



Blandford + Neighbourhood Plan: Revised Sustainability Appraisal Report

Response on behalf Bryanston (RFE) Ltd

Objection to Revised Sustainability Appraisal Report (May 2017)

These representations to the Blandford + Neighbourhood Plan are submitted on behalf of Bryanston (RFE) Ltd in response to the Revised Sustainability Appraisal Report (May 2017). Bryanston (RFE) Ltd does not consider that the evidence provides sufficient justification to support the proposed approach for the following reasons:

- ▶ **Not all reasonable alternatives have been considered:** additional options at Lower Bryanston Farm and Crown Meadows should have been tested. Land at Lower Bryanston Farm, outside of the extent of the Local Plan Allocation and not tested through the evidence base work for the Local Plan should have been assessed as another option. Crown Meadows is discounted at paragraph 7.13 of the SA but it should have been tested through the SA process to provide a robust and transparent assessment. The conclusion is solely based on heritage factors and local opposition. Wider sustainability factors need to be balanced against the heritage considerations. In the absence of a robust evidence base to demonstrate the consideration of reasonable alternatives, the document has not fully met the requirements Planning Practice Guidance (paragraphs 11-037 and 11-038).
- ▶ **The revised Sustainability Assessment does not provide an objective assessment:** The SA has been undertaken in a manner which is contrary to guidance in planning practice guidance (paragraph 11-037) which advises that reasonable alternatives should be identified and considered at an early stage in the plan making and prepared in an iterative manner. Because this SA has only considered alternatives after the Neighbourhood Plan was submitted for examination, the revised SA appears written to 'fit' the neighbourhood plan rather than informing its development, contrary to the above guidance. The conclusions are not based on objective assessments and do not reflect the Council's Local Plan evidence.

Specific comments on the revised SA are outlined below.

Not all reasonable alternatives have been considered

To meet the tests set out in Planning Practice Guidance (paragraphs 11-037 and 11-038) the Qualifying Body must demonstrate that consideration has been given to other reasonable alternatives to demonstrate that the submitted plan is adequately justified. There are several additional alternatives that could have been considered:

1. **Additional land around Lower Bryanston Farm:** The west of Blandford St Mary growth option (red shading on reasonable alternatives plan on page 31) includes land which is outside of the current planning permission at Dorchester Hill (blue outline) and imminent planning application at Lower Bryanston (green outline). All other land shaded in red is outside of the extent of the Local Plan Allocation and land tested through the evidence base work. Therefore, these areas should have been assessed as another option. Evidence provided in the preparation of the Local Plan demonstrates the sustainability and deliverability of location hence the allocation of adjacent sites. Additional land around these allocations presents highly sustainable location for additional development near the Town Centre and existing facilities.

Although located within the AONB, the topography of the land ensures that the location occupies a discreet location within the local landscape. The land is generally within a localised hollow with land around the western edge of the settlement being lower than surrounding land. The topography and mature woodland of The Cliff combined with the undulating topography and blocks of plantation woodland to the south south-west and west of this site restrict the visibility of this site from much of the Dorset AONB. There was no objection to the west Blandford St Mary growth option from the Dorset AONB. Further opportunities at West Blandford St Mary should therefore have been considered through the revised SA and tested against Option 1.

2. **Crown Meadows:** The site is discounted at paragraph 7.13 of the SA but it should have been tested through the SA process to provide a robust and transparent assessment. The conclusion is solely based on heritage factors and local opposition. Wider sustainability factors need to be balanced against the heritage considerations. Factors such as sustainability, transport and accessibility, support for Town Centre businesses should be weighed in favour of the site.

Land owned by Bryanston (RFE) Ltd at Crown Meadows was identified throughout various stages of the North Dorset Local Plan Part 1 preparation to deliver housing development. Located directly adjacent to the town's secondary school and a primary school, the site offers an opportunity to deliver sustainable development. The site was consistently identified in the Council's evidence base as one of the most sustainable locations to provide additional housing in Blandford and the District. Although the site was not carried through to the adopted Local Plan Part 1, the Council's own evidence base in preparing the North Dorset Local Plan identified that development could be accommodated on the site if it were limited to the more 'urban fringe' northern part of the site¹.

The Council has recently issued a call for sites as part of the Local Plan review process. Other reasonable alternatives on the Crown Meadows site to mitigate any impact on built heritage should be considered. There is no evidence that the Qualifying Body has considered any alternative scales of development or a design responses to mitigate heritage impacts, including a smaller scale of development which addresses the heritage concerns.

A smaller scale of development has potential to infill a section of the damaged settlement edge and would be framed between the large utilitarian school buildings and development at Parklands. Development in this location would effectively 'finish off' development on the western side of the town whilst also integrating into the existing settlement pattern without harming the quality and character of the area or the openness of the river corridor and protecting the heritage assets from substantial harm.

3. **A combination of smaller sites across the town:** The Qualifying Body could also have considered testing a range of smaller sites across the town focused on sustainable locations.

¹ North Dorset District Council (November 2013) Market Towns Site Selection Background Paper – paragraph 5.20.

