypass around three quarters of its edge. There is arguably no other land within the bypass and beyond the River Stour floodplain of any scale that is either suited or available for housing development. NDDC cannot bury its head in the sand and ignore this reality.

4.2 The town must therefore plan for a new era and one that has to accept compromising its planning policy constraints. Growing the main town to the north and north east represents the most positive, justified and effective strategic choice that has strong local community support and acknowledges the town must have a viable future well beyond 2026. There are no delivery or other obstacles that cannot be overcome, especially if the Neighbourhood Plan is used to allocate the land and to translate the key principles of Policy 16 into robust masterplan for the N and NE sites.

### **What part of the LP1 is unsound?**

4.3 In which case, as it proposes a spatial strategy that is diametrically opposed to this vision, Policy 16 must be unsound (and as a result parts of policies 2, 6 and 14).

### **Which soundness criterion it fails and why does it fail?**

4.4 It fails to be positively prepared by planning for development only to 2026 and not beyond and will lead to an unsustainable pattern of development. It is unjustified in that its spatial strategy is flawed and NDDC has consistently failed to properly assess the reasonable alternatives. In these and other respects it therefore fails to support national policy and, worse, fails the needs of the local community.

TOTAL WORD COUNT 2961

## How the NDLP1 can be made sound?

### **POLICY 16: BLANDFORD (PROPOSED MODIFICATIONS)**

Blandford will maintain its role as the main service centre in the south of the district through:

b extensions, primarily of housing to the **north and north east of Blandford Forum** ~~and to the south east and west of Blandford St Mary~~; and  
c employment uses on land ~~within the bypass~~ on the northern edge of the town and the mixed use regeneration of the Brewery site close to the town centre.

~~About~~ **A minimum of** 1,100 homes will be provided at Blandford Forum ~~and Blandford St Mary~~ during the period 2011 - 2026. In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through:

h the development of **land to the north and north east of Blandford Forum** ~~south east of Blandford St Mary~~; and i the development of land ~~to the west of Blandford St Mary~~.

Employment needs in the town for the period up to 2026 will be met through:

k the development of land off Shaftesbury Lane **and an extension to the Sunrise Business Park**;

~~P16A the identification of a safeguarded route for the Spetisbury and Charlton Marshall Bypass as part of the development of the land south east of Blandford St Mary;~~

In the period up to 2026, social infrastructure to support growth will include:

u the extension of the Archbishop Wake school and ~~either extension of the Milldown school or~~ the provision of a new 2FE primary school **on land north or north east of Blandford Forum**; and  
v a new doctors' surgery **on land north or north east of Blandford Forum** **and/or** the expansion or relocation of existing doctors' surgeries.

A network of green infrastructure will be developed in and around Blandford, focussing on linking existing sites (such as the Milldown and Stour Meadows) and providing new sites and links to serve the residents of both the new and existing developments in the town. New or improved facilities will include:  
w informal open space associated with housing development ~~to the west of Blandford Forum~~ **at land north and north east of land of Blandford Forum**;

**POLICY 2: SPATIAL STRATEGY (PROPOSED MODIFICATIONS)****The Four Main Towns**

Blandford ~~Forum and St. Mary~~, Gillingham, Shaftesbury and Sturminster Newton are identified as the 'main towns' in North Dorset.

**POLICY 6: HOUSING DISTRIBUTION (PROPOSED MODIFICATIONS)**

The vast majority of housing growth will be concentrated at the District's four main towns of Blandford ~~Forum and St. Mary~~, Gillingham, Shaftesbury and Sturminster Newton.

The approximate scale of housing development at the four main towns during the period 2011 - 2026 will be as follows:

a Blandford ~~Forum and St. Mary~~ – about **at least** 1,110 homes;

