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Our ref: 195342

Edward Gerry
Planning Policy Team Leader
North Dorset District Council
Nordon, Salisbury Road
Blandford Forum
Dorset DT11 7LL

BY EMAIL ONLY

Dear Edward

Town and Country Planning, England: The Neighbourhood Planning (General) Regulations 2012 (as amended) - Blandford + Neighbourhood Plan 2015-2031

Thank you for consulting Natural England on the Blandford + Neighbourhood Plan.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The plan area lies partly within the Dorset Area of Outstanding Natural Beauty (AONB) and Cranborne Chase AONB and includes the Bryanston Site of Special Scientific Interest (SSSI).

Policy 1 – Land North & East of Blandford Forum - Objection

The proposed Neighbourhood Plan includes a significant urban extension located beyond the A354 Blandford bypass in a rural locality within, and within the setting, of the Cranborne Chase AONB, a designation of national importance with the highest status of protection in relation to landscape and scenic beauty.

Natural England strongly recommends that the Cranborne Chase AONB team are fully consulted on any implications of the proposed Policy 1 on the AONB. Their knowledge of the location and wider landscape setting of the proposed allocation should help to confirm whether or not it would impact significantly on the purposes of the designation. They will also be able to advise whether the development accords with the aims and policies set out in the AONB management plan.

In exercising or performing any functions in relation to, or so as to affect, land in an AONB, all public bodies, local planning authorities and Natural England, have a duty to have regard to the statutory purpose of AONBs, which is the purpose of conserving and enhancing the natural beauty of the area (Section 85 Countryside and Rights of Way Act, 2000). Local planning authorities are required to take such action as appears to them to be expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty and amenity of an AONB to the extent that it lies within their area (Section 84(4) Countryside and Rights of Way Act, 2000). It is against this duty, and with regard to national and local planning policy, that the proposals must be measured.

In weighing up the benefits of any policy against the impact to the AONB your authority should have particular regard to the provisions of the National Planning Policy Framework (NPPF). In particular, Paragraph 115 which states 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 conservation of wildlife and cultural

heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”

Paragraph 116 further states 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.

The Planning Practice Guidance provides further guidance on impacts on the protection of nationally designated landscapes:

<http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/landscape/>

Natural England advises that Policy 1 provides for a development that should be considered as “major” in the context of NPPF paragraph 116 and so any proposals should be required to meet the policy’s “exceptional circumstances” test. Exceptional circumstances will not exist unless all three criteria (i.e. the national and local need, cost and scope for developing elsewhere, and the environmental effect and scope for moderating it) can be satisfied.

In our view the alternative development allocations set out in the adopted Local Plan demonstrate that there are opportunities for delivering the current housing needs without necessitating further significant development within the protected landscape. On this basis the proposed policy cannot meet the exceptional circumstance test required by the National Planning Policy Framework. Further, the Policy is not in general conformity with the strategic policies contained in the adopted local plan. Policy 1 is therefore neither consistent with local, or national policy, and therefore fails the basic conditions required of a Neighbourhood Plan as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

Natural England is also concerned that despite the high level of protection afforded to the designated landscape of the AONB Policy 1 only provides a relatively modest level of landscape mitigation, restricted to a relatively narrow linear landscape buffer along the north eastern boundary, while the landscape and biodiversity benefits of the south eastern margin are also limited. In our view a development of this scale within a rural locality on land designated as AONB should be seeking to enhance and strengthen local landscape character, while providing substantive biodiversity and public access benefits. This would need to include measures designed to improve the screening and setting of the existing development located to the north of the bypass, along with measures to protect and enhance the Pimperne Brook corridor.

Natural England notes and welcomes the ecological survey and DERC data search of the proposed development site and has no concerns regarding this aspect of the proposal. Any final scheme should however be supported by a Biodiversity Mitigation Plan that has been approved by the Dorset County Council Natural Environment Team (DCC NET).

Policy 1 - Soil and Agricultural Land Quality

Natural England is concerned that the proposed Neighbourhood Plan Policy 1 may harm over 20 ha of land with soils classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraphs 109 and 112. In particular paragraph 112 requires that,

"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality".

The Neighbourhood Plan Policy 1 should therefore determine and take appropriate account of the quality of the soils that would be affected by the proposed allocation.

To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 112 of the NPPF, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan. General mapped information on soil types is also available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.

Policy 2: Land at Shaftesbury Lane, Blandford Forum

The policy provides for a significant urban development within the Cranborne Chase AONB, but is contained within the A354 Blandford bypass. Natural England advises that the current proposals should be considered as "major" in the context of NPPF paragraph 116 and so any development proposals should be required to meet policy's "exceptional circumstances" test. Exceptional circumstances will not exist unless all three criteria (i.e. the national and local need, cost and scope for developing elsewhere, and the environmental effect and scope for moderating it) can be satisfied.

In this case, however, the principle of development in this locality has previously been considered by the adopted local plan. Given the locality within the bypass and its close association with existing developed areas Natural England considers that the allocation with appropriate biodiversity and landscape mitigation measures are unlikely to have a detrimental effect on the environment, landscape or recreational opportunities. Indeed with appropriate landscape mitigation measures the allocation is likely to have the potential to help improve the appearance of the existing development from the wider views within the AONB. On this basis Natural England has no objection to the policy.

The final scheme for the site should also be supported by a DCC NET approved Biodiversity Mitigation Plan.

Policies 3 – 8

No comment

Policy 9 – Green Infrastructure Network

Natural England supports the principle of the policy, however, it is unclear from the proposals map what is envisaged as a large proportion of the identified network runs through existing built development,

whilst significant areas of existing green infrastructure are excluded. For example, the Milldown Local Nature Reserve and Stour Meadows are excluded. In our view the network should identify and help protect all existing areas of green infrastructure within the plan area, as well as seeking to identify new areas that are in conformity with the adopted local plan that would support and enhance the network.

Policy 10 – Local Green Spaces

Similarly, Natural England supports the principle of Policy 10, but would recommend that the existing areas of valued green infrastructure (such as the Milldown LNR, etc) even if already identified and protected through the adopted local plan, are also included within the proposals map. In line with the basic conditions required of Neighbourhood Plan all new areas of proposed Local Green Space should be in conformity with the adopted local plan.

Other comments

Natural England recommends that the plan includes an additional policy to promote the inclusion of biodiversity enhancements within built development. This might include the provision of bat and bird boxes of a design that is built into the fabric of the new builds, planting of native trees and hedgerows, the provision of fruit trees etc. In Blandford the provision of swift nesting bricks would be particularly valuable. In order to secure such measures the policy should require new development on greenfield sites greater than 0.1 ha to be supported by a Biodiversity Mitigation Plan, that has been approved by the Dorset County Council Natural Environment Team. The Biodiversity Mitigation Plan should be prepared by a suitably qualified individual and follow the standard format available on the Dorset For You website.

For any queries relating to the specific advice in this letter please contact [REDACTED]

Yours sincerely

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