

Cranborne Chase Area of Outstanding Natural Beauty



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Sara Loch
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Church Lane
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By email: admin@blandfordforum-tc.gov.uk

27th October 2015

Dear Sara Loch

Blandford Neighbourhood Plan 2015 – 2031

Thank you for the opportunity to comment on this draft neighbourhood Plan. I see that the document relates to Blandford Forum Town Council, Blandford St Mary Parish Council, and Bryanston Parish Council. These councils are working together under the title 'Blandford +' to prepare a Neighbourhood Plan.

The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital. The [AONB Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' Objectives and Policies for this nationally important area. The national Planning Practice Guidance [Natural Environment paragraph 004] confirms that the AONB and its Management Plan are material considerations in planning.

The National Planning Policy Framework states (paragraph 109) that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes which include AONBs. Furthermore it should be recognised that the 'presumption in favour of sustainable development' does not automatically apply within AONBs, as confirmed by 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. The conservation of wildlife and cultural heritage are important considerations in these areas.

More detailed information in connection with AONB matters can be found on the AONB [web site](#) where there is not only the adopted AONB Management Plan but also Position Statements and Good Practice Notes ([Planning Related Publications](#)). In particular when considering construction within the AONB I would draw attention to our [Good Practice Note on Colour in the Countryside](#)

The AONB makes the following comments on the draft Neighbourhood Plan:

1. Until the invitation to comment on this draft Neighbourhood Plan the AONB has not been involved in the Plan preparation. Parts of this AONB are included to the north and east of the Plan area and the proposals may also impact on the setting of this AONB. The area to the west, and approximately 50% of the area of the Plan, appears to be in the Dorset AONB.
2. This AONB does NOT agree with the basic premise in paragraph 1.11 that the North Dorset District Council planning strategy for Blandford is fundamentally wrong.
3. Despite the statements in paragraphs 1.15 and 1.16 about survey and consultation the Blandford + Group has not been in contact with this AONB, it has not provided a presentation to this AONB, nor have any updates been provided to the AONB.
4. It is noticeable that the seven **Key Objectives** on page 9, flowing from paragraph 2.6, put the maintenance and protection of the environment at the bottom of the list. No reference is made in the Key Objectives to conserving landscapes, or conserving and enhancing the natural beauty of the AONB. This appears to be a fundamental failure in relation to National Policy.
5. It is noticeable that the draft Plan is clear that it seeks significantly greater development than that being proposed in the North Dorset local Plan.
6. **Policy 1 - Spatial Plan**, appears to redefine the settlement boundary of Blandford Forum to that of the Blandford + boundary. Nevertheless it appears that development in the Parishes of Blandford St Mary and Bryanston would be severely limited as the overall Vision, page 8, indicates that *'Blandford St Mary and Bryanston have remained at their current size as small but viable communities'*.
7. There is an assertion in paragraph 3.8 that Blandford has to grow to the north and east *'where the social infrastructure problems are at their most acute'*. No evidence is produced to support that assertion, neither are reasons given why new development in sensitive landscapes would be the solution to 'social infrastructure problems'.
8. **Plan B Alternative Growth Strategy for Blandford Forum**, page 12, is confusing. It has arrows pointing inwards to the town centre from the north east and outwards to the south west in the Blandford St Mary area. The arrows suggest inward actions from the north east and actions outwards from the town to the south west. The presumption that any growth at Blandford St

Mary is unsustainable is not justified or validated by evidence. Question 1 seeks support for future growth on the northern and eastern edges of Blandford without any clear explanation.