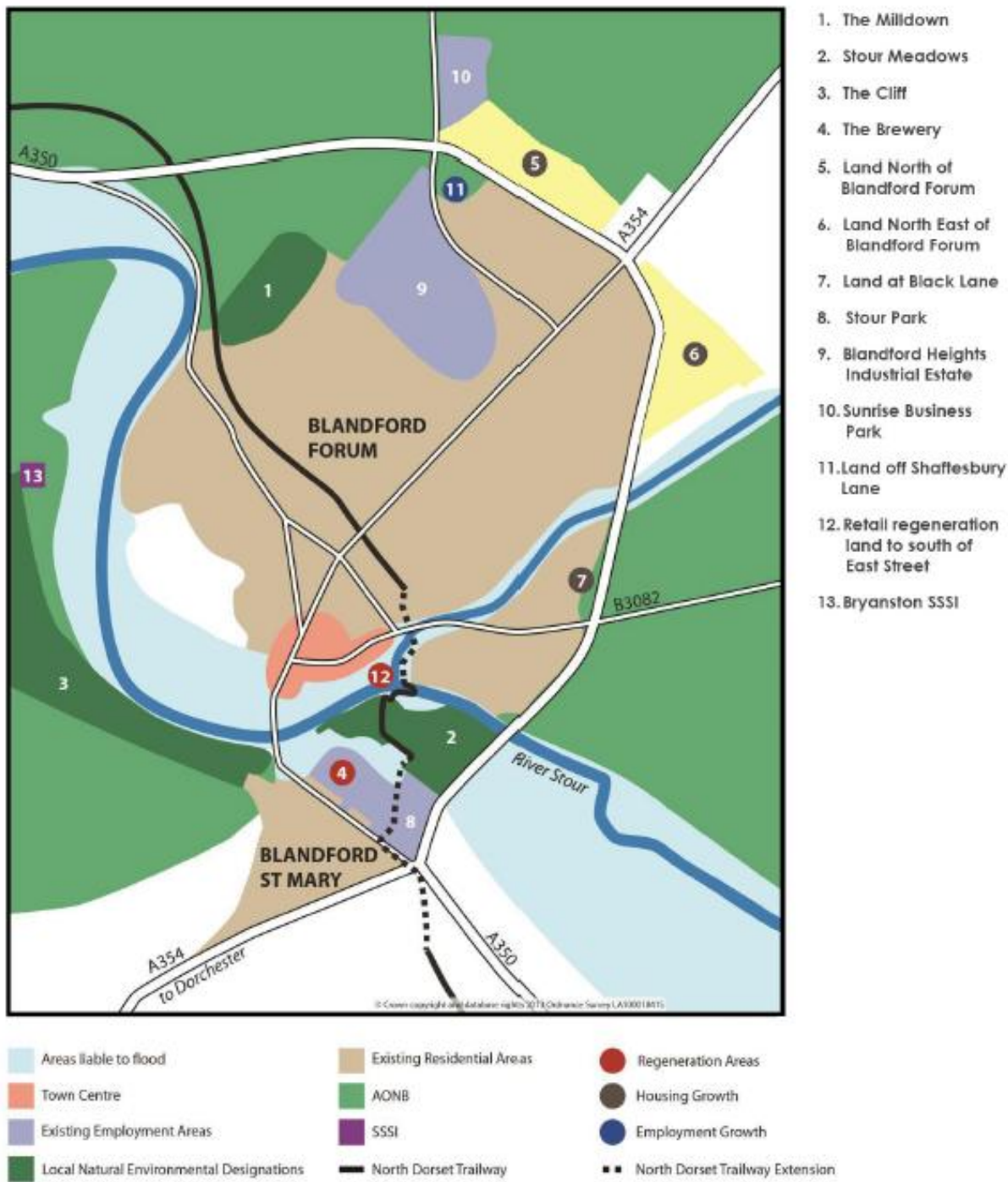
The approximate scale of affordable housing development that will be sought at the four main towns during the period 2011 - 2026 will be as follows:

e Blandford ~~Forum and St. Mary~~ – about **at least** 440 affordable homes;

**POLICY 14: SOCIAL INFRASTRUCTURE (PROPOSED MODIFICATIONS)****Education Facilities**

b provision is made to accommodate the additional forms of entry required at primary and secondary school levels across the District including, if necessary, new primary schools in **Blandford Forum**, Gillingham, Shaftesbury and Sturminster Newton;

FIGURE 8.1: BLANDFORD INSET DIAGRAM (PROPOSED REPLACEMENT)



## **APPENDIX A**

### **A VISION OF THE BLANDFORD PLUS NEIGHBOURHOOD PLAN IN 2031**

SEE SEPARATE REPORT

## **APPENDIX B**

### **A SUSTAINABILITY APPRAISAL OF LAND NORTH & NORTH EAST OF BLANDFORD FORUM**

SEE SEPARATE REPORT

**For office use only**

Batch number: \_\_\_\_\_

Received: \_\_\_\_\_

Representor ID # \_\_\_\_\_

Ack: \_\_\_\_\_

Representation # \_\_\_\_\_

# North Dorset Local Plan – 2011 to 2026 Part 1

## Pre-submission Focused Changes Consultation

**1 August to 12 September 2014**

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012

## Response Form

**For each representation you wish to make a separate response form will need to be completed.**

This is a formal consultation on the legal compliance and soundness of the Local Plan as amended by focused changes, before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at

[www.dorsetforyou.com/focusedchangesconsultation/north](http://www.dorsetforyou.com/focusedchangesconsultation/north)

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Alternatively you can submit your comments online at:

[www.surveymonkey.com/s/NorthDorsetLocalPlanFocusedChangesConsultation](http://www.surveymonkey.com/s/NorthDorsetLocalPlanFocusedChangesConsultation)

**Deadline: 11 : 59 p m on 12 September 2014. Representations received after this time may not be accepted.**

## Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title	Mrs	
First Name	Linda	
Last Name	Scott-Giles	
Job Title( <i>where relevant</i> )	Town Clerk	
Organisation ( <i>where relevant</i> )	Blandford Forum Town Council	
Address		
Postcode		
Tel. No.		
Email Address		

## Part B – Representation

The Focused Changes to the North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representations to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan as amended by focused changes, complies with the **legal requirements** and is '**sound**'.

