



North Dorset Local Plan Examination

Issue 7: Blandford (Policy 16) Wednesday 18 March 2015.

The Crown Estate (ID: 2986)

Question 7.1 Is there any evidence that the proposed residential development sites at Blandford Forum, including the development of land to the south-east and west of Blandford St Mary, is not available, sustainable or deliverable? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?

- 1.1 Policy 16 sets out the strategy for Blandford Forum and identifies land owned by The Crown Estate to assist in meeting development needs of the town; i.e land at West Blandford St Mary. The Crown Estate **supports** the allocation of this site. This provides a highly sustainable and deliverable location for development which can play an important role in delivering new high quality development in the town.
- 1.2 It presents a logical and sustainable location for new housing provision and meets the tests of soundness set out in NPPF. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing will be delivered within five years.
- 1.3 AMEC has prepared an evidence base of technical reports to demonstrate the suitability, availability and deliverability of the site in line with guidance in the NPPF. These include transport, landscape, biodiversity and drainage/flood risk assessments. They have previously been shared with the Council and demonstrate that the site is deliverable and can provide a number of benefits through development.
- 1.4 The sustainable development merits of the site are outlined below:
 - **Development opportunities:** The Crown Estate's landholding at West Blandford St Mary has significant potential to assist North Dorset District Council in meeting its development needs. The land is free of significant constraints and can provide a development of at least 65 dwellings. It also has potential to link into a more comprehensive development to the south of the town on Dorchester Hill which is also partly owned by The Crown Estate.
 - **Sustainability and Access:** With close proximity to the town centre and nearby amenities, the site provides one of the most sustainable housing options which will encourage transport modes other than private car. The site is well integrated with existing communities and is also in close proximity to the shops and amenities in Blandford St Mary and is within walking distance of Blandford town centre (see our response to question 7.4 below).
 - **Landscape and Amenity:** Although located within the AONB, the topography of the land ensures that development would occupy a discreet location within the local landscape. In addition a high quality landscaping scheme, possibly including some land to the west of the site within the ownership of The Crown Estate, would help to further assimilate the site into the local landscape (see response to question 7.2 below).

- **Ecology:** The Crown Estate has long recognised that there is the potential for development proposals on greenfield sites such as that at West Blandford St Mary to affect biodiversity. There is the potential for effects on the nationally important population of greater horseshoe bats that roosts in the Bryanston Site of Special Scientific Interest (SSSI). In view of these sensitivities, between March and November 2014, a desk study, phase 1 habitat survey and hedgerow survey, as well as detailed phase 2 surveys of the Site were carried out. In addition, given the importance of potential effects on greater horseshoe bats, radio-tracking data on greater horseshoe bats from the SSSI were obtained from the Vincent Wildlife Trust (VWT). Following consultation with Natural England (NE), VWT and Professor Rod Blackshaw (Exeter University – invertebrate specialist), a presence/absence survey for cockchafer (a key prey species for greater horseshoe bats) was carried out.

The bat survey revealed very low levels of bat activity by all except common pipistrelle species, with all-night recording using static bat detectors showing only a few passes per night by other species including greater horseshoe bat. Results indicate that the Site is only used occasionally by commuting bats of all species except pipistrelles. Pipistrelles largely used the hedgerows surrounding the Site; given that these will be retained, and will likely continue to be used by pipistrelles and other species relatively tolerant of high light levels (e.g. serotine and noctule), the development is unlikely to have an adverse effect on these species. The VWT radio-tracking data also indicate that the Site is not a key foraging area for greater horseshoe bats.

A population of cockchafer larvae was found on the Site, but this was relatively small in size and patchily distributed, with larvae found in only five out of 25 soil samples. This could nevertheless mean that the Site provides a partial foraging resource for greater horseshoe bats during the April-May period when the adult beetles emerge and migrate to adjacent woodland. Compensatory habitat capable of providing an equivalent foraging resource will therefore be provided at appropriate locations on The Crown Estate's wider estate within the bats' roost sustenance zone in advance of development. In addition, measures will be incorporated into the Site masterplan to ensure that light-sensitive bat species including greater horseshoe can continue to use the Site boundary hedgerows (all of which will be retained within development proposals) for commuting between the roost and key foraging areas. With these measures in place there are not likely to be any adverse effects on the conservation status of bats in the short term, and a beneficial effect in the long term.

- **Flood Risk:** The site is entirely in Flood Zone 1 (lowest probability of flooding). A sustainable drainage strategy can be employed as part of any development to ensure no increase of surface water run-off onto adjacent land.

What Part of Local Plan Part 1 is unsound

- 1.5 Whilst we generally support the emphasis of Policy 16 (including the identification of growth at West Blandford St Mary) we consider the deletion of the allocation of land at West Blandford (Crown Meadows) to be unsound and is not justified.

