



**BLANDFORD PLUS NEIGHBOURHOOD PLAN STEERING GROUP**

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

**1. Introduction**

1.1 The purpose of this report is to carry out an objective assessment of the Land North and North East of Blandford Forum as a reasonable alternative to the proposed spatial strategy of Policy 16 of the North Dorset Local Plan 2011-2026: Part 1 (NDLP1).

1.2 It has been prepared by RCOH Ltd on behalf of the Blandford Plus Neighbourhood Plan Steering Group, which itself has been authorized to represent the views of Blandford Forum Town Council, Blandford St Mary Parish Council and Bryanston Parish Council. It is intended to inform the Examination of the NDLP1 and is submitted as an appendix to the Examination Statement made by the Steering Group.

**2. Background**

2.1 The parish councils have longstanding objections to the choice of the 2010 Core Strategy and now the NDLP1 of Blandford St Mary for the significant majority of housing development in the period to 2026. Instead, they wish for a longer-term spatial strategy focused on the mixed development of land north and north east of Blandford Forum to 2026 and beyond.

2.2 They consider this strategy will not only be a more sustainable location for development, but crucially it will enable a series of social and grey infrastructure weaknesses in the northern half of the town to be addressed in a way that is not possible with the chosen strategy. A further summary and explanation of these views is contained in the paper 'A Vision for the Blandford Plus Neighbourhood Plan Area in 2031', which is also appended to the Statement.

2.3 The land in question comprises two sites: the first of approximately 28 Ha to the immediate north east of the A350 bypass and below Letton Park; the second is approximately 13 Ha and also immediately adjoins the bypass but to the west of the A350 Salisbury Road. The first site lies entirely outside the Cranbourne Chase AONB; the second lies entirely within that AONB. The sites are in the same landownership and have both been made available for consideration for development in the 2010 North Dorset Strategic Housing Land Availability Assessment (SHLAA) for housing and other uses.

### **3. The NDLP1 Sustainability Appraisal**

3.1 The Initial Sustainability Appraisal of the Draft New Plan of 2010 assessed all of the SHLAA sites around Blandford Forum and Blandford St Mary.

3.2 The site to the north east of Blandford Forum was discounted at an early stage due to landscape impact and the potential for it to increase flooding along the Pimperne Brook. In addition it was considered to be the least accessible to local facilities. The land to the north of the bypass was excluded as Policy BL6 of the 2003 Local Plan safeguarded the land for sports and recreation use.

3.3 The sites around Blandford St Mary and land to the west of the town were assessed and some were considered potentially sustainable. An Addendum to the report was published later in 2010 alongside the Key Issues for the Revision of the Draft New Plan. It discounted the site south of the A350/A354 roundabout due to the landscape impact and the difficulty in achieving satisfactory pedestrian and cycle routes across the bypass. However, the land to the west of Blandford Forum along with the sites to the west of Blandford St Mary, were still considered the most sustainable options for the NDLP1 to pursue.

3.4 The Supplement to the Pre-Submission Sustainability Appraisal report of 2014 re-appraised the sites in the light of significant objections to the proposed West of Blandford Forum housing location and informed the decision to delete it from the NDLP1.

3.5 It noted that “new information has been submitted for the south of the A350/A350 roundabout site ... as part of the pre-application work prior to a planning application being submitted” (para 3.12). This was sufficient to make a significant change to the appraisal outcome, as highlighted in its Figure 3.1, notably in respect of landscape impact, biodiversity gain and infrastructure provision. But, it also noted that, “Information supplied in relation to transport has identified a number of issues that need further work. The main issue relates to the accommodation of a revised route for the Charlton Marshall /Spetisbury/Sturminster Marshall bypass. It has identified a route further south from the existing roundabout towards the crest of the hill. This is likely to have a greater landscape impact and hence will require mitigation” (para 3.19).

3.6 Further, it noted that, “There is also an issue about the severance created by the Blandford bypass. This road creates a barrier for pedestrians and cyclists to obtain safe access to the facilities (schools, shops etc) within the town. Pedestrian and cycle routes across the bypass currently cross adjacent to the roundabout and, with the speed of the traffic at this point, safety is a concern. An alternative safe route such as a bridge, needs to be provided to enable pedestrians and cyclists to gain access to the facilities in the town and this has not yet been adequately addressed in the transport proposals for the site” (para 3.20). Surprisingly, given the previous assessments and the acknowledged shortcomings of the site, the assessment concludes that, “although these negative impacts will require more work, there are areas where the new information has adequately demonstrated that mitigation can be secured to reduce the impact and offer some benefits” (para 3.21).

