

**REPRESENTATIONS ON THE
DRAFT BLANDFORD+ NEIGHBOURHOOD PLAN
ON BEHALF OF CLEMDELL LIMITED**

SUMMARY

Clemdell is concerned that the Blandford + Neighbourhood Draft Plan – October 2015 (“the Draft Plan”) fails the Basic Conditions, inter alia, for the reasons expanded upon in this Representation:

- Key baseline information and evidence has not been gathered or published for consultation.
- The underlying strategy is an inversion of sustainability.
- It diverts resources from the most deprived to the least deprived.
- It promotes a spatial strategy examined and rejected through the public process of a Local Plan Examination.
- It “*strikes at the heart*” of the Town Centre.
- Although not a Basic Condition, it promotes the decline of Blandford’s Heritage Assets.
- No alternatives are proposed in the event that its spatial strategy again fails the SA/SEA.
- It focuses development proposals within, and within the setting of, an AONB.

1.0 GENERAL INTRODUCTION

- 1.1.1 PPG Neighbourhood Plans (“the PPGNP”) ID 41-040-20140306 states “*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 ...*”
- 1.1.2 The Draft Plan is not evidence based. This leads to a strategy without a reality check. Where documents are referenced it is out of date and misrepresented. For example the 2008 Retail Survey, whereas the LPA has commissioned further work from MWA included in the Local Plan Part 1 (“the NDLP1”) Evidence Base as SED016)
- 1.1.3 The B+ proposal at paragraph 1.14 to “*explain in more detail the background to the Plan*” in a later iteration of the Draft Plan does not chime with having an evidence base for this version. B+ has produced documents for the NDLP1 Examination and for its website and these are cross referenced in this Representation as appropriate.
- 1.1.4 Until robustly tested evidence is produced for public scrutiny and examination the public consultation cannot properly commence. Such evidence needs to address, inter alia, the evidence base of the NDLP1 including the MWA Reports and the government’s IMD which rebut the views of B+.
- 1.2 Paragraph 1.4 of the Draft Plan identifies the four “Basic Conditions” that the Draft Plan “*must meet*”. However, as will be set out in this brief Representation it either fails, or has not yet considered, the Basic Conditions.
- 1.3.1 For a straightforward example: the Draft Plan affirms that to meet a Basic Condition it must be consistent with “*local planning policy*” and frankly admits it is not, stating at paragraph 2.5 “*Crucially however, 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*”. B+ needs to explain how that statement sits with its paragraph 3.5 that the Draft Plan “*complements the strategy and proposals of Policy 16 of the new Local Plan*”. The B+ strategy is described as an “*alternative*” to the Local Plan at paragraphs 4.5, 5.1 etc of its web Visioning Document (that document was also submitted for the

NDLP1 Inspector's consideration).

- 1.3.2 The Basic Condition on conformity with strategic local plan policies is underlined at NPPF paragraph 184 "*Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them.*" As noted at paragraph 3.3 of the Draft Plan, the Development Plan for the area includes "*the saved policies of the adopted Local Plan 2003 – 2011*". For completeness it should be noted that the Draft Plan does not comply with the relevant saved policies.
- 1.4.1 The Draft Plan fails to acknowledge the current planning applications progressing in the broad locations identified in NDLP1 and therefore fails to recognise the effect this will have on the B+ area. There are no policies in the Draft Plan to integrate these developments into the B+ area. The Draft Plan is already materially out of date.
- 1.4.2 Further, at paragraph 3.7 the Draft Plan acknowledges that the NDLP1 allocations "*may have been endorsed by the District Council before the Neighbourhood Plan has been adopted*". NDLP1 will have thereby provided for the full objectively assessed need ("OAN") for housing to 2031.
- 1.5.1 PPGNP ID 41-073-20140306 states "*A qualifying body is strongly encouraged to consider the environmental implications of its proposals at an early stage,*" On the contrary paragraph 1.19 of the Draft Plan states "*A Draft SA/SEA report will be prepared with the assessment conclusions will be consulted on alongside the Pre Submission B+NP*"
- 1.5.2 In this case NDDC has carried out an assessment of the Draft Plan's broad strategy. That SA/SEA rejects the B+ approach, particularly its spatial strategy. Sustainability is a Basic Condition.
- 1.5.3 Albeit that is not referred to in the Draft Plan, in its submission to the NDLP1 Examination B+ attached its Sustainability Appraisal of Land North & North East of Blandford Forum and it is thus being considered by the Inspector
- 1.5.4 The NPPF states (paragraph 109) that the planning system should contribute to and