If you are seeking to make a representation on the **way** in which the focused changes have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the focused changes it is likely that your comments or objections relate to the **soundness** of the plan and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at the consultation exhibition in Blandford Forum on 14 August 2014 or call 01258 484201.

### 1. Please select which document you are commenting on:

- ☒ North Dorset Local Plan 2011 to 2026 Part 1: Pre- Submission Focused Changes  
(please complete Questions 2 to 9)
- ☐ Supplement to the Sustainability Appraisal Report (please complete Questions 2 and 10)

### 2. Please state to which pre-submission focused change you are commenting on:

Change Reference:	Section reference:
-------------------	--------------------

### 3. Do you consider the Local Plan as amended by focused changes, to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

- ☐ Yes ☐ No

### 4. Do you consider the Local Plan as amended by focused changes, to be 'sound'?

- ☐ Yes ☐ No

### 5. If you consider the Local Plan as amended by focused changes, to be unsound please specify your reason(s) by ticking the box(es) that apply below

- ☐ It has not been positively prepared
- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

6. Please give specific details of why you consider the Local Plan as amended by focused changes, has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

X

The Town Council support the focused changes, but are saddened to see that the response to withdrawal a housing site has resulted in the withdrawal of community access to the Deer Park.

*Continue on a separate sheet if necessary*

7. What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound? It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*Continue on a separate sheet if necessary*

8. If your representation is seeking a change to the Local Plan as amended by the focused changes, do you consider it necessary to participate in the oral part of the examination?

- ☐ No, I do not wish to participate in the oral examination
- ☒ Yes, I would like to participate in the oral examination

**9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary.** Please note that the Inspector determines who is heard at the examination.

**10. Please outline your comments on the Supplement to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment.** Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

**11. Do you wish to be notified of any of the following?** Please tick all that apply. We will contact you using the details you have given above.

- ☒ That the Local Plan Part 1, as amended by the Focused Changes, has been submitted for independent examination
- ☒ The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1
- ☒ The adoption of the Local Plan Part 1.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