9. **Policy 2, Land to the East of Blandford Forum**, allocates land for development to the east of the bypass in the sector between the Wimborne and Salisbury roads. The proposal is for 500 houses and a doctor's surgery. This area would be separated from the town by the bypass. There appears to be an assumption (unsupported) that safe and easy links can be made to the town across the bypass.
10. Paragraph 3.10 notes the land (28 ha) falls within the setting of the AONB and emphasises that it does not lie within the AONB. The fact that the land in question tilts towards this AONB and, therefore, would expose any development to view, is not mentioned. Harm to the AONB is not addressed. It is clear from paragraph 3.12 that the impacts on the AONB have not been considered as this is identified as a matter to be mitigated. The impacts of local development proposals on nationally designated and nationally important landscapes do have to be set out and assessed. If that is not done now it will have to be done for the formal Examination.
11. The questions for respondents associated with this Policy 2 invites a response that effects on the AONB would be acceptable. Such biasing of a consultation is unacceptable.
12. **Policy 3, Land to the North of Blandford Forum**, is factually incorrect as it refers to land adjoining the AONB being allocated for development. The land being proposed is within the AONB and this lack of knowledge and understanding of the AONB does not provide any confidence in the knowledge base that the Blandford + Group are using to establish their policies upon.
13. Paragraph 3.14 is factually incorrect. There is an unfounded assumption in paragraph 3.15 that impacts of development on the AONB can be mitigated when they have not been identified. The problems of providing a new primary school in this area have already been pointed out to Dorset County Council but paragraph 3.16 seeks to resurrect this topic.
14. **Policy 4, Land at Shaftesbury Lane**, fails to recognise that this site is within the AONB. Very high standards of development and design, along with respect for landscape matters, are required for this site within the AONB land enclosed by the bypass.
15. The section on green infrastructure and a green network fail to acknowledge the areas designated as AONB, despite AONBs obviously being part of the nation's green sites and its environmental capital. Green infrastructure does not have to be publicly accessible so the proposals appear to be unnecessarily restricted.
16. Whilst focusing on the built aspects of just Blandford Forum Policy 11 fails to acknowledge the key contributions the AONB and the Stour Valley make to Blandford.

17. Despite the proposals for development on or adjacent to AONB land it is noticeable that paragraph 4.4, **Infrastructure**, relating to Community Infrastructure Levy funding, does not identify any AONB projects. This omission clearly contradicts the earlier statement about mitigating impacts on the AONB.

18. Having read the draft document and reviewed the plans it would seem that the primary purpose of the Blandford + Neighbourhood Plan is to prevent development in Blandford St Mary and Bryanston. This is being done under the guise of an alternative development scheme that would encroach into the nationally important AONB to the north and east and provide housing in and adjacent to the AONB in those localities.

The AONB's responses to your questions are: -

Q1. Do you agree that the Plan should focus future growth on the northern and eastern edges of Blandford Forum and on the Town Centre? A1 NO
Q2. Do you agree the proposed mix of uses for this site? Will the policy ensure that the scheme will be acceptable, especially in terms of its effect on the adjoining AONB and on the local roads? A2 NO and NO
Q3. Do you agree the proposed mix of uses for this site? Will the policy ensure that the scheme will be acceptable, especially in terms of its effect on the adjoining AONB and on the local roads? A3 NO and NO
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 with more land safeguarded for business uses? A4 This site is within the AONB and there is a requirement for very high quality design and respect for landscape matters.
Q5 Do you agree that when the District Council Offices close the site should be redeveloped for housing but with a childcare facility retained? A5 No comment
Q6. Do you agree that this land on the edge of the Town Centre should be redeveloped for uses that attract more visitors to the town and Trailway? Has the policy identified the key principles to secure a successful scheme? A6 This flood plain site is within the setting of this AONB. It is open green space with access and the AONB would prefer to see that maintained.
Q7 Do you agree this prominent vacant site at the southern gateway to the Town Centre should be redeveloped to provide a new ground floor retail or community use with flats above? A7 No comment
Q8 Do you agree with our definition of the Town Centre Area? Do you agree with our redefined primary and secondary shopping frontages? If not, why not? Although the policy does not include proposals, do you have a view on how to improve the traffic flow within the town centre? A8 No comment
Q9 Do you support our proposals for a 'green network' to serve Blandford and the surrounding parishes? A9 The green network proposals fail to include or even acknowledge the areas designated as AONB.

<p>Q10 Do you support the provisional list of proposed designations? If there are other areas you feel should be designated as Local Green Space we would be pleased to hear of these?</p> <p>A10 The green network proposals fail to include or even acknowledge the areas designated as AONB.</p>
<p>Q11. Does the policy identify all the important characteristics of Blandford Forum town which should be preserved and protected? If not, what is missing?</p> <p>A11 NO. The key attributes of the AONBs and the Stour valley are not explicitly included.</p>
<p>Q12. Does the policy identify all the important characteristics of the village? If not, what is missing?</p> <p>A12 NO. Its position in the setting of the AONB and its relationship to the Stour Valley are not included.</p>
<p>Q13. Does the policy identify all the important characteristics of the village? If not, what is missing?</p> <p>A13 No comment</p>
<p>Q14. Do you support the protection of visitor accommodation and the proposals to allow a change of use from residential to bed and breakfast accommodation?</p> <p>A14 This policy could facilitate green tourism to the benefit of the AONB.</p>
<p>Q15. Do you agree that the community facilities listed should be protected? Are there any facilities missing from the list? Is it right for the policy to encourage the improvement or extension of an existing facility for it to remain viable?</p> <p>A15 No comment</p>

I hope these comments are helpful to you.

Yours sincerely

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