enhance the natural and local environment by protecting and enhancing valued landscapes. Furthermore it should be recognised that the “*presumption in favour of sustainable development*” does not automatically apply within AONBs, as confirmed by NPPF paragraph 14 footnote 9, due to other policies relating to AONBs elsewhere within the Framework. It also states (paragraph 115) that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty.

1.5.5 The Draft Plan fails to identify alternatives in the event that the core of its approach, i.e. allocating land within and affecting an AONB to the North East of its area, is found again to be unsustainable by an Inspector This could then leave the Draft Plan’s allocation of the AONB site, at Policy 4, as a stand-alone competitor to the Town Centre.

1.6 As stated in its Visioning Document paragraph 4.5, B+ starts from the offer of severed land in the north east (albeit already rejected through the extensive public process of NDLP1). That starting point leads to the construction of a proposed a rationale which in short is based upon unevidenced “deprivation”.

2.0 **SPATIAL POLICIES (QUESTIONS 1 to 3)**

2.1.1 The government publishes the Index of Multiple Deprivation (“the IMD”) which combines information from seven domains to produce an overall relative measure of deprivation. That information is publically available and is used by DCC/NDDC in compiling its Ward Profiles - the 2011 Profile uses the 2010 IMD This confirms Old Town “*as the most deprived ward in North Dorset.*”

2.1.2 North and East Blandford in contrast are the least deprived. The public information available to B+ for 2015 evidences that the situation has not materially altered.

2.1.3 Therefore the basis of the Draft Plan strategy, at paragraph 3.8 that “*it is important that the spatial plan enables the town itself to grow to the north and east, where the social infrastructure problems are at their most acute*” is incorrect and in fact inverts the position. The “problems” listed in paragraph 3.8 are taken into account within the IMD

when evidencing, inter alia, that social infrastructure problems are least acute in the north and east and most acute in Old Town. B+ has not published any analysis or evidence that rebuts the work of the IMD.

- 2.1.4 The Draft Plan's spatial strategy is thus promoting un-sustainable growth contrary to the Basic Conditions. Further, the Draft Plan's spatial strategy has been assessed, examined and rejected as unsustainable through the statutory local plan procedures and is being considered by the NDLP1 Inspector. As explained in response to Question 4, further unsustainable proposals are added on the back of this spatial strategy. MWA (retained by NDDC) concluded these will have an impact that "*will strike at the heart of the town's convenience goods offer*". (SED016 page 11 paragraph 3.6)
- 2.2.1 Question 1 posits, inter alia, focussing growth on the Town Centre, if read with Key Objective 4 "*To maintain and enhance the economic performance of the retail core and to build on the ability of the town to attract and retain new businesses and major high street brands*". That is supported, However there are presently no proposals for such growth in the retail core, other than the de minimis proposal in Policy 7 for a 0.03ha site (compared to in excess of 40ha to the north and east outside of the town and a 0.9ha out-of-town site to draw trade from the Town Centre). Town Centre Regeneration Sites proposed in NDLP1 are excluded. As set out below the Draft Plan will, for the reasons identified by MWA, strike at the heart of the Town Centre.
- 2.2.2 As B+ is fully aware the Draft Plan directs Town Centre Uses **away** from the "*retail core*". There is no need for the Draft Plan to repeat proposals in NDLP1 that are not part of the Development Plan. However B+ has chosen to do so. Explanation, and evidence, is required from B+ to explain for example how Policy 4 directs retail growth to the Town Centre.
- 2.2.3 The Draft Plan relies upon PPGNP paragraph ID 41-009-20140306 that a "*draft Neighbourhood Plan or Order is not tested against the policies in an emerging Local Plan*" to promote its alternative to NDLP1 for residential development. Therefore B+ needs to clarify, and evidence, why it has any reason to support and enhance as its Policies 4 and 6 the opposite to its Key Objective 4 and Policy 1. This evidence should be in the context of NPPF paragraph 23 and general sustainability policies which are Basic Conditions.