*If submitting the form electronically, no signature is required.*

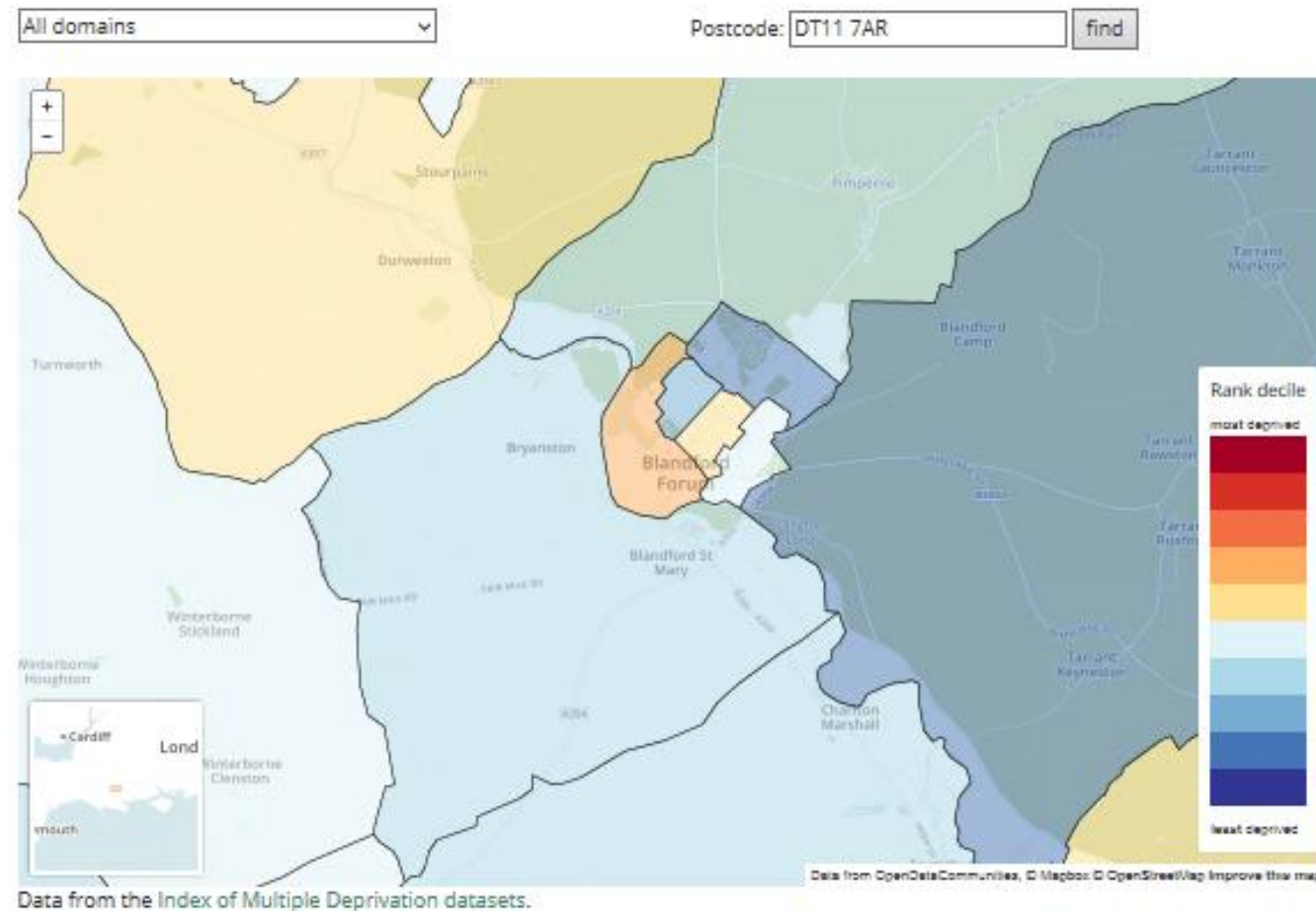
**Submit Form**

This button should attach your form to a pre-addressed email, if it does not, please save the form and send it to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

## 2010 Deprivation mapper

Note: this app shows the 2010 deprivation data. For 2015 data you might want to try one of the following apps:

- 2015 Indices of Deprivation Mapper
- IMD 2015: lookup by postcode
- IMD 2015: lookup by area



	Blandford Damory Down	Blandford Hilltop	Blandford Langton St Leonards	Blandford Old Town	Blandford Station	Portman (containing Blandford St Mary)	
Employees 2009	100	1,300	200	1,900	700	1,400	Source: Business Register and Employment Survey (2013), ONS
Employees 2010	100	1,300	200	2,200	800	1,400	Source: Business Register and Employment Survey (2013), ONS
Employees 2011	100	1,200	200	2,000	600	1,300	Source: Business Register and Employment Survey (2013), ONS
Employees 2012	100	1,000	200	2,100	500	1,300	Source: Business Register and Employment Survey (2013), ONS
Employees 2013	100	1,100	200	2,100	500	1,300	Source: Business Register and Employment Survey (2013), ONS
Self-employed	127	138	106	149	160	153	Source: Census of Population, 2011
Work mainly at/from home	89	100	75	122	96	133	Source: Census of Population, 2011



[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Employees data

Hi Barry

Sorry it's taken me a while to get this to you, the commuting data can be a little tricky so I wanted to make sure I was giving you the correct data. I have attached two spreadsheets for you. The first is the data for each of the Blandford Wards including employees, self-employed and those that are working at/mostly from home. I have put some notes on the spreadsheet about the data so please take a look at these. These wards are based on the 2011 definitions and we won't receive any data for the new wards for some time.

I have also included 2009-2013 employee data as this data gets updated when a new set comes out. It is difficult to say whether much has changed since 2009 as this is a sample survey and is rounded to the nearest 100.

The second spreadsheet is about commuting. This data is only available at MSOA level so covers all of Blandford. The first column shows where people are travelling to for work from the Blandford area in terms of all other MSOAs in the Dorset County area. The second column is a bit broader so you can see which districts people are travelling to for work.

I'm afraid we don't have any data for civilian employment in Blandford Camp.

I hope this is what you are looking for.

Steph

[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** Re: Employees data

Hi Steph:

### **Employment in Blandford Forum**

Thanks for your analyses. It is interesting that 2013 employment is still not back at the 2009 level. As I mentioned I had a meeting with Blandford+ last week and they asked for some further info.

Could you let me have the employment figures for each of the Blandford Forum Wards in the same detail as provided for Old Town. Please confirm this was based on the old ward

boundaries. As I mentioned I was told that Sunrise has been transferred from Cranborne Chase into presumably Hilltop so that it is in the Blandford+ Neighbourhood Plan.

I was also asked if you have any figures for civilian employment in Blandford Camp which was in Lower Tarrants but now seems to be split.

Do you have any information that illustrates the proximity of residents to their jobs. I think I have seen some general comment that a large proportion of people working in town live close to their jobs.

Regards,

Barry

[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** Employees data

Hi Barry

I received your message for employees on Sunrise and Blandford Heights industrial sites. Unfortunately, we don't have numbers on the sites themselves but can find out the employees for the Wards that contain these sites.

Blandford Heights is within the Blandford Hilltop Ward and Sunrise is within the Cranborne Chase Ward. The Cranborne Chase Ward is quite large and please bear in mind that there might be employees working in these Wards that are employed in businesses not on the two industrial sites specified.

I have attached a spreadsheet with the data in but please let me know if you need anything else.

Thanks

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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Our Ref: NP/2015/DP  
Date: 9<sup>th</sup> December 2015

Dear Mr Pliskin

Thank you for agreeing to meet with Blandford + together with the representatives to Morrisons. As you know such a meeting has not been agreed to, although I note that you and Mr Kamm has agreed to meet with the group and can therefore offer some time to meet on Monday 14<sup>th</sup> December between 10:00am and 10:30am. I have attached a structure to guide discussion should you both be available.

