

BLANDFORD PLUS NEIGHBOURHOOD PLAN

OBJECTION ON BEHALF OF

M TAYLOR, [REDACTED]

1.0 The plan as submitted is unsound.

Whilst the objector does not object to the future development of land to the north/north-east of Blandford, the plan as submitted is unsound.

1.1 Paragraph 1.4 of the Neighbourhood Plan itself states:-

"Although there is considerable scope for the local community to decide on its planning policies, Plans must meet four "basic conditions". These are:

- Is the Plan consistent with National Planning Policy?*
- Is the Plan consistent with Local Planning Policy?*
- Does the Plan promote the principles of sustainable development?*
- Has the process of making the Plan met the requirement of European Environmental Standards?"*

1.2 The answer to the first three questions is no. It is not consistent with National Planning Policy, it is not consistent with Local Planning Policy and it is not sustainable in its present form.

1.3 The North Dorset Local Plan Part 1 was adopted in 2015. The inspector clearly felt that the plan did not meet the Full Objectively Assessed Need for Market and Affordable housing and

recommended an early review of the Plan. A recent Strategic Housing Market Assessment (SHMA) has identified a higher level of need. The local planning authority embarked on a review on 16th March 2016 taking into account the recent SHMA and has issued a call for sites. The consultation period is due to end on 21st October. It is intended the Review will be adopted in 2018. In these circumstances it would be premature to adopt a neighbourhood plan which would prejudice planning considerations the proper forum for which is the Local Plan Review. The land proposed to be allocated for mixed use is not required in the short term with several significant developments having been submitted in the last 12 months for in excess of 590 dwellings.

THE NORTH DORSET LOCAL PLAN PART 1

1.4 The adopted local plan states:-

"POLICY 6: HOUSING DISTRIBUTION

At least 5,700 net additional homes will be provided in North Dorset between 2011 and 2031 to deliver an average annual rate of about 285 dwellings per annum. The vast majority of housing growth will be concentrated at the District's four main towns of Blandford (Forum and St. Mary), Gillingham, Shaftesbury and Sturminster Newton.

The approximate scale of housing development at the four main towns during the period 2011 - 2031 will be as follows:

- a) Blandford (Forum and St. Mary) – at least 1,200 homes;*
- b) Gillingham – at least 2,200 homes;*
- c) Shaftesbury – at least 1,140 homes;*
- d) Sturminster Newton – at least 395 homes...."*

The current Review is likely to recommend changes but only after a proper consideration of the alternative strategies.

1.5 The Local Plan continues:-

"POLICY 16: BLANDFORD

Sustainable Development Strategy

Blandford will maintain its role as the main service centre in the south of the district through:

- a) development and redevelopment within the settlement boundary; and*
- b) extensions, primarily of housing to the south-east and to the west of Blandford St Mary; and*
- c) employment uses on land within the bypass on the northern edge of the town and the mixed-use regeneration of the Brewery site close to the town centre...*

Meeting Housing Needs

At least 1,200 homes will be provided at Blandford Forum and Blandford St Mary during the period 2011 - 2031. In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through:

- g) mixed-use regeneration of the Brewery site; and*
- h) the development of land to the south east of Blandford St Mary; and*
- i) the development of land to the west of Blandford St Mary (at Lower Bryanston Farm and Dorchester Hill).*

Development of land at Lower Bryanston Farm and Dorchester Hill should only commence once a mitigation package (that includes details of implementation measures) has been agreed to the satisfaction of Natural England.

A package of mitigation measures have been agreed in respect of part of this land and the planning authority has resolved to grant planning permission.

- 1.6 It should be noted that there is no reference in the policy to homes being provided north or north east of the A350 Blandford by-pass. There is no provision elsewhere in the Policy for the distribution of housing, which would suggest any mandate for a neighbourhood plan which included housing on the scale of 400 dwellings.

- 1.7 In the Preamble to Policy 16 of the adopted local plan it states:-

"8.23 Nevertheless, additional greenfield land will be required for housing development but there are a limited number of potential options for further growth due to environmental constraints. Much of the land around Blandford is constrained by the Dorset AONB, the Cranborne Chase and West Wiltshire Downs AONB and the floodplain of the River Stour. Within these constraints there are three main options for further growth, which are:

- land to the west of Blandford St Mary and west of Blandford Forum, largely outside the Dorset AONB (with capacity for about 500 dwellings);*
- land to the south-east of Blandford St Mary, outside both AONBs (with capacity for about 300 dwellings); and*
- land to the north-east of Blandford Forum beyond the bypass outside, but surrounded by the Cranborne Chase and West Wiltshire Downs AONB (with capacity for about 800 dwellings).*

1.8 It is to be noted that this Preamble identified the possibility of development of land to the north east of Blandford Forum, but this was not included in the preferred strategy, which is set out in the Policy itself. Furthermore, it does not refer to land north of Blandford Forum and it also makes it clear that it was land surrounded by the Cranborne Chase and West Wiltshire Downs AONB. It did not include land within the AONB. It may well be that in the Review of the Local Plan it will be necessary to consider further allocations within AONBs but that is not the case under the current local plan.

1.9 The next paragraph in the Preamble to the Policy sets out the Council's preferred approach:-

"8.24 The Council's preferred approach is to develop land to the south-east and to the west of Blandford St Mary. Development in these locations would be more accessible to facilities and services and would have less impact on the natural and historic environment than the other option".