2.3.1 Question 2 proposes an additional strategic residential development severed from the existing settlements. The context is PPGNP:

- At paragraph ID 41-042-20140306 sets out the preliminary work that is required stating “*A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.*”
- At paragraph ID 41-044-20140306 it sets out the preconditions thusly: “*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. A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate. The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies (see paragraph 16 and paragraph 184 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan. Should there be a conflict between a policy in a neighbourhood plan and a policy in a Local Plan, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.*”

2.3.2 In this case the Draft Plan is proposing alternative sites to the NDLP1 (and which are not in the Development Plan). Irrespective of which emerging plan is the last to be adopted at some future date, the sites proposed in the NDLP1 are proceeding to permission and, prima facie, will be approved prior to either plan being adopted into the Development Plan. As set out in the PPGNP to comply with the Basic Conditions the Draft Plan should be planning positively to support this development. The Draft Plan contains neither evidence to “*demonstrate need above that identified in the Local Plan*”, nor that it has carried out an “*appraisal of options and an assessment of individual sites against clearly identified criteria*”.

- 2.3.3 NDDC is required by NPPF (such as paragraph 159) to “*ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing*” (NDLP1 paragraph 5.5). NDDC having done so to its own satisfaction (which the Inspector will consider), the onus is now upon B+ to produce an objective assessment rebutting that by NDDC before the Draft Plan proposes what will be an additional strategic site in excess of an examined OAN.
- 2.4 Question 3 refers to an allocation of an AONB site for strategic development. The Draft Plan states at paragraph 3.14 that “*(t)he site lies on the edge of and adjacent to the Cranborne Chase and West Wiltshire AONB*”. In contrast the B+ Vision states at paragraph 4.3 (and repeated twice in the B+ submission to NDLP1 Examination) that this same site “*lies within the Cranbourne (sic) Chase AONB*”. This distinction is of substantive importance given the protection afforded to AONB’s.
- 2.5 Particular protection is also afforded to high grade Agricultural Land. The B+ strategy dependent upon the loss of AONB and Grade 2 Land is prima facie problematic in satisfying the Basic Conditions. Paragraph 3.14 asserts the allocation “*can be contained within the landscape*” but provides no evidence in the Draft Plan to support this.
- 2.6 It is relevant to note that the Draft Plan proposes bridges to overcome the severance of the sites proposed (eg Policy 2(iii)) which must be contrasted with the B+ evidence to the NDLP1 Examination that “*The user experience of such bridges is known to be poor*” (ID3051 paragraph 3.17)
- 2.7.1 At paragraph 5.4 of the B+ Visioning Document it is said that: “*Should the Inspector support the proposed NDLP1 spatial strategy then the Steering Group will consider if it will be possible for the neighbourhood plan to contain similar policies for the other sites. It may prefer to stay silent on these matters and allow NDDC to manage their delivery through planning applications, so that it may focus on positive planning policies elsewhere in the area.*”
- 2.7.2 This paragraph, repeated in substance at paragraph 3.7 of the Draft Plan needs clarification for proper consultation. Does this mean that if the NDLP1 Inspector

determines that, inter alia, the OAN has been met for the B+ area to 2031 by NDLP1 and rejects the B+ Sustainability Assessment that is the end of the B+ alternative strategy. If not what is the evidence that would meet the Basic Conditions.