You may be aware that the publication of a Draft Plan is not governed by regulations, and therefore many of the regulations you refer to will apply to a Pre-Submission Plan which the group has not yet published. A full public consultation and independent examination, as suggested in your response, will take place further along the line of the project as set out in the regulations. However, your comments, as well as every response received in relation to the Draft Plan has met the group's aim of publishing a Draft Plan prior to submitting a Pre-Submission Plan, which was to confirm the community's agreement with the plan, who will ultimately vote for the adoption of the plan, and to draw out formal responses from authorities and organisations.

As you point out the wording in the Plan needs to be reconsidered. The development it proposes is in addition to that of the Local Plan as the group accepts that it has probably lost the battle for it to be accepted as an alternative strategy in the Local Plan. In terms of your response please see comments below:

- Conclusion 6.1 – The NPPF does not require evidence to justify an oversupply of housing;
- Conclusion 6.2 – The alternative was not tested and the NDLP1 main modifications (MM14) allows for growth beyond the bypass;
- Policy 11 is intended to support, not undermine town centre investment, as is the infrastructure list;
- The 'shared focus' of Stour Meadows (as illustrated) is intended to improve connectivity with Blandford St Mary not undermine it.

The group are already aware that there is disagreement from Clemdell Ltd in relation to its vision for Blandford Forum and have noted the matters you have raised in your response. The group will be discussing the issue of Morrison's store being included within the Primary or Secondary Shopping frontage with Peacock and Smith.

Kind regards



Sara Loch  
Chairman of Blandford +



I have just received the notice that LP1 has been adopted as part of the Development Plan. It is perhaps an appropriate point to review your email of 14 December to Jonathan, and to round out some of the points in his email of 11 December:

1 The regulations referred to in Clemdell's submissions on the Draft Blandford+ Plan (whether they be references from Regulations, NPPF or PPG) are national policy applying to all stages in the preparation of a Neighbourhood Plan. It is established that NPPF and PPG must be read as a whole. Compliance is within the Basic Conditions.

2 The development that Blandford+ proposes is confirmed by Sara as being in addition to that of the Local Plan. This was our assumption in Clemdell's representations..

As a general point each and every policy in a Neighbourhood Plan should be “supported by appropriate evidence”. (PPG ID 41-041-20140306) which NPPF para 58 requires to be “robust”.

The LP Inspector is quite precise in saying that he has considered all the evidence, which clearly included the Blandford+ evidence to the Examination for additional allocations, before concluding eg at para 41 “*there is nothing that would lead me to conclude that the Council should be requiring a higher level of growth than the objectively assessed need*”.

- 3 Another Basic Condition is evidencing the contribution of each policy to “*the achievement of sustainable development*” (PPG ID 41-065-20140306) In so far as the Blandford+ strategic proposals are concerned its sustainability was tested and rejected by NDDC in COD010 and again in COD004 and SUD003 and SUD008. The LP1 Inspector has determined the robustness of that decision.

Again, on this point, the Inspector is clear that he has considered the Blandford+ appraisal and found that its evidence is (eg at para 84) “*insufficiently compelling*”.

Blandford+ submitted to the LP1 Examination a detailed Sustainability Appraisal supporting its alternative strategy. This was tested through a public hearing. The Inspector has endorsed NDDC’s conclusion that the North/North East is unsustainable and thus agreed, upon examination, the rejection of the Blandford+ submission. This outcome seems to agree with Blandford+ as Sara says “*the group accepts that it has probably lost the battle for it to be accepted as an alternative strategy in the Local Plan*”. I do not understand how it can be said that the Blandford+ alternative spatial strategy has not been tested.

The Blandford+ spatial strategy has thus been examined and per se fails at least two Basic Conditions.

- 4 The LP1 potential for proposals beyond the by-pass can only be read in context. The Development Plan now reads at para 8.12 “*with additional greenfield sites beyond the bypass [MM14] being brought forward **after** that date.*” That date being after 2031 ie after the expiry of the Neighbourhood Plan period.

Further para 8.13 now reads (by specific reference to the Blandford+ Plan): “*This will deal with **nonstrategic** matters to supplement the policies contained in this Local Plan, .which can include additional greenfield sites beyond the bypass.[MM14]*”

I cannot see that this provides any support for strategic allocations within the current Neighbourhood Plan period or suspension of the need to meet Basic Conditions. On the contrary LP1 has been specifically reinforced to preclude consideration of the Blandford+ alternative before 2031.

The Inspector has been quite careful to go further than LP1 in stressing that any housing “*proposal would accord with the agreed spatial approach,*” which is “*development within the ‘settlement boundary’*” (paras 33 and 76). LP1 Appendix B.1 states: “*Policy 2 – Core Spatial Strategy states that the settlement boundaries around the four main towns, Stalbridge and the larger villages as shown on the Proposals Map of the North Dorset District Wide Local Plan (2003) will be retained.*”

The Core Spatial Strategy rejects the strategic allocations proposed in the Blandford+ Plan.