1.10 To be clear, the objector does not object in principle to a possible future urban extension north and north east of the by-pass. The

objection at the present time is to the Neighbourhood Plan which is not in conformity with the adopted Local Plan. The review might suggest a policy change.

The Submitted Neighbourhood Plan

- 1.11 The submitted plan is premature pending the Local Plan Review. The land allocation is not needed so urgently that it cannot await the proper review process which has commenced and will be completed within 2 years..

- 1.12 Under the heading Land Use Planning Policies, sub-heading Policy 1 Land north and east of Blandford Forum, the Neighbourhood Plan states:-

"The Neighbourhood Plan allocates land to the North and East of Blandford Forum (as shown on the policies map) for a mix of uses comprising:

- i. Open market, starter, self-build and affordable rented homes;*
- ii. New business uses as an extension to the Sunrise Business Park;*
- iii. A new two form entry primary school;*
- iv. A community hub comprising a new general practice surgery, a community centre and a small number of convenience food and similar uses to serve the locality;*
- v. Safe and convenient cycle and pedestrian connections across the A350 bypass to the retail and employment uses on Shaftesbury Lane, to the recreation ground at Larksmead, and to Pimperne Brook/Black Lane;*
- vi. improvements to the existing bus services connecting the land to the town centre, Blandford School, the Sunrise Business Park and Blandford Heights Industrial Estate;*
- vii. Public open space including informal open spaces and an equipped children's play space; and*
- viii. The relocation of Lamperd's Field Allotments to the north of their existing position.*

All of the above are within the AONB.

1.13 In order to provide any of the above the proposal requires:-

- (a) A replacement 5 arm roundabout at the junction of the A350 with Shaftesbury Road
- (b) A redesigned junction of the A354 with the A350 including traffic signals.
- (c) A new roundabout south east of (b)

1.14 This is a proposal for a mixed use development of a strategic scale. It should be a matter for a review of the Local Plan to consider where best to locate the development needed to meet the future needs of the District and Blandford. It may be that development to the north and north east of Blandford is a preferred option, which my Client would not object to in principle. However, the Neighbourhood Plan contains detailed proposals for a very extensive mixed development. We question whether the sale of land for up to 240 market dwellings and 160 affordable dwellings will fund the physical and social infrastructure proposed. It is likely this will require a significantly larger scale of development which cannot be accommodated within the Neighbourhood Plan Area. That is another reason to await the Local Plan Review.

1.15 The Neighbourhood Plan goes on to say:-

"3.8 The northern land forms 13 ha ... The site lies within but on the edge of the Cranborne Chase and West Wiltshire AONB".

The site does lie within the AONB which actually extends south across the by-pass to Shaftesbury Lane where where a large mixed use development has already been permitted, so the land in question is not "on the edge of".

1.16 It is clear that the Neighbourhood Plan is based upon the Master Plan prepared on behalf of adjoining land owners. The Master Plan actually extends across the Neighbourhood Plan boundary into Pimperne Parish. There are references to this within the Neighbourhood Plan at Paragraph 3.9 for example which states:-

"3.9 Based on the housing land budget contained in the Framework Masterplan, it is anticipated that approximately 400 dwellings will be delivered within the neighbourhood plan boundary..."

1.17 and it continues at Paragraph 3.17:-

"3.17...In addition, the policy acknowledges that part of the housing land east of the town lies beyond the designated neighbourhood area in Pimperne Parish. It therefore defines that part of the scheme within the area as Phase 1 and that part beyond the area as Phase 2, and requires that no part of the delivery of Phase 1 depends on the delivery of Phase 2.

The obligation will detail the phasing of onsite delivery of infrastructure as well as financial contributions to other off-site works".

1.18 In our professional opinion the economic, physical and social infrastructure and affordable housing identified above cannot be supported by phase 1 housing alone. It would in my opinion require a much larger scale of development. Approximately half of the housing needed to fund the infrastructure (Phase 2) lies outside of the Neighbourhood Plan boundary.

1.19 It would appear that the Master Plan is driving the Neighbourhood Plan. The Master plan is in conflict with the adopted Local Plan. There is no certainty that Phase 2 would ever be delivered. The Plan has adopted an artificial boundary determined by the administrative boundary of the Town Council, instead of flowing from a properly conceived, comprehensive planning appraisal, which takes into account all of the issues set out in the National Planning Policy Framework.

1.20 What the NPPF actually says is:-

The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.(para. 6)

1.21 It continues:-

"114. Local planning authorities should:

- *set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;”(We support the local planning authority’s approach of carrying out a strategic review) “and*

- *maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, ...”*

115. 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.

116. 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 am not aware that any such assessments have been made. All of these assessments will be made in respect of all the options which will be considered as part of the local plan review.

2.00 SUMMARY

2.01 In summary, it is clear that the Neighbourhood Plan Policy 1 does not comply with the National Planning Policy Framework and does not comply with the North Dorset District Local Plan Part 1. It is unsustainable and unsound. This part of the Plan should await the review of the Local Plan which has already commenced for delivery in 2018. Adoption of the neighbourhood plan now would prejudice proper consideration in the review of the local plan.