3.0 RETAIL (QUESTIONS 4 - 6 – 7)

- 3.1.1 Policy 4 of the Draft Plan proposes, inter alia, the allocation of land for an out-of-town retail supermarket. This is the land previously subject of an approval for Asda. The Policy seeks to overturn national policy. NPPF and PPG establish that sustainability requires a “town centre first” planning policy and sequential tests for large out-of-town stores as is proposed.
- 3.1.2 In its evidence to the NDLP1 Examination B+ stated at ID3051 paragraph 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.* “. That evidences a need for that land to be retained for its Development Plan use.
- 3.2.1 The Draft Plan paragraph 3.18 refers to the 2008 Joint Retail Report (“the JRR”) in support of this out-of-town proposal. The JRR was prepared at a time when the Morrisons store had been closed for three years (JRR Site Bland 1). There is no suggestion in the JRR that there should be an out-of-town store. Indeed, in accordance with national policy, JRR states at paragraph 10.2 “*The sequential approach suggests that town and district centre sites should be the first choice for retail and commercial leisure development*”
- 3.2.2 The “*need for additional convenience goods floor space in Blandford*” referred to in paragraph 3.18 of the Draft Plan is in fact stated at JRR 10.6 as a recommendation of a policy of “*reducing the existing level of shop vacancies.*”, and at 10.7 “*The quantitative capacity could be met through a combination of an extension to the existing Tesco store and the reoccupation of the Morrisons supermarket.*”
- 3.3 Reference to the superseded JRR is interesting in light of B+ representation on NDLP1 objecting to NDLP1 being based, inter alia, on the LPA’s use of out of date evidence. As B+ is aware NDDC commissioned further research into the vitality and viability of Blandford’s retail offer. This research by MWA is part of the LP1 Evidence Base

(SED016) and is held by B+.

- 3.4.1 B+ is aware of MWA's conclusions of the effect of a similar store to Draft Plan Policy 4 upon the vitality and viability of the Town Centre. MWA concludes "*that the impact will strike at the heart of the town's convenience goods offer*". (SED016 page 11 paragraph 3.6). The MWA conclusions on the effect of the supermarket proposal are set out in more detail in response to Question 8.
- 3.4.2 Policy 4 must be set against Policy 1 and Key Objective 4. B+ should evidence in the Draft Plan how it reconciles the retail part of Policy 1 against Policy 4, i.e. how does Policy 4 direct retail growth "*to Blandford Forum Town Centre*"?
- 3.4.3 No evidence is offered by B+ to rebut the conclusions in the retail evidence other than at paragraph 3.19 of the Draft Plan: "*The north of the town is currently poorly served by convenience shops and on the basis of the growth strategy and allocations to the north and east it is considered prudent to retain this land for out of centre retail uses.*" As already noted independent government evidence, and NDDC evidence, rebuts this statement.
- 3.5.1 Question 4 does not address Policy 4. The Question asks "*Q4. Do you agree with this proposal for a smaller food store than the ASDA scheme to serve the local needs of the northern part of Blandford Forum*".

The Policy:

- does not propose a food store – it proposes a "*retail use*";
- does not propose a materially different store than Asda. Asda was 2300m² (as stated at paragraph 3.18). The Policy proposes 2500m²;
- fails to consider or recognise the MWA conclusions (detailed below) that an Asda type store will remove a substantial part of the Town Centre's trade;
- does not respond to MWA's conclusion on Asda that: "*The proposed food store does in our view comply with the sequential approach to site selection*".(SED016 page 11 paragraph 3.2);
- fails to consider or recognise the effect of the site within an AONB;
- fails to ask whether the proposal is compatible with Policy 1/Question 1.