- 5 The definition of Primary and Secondary frontages is a question of evidenced fact not the political whim of a Steering Group member. It is also subject to meeting the sustainability and national policy legs of the Basic Conditions.

In addition to NPPF paragraph 23, NPPF para 70 requires positive planning policies to ensure that established shops are retained for the benefit of the community. This paragraph, of course, applies to Neighbourhood Plans. The arbitrary suspension of reality in the Plan is contrary to the Basic Conditions.

Although requested, no Blandford+ baseline evidence has been disclosed to rebut, inter alia, the Development Plan and SED016. I repeat that request.

- 6 No comment has, so far, been made by Clemdell on Blandford+ Policy 11 – this is a design policy for the whole town not a Town Centre policy.
- 7 Clemdell's point about connectivity with Blandford St Mary is precise. The Blandford+ Plan proposes, in terms, a policy to turn connectivity away from the retail core (contrary, inter alia, to NPPF paras 23 and 70) . Further, the Plan undermines tourist facilities (contrary to its Policy 14).

No mention is made in the Plan of Mortain Bridge. I have looked at the revised Hall & Woodhouse Brewery plans which continue to promote the link between Blandford St Mary and the retail core across Mortain Bridge – thus on that basis the Brewery proposal is contrary to para 3.27 of the Blandford+ Plan and will be opposed by the Steering Group. That is contrary to the Basic Conditions such as sustainability

Further, national policy requires positive planning policies whereas the Blandford+ Plan is silent on enhancing connectivity into the retail core from the LP1 allocated sites now progressing to permissions.

- 8 Whether or not changes to the Development Plan are the result of Clemdell's focussed representations and expectations is not presently relevant.

Albeit Blandford+ have sought to undo those modifications made, as a result of public examination, to strategic LP1 Policies to align the Development Plan with national policies (which bind the Neighbourhood Plan as Basic Conditions) that is not the point Clemdell has been trying to make.

The relevant point is that, in addition to ignoring national policy and the Development Plan, Blandford+ has comprehensively ignored the LP1 evidence-base and other robust, proportionate and available evidence such as that provided by DCC, the IMD, and the LP1 public examination. There would be a basis for discussion if Blandford+ had put forward any alternative as its baseline evidence to satisfy Basic Conditions. Blandford+ had the opportunity to put forward its alternative strategy for the retail core of the Town Centre through the democratic process of a public examination – it made no representations on the Town Centre to the LP1 Examination.

Although requested, we have not been referred to any evidence for rejecting the objective evidence base other than the political position of Cllr White that he does not accept a Town Centre first strategy, he wishes to see the town's anchor store turned into a community centre, and he has a 40 year old grudge to be satisfied - his policy runs through the Neighbourhood Plan.

The “*proportionate, robust evidence (that) should support the choices made and the approach taken*” (PPG ID 41-040-20140306) has not been disclosed. As Jonathan has noted it is particularly concerning that only at the November Meeting, after publishing a Draft Plan, did the Steering Group minute that it was developing an evidence base. That concern is reinforced by the statement that additional strategic housing, which also reverses the examined Development Plan spatial strategy, “*does not require evidence*”.

With regard to your email of 14 December I think the key points include

- 1 As we saw it, the purpose of the meeting was to consider evidence and/or amendments to be put forward in advance by Blandford+ in response to Morrisons concerns. I think Ed Kemsley’s question, in his email of 16 November, is quite proper and requires an answer to comply with PPG (ID 41-015-20140306, repeated within PPG Step 2). His question is “*are you able to advise if we can expect a reply from the group/their consultants to the issues/queries raised in our representation?*” Mr Kemsley’s email asked for these replies by email and Jonathan supported this as a proportionate and democratic way forward.

I put that question again.

Therefore (as examples) we expected that the Steering Group would circulate for the meeting the “*proportionate, robust evidence (that) should support the choices made and the approach taken*” (PPG ID 41-040-20140306) that, inter alia:

- i. downgraded the retail core’s anchor store to a “secondary” area – and thus rebutted SED016 and NPPF;
- ii. constituted the stress survey required to sterilise the car parks – and thus rebut Policy 16 of LP1 and the analysis of underusage, derived from ticket sales;
- iii. disregarded the regeneration requirements of Policy 16 of the Development Plan..

If there is no evidence to support Blandford+ Plan Policies for the retail core then the Steering Group must say so.

- 2 Your email to Mr Kemsley of 6 November, from which he quotes in his response of 1 December, notes that our meeting was to “*allay any concerns and focus on gaps*”. That is very different from the purpose stated in your email to Jonathan of 14 December being merely “*to hear first hand the general comments that those attending might have*” and update consultees (eg Morrisons and Clemdell) “*on the programme going forward*” which as you say is to “*move towards the statutory Pre-submission Stage*”.

There is no indication in your email of 14 December that Blandford+ had anything to table that will allay concerns or allow stakeholders to have the “*active role*” required by PPG.

