

## Comments on the Draft Blandford+ NDP

**NOTE** - Comments are offered from a Planning Policy perspective only - officers dealing with particular aspects (eg conservation) have not contributed at this stage. For ease of reference, comments are set out according to the sections of the Draft Neighbourhood Development Plan. Some comments may run over more than one topic or section and should be seen in this context. Comments are intended to be constructive to improve the NDP before submission and it may be that a revised draft is needed before the submission version is confirmed.

### 1. INTRODUCTION & PURPOSE

1.2 The wording of this paragraph gives the impression that only NDP policies determine planning applications. Reference is made later in the document to other policies and determinants and at paragraph 4.3 but in this early paragraph it should be made clear that a whole range of considerations (NPPF, Local Plan etc) have to be taken into account when planning decisions are being made by the District Council. It should also be pointed out that those decisions will be made by the District Council. In this respect, it might be helpful if paragraph 1.2 were to tie in more closely with statements in 1.3.

1.7 Reference is made to *'the Councils'* but *'It has...'* - this is confusing - what is the *'It'*?

1.8 If Blandford and Blandford St Mary *'effectively function as a single settlement'*, how can the statement in 1.12 be true - *'the village has remained a distinct settlement'*? Appendix A to Blandford+'s submission to the Local Plan Examination in Public (EIP) also said *'The village has never regarded itself as part of a single town with Blandford Forum and its does not function as such'*.

1.11 It is unclear how allocations in the Local Plan already place pressure on schools and GP surgeries as the allocations have not yet been built out. The last sentence is confusing - is this no further growth at all or from the proposed 1200 homes?

1.12 Blandford St Mary is again called a distinct settlement and has *'never regarded itself as a single town with Blandford and it does not function as such'* but this seems to be contradictory as it has previously been stated that it *'functions as a single settlement'* (para 1.8).

If Bryanston PC objects to *'further development creeping into the AONB'*, what is different to development in the north proposed by NDP which does more than creep into the AONB?

1.14 It is not sufficient to say that *'The final version of the Plan will not only contain the preferred policies but it will also explain in more detail the background to the Plan, it will provide a profile of the area and it will describe the key planning issues in the area, to which the Plan is aiming to respond'* in light of the statement in 1.13 that *'It is especially important to understand the preferences for the options that are presented in the document.'* How can the reader understand the preferences for the options if he/she is not provided with the background to the plan?

1.15 The presentation of Town Growth and Village Growth is judgmental and could bias responses.

Also, Q3 is based on impact on the AONB and heritage - *'Any development will inevitably have some landscape impact on an Area of Outstanding Natural Beauty as well as impact on our heritage. Providing that the provision of green space and new landscaping minimises this impact as far as is possible, **which option will have the least impact?**'* As this has nothing to do with infrastructure it is rather misleading. Similarly, Q1 was really to do with where people live. The NPD needs to have correct references to avoid any confusion. Q4 seems rather biased in referring to options not being available under 'Village Growth' as there is no commitment to these in 'Town Growth'.

## **2. DRAFT VISION, OBJECTIVES & SPATIAL STRATEGY**

There is a spelling error in the title which has probably been spotted already.

2.5 There is a fundamental concern regarding this paragraph which states unequivocally that *'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'*. Consequently, the policies which flow from this, notably in respect of development proposals to the north and north east of Blandford do not accord with the Local Plan. The Government's Planning Practice Guidance (Paragraph: 065 Reference ID: 41-065-20140306) clearly sets out the basic conditions which a Neighbourhood Development Plan must meet if it is to proceed to a referendum. These include the relationship between a NDP and a Local Plan (the NDP must be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)).

Guidance (Paragraph: 074 Reference ID: 41-074-2014030) is very clear on the matter of conformity with the strategic policies in the development plan. In particular, *'whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy **without undermining that policy** ' and 'the rationale for the approach taken in the draft neighbourhood plan or Order **and the evidence to justify that approach**'.*

The Basic Conditions also refer to the need to help achieve sustainable development (Paragraph: 072 Reference ID: 41-072-20140306). Guidance says that *'In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, **sufficient and proportionate evidence should be presented on how the draft neighbourhood plan ... guides development to sustainable solutions**'*. Comment made in respect of paragraph 1.14 above is pertinent here.

2.6 It is useful having the key objectives summarised clearly but is the conclusion that growth to the north as well as to the south of Blandford is needed? The proposed number of dwellings is 1200 in LP1 but the total number of dwellings proposed in the Draft NDP is not clear. Policy 2 mentions approximately 500 east of the by-pass but Appendix A in Blandford+'s submission to the Local Plan EiP said *Up to approximately 1,000 new homes (800 on NE and 200 on N) to contribute to the current plan period and to 2030*).