- 3.5.2 Thus it fails basic tests of sustainable development which a Neighbourhood Plan must meet as a Basic Condition. Again, for completeness, this allocation does not conform to the Development Plan.
- 3.6 Policy 6 duplicates the NDLP1 allocation of the whole of the edge-of-centre Langton Road carpark for competitive uses that will challenge the vitality and viability of the Town Centre's retail core contrary to Key Objective 4.. The concerns expressed at Question 4 are repeated for Question 6. The Draft Plan fails to consider the effect of its Policy upon the setting of Listed Buildings (see in contrast Policy 7). The importance of this Policy is in the need for B+ to reconcile it to its Policy 1 and Key Objective 4 and disclose its true agenda for the Town Centre's core.
- 3.7.1 Policy 7 allocates the long vacant site for sustainable uses and is supported. But in the context of the Draft Plan's disregard of the Town Centre the Policy fails to recognise or consider how the uses can be integrated into the Town Centre's core or its proposals can viably sit alongside Policies 4 and 6.
- 3.7.2 Further at paragraph 3.33 the Draft Plan notes: "*The draft Community Infrastructure Levy (CIL) also proposes to use the Town Centre Area as the transition between CIL charging areas.*" This is not strictly true as CIL is proposed on residential development at the same rate both within and without the Town Centre and therefore the continuation of that paragraph "*This is designed to encourage development on more complex existing sites in the town centre*" is not understood particularly in light of the obligation on B+ set out in PPGNP paragraphs ID 41-005-20140306 and ID 41-042-20140306 to ensure that its allocations are viable.
- 3.7.3 Although Policy 7 proposes the site, inter alia, for shopping uses it is not added to either the Primary or Secondary Shopping Areas (this applies also to The Crown). Indeed the Inset Plan introduces, without explanation, the novel concept of retail frontages contrary to the NPPF Glossary and Policy 8.
- 4.0 **BLANDFORD FORUM TOWN CENTRE (QUESTION 8)**

- 4.1.1 It has been noted that the Draft Plan asserts as Key Objective 4. *“To maintain and enhance the economic performance of the retail core and to build on the ability of the town to attract and retain new businesses and major high street brand.”* and then, as Policy 4, proposes support for an out-of-town supermarket that will (upon the evidence available to B+) ensure the opposite result.
- 4.1.2 Morrisons is the anchor for the retail core and is a major high street brand. The textual proposal to downgrade it from “primary” in the 2003 Local Plan to “secondary” contrary to the saved policies in the Development Plan is contrary to the Basic Conditions.
- 4.1.3 The B+ web document “Retail and the Town Centre” page 8 explains its intention for the anchor store in the retail core thusly: *“falling under Secondary Shopping Frontages to allow more scope should the use of the building become available for an alternative use during the plan period;”*
- 4.1.4 At a minimum B+ should explain how that fits with NPPF23 and its own Key Objective 4. It needs to evidence its proposals to mitigate the purpose of its Policy upon the vitality and viability of the Town Centre.
- 4.2 The most up to date evidence produced for the LPA is the MWA Reports, forming part of the NDLP1 Evidence Base as SED016. Whilst the JRR was compiled in 2007 and abstracted District Wide sub-reports from its multi-district analysis, MWA focussed on the B+ area.
- 4.3 MWA looked separately at the proposed Tesco extension and Asda (on the AONB site the supermarket proposed in Policy 4). MWA underlined the existing fragility of the Town Centre that was also endorsed by an Appeal Inspector (APP/N1215/A/13/2205814) less than a year ago in November 2014.
- 4.4 The Draft Plan is silent on proposals for the future of the Tesco extension and there is no reason to assume that Stour Park, having already attracted Argos from the Town Centre, will not attract further retail users from the Town Centre. This is especially so with the development of the housing sites now moving forward around Blandford St Mary. Policies 6 and 8 are also aimed at further undermining the vitality and viability of the retail core of the Town Centre.
- 4.5 Focussing on the effect of Policy 4 on the Town Centre MWA conclusions for that site can be abstracted. For example it takes as a given that *“the impact will strike at the*

heart of the town's convenience goods offer and have additional impacts on the comparison goods turnover" (SED016 page 11 paragraph 3.6)

4.6 In detail MWA concludes that a smaller store than proposed in the Policy 4 location will:

- take 14.5% of Morrisons convenience turnover
- the convenience trade draw from the town centre would be in the order of £2M
- the overall impact on the town's convenience goods trade would be 13.8%

all from (SED016 page 6 paragraph 2.1) and

- take £1.8m from the Town Centre in comparison goods. (SED016 page 9 paragraph 2.16)