The concerns of Clemdell, Morrisons, and I suspect, other consultees are not general they are specific and require evidence based responses to satisfy Basic Conditions.

- 3 National policy requires that before commencing its draft, a Qualifying Body “*should work with other members of the community who are interested in, or affected by, the neighbourhood planning proposals to allow them to play an **active role** in preparing a neighbourhood plan or Order.*” (PPG ID 41-015-20140306, repeated within PPG Step 2).

For any meeting to be a genuine discussion and comply with the Basic Conditions there must first be full disclosure of the Blandford+ robust baseline information and evidence (gathered as part of Step 2 in preparing a Neighbourhood Plan (PPG ID 41-080-20150209)) that the Steering Group proposals could satisfy the Basic Conditions. Further all consultees should have open access to the full text of the detailed representations (ie not a flawed Monkey summary). Jonathan has asked when Blandford+ will be publishing this.

You have not responded; please do so without further delay.

- 4 PPG puts the onus on Qualifying Bodies to initiate and continue engagement with affected parties and allow them to play an active role in the drafting of the plan. I would hope it is not disputed that Morrisons will be severely affected by the Blandford+ proposals. Jonathan and I asked in April 2015 that you engage with Morrisons, particularly at a local level. To be clear we do say that “*Morrisons have only been involved in response to their response to the consultation*” – so far as I am aware there was no approach from the Steering Group to Morrisons.

Similarly there was no approach to Clemdell – Jonathan had to write in. I would be interested to know what Town Centre businesses were invited by the Steering Group to “*play an active role in preparing a neighbourhood plan.*” (per PPG ID 41-015-20140306) Please let me know which Town Centre businesses were invited to participate in the Steering Group and/or the initial drafting of the plan at Stage 2.

- 5 It is plain wrong to state “*the group was under no obligation to consult at this informal stage*” – that obligation is in the Neighbourhood Plan PPG at every stage of the process.

I am concerned that you (and Sara Loch) even consider it appropriate to seek to argue that consultation is not a requirement throughout the Neighbourhood Planning process. As an example by reference to Step 2 the obligation is upon the Qualifying Body to “*engage and consult....those with an interest in or affected ..... talk to land owners and the development industry*” before (and not after) it starts to prepare proposals documents.

Because the Blandford+ area includes the Town Centre which would otherwise qualify as a Business Area this obligation upon Blandford+ to initiate early genuine engagement with Town Centre businesses is much greater. Blandford+ has excluded businesses from having a democratic and direct say by way of an active role in the drafting of the plan and the additional referendum.

Every time I read of Morrisons proposed closures I expect to see Blandford on the list. In addition to the fragility of the retail core, SED016 evidences:

- the store's underperformance against the company's standards and
- that Morrisons is the town's anchor store.

This means if Morrisons goes it takes away, inter alia:

- linked trips
- local employment
- local services.

Consequently other stores will go. The Steering Group has the evidence of Blandford's self-containment and that the Town Centre is the principal source of employment in Blandford+ for local people.

There is no reason why Morrisons or any national company should wish to remain in a town that, by design, undermines the viability and vitality of its retail core. The Blandford+ Plan contains no credible proposals for mitigating the harm caused by its policies to employment of, and services for, local people in the most deprived part of Blandford+ ie the Town Centre.

What Clemdell's concern boils down to is that there is a lack of transparency, and an inflexibility in moving from a preconceived, and prima facie unevidenced, Plan to alignment with the Basic Conditions. It is ingenuous to represent "*noting*" submissions "*as good practice and constructive, rather than the opposite.*" That is simply blanking the active role of stakeholders and is contrary to the Basic Conditions. The Steering Group well understands the negative impact its proposals will have on business confidence, on employment and on services.

Clemdell, in taking the initiative in seeking constructive engagement with the Steering Group, properly expects that the Neighbourhood Plan would align with the Basic Conditions and where there was disagreement the reasons would be evidenced. However, it may well be that if the Steering Group releases the baseline evidence upon which its policies rely, that will change Clemdell's position.

Therefore, in addition to a response to the questions noted above, I would again ask you to please publish:

- i) your baseline evidence
- and
- ii) the full text of representations

so that all affected parties can read and understand the range of views and the robust evidence that must underlie the Draft Blandford+ Plan as published. In particular I would repeat Mr Kemsley's request that he receives a full and early reply from the group/their consultants to the issues/queries raised in Morrisons specific representations.

Regards,

Barry.

**NORTH DORSET LOCAL PLAN PART 1  
EXAMINATION**

**RESPONSE TO  
INSPECTOR'S NOTE TITLED 'STRATEGIC HOUSING MARKET  
ASSESSMENT (SHMA) 2015'**

**November 2015**

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## 1. Introduction

- 1.1 This statement is in response to a note from the Inspector titled 'Strategic Housing Market Assessment (SHMA) 2015'.