3.7 This conclusion was drawn without any further re-assessment of the other strategic option of north of Blandford Forum, even though there had been a number of important changes to its context since 2010. These included the consent for major housing and retail development off Shaftesbury Road and by changes made to the land use mix and quantum of housing in further masterplanning work by the landowner. Had there been an objective review, and not one appearing to be driven by the need to find an alternative to the deleted site with haste and to placate the promoter of the land south of Blandford St Mary, then it would have drawn a very different conclusion.

3.8 It is considered that the sustainability attributes of the sites around Blandford St.Mary have been exaggerated and their negative impacts have been under-stated throughout the Sustainability Appraisal process, but especially in its final iteration of 2014. None of these sites will enable improved access to services (SA Objective 2) as the existing limited services of the village are already at or close to capacity and the village road network is not capable of accommodating additional traffic of this scale. The impact on the environment of congestion on the local village road network resulting from 800 new homes on the village edge can only be They will discourage healthy lifestyles (SA Objective 3) and undermine a good quality of life (SA Objective 5), as they will

force their isolated estate communities to use their cars to access shops, schools and employment. And none will have any genuine positive effect of maintaining economic growth (SA Objectives 13-16), as they are focused entirely on housing development. A record of this more accurate assessment is contained in the Appraisal table at the end of Section 4 below.

#### **4. The North & North East Blandford Forum Reasonable Alternative**

4.1 The 2010 Sustainability Appraisal reported the following in respect of the north-eastern site:

*“Extending the town to the north east may result in increased risk of flooding to the town centre of Blandford as a result of surface water draining into the small tributary of the Stour which runs through the town centre. It would have a significant impact on the landscape around the town and the setting of the AONB through the “leapfrogging” of the bypass and would result in loss of agricultural land and associated biodiversity. The site is also further away from the cluster of services that exist in the town centre and therefore would make sustainable travel choices such as cycling and walking more difficult and less attractive” (para 6.57)*

4.2 But, there are no indications that the flood risk referred to cannot be satisfactorily mitigated through a network of effective sustainable urban drainage measures. None of the developable area of the site falls within a Flood Risk Zone 2 or 3. The Appraisal was therefore incorrect in assessing this as being a negative effect (SA Objective 6).

4.3 There will be an impact on the setting of the AONB and there will be a loss of agricultural land but none that has any known biodiversity value that cannot be improved upon. The Appraisal overstates these impacts in SA Objectives 7, 8 and 9, as the land is entirely capable of accommodating satisfactory mitigation measures, as similarly proposed for the Blandford St Mary sites. The land will result in the bypass being 'leaped' but this is inevitable given the lack of available land within the bypass for development to 2026, let alone after 2026. In any event, there are opportunities to breach the bypass effectively with bridges which can connect with existing green infrastructure off Preetz Way. The same cannot be said for the main Blandford St Mary site.

4.4 The land is some distance from the town centre but it is close to the major employment areas of the town at Blandford Heights and at Sunrise Business Park and to the consented superstore off Shaftesbury Road. For those walking or cycling to work, these locations are just as likely to be the source of employment as the town centre and the distances are much shorter. Furthermore, the intention has always been for the northern sites to deliver more than housing, including crucial new social infrastructure – a

## Appendix B

primary school, GP surgery and small local centre. These features will significantly reduce journeys by car that may otherwise have been needed and may lead to fewer journeys in the existing town, given the current geographically skewed distribution of primary school places and employment areas. The Appraisal should therefore have assessed the alternative of having a series of positive effects (SA Objectives 2, 3, 5, 11, 13, 14 and 15).

4.5 As the land north of the bypass was excluded from further SHLAA assessment, it was not assessed in the Sustainability Appraisal. Again, the Appraisal has not kept up with changing events and should have re-assessed the land in 2014 once it was clear that the previous Local Plan policy designation was no longer relevant and that other land inside an AONB (at Lower Bryanston Farm/Dorchester Hill) was being considered and supported by the NDLP1.

4.6 Although within the edge of the Cranbourne Chase AONB, its character is shaped as much by the bypass and by Sunrise Business Park as it is by the open countryside further to the north. Although mostly a plateau, the land form does drop slightly from the northern boundary edge to the bypass so not all of the site is visible in long views towards the town from the east and no more than would be the case with views to the town from the south or west approaching Blandford St.Mary. Although having a negative impact on SA Objectives 7, 8 and 9, like the Blandford St Mary sites, these impacts are capable of being mitigated satisfactorily.

