

BLANDFORD PLUS NEIGHBOURHOOD PLAN 2015-2031 DRAFT PLAN

REPRESENTATIONS ON BEHALF OF MRS L ABBOTT

OWNER OF LAND AT

BLANDFORD ST MARY

PREPARED BY:

M D Brown FRICS MRTPI

1. We act for Mrs L Abbott, owner of land to the south of the by-pass at Blandford St Mary. She is a major stakeholder, so far as future development of the town is concerned. It is a surprise therefore that Mrs Abbott has not been contacted by the promoters of the Neighbourhood Plan and indeed that as the representatives of her interests, we only became aware of this through other agencies. We are grateful for this opportunity to make representations on the draft plan.
2. We believe that there are some errors of fact, some questionable assumptions and a number of inconsistencies. It appears to us that there is a conflict between the stated deliberately brief informal approach and one which is based on informed sustainable assessment
3. On the home page of your website in small print, it is acknowledged that Neighbourhood Plans *"are not supposed to disagree with the District Council's"* (Local Plan). It goes on to say *"It may not be able to change something in the Local Plan"*. It is surprising that the Neighbourhood Plan does not therefore recognise the advanced stage which has been reached in the preparation of the Blandford Local Plan, Part 1 (LP1). The Local Plan has been the subject of an Examination in Public, the inspector has published his interim report and Major Modifications consistent with the Inspector's report have been published for public consultation. The final report of the Inspector will be binding. It is unlikely that the Strategic Policies of the Local Plan will not be adopted.
4. Bearing in mind that this is a Neighbourhood Plan for the whole of the Town Council area and two Parish Council areas, it seems inappropriate that the Policies should be framed in terms of administrative areas, rather than functional areas. This a theme which runs throughout the Plan and one which, in our opinion, is not a correct approach.
5. Paragraph 1.4 of the Draft Plan asks the question *"Is the Plan consistent with local Planning Policy?"*. The answer must be no. It proposes development beyond the settlement boundary in the existing Local Plan, which I acknowledge to be out of date.

However, it is also inconsistent with the Policies in the emerging Local Plan which will shortly be adopted.

6. Paragraph 1.5 states that *"The Councils must be able to show that it has properly consulted local people and other relevant organisations"*. It has not consulted with our client, one of the major stakeholders.
7. Paragraph 1.7 states that promoters of the Plan have reviewed existing national and local planning policies. As we shall see, there is some serious conflict, not only with the Local Plan, but also with the National Planning Policy Framework.
8. Paragraph 1.8 contains a statement which the rest of the Plan seeks to ignore. That is that *"Blandford comprises the main town of Blandford Forum to the north of the River Stour and the smaller built up area of Blandford St Mary to the south, which effectively function as a single settlement"*. The town has functioned in this way for as long as I can remember and the town has expanded to include the development of the development known as Bryanston Hills, the Tesco's Superstore and the commercial development between Tesco's and the Brewery.
9. Paragraph 1.8 goes on to say that the town is "encompassed by two areas of outstanding natural beauty....". That is not an accurate statement. The town is not encompassed by an AONB to the south.
10. It is disingenuous of the draft Plan to state that *"NDDC preferred spatial strategy plans for no further growth in Blandford Forum from 2015-2031"*. The Local Plan developed a strategy to concentrate further growth in four major towns in the District. In doing so, it was not looking at administrative boundaries, but at the functional area of the towns. Reference to Blandford St Mary as a *village* only occurs in this Neighbourhood Plan. However, for the most part, Blandford St Mary is not a village in its own right. There is a smaller settlement, Lower Blandford St Mary, which could be regarded as a village. The area of the town which lies within Blandford St Mary Parish cannot be described as a village. The scale of development in terms of the number of houses,

the large employment area, including the Brewery and more recent development of a Superstore and adjacent commercial development, clearly defines this as part of the town. The town centre serves both administrative areas, Tesco's, the Brewery and the adjacent commercial development serve both administrative areas. Stour Meadows, which the Plan proposes should be a focus, strengthens the link between the town centre and the Parish of Blandford St Mary.