Which soundness criterion does it fail

- 1.6 It is considered that if further allocations are made in accessible and sustainable locations such as West Blandford, it will assist in ensuring the soundness of Policy 16, including the tests of positively prepared, justified and effective.



Why it fails

- 1.7 In line with our response to Issue 4, we feel that in order for the Local Plan Part 1 to be found sound, the Council will need to allocate additional land at Blandford Forum. In our response to Issue 4 we highlighted the need for the housing requirement at Blandford to be increased to provide a more positive strategy and meet affordable housing needs.
- 1.8 The Crown Estate also considers the deletion of the allocation of land at West Blandford (Crown Meadows) through the Focussed Changes (August 2014) to be unjustified (see response to question 1.4). Furthermore, alternative designs have not been satisfactorily considered. In order to boost the supply of housing the Council will need to give consideration to increasing allocations in sustainable locations with good access to the town centre in preference to less sustainable options outside the by-pass.
- 1.9 In our response to question 1.4 we introduced an alternative smaller option at West Blandford which can deliver much needed development for Blandford, whilst also responding to the historic environment context and concerns raised by the Council during the Focussed Changes consultation (August 2014).
- 1.10 Furthermore, The Crown Estate has undertaken, and shared with the Council, a substantial amount of technical work to demonstrate why this provides a suitable and sustainable location for housing growth. This has included landscape assessments, modelling and photomontages aimed at protecting important views from Blandford Bridge. Issues such as ecology, transport and flooding have also been looked at in detail. The results of these extensive assessments indicate no technical reasons why development on this site should be prohibited.

How can Local Plan Part 1 be made sound

- 1.11 As noted in our response to Issue 4, the Council will need to identify further greenfield sites at Blandford Forum to assist in meeting the objectively assessed needs over a longer plan period. A revised option at West Blandford can therefore make an important contribution to meeting housing needs and should be considered for allocation.

Precise changes/wording sought

- 1.12 Suggested amendment to Policy 16

Meeting Housing Needs

About ~~1,110~~ 1,383 homes will be provided at Blandford Forum and Blandford St Mary during the period 2011 – ~~2026~~ 2030. In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through the following allocated sites:

- g mixed use regeneration of the Brewery site;
- h The development of land to the south east of Blandford St Mary;
- i the development of land to the west of Blandford St Mary; and
- j. the development of land to the west of Blandford Forum.

Question 7.2 Can development at Blandford St Mary be satisfactorily assimilated into the existing settlement and the wider setting, including the AONB?

- 1.13 Technical work undertaken by The Crown Estate and the District Council demonstrates that development at Blandford St Mary, including the Crown Estate's land adjacent to Lower Bryanston Farm can be assimilated into the local landscape without harming the AONB.

- 1.14 AMEC's landscape assessment which has previously been shared with the Council, also points to opportunities to provide development in this location whilst also respecting the landscape setting. The Crown Estate's land at Blandford St Mary is located to the south of the River Stour, separated from Blandford Forum by Blandford Bridge and The Cliff. The site is located on the western edge of the settlement, in a localised hollow formed by rising land to the north, west and south west. The topography and mature woodland of The Cliff combined with the undulating topography and blocks of plantation woodland to the south south-west and west of this site restrict the visibility of this site from much of the Dorset AONB.
- 1.15 The photograph provided in **Appendix A** demonstrates how development could use the local topography to minimise landscape impacts. The photograph taken from a bridleway looking east towards the edge of Blandford St Mary, demonstrates the discreet location within the local landscape. They also demonstrate how well development relates to the existing built form. Whilst some long range views might be available from the west and south-west, development would be seen within the context of Blandford St. Mary. Further structural landscaping, particularly on the western and south-western boundaries, could help to mitigate any potential impact. Further work will be undertaken to inform the design as part of a planning application and could utilise The Crown Estate's wider land holding if required.
- 1.16 AMEC's landscape assessment concludes that the site can be developed without resulting in a significant change to the character of the Dorset AONB or the character of the Blandford St. Mary provided that the detailed design of the scheme responds to and enhances the existing landscape character of the surrounding area including a consideration of the following:
- Built form should be focused within the eastern section of the site, adjacent to existing built form within Blandford St. Mary on the lower lying land.
 - The proposed buildings should respond to the existing built form within Blandford St. Mary in terms of height, block size and density. Built form should generally not exceed two storeys.
 - The hedgerow boundaries to the site along Dorchester Hill, Fair Mile Road and New Road are very effective at filtering and screening views into the site. They should be retained as part of the scheme development to maintain an element of visual continuity.
- 1.17 The Council's evidence base also confirms that the site has capacity to sensitively accommodate development (reference MTC001)¹. It concludes at paragraph 5.26:
- "If development were to be restricted to the lower/flatter eastern half of the site then this would minimise the identified impact. If the creation of a new, hard, urban, west facing edge were to be softened by structural planting then this also would be a key mitigation measure. Development in this suggested, limited location would also sit within the context of existing development and be at a low enough elevation not to create a significant negative landscape and visual impact on the wider character of the AONB and the setting of the town. If existing hedgerows / trees were protected, maintained and managed then this also would be a significant mitigation measure."*
- 1.18 In this context, AMEC agrees that development at West Blandford St Mary can be assimilated into the local landscape without harm to the AONB. A high quality landscaping scheme, possibly including some land to the west of the site within the ownership of The Crown Estate, would help to further assimilate the site into the local landscape. Given that the landscape impacts can be mitigated, this highly sustainable site should be a priority for allocation.

