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Sara Loch Chairman of Blandford + Blandford Forum Town Council Church Lane Blandford DT11 7AD By email: admin@blandfordforum-tc.gov.uk

29<sup>th</sup> October 2015

Dear Sara Loch,

## Re: Consultation on the draft Blandford+ Neighbourhood Plan

Thank you for consulting Dorset AONB Team regarding the draft Blandford+ Neighbourhood Plan. I herein provide comments regarding the effect of the Plan on designated landscapes, particularly Dorset AONB.

A central issue arises from the alternative growth strategy proposed by the Neighbourhood Plan, as compared with that of the Local Plan. The Local Plan proposes growth to the West of Blandford Forum and Blandford St. Mary, which would place development in locations where it would be more likely to have significant effects on Dorset AONB. The draft Neighbourhood Plan proposes an alternative strategy, removing development from Blandford St. Mary and locating increased levels of growth to the north and east of Blandford Forum. While this approach would be likely to reduce effects on Dorset AONB, the alternative strategy also appears likely to have significant consequences for the neighbouring Cranborne Chase AONB, as the growth areas are either within or in close proximity to this AONB. In this context and considering the information presently available, I do not consider that it would be appropriate for the Dorset AONB Team to endorse the Blandford+ alternative growth strategy or to provide comments on the potential to mitigate the proposed allocations affecting Cranborne Chase AONB.

I note that your SEA Appraisal Framework includes a question as to the Plan's justification of the exceptional circumstances that would support the alternative growth strategy that appears likely to include major development within the Cranborne Chase AONB, i.e. as proposed by policies three and four. With regard to such development within an AONB, the provisions of NPPF paragraph 116 are highly relevant. Here it is stated that: "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

I consider that robust evidence as to the need for the growth being proposed is required, alongside detailed information that enables understanding of how the location of the alternative growth proposals affects the AONBs, which may also include information on potential mitigation measures and how such these might integrate with existing landscape character. Without such information it is not possible to assess how the alternative growth strategy will address the exceptional circumstances test.

Elsewhere within the draft Plan there may be opportunities to strengthen references to AONBs and the following points may be considered for inclusion:

- AONBs are designated under the National Parks and Access to the Countryside Act 1949. The purposes of the AONB designation were updated and confirmed by the Countryside Commission in 1991. The primary purpose of the designation is to conserve and enhance natural beauty of the areas. In pursuing the primary purpose, account should be taken of the needs of agriculture, forestry, other rural industries and the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- The Countryside & Rights of Ways Act 2000 confirmed the significance of AONBs and created improved arrangements for their management. Section 85 placed a statutory duty on all 'relevant authorities' to have regard to the purpose of conserving and enhancing natural beauty when discharging any function affecting land in AONBs. Section 89 places a statutory duty on local planning authorities to act jointly to produce a Management Plan for each AONB in their administrative area. The Management Plan is regarded as a material consideration.
- The National Planning Policy Framework (NPPF) states, at section 115 that: "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty...".

I hope these comments are useful in informing your development of the Plan.

Yours sincerely,



Richard Brown Dorset AONB Landscape Planning Officer