There seems to be less growth proposed in the Draft NDP than in LP1 if the sites in the Local Plan are not to be progressed, as implied in the NDP. There is no reference to any evidence to support this approach - has any viability work been carried out as there could be significant S.106 costs involved on top of CIL liability? The Planning Advisory Service Neighbourhood Planning Advice Note 'Housing Needs Assessment for Neighbourhood Plans' says that *'neighbourhood plan housing policy needs to*

*be underpinned by robust, objectively assessed data providing a picture of housing need at the level of the neighbourhood plan area'. That advice has been ignored in the Draft NDP. Does a Housing Needs Assessment (as recommended as good practice by the Planning Advisory Service) underpin the proposals? There is no reference to this if it exists. National Guidance (Paragraph: 006 Reference ID: 2a-006-20140306) sets out that 'The neighbourhood plan should support the strategic development needs set out in Local Plans, including policies on housing and economic development. The level of housing and economic development is likely to be a strategic policy'. There is a clear implication that, since the housing needs underpinning LP1 are evidence based, any variation needs to be similarly evidence base.*

Government guidance on preparing neighbourhood development plans clearly states (Paragraph: 040 Reference ID: 41-040-20140306) that *'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 or the proposals in an Order'*. It goes on to say (Paragraph: 042 Reference ID: 41-042-20140306) *'A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria'*. There is no indication in the Draft NDP that this work has been done. Finally, it points out that policies should be clear and unambiguous and *'should be concise, precise and supported by appropriate evidence'*.

Dave Chetwyn, planning adviser to Locality, has said neighbourhood plans *"have to be evidence-based, have regard to national policy, strategic local policy, EU obligations, and deliver sustainable development. They have to stack up."*

The Council is quite happy to share and discuss the Local Plan evidence base if it would help the NDP process.

### **3. LAND USE PLANNING POLICIES**

As a point of clarification, the term 'Development Plan' is used in the third paragraph but separate reference is made to the LP1 and NDP in the second paragraph. For non-professional readers of the NDP this could be puzzling.

3.1 This paragraph refers to 'use of land' but some policies almost refer to specific users - eg pre-school and childcare within D.1.

#### **Policy 1.**

If tourism growth is directed to town centre then why does Policy 14 seek to allow it in villages?

3.8 This is an unsubstantiated statement: *' To deliver such crucial investment in a new primary school, a GP surgery, a new convenience store, additional employment land, a new household waste recycling centre, new public transport services and new public open space, it is necessary to use available and suitable land on the northern and eastern edges of the town'*. Nothing is presented to show that the proposals to the north of Blandford are any more sustainable than to the south, as proposed in LP1. For example, walking distances to town centre are no more from Ward's Drove than from the A350/A354 Salisbury Road roundabout.

Why are infrastructure problems most acute in north? Is there any evidence of this?

Plan B - what is the basis / purpose of arrows? Why do not both areas show the same inward / outward aspects? It is not clear from the diagram or the text and could be seen as biasing responses.

## **Policy 2.**

Inset 1 shows the boundary of development land east of Blandford as not running up to the proposed settlement boundary. Why is this? Has it been artificially stopped short of the AONB boundary to avoid intruding? If so, that is fairly irrelevant since the NPPF is clear that the setting of an AONB is very important. However, this seems to be ignored: *'The land falls within the setting of the Cranborne Chase AONB but does not lie within it'*. The NPPF sets out 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.

The overall implication from the Policy wording appears to be that any impact on the AONB can be satisfactorily mitigated.

Is there more to come - Policy 2 ix concludes *'and'*?

Planning Practice Guidance (ID 8-001-20140306) says: *'This duty [to have regard to the purposes of AONBs] is particularly important to the delivery of the statutory purposes of protected areas. The duty applies to all local planning authorities, not just national park authorities. The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas'*. DeFRA guidelines on 'The Duty to Have Regard To' includes parish and town councils.

National guidance says that *'National Parks and Areas of Outstanding Natural Beauty management plans do not form part of the statutory development plan, but may contribute to setting the strategic context for development by providing evidence and principles, which should be taken into account in the local planning authorities' Local Plans and any neighbourhood plans in these areas'*. There is no real indication that this has happened in the Draft NDP.

## **Policy 3.**

There is no reference to housing and number of dwellings but Blandford+'s submission to the Local Plan EIP quoted 200. As mentioned above, there does need to be clarity about housing numbers.

Comment on the AONB is similar to that under Policy 2.

3.10 Where is the evidence that safe access can be put into place from the bypass to the proposed development? Have the costs of bridging the bypass been taken into account, given the fact that the A354 has extensive verge areas along this section which will add to those costs?

3.13 *'This allocation will be expected to provide financial contributions to meeting all infrastructure requirements and other provisions of the Neighbourhood Plan'* - does this mean all for the Draft NDP area or just the site? If it is the former then contributions can only come via CIL as S.106

contributions relate only to the site directly. If the reference is site specific then it should say so for clarity.

3.14 It should be stated explicitly that this land lies within the AONB - *'on the edge of and adjacent to'* implies not actually within. The statement is made that development *'can be contained within the landscape'* - is this based on the Cranborne Chase and West Wiltshire Downs AONB Partnership's view?

#### **Policy 4.**

3.19 The view is presented that the north of Blandford is poorly served by convenience shops so the NDP seeks to retain the ASDA site for *'out of centre retail uses'*. Convenience shops tend to be smaller than the present 3,900 sq m consent granted to ASDA - is the proposal for a number of convenience shops or just one?