The Inspector's note reads as follows:

*'It has been brought to my attention that the Eastern Dorset 2015 SHMA is to be published soon. I understand that it concludes that the objectively assessed need for North Dorset is 330 dwellings a year – as opposed to the 285 figure on which the housing policies of LP1 are based.*

*I have not seen or tested any of the evidence which informs the revised SHMA but nor am I aware of any reasons why I should question its conclusions.*

*Although there is a degree of flexibility embedded in the policies of LP1 (in terms of housing numbers and provision) and the Council is committed to an early review of the local plan, I nevertheless consider that the requirement for an additional 45 dwellings a year is significant.*

*I therefore ask the Council to carefully consider the implications of this new evidence and let me know, via the Programme Officer, as soon as possible how it wishes to proceed.*

*For example, the Council may wish to reconsider LP1 in the light of these new figures, identify where to locate the additional housing (including updating the Sustainability Appraisal) and engage in full appropriate public consultation before revising the plan. Alternatively it may wish to re-emphasise in writing its commitment to an early review of the plan which would take the new figures into account. This should include confirmation of specific dates by which the review would commence and be completed and clearly these dates should be as soon as is reasonably possible. If the Council follow the latter route, I would take this into account in completing my Report.'*

## 2. Council's Response

- 2.1 In light of the Inspector's Note titled 'Strategic Housing Market Assessment (SHMA) 2015' the Council wishes to re-emphasise its commitment to an early review of the plan. The early review will take into account the objectively assessed housing need of 330 dwellings per annum identified in the soon to be published Eastern Dorset 2015 SHMA and consider whether this number of dwellings can be met in the plan area.

- 2.2 However, as set out in Brandon Lewis's letter to Simon Ridley, the previous Chief Executive of The Planning Inspectorate, (December, 2014) ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/)

[390029/141219 Simon Ridley - FINAL SIGNED.pdf](#) ) the outcome of a SHMA is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. In its review of the plan the Council will need to give careful consideration to the SHMA evidence and consider whether environmental and policy constraints will impact on the Council's final housing requirement.

- 2.3 In terms of dates for the review, and in particular specific dates by which the review will commence and be completed, the Council can confirm that it will aim to start the review by 31<sup>st</sup> March 2016 and complete the review by 30<sup>th</sup> November 2018. Nevertheless, as set out in the Council's response (Document Ref: INS023) to the Inspector's Note titled 'Responses to the Main Modifications' the proposed date by which the Council adopts the plan could be subject to change and any such changes would be detailed in future revisions of the Council's Local Development Scheme.

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# Meeting Structures and Meeting Notes

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**Meeting Structures and Meeting Notes have been removed from the website to allow for space to be made available for the large documents that have been uploaded for the Pre-Submission Plan evidence base. Please contact Blandford Forum Town Council if you would like a copy of past Meeting Structures and/or Meeting Notes.**

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The land to the north east breaches the defensible barrier of the town's bypass and develops up to the boundary of the AONB. Due to the open nature of this area, the landscape impact would be considerable and therefore undesirable. Parts of the sites to the south west are within the AONB but due to the topography of the area, the impact of development would be sheltered / screened by hills and woods. The overall impact of such development on the landscape is therefore less than development to the north east.

The land that forms the site to the north east drains directly into a small stream which flows through Blandford town centre and into the River Stour. If development was to take place on this site, it would need to ensure that runoff from the developed site does not increase flows in this stream due to the potential to increase the risk of flooding in Blandford. If possible development should aim to reduce the risk of flooding to areas downstream. Effective SuDS would need to be incorporated to ensure that this was the case. Development of the site to the south east would bring the town to the edge of the floodplain of the River Stour. This does expose part of the site to potential flooding from the Stour but development should avoid impact on and be confined to the areas outside of the floodplain. Again SuDS will need to be incorporated into the development to ensure that flooding downstream is not increased.

The biodiversity on any development site is reduced through the act of development and long established habitats are permanently lost. Development of the site to the north east will result in permanent loss of agricultural land including the associated impact on hedgerows and fields. However development to the south east may have a potential impact on the hunting grounds of the greater horseshoe bats living at Bryanston. In addition there are areas suitable for woodland habitat restoration in the areas to the south of the town as identified by the Southwest Nature Map.

Both of the options for the expansion of the town result in the permanent loss of productive agricultural land. The majority of the area to the south west is grade 4 agricultural land with a small amount of grade 3 land. The area to the north east is similar but also includes an area of grade 2 agricultural land which is of higher productive value. It is also important that development of a site does not result in pollution of neighbouring agricultural land or groundwater resources. Adequate measures need to be put in place to ensure this does not happen.

Development of large greenfield sites offers the opportunity to incorporate large scale renewable energy schemes such as sustainably fuelled district heating and power. This could be used to fuel flatted developments on the site but also neighbouring large heat users such as schools, the leisure centre and the hospital. Greater benefits could be achieved from this by developing the areas to the south west due to the proximity of the site to such heat loads.

One important aspect of sustainable development is reducing the impact of developments. An obvious impact of a residential development is the amount of travel that results once the new dwellings are occupied. By locating development close to the