

# **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**

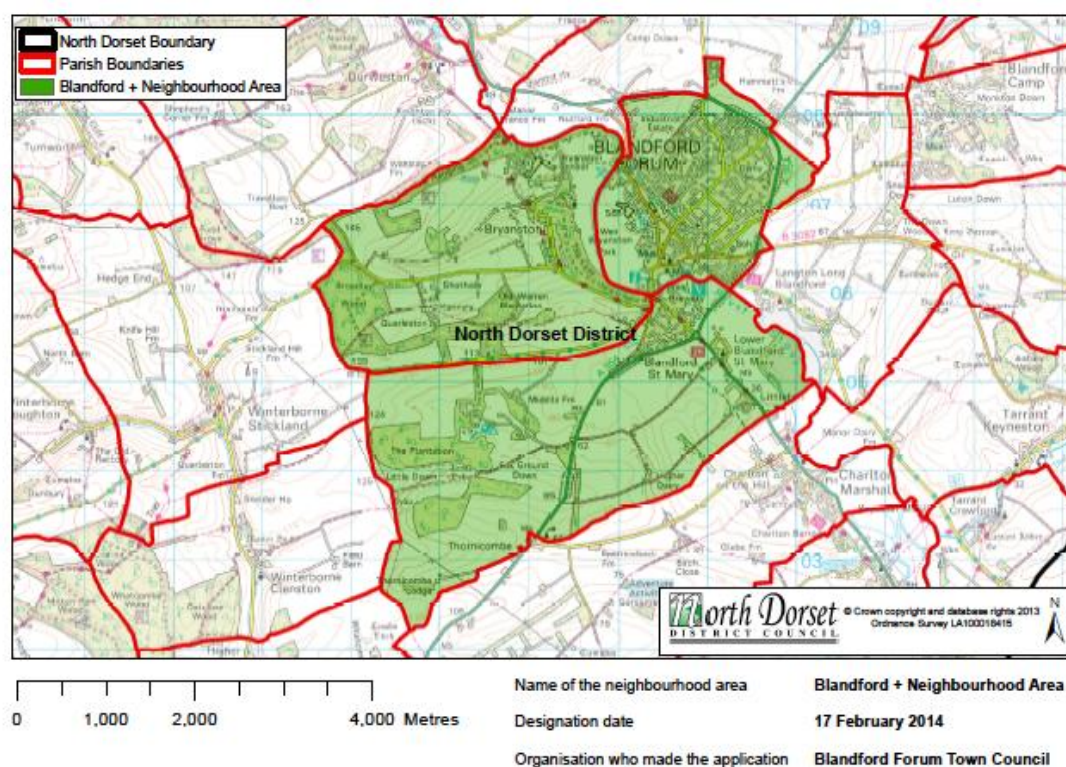
**20 FEBRUARY 2015**

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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;

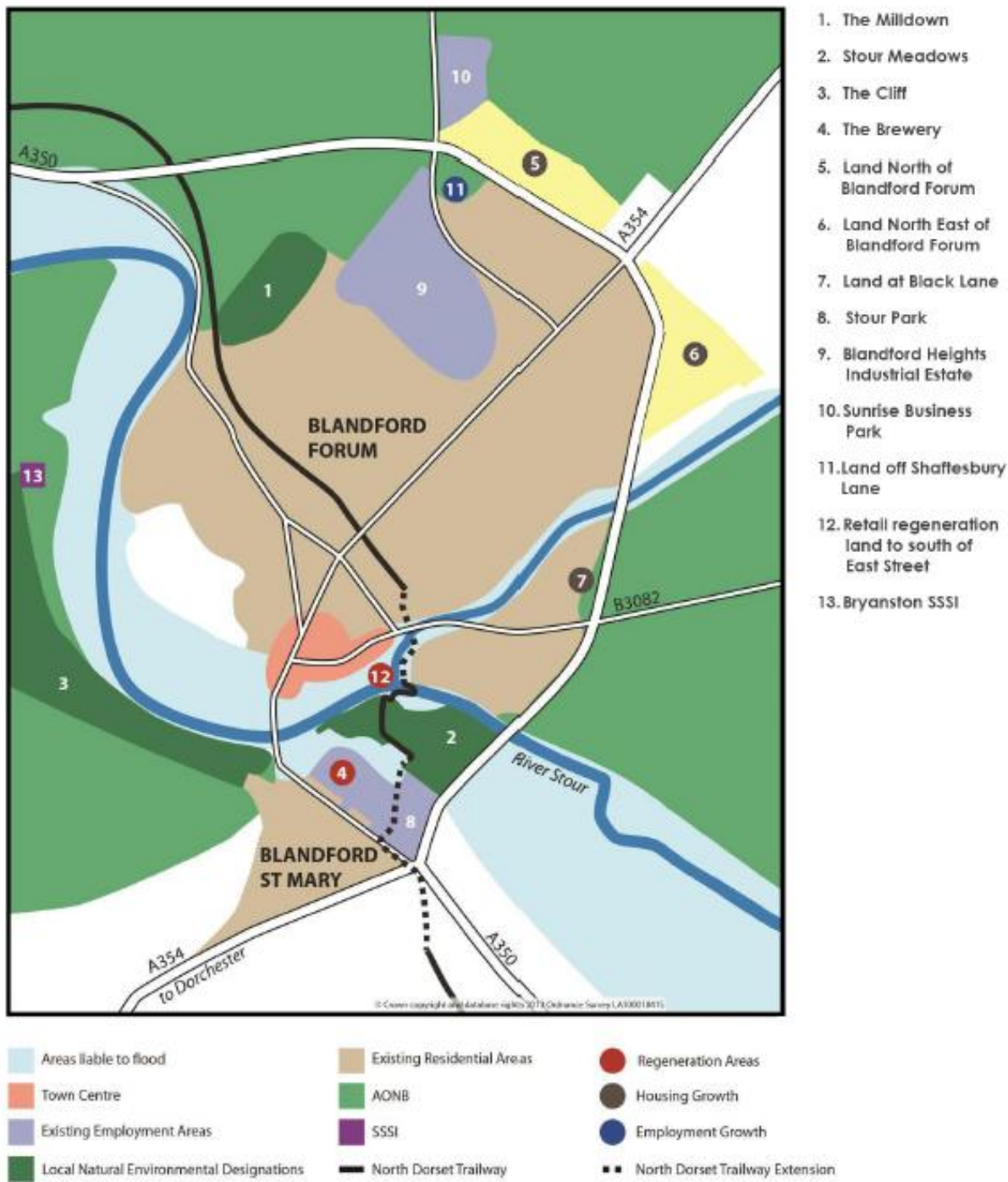
The approximate scale of affordable housing development that will be sought at the four main towns during the period 2011 - 2026 will be as follows:

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