4.7.1 MWA identifies that *"The town centre is anchored by the Morrisons store"* (SED016 page 7 paragraph 2.12) and that its turnover projected for 2016 without impact from Policies 4 and 7 and Stour Park, would be c.£11.37M (SED016 page 41 Table J) and *"we are aware that Morrisons have indicated that the benchmark convenience goods turnover of the store is approximately £13.5m. This would be well below the level the store is currently achieving."* (SED016 page 41 paragraph 2.12)

4.7.2 In response to the application for Asda on the Policy 4 site Morrisons supported the MWA conclusions and added that Asda *"will compete directly with the town-centre's retail offer which due to its size is particularly vulnerable to an out-of-centre retail development"*.

4.7.3 Draft Plan Policies 4 and 6 are therefore directly opposed to Key Objective 4 *"To maintain and enhance the economic performance of the retail core and to build on the ability of the town to attract and retain new businesses and major high street brands."* and of course fail to comply with the Basic Condition to promote sustainability and are contrary to national guidance.

4.7.4 Draft Plan paragraph 3.31 proposes changes to the 2003 Local Plan and downgrades Morrisons, the anchor of the Town Centre, to secondary frontage and describes it as *"the food store at the Marsh and Ham car park"*. This speaks volumes about the B+ attitude to the Town Centre and the core of the retail area. This is compounded by proposing tertiary parts of Salisbury Street as "Primary". The designations are

contradictory to the NPPF Glossary and to the VOA ratings.

- 4.8.1 The Draft Plan fails to recognise and support the core importance of the Town Centre as the employment hub of its area. Statistics provided by DCC (and forwarded to B+) evidence the focus of local employment in Old Town, greater than the other parts of the B+ area combined, and that employees are drawn principally from that local area.
- 4.8.2 The thrust of the Draft Plan to not only to undermine the vitality and viability of the Town Centre core but puts real existing jobs at risk.
- 4.9 The health of the Town Centre is not only assessed by analysis such as that from MWA and Appeal Inspectors. It is also reflected in VOA rating assessments. There have already been successful appeals against business rating valuations. Business rates track rents. As rents fall in the Town Centre so the Business Rates (which will go to NDDC) fall so that the District as a whole suffers. As businesses and investors are put under pressure for example from seeing Draft Plan policies promoting alternative competitive sites there is no incentive to invest in buildings thus prejudicing the future of the historic assets in the Town Centre. Although it is not a Basic Condition the Draft Plan by undermining the viability of the Town Centre is directly in opposition to its stated Key Objectives.
- 4.10.1 PPGNP ID 41-004-20140306 confirms that "*Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan*" Question 8 refers to Draft Plan paragraph 3.34 identifying proposals for the improvement of traffic flow within the town centre. These are not identified and the uncertainty creates concerns about future servicing for shops and vehicular access for residents which does not contribute to confidence in the future of the Town Centre.
- 4.10.2 However there is no reference in the Draft Plan or Question 8 to the interrelated extent and management of the Town Centre car parks.
- 4.11.1 Policy 8 states "*Proposals that will result in the net loss of public car parking spaces in the Town Centre Area will be refused.*" B+ has steadfastly refused to obtain evidence on the use or need for the current (or greater) number of carparking spaces. The Marsh and Ham carpark could properly be described in the same terms as the land in Policy 7 at paragraph 3.29 as "*The site is prominent and currently detracts from the very special character of the Blandford Forum Conservation Area within which it sits.*" The Draft Plan does not explain or support that part of Policy 8 in any way, in line with its

dismissal of the importance of Morrisons and the neglect of the Marsh and Ham as a key green link in Policy 9

4.11.2 NDLP1 Policy 16 states: “*The emerging Neighbourhood Plan for Blandford will have a key role to play in identifying regeneration opportunities in the town*” and includes the key site south of Market Place (for the avoidance of doubt this is not Langton Road as the B+ Retail and the Town Centre document implies at page 10). B+ seeks simply to lay a dead hand on regeneration in the core retail area contrary to its Key Objective 4 and Policy 1.