Where does 120 car parking spaces for up to 2,500 sq m come from? It will be difficult to justify this level of parking provision for a small store. (ASDA's original application embodied 210 spaces for 3,900 sq m.)

A large part of this policy seems to emerge from nowhere. Is there support for D1 use for FE? Has there been any discussion with providers or exploration of funding? This proposal does not appear to have been covered in the public consultation earlier in year.

There is a significant lack of text associated with this policy, especially in respect of the need for B1, B2 and B8 development.

#### **Policy 5.**

The strength of proposed Policy 5 is questionable since Class D.1 is any non-residential institutional use. Consequently, any planning consent for an application for the Nordon site which included 'the provision of a D1 childcare nursery building' would include reference to a D.1 use rather than specifically to a childcare facility. It would thus be open to future change to any other D.1 use. Pre-school provision is market driven and there is no certainty that Larksmead Pre-School would be the occupier of a D.1 building if the owner found a more profitable user. For example, the Council is aware that there is pressure on GP surgeries in Blandford – use as a health centre might prove to be a more attractive option than a pre-school facility.

The car parking standard proposal of a minimum of 2 spaces per dwelling is likely to conflict with the parking policy in the Local Plan, which refers to the provisions based on the Dorset Residential Car Parking Study, and which includes parking provision for motorcycles .

#### **Policy 6.**

Should not the FRA have been done before putting forward the proposals?

### **Policy 7.**

This policy helpfully moves things on in respect of this site which, as the NDP notes, is prominent and part of the gateway into Blandford. A retail use might be difficult to deal with as shops tend to want prominent fascias but a carefully designed scheme would certainly enhance this part of the town.

### **Policy 8.**

3.31 It is difficult to understand why the secondary frontage along Salisbury Street has been extended so far to the north when the proportion of non-residential uses is very low.

3.33 The 'Town Centre Area' is not a transition between charging areas but a means of identifying where the retail Levy will be charged. There is still the residential charge in the town centre. Reference to 'the Town Centre Area' implies that the CIL Charging Schedule will use the NDP town centre definition but that is not the case – the CIL Charging Schedule will use NDDC's town centre definition which may or may not be same as the NDP definition. The District Council is currently reassessing town centre area definitions relating to the towns within the District.

Also, many changes of use which are now permitted development (eg retail to residential - premises designated for A1 retail and A2 financial and professional service uses can be converted to a single house or a building containing up to 4 flats, with an upper size limit of 150 sq m, without the need for a full planning application).

The Draft NDP should not include traffic management as an issue if there are no proposals in the document.

### **Policy 9.**

While it is good to see a focus on green infrastructure, use of the term 'network' as a description for the assembly of 'green' elements in the Draft NDP may not be appropriate. 'Network' usually implies a system of lines or channels that cross/interconnect over an area. Allotments and children's play areas, for example, do not fit into this interpretation of the term.

This comes across as a rather neutral policy - what about including improvements to green spaces and new ones?

### **Policy 10.**

3.41 If the Local Green Spaces listed are to be designated then they should have been assessed against the NPPF before inclusion. The policy is rather confusing in that it is not clear whether or not the green spaces listed are to be designated in the Draft NDP or are there simply for consultation. If the latter is the case then they should be removed as the Draft NDP is the precursor to the submitted version.

### **Policies 11/12/13.**

There is an understandable focus on the Conservation Areas but it might be useful to widen out the consideration of design to the wider area. Some of the policy wording might be a little more consistent - Policy 13, for instance, at e. simply refers to '*unsightly and inappropriate features or*

*details'* whereas f. actually give some examples of original features. Examples of unsightly and inappropriate features would be helpful to developers looking at the NDP.

**Policy 14.**

What is sufficient off-street parking - that it meets LP1 standards? How is the closure of a B&B establishment to be prevented?

**Policy 15.**

The protection of community facilities is important and this policy should assist in this. The status of the Bryanston Estate Club perhaps needs to be clarified. Also, the last part of the policy refers to extending the viability of existing community facilities - how is this different to sustaining viability? It might also be better to deal with new facilities in a separate clause.

**Implementation**

Does this refer to the 25% allocated to Blandford+ by NDDC?

4.5/6/7 Who will prioritise? Has any calculation been done to estimate the amount of income from CIL? There appears to be potentially an extremely large funding gap (eg, Fording Point's own estimate is £718,800.) If a large proportion of new housing is designated affordable (under the new definition) then reduced CIL levies will be payable (eg ignoring 5% admin top slice and exemptions, 1200 new houses with 50% affordable = 600 houses @ 76 sq m (RIBA) x £35 x 25% = £399,000 over 15 years = £26,600 p/a. Even if no affordable, only about £53,200 p/a). Blandford+ submission to the Local Plan EiP suggested 440 affordable in Blandford (before the recent redefinition of affordable).

4.6 This paragraph refers to '*the Parish*' - should this be the Blandford+ area?

**General**

The Inset Plans are generally clear and well referenced. The only points which do stand out are that the boundary of the secondary shopping area is not very clear on Inset 1 and the AONB is not shown on Inset 1.