

**From:** [Barry Blandford](#)  
**Sent:** Wednesday, January 27, 2016 11:54 PM  
**To:** [Leani Haim](#)  
**Cc:** [saraloch@easynet.co.uk](mailto:saraloch@easynet.co.uk) ; [neil.homer@rcoh.co.uk](mailto:neil.homer@rcoh.co.uk) ; [KammJP@aol.com](mailto:KammJP@aol.com)  
**Subject:** Blandford+

Leani.

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:

Firstly from Sara Loch's letter to me of 9 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..  
 I cannot understand how it can be credibly argued that "*the NPPF does not require evidence to justify an oversupply of housing*". National policy to the contrary is set out most clearly, for example, in PPG ID 41-044-20140306 "*A neighbourhood plan can allocate additional sites to those in a Local Plan where this is **supported by evidence** to demonstrate need above that identified in the Local Plan.*"  
 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*".  
 Compliance with national policy is a Basic Condition. The Blandford+ Plan simply ignores the OAN. Thus failure to produce robust evidence to justify an oversupply of housing is per se failure to meet the Basic Conditions.  
 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.