4.7 In any event, the significance of the many land use benefits of this land should provide the 'exceptional circumstances' for development required by the NPPF and should be fully assessed in the Sustainability Appraisal. With the loss of a key employment land allocation off Shaftesbury Road to a retail use in 2013, this land provides an excellent opportunity to bring forward new land as an extension to the very successful Sunrise Business Park that forms its western boundary. The extension could be accessed from the Business Park or from the bypass.

4.8 In addition, part of the site adjoining such an extension is being examined for a replacement of the existing household waste recycling facility in the Blandford Heights Industrial Estate. A modern facility will enable a full range of recycling services to be offered to the whole town and surrounding area in an appropriate location. This potential should have been known to NDDC and the Appraisal should therefore have assessed this as having a positive effect (SA Objective 11).

4.9 Both the additional employment land and this facility will enable the town to become more self-sustaining in relying less on other larger towns some distance away for jobs and for modern recycling facilities. The remainder of the land could be used for a variety of new uses – housing, parkland, allotments extension – all set within a strong green infrastructure edge containing the land

within a confined space and minimizing its visibility from the AONB. Importantly, there is already a pedestrian footbridge to the land over the bypass connecting it to the new housing area off Gurkha Road and there is scope for another bridge, if deemed necessary, over the bypass closer to the proposed new superstore.

4.10 A new assessment has been carried out to update the 2010 Sustainability Appraisal of the north-east land and to merge that site with the north land to create a 'Blandford Forum' alternative to the cluster of sites proposed in the NDLP1 at 'Blandford St Mary'. The alternative is then compared and contrasted with the proposal (see table below).

POLICY 16 BLANDFORD SITES						
SA OBJECTIVES			BLANDFORD ST MARY		BLANDFORD FORUM	
			NDDC*	B+NP	NDDC**	B+NP
Social progress that recognises the needs of everyone	1	Provide housing including affordable housing that meets the needs of the community	++	++	++	++
	2	Create balanced communities where housing, employment and community facilities are delivered to meet needs, improving access to essential services	-	-	-	+
	3	Improve the health and wellbeing of the population through reducing poverty and encouraging healthy lifestyles	?	0	-	+
	4	Reduce barriers to individuals participating fully in their community promoting a strong, vibrant and inclusive way of life	-	-	+	+
	5	Improve quality of life through well designed inclusive developments	0	-	0	+

Effective protection of the environment	6	Reduce the impact of climate change, including flood risk and make best use of the opportunities that arise	0	0	-	0
	7	Protect and where opportunities arise, enhance habitats and biodiversity	+	?	-	0
	8	Improve the quality of the built environment, protecting the District's heritage assets and distinct townscapes and recognise opportunities that arise	-	-	-	0
	9	Recognise the importance of the district's distinct rural landscapes beyond just the aesthetic value	-	-	-	-
Prudent use of natural resources	10	Reduce impacts on the environment	-	-	-	-
	11	Reduce pressure on the district's natural resources, reducing waste and promoting the wise use, reuse and recycling of land and resources	-	-	-	+
	12	Promote energy and resource efficiency, encouraging clean energy production	+	+	+	+

Maintenance of sustainable levels of economic growth and employment	13	Improve the competitiveness of the district's economy through provision of the necessary infrastructure for a more sustainable economy	+	0	0	++
	14	Enable local needs to be met locally, encouraging more sustainable forms of travel	+	-	-	+
	15	Encourage innovation, improve productivity, regenerate towns and villages creating a business environment in which new businesses start and existing businesses grow	0	0	0	+
	16	Improve skills and incomes of the lowest paid and provide satisfying work opportunities for all so that people can realise their full potential	+	0	+	+

Key to Appraisal Results		Notes
Strong positive impact	++	* Derived from 2014 Supplement to the Sustainability Appraisal of the Pre Submission NDLP1  ** Derived from North Dorset Core Strategy & Development Management DPD Initial Sustainability Appraisal Report (March 2010) – the alternative was referred to as 'Option 15(1)b Extension to the North East' but did not include land north of the bypass
Positive impact	+	
Neutral or no impact	0	
Negative impact	-	
Strong negative impact	-	
Unknown or uncertain impact	?	



### **5. Conclusions**

5.1 The comparison is stark in the extent to which the 'Blandford Forum' alternative out-performs the 'Blandford St Mary' proposal. There is no indicator where the alternative compares poorly to the proposal and on many, the alternative assesses more favourably. Unless landscape impact is weighted disproportionately high in the assessment, then there is no justification for the chosen option. And even then, the alternative should have been afforded the type of detailed landscape mitigation analysis given to the chosen option but this was never done.

5.2 In summary, the reasonable alternative should have been properly assessed by NDDC and selected as its preferred strategy.