11. Paragraph 1.12 is not correct as a matter of fact. It says that Blandford St Mary Council have consistently objected to the Plans to grow Blandford St Mary village. There was never a Plan for "village" growth; it was a Plan to enlarge the town of Blandford, which includes land in Blandford St Mary Parish. Blandford St Mary Parish Council did not object to that Plan, indeed it positively supported the "Focussed Change" to the Local Plan which was the subject of public consultation. The "village" referred to in your draft Neighbourhood Plan has not remained a distinct settlement from Blandford Forum. This statement is totally conflicted by Paragraph 1.8 above. It is also clearly not a matter of fact.
12. Paragraph 1.12. I fear that the wording of the Plan is such that the ordinary member of the public is likely to be misled into thinking that what the Plan refers to as a "village", is Lower Blandford St Mary, rather than an extension of Blandford town. Its continual reference to a village is wholly inappropriate.
13. The reference in Paragraph 1.14 to the document being deliberately brief, is in itself a serious shortcoming in the Neighbourhood Plan. In promoting the development land to the south of Blandford St Mary, the Owner has been put to considerable cost to demonstrate sustainability and in considering therefore the allocation of alternatives, the plan should not do so without similar studies. These should include:- Landscape and Visual Impact Assessment, including the impact upon the AONB, and the visual impact of any highway structures necessary to effect access; Transport Impact Assessment to assess the impact of traffic on the highway network, and public transport provision. It should demonstrate what highway works are necessary to enable access to be provided which accords with national and local guidance; It should

include the study of ecology and biodiversity, both on the site and adjoining the site; It should consider the impacts upon archaeology, geology and hydrology and should require a Flood Risk Assessment, the potential for contamination and a Noise Impact Assessment. All of these studies should be carried out to demonstrate the sustainability of alternative locations before selection of preferred locations.

14. Paragraph 1.15 contains what I believe is a typographical error, it refers to a pre-draft survey in "2013". I believe that was actually 2015. By presenting the local plan proposal for strategic growth as "*village growth*" was a misrepresentation for the reasons I have given above. The results of that survey must therefore be treated with caution. Accepting that 80% of responses preferred town growth, that is exactly what they have in the Local Plan (LP1). Land to the south of the town is not within an Area of Outstanding Natural Beauty and does not have any common boundary with an AONB.
15. Paragraphs 1.17-1.19. It is essential that strategic environmental assessment be carried out before any allocation of land for development. There is no evidence this has been undertaken prior to identification of growth areas in this draft Neighbourhood Plan.
16. Paragraph 2.3 refers to the preferred vision of a workshop, but we have no evidence in this draft plan as to what alternatives were put forward. It is difficult to understand the reference to Blandford Forum as distinct from the functional area of Blandford Town. The relevance of administrative area boundaries is questioned. Blandford St Mary is not a complete community in its own right, it is part of a larger town. Much of the recent development of Blandford as a town has taken place within the Parish of Blandford St Mary.
17. Paragraph 2.5 states that "crucially however, this vision does not accord with that of the emerging North Dorset Local Plan (NDLP1)". Why not? Bearing in mind the advanced stage of the Local Plan, it should not have been effectively ignored. The

Planning Authority has demonstrated its proposals for growth meet their full objective assessment of the need for market and affordable housing. (NPPF 47)

18. Paragraph 2.6.1 For the reasons set out above we suggest that the word "Forum" be deleted.
19. Paragraph 2.6.2. This paragraph is inconsistent with Paragraph 1.8 of the Neighbourhood Plan and with the Local Plan. It is also inconsistent with the National Planning Policy Framework Paragraphs 115 and 116, in that a large proportion of the land is within the Cranborne Chase and West Wiltshire Area of Outstanding Natural Beauty. The land east of the town is contiguous with the boundary of the CC&WWAONB. This proposal represents major development, contrary to Paragraph 116.
20. Policy 1. The settlement boundary should encompass the whole of the town of Blandford, which includes the urban extension at Blandford St Mary. It would be inconsistent with Paragraph 1.8 of the Neighbourhood Plan to do otherwise. The Neighbourhood Plan should recognise that there is one town which crosses the boundary between two administrative areas. See comments above.
21. It is inconsistent to extend the settlement boundary to the north, whilst at the same time ignoring the allocation at Blandford St Mary in the local plan.
22. Paragraph 3.5. Policy 1 as drafted does not "complement" the strategy of Policy 16 of the Local Plan because it ignores that part of the policy which states:-
" ... Blandford's housing needs will be met through...h the development of land to the west of Blandford Forum south east of Blandford St Mary; and ..."
23. Paragraph 3.7. again perpetuates the falsehood of Blandford St Mary being a village. The new Local Plan refers to Blandford town and in doing so happens to cross an administrative boundary. The Paragraph goes on to say that the Plan proposals may have been endorsed by the District Council before the Neighbourhood Plan has been

adopted. That is almost certainly the case, bearing in mind the stage which the Local Plan has reached. The planning authority is only awaiting the inspector's final report following consultation on the Modifications which did not include any additional allocation of land for housing.