4.12 Thus the Draft Plan plans to increase deprivation in the most deprived part of the B+ (and North Dorset) and put resources in the least deprived area.

5.0 GREEN INFRASTRUCTURE (QUESTION 9)

5.1.1 It is indicative of the B+ negative attitude to the Town Centre’s retail core that it omits reference to the existing key link between Blandford St Mary and the Town Centre. The pedestrian links from Blandford St Mary are currently being reinforced within the redevelopment of the Brewery to promote sustainable movement and connectivity through the town across Mortain Bridge. That should be the focus for access to wider green spaces.

5.1.2 This is further emphasised in the B+ web document “Local Green Spaces” .

5.2 The NDLP1 overarching policy for Blandford is “self-containment”. This is another way of stating the national policy of sustainable development. The Draft Plan is keen to build bridges (eg Policy 2(iii) and paragraph 3.10) as a means of overcoming its strategy of severed development but ignores the function of the existing Mortain Bridge which does not have to go over the by-pass to link the Town Centre with existing and new development in Blandford St Mary.

5.3 In stark contrast Draft Plan paragraph 3.27 proposes enhancing the edge-of-centre links at Langton Road directing people away from the core Town Centre stating: “*The site offers good visitor access to both the town centre and also Stour Meadows and the Brewery visitor centre beyond.*”

5.4 The route across the Mortain Bridge should be part of Infrastructure to be supported by CIL listed at para 4.4 in order to support Key Objective 4 and enhance this green route as the main destination for shopping, leisure and tourism

6.0 **CONCLUSION**

6.1 The Draft Plan fails to address the Basic Conditions. For example B+ does not appear to have produced evidence to support additional housing need that would supersede NDDC's ONA or rebut the IMD.

6.2 The alternative spatial strategy has been assessed and rejected as unsustainable through the NDLP1 process. B+ has submitted its own SA to the Local Plan Inspector who is in the process of considering whether this represents a sustainable alternative.

6.3 The Draft Plan spatial strategy asserts that it is a response to deprivation in the north and east of its area. There is no evidence provided for scrutiny that challenges the government's IMD that the north-east is the least deprived - the opposite of the B+ assertion.

6.4 To reinforce the deprivation identified in the IMD in Old Town the outcome from the Draft Plan would be to divert resources from the core Town Centre to the area identified independently as the most privileged. It is investment that challenges deprivation and a strategy that diverts investment from the town centre will consequentially contribute towards the increase of Town Centre deprivation. Long term private investment in the core Town Centre provides not only support for the maintenance of Heritage Assets but, of greater importance, support for facilities, resources and jobs.

6.5 Sustainability is a Basic Condition. B+ needs to show how it reconciles its stated Key Objective 4 of firstly with the content of the Draft Plan. Then more particularly why it has omitted, inter alia, the following: proposals for facilities addressing deprivation in Old Town, regeneration of land in the retail core, enhancing green links focussing on Mortain Bridge, integrating land coming forward through current planning applications. It must address the evidence put forward by, inter alia, the OAN, IMD and MWA as to

the B+ area.

- 6.6 B+ had the proportionate and objective evidence before it which demonstrates the unsustainability of its proposals when preparing the Draft Plan. If it believes the evidence is incorrect it must address that evidence and produce for consultation a clear rebuttal, inter alia, of the IMD and MWA. It must be prepared to engage in genuine consultation rather than constructing a consultation aimed at underpinning its unresearched and unevidenced plan..
- 6.7 The consultation is fatally flawed. The 'Comment Slip' that B+ has asked respondents to complete fails to provide a format that can properly represent the views of individuals on the proposed Plan. The first question, for example, requires people who agree with town centre growth but not growth in the north and east to misrepresent their views whether they say yes or no. The design of the survey questionnaire is fundamentally flawed as a method of finding out what people think. It will not be possible to rely on the outcome and thus its usefulness is severely undermined.