Bryanston (RFE) Ltd's land including sites at West Blandford St Mary and Crown Meadows, has significant potential to assist in meeting its development needs of the town. With sites in very close proximity to the Town Centre and nearby amenities, West Blandford St Mary and Crown Meadows provide highly sustainable housing options which would encourage transport modes other than private car.

The District Council's strategy provided in Policy 16 of the North Dorset Local Plan Part 1 is focussed on delivering development in sustainable locations which have good access to Blandford Town Centre. Well-located sites at Crown Meadows and West Blandford St Mary would enable good integration with the existing town and would reduce the impact on the local highway network given the excellent access to retail, leisure and employment opportunities in the Town Centre.

Due to its compact nature and range of services, Blandford Forum, like many market towns, experiences a high percentage of journeys to work made by sustainable modes of travel; particularly journeys made on foot. The District Council's transport study to support the Local Plan preparation² identified sites at Crown Meadows and West Blandford St Mary as being the most sustainable greenfield options in the town. Being within close proximity to the Town Centre and directly adjacent to the town's secondary school and a primary school, the sites offer the best opportunity to deliver sustainable development and have particularly advantages over less sustainable sites to the north of the town.

If Option 1 is allocated outside of the town centre, and the by-pass, this would counter the guidance in the NPPF. Being located further away from local community facilities and services would do little to discourage car dependency and would result in higher trips, as many residents would have little option but to drive to local jobs, community facilities and services. This would place a greater burden on the local road network and run counter to local concerns about the traffic impact of future residential development.

In the absence of a robust evidence base to demonstrate the consideration of reasonable alternatives, the document has not fully met the requirements Planning Practice Guidance (paragraphs 11-037 and 11-038). It is considered that had a more robust assessment of the options been undertaken, greater weight would have been given to allocating development in highly sustainable locations such as West of Blandford St Mary and Crown Meadows.

The revised Sustainability Assessment does not provide an objective assessment:

The Sustainability Assessment (SA) has been undertaken in a manner which is contrary to guidance in planning practice guidance (paragraph 11-037) which advises that *"reasonable alternatives should be identified and considered at an early stage in the plan making process as the assessment of these should inform the preferred approach (our emphasis)"*. Paragraph 11-038 continues *"the development and appraisal of proposals in the neighbourhood plan should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of the preferred approach for consultation (our emphasis)." Because this SA has only considered alternatives after the Neighbourhood Plan was submitted for examination, the revised SA appears written to 'fit' the neighbourhood plan rather than informing its development, contrary to the above guidance.*

We also have several concerns regarding the assessment, particularly the conclusions for Option 1. It is important that the SA is robust and can withstand scrutiny to justify the preferred approach. Specific concerns regarding the assessment of option 1 include:

- ▶ **Sustainability:** Option 1 does not compare favourably in sustainability terms to other reasonable alternatives and its proposed allocation is not based on sound planning principles and would therefore undermine the sustainability of the plan. Its allocation is a consequence of the

² Burro Happold (March 2010) North and North East Dorset Transport Study

allocation of land to the south of the town through the Local Plan and a desire from the Qualifying Body to locate development away from existing communities rather than being based on sound planning principles. The site is outside the busy bypass and will never be well connected or integrated with the existing town. Even if a bridge or subway option are affordable it will still not prevent the development of an essentially out of town and more car based development that is less accessible by walking and cycling. This would be contrary to sustainable development objectives.

Landscape: The site will have a significant impact on landscape character. In assessing the site in the Local Plan Part 1, the Council's evidence base concluded *"development of this land would have an injurious effect on the open, undeveloped, rolling rural character of this site, harming its role in providing a green setting for this edge of Blandford. Development would also have an adverse impact on the existing character and visual amenity of this part of the Cranborne Chase and West Wiltshire Downs AONB."* Paragraph 5.24 continues *"due to the openness of the site to views from the AONB, little mitigation is possible which could minimise the identified negative impacts on the landscape and townscape character."* Sites of lower landscape impact/value exist to the south of the town.

Agricultural Land: It is considered that in assessing the sites, the Qualifying Body has not given due consideration to advice in NPPF, paragraph 112 which requires the economic benefits of the protecting the best and most versatile agricultural land to be considered and seek to use areas of poorer quality land where significant development on agricultural land is necessary. Therefore, as identified on the agricultural land classification map, Option 1 is Grade 2 agricultural land and sequentially land of a lower agricultural classification should be preferred to protect the best and most versatile and agricultural land.

Overall, we are concerned that the SA does not provide an objective assessment of the options. It is being retro fitted to the preferred strategy of placing development in unsustainable locations away from existing communities. These concerns undermine the soundness of the site selection process which is not fully justified. The weighting attached to issues for option 1 appear to give greater emphasis to delivering a school and community facilities. There is a concern that these benefits are being over stated. In our experience of dealing with urban extensions, a development of approximately 1,000 homes is required to deliver essential facilities to deliver sustainable communities. There is no viability advice to demonstrate that the site with community facilities is deliverable. Without sufficient facilities to meet all day-to-day needs, it would result in a car based and unsustainable neighbourhood.

If the site selection had considered other sites, it would have highlighted the benefits of well-located and accessible locations to the town centre such as Crown Meadows and West Blandford St Mary which benefit from proximity to a plethora of existing community facilities to support sustainable development.