24. Paragraph 3.8. It is unacceptable to refer to unsustainable growth at Blandford St Mary. The Local Planning Authority put the proposers of that land to great expense to demonstrate the sustainability of development at Blandford St Mary. Independent consultants were engaged to prepare a Traffic Impact Assessment and Transport Study, Landscape Visual Impact Assessment, Biological and Environmental Survey, Archaeological Survey, Flood Risk Assessment, geological, Hydrological Assessment and Noise Assessment. Proposals were put forward to secure the link in the trailway from Spetisbury into Blandford town. On the other hand, none of this work has been evidenced with regard to the proposal for land to the north and east of Blandford.
25. Promoters of land at Blandford St Mary are aware the contribution that they will make towards community infrastructure, including education, a community centre and possible provision for a health facility. The promoters envisaged a mixed use development, not a purely residential development. The proposal at Blandford St Mary was thoroughly examined in detail at the Examination in Public.
26. Land to the north and east of Blandford is inherently less sustainable, being remote from the town centre and a substantial of the area north being within the CC&WWAONB. The area to the east is contiguous with the AONB and not linked to the Trailway. Proposals for this area should only follow the same tests carried out for the land west of Blandford Forum south east of Blandford St Mary.
27. Paragraph 3.9. The 2003 Local Plan is out of date. A new settlement boundary should be defined that accords with the proposals for an urban extension.
28. Plan B in your draft Neighbourhood Plan is misleading. It shows the North Dorset Local Plan Growth Strategy as looking outwards, in fact it looks towards the town centre. It

appears to suggest further growth to the south and south west, however that ignores the fact of the ridge which forms a physical boundary to development south and west. Beyond the ridge is now a large solar farm. The plan shows how Stour Meadows constitutes a “shared focus”. Plan B should therefore be amended to show the arrows in the NDLP1 Strategy as focussing inwards, not outwards.

29. In answer to Question 1, the Neighbourhood Plan should not focus future growth on the northern and eastern edges of Blandford Forum, without first carrying out the studies that were undertaken with respect to the NDLP1 Strategy. Furthermore, I suggest that viability should also be investigated to demonstrate that the economic development proposal can deliver social and community proposals in addition to the physical infrastructure necessary for highways and drainage.
30. Paragraph 3.10. There is no evidence that this area can be safely accessed from the A350 and the A354. Without a highway assessment and junction design this cannot be assumed.
31. In answer to Question 2, we cannot agree the mix of uses without the relevant studies having been carried out. These studies cannot be left until after an allocation has been made. That would be “putting the cart before the horse”.
32. With regard to Policy 3, as a matter of correction, the north area lies within the Cranborne Chase, West Wiltshire Area of Outstanding Natural Beauty. The neighbourhood plan therefore needs to take account of Paragraphs 115 and 116 of the National Planning Policy Frameworks.
33. With regard to Policies 4 and 5, consideration should also be given to alternative uses of these sites, including the possibility of a Primary School. The site referred to in Policy 5 does appear to have an advantage in terms of a functional link between the existing Pre-School and a new Primary School.

34. The map/diagram on Page 18 demonstrates a functional link between the town centre of Blandford and the urban extension at Blandford St Mary.
35. Policy 10. The Local Plan 1 housing allocation south of the town has a direct relationship to the Stour Meadows and the Trailway. As a matter of correction, Site 29 on inset Map 2 is not Bryanston Village Green. It is land proposed for Blandford St Mary allotments.
36. Paragraph 4.2. It is not accepted that care has been taken to ensure that the Policies in this Plan are achievable. Reference is made to a transport study to a Landscape Visual Impact Assessment but this needs to be carried out before allocation. There is no examination of the flood risk, drainage, geology, hydrology, biology, archaeology or noise impact from the A350/A354.
37. Paragraph 4.4. The development of land at Blandford St Mary identified in Local Plan 1, will facilitate or contribute to required infrastructure as appropriate. This may include:-
- iii. Blandford – Cycleway Schemes,
 - viii. The new two form entry Primary School,
 - ix. New Health and Wellbeing Centre,
 - xiii. Blandford St Mary Community hall,
 - xv. Allotments and
 - xvii. Extension to the Trailway network.
38. In summary, the Plan has much to commend it, but it is pre-occupied with administrative boundaries, inconsistent with strategic growth proposals in the Local Plan.
39. We look forward to engaging with Blandford Neighbourhood Forum to achieve a Neighbourhood Plan which develops the Local Plan and enhances it.