¹ North Dorset District Council (November 2013) Market Towns Site Selection Background Paper.

Question 7.4 Can it be demonstrated that the proposed development in Blandford Forum and Blandford St Mary would not have a significant adverse effect on highway safety or on the ability of other infrastructure to satisfactorily accommodate the growth?

- 1.19 As noted in our response to question 1.4 up to the Pre-submission Plan published in November 2013 (reference SUD001b²) the Council's strategy provided in Policy 16 was focussed on delivering development in sustainable locations which had good access to Blandford town centre such as well-located sites at West Blandford and West Blandford St Mary. Such locations would enable good integration with the existing town and would reduce the impact on the local highway network given the excellent access to retail, leisure and employment opportunities in the town centre.
- 1.20 The North and North East Dorset Transport Study³ identifies that it is important to locate development close to existing and planned public transport nodes; one of which is Blandford Forum Market Place. Indeed, due to its compact nature and range of services, Blandford Forum, like many market towns, experiences a high percentage of journeys to work made by sustainable modes of travel; particularly journeys made on foot.
- 1.21 The level of car ownership and sustainability credentials of town centre locations is reflected by the fact that approximately a third of residents travel to work by sustainable modes and approximately a quarter of residents walk to work. Furthermore, almost half of all journeys to work remain within the town. Therefore, choosing central locations offers the greatest potential to maximise sustainable transport use and minimise the impacts of car use; in line with the NPPF.
- 1.22 At the heart of the NPPF (paragraph 17) is a presumption in favour of sustainable development which can, in part, be delivered by promoting sustainable transport. One of the core land-use planning principles, underpinning plan-making and decision-taking, is that planning should '*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*'
- 1.23 In preparing Local Plans, the NPPF (paragraph 30) states that '*...local planning authorities should...support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.*' In particular, plans and decisions should take account of whether (paragraph 32):
- The opportunities for sustainable transport modes have been taken up, depending on the nature and location of the Site, to reduce the need for major transport infrastructure;
 - Safe and suitable access to the Site can be achieved for all people; and
 - Improvements can be undertaken within the transport network that effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 1.24 The NPPF (paragraph 35) states that developments, inter alia, should be located and designed where practical to:
- Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;

² North Dorset Local Plan - 2011 to 2026 Part 1 Pre-submission Document

³ Buro Happold (2010). 023422 – North and North East Dorset Transport Study: Working Towards a Transport Strategy (Revision 05).



- Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; and
- Consider the needs of people with disabilities by all modes of transport.

- 1.25 The Crown Estate's sites are located in highly sustainable locations where multi-modal access to the town centre, schools, health, retail and employment opportunities is achievable. They are also within acceptable walking distances of bus stops served by frequent services to Poole, Weymouth, Dorchester and Salisbury. Such locations offer the best opportunity to reduce the need for people to make journeys by car and will help promote sustainable travel patterns amongst future residents thereby minimising the impact on the local highway network.
- 1.26 If an alternative site were considered outside of the town centre, and the by-pass, this would counter the guidance in the NPPF. Being located further away from local community facilities and services would do little to discourage car dependency and would result in higher trips, as many residents would have little option but to drive to local jobs, community facilities and services. This would place a greater burden on the local road network and run counter to local concerns about the traffic impact of future residential development. Furthermore, development outside of the by-pass has greater potential to impact on the Strategic Road Network, a concern expressed by the Highways Agency.⁴
- 1.27 Throughout the preparation of the Local Plan Part 1, AMEC has held numerous discussions with the Highways Authority who recognise the benefits of delivering development in sustainable locations with good access to the town centre such as West Blandford and West Blandford St Mary. Through analysis of highway data, they have confirmed that the road networks around both sites have capacity during AM and PM peak hours to accommodate development in these locations. Furthermore, analysis of accident data around both sites, confirms no highway safety concerns.
- 1.28 Overall, a strategy which focuses development in sustainable locations with good access to the town centre has most potential to reduce the impact on the local highway network through reducing the need to travel by car.

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⁴ Report to planning policy panel (27 March 2013) referenced in *The New Plan for North Dorset – Consultation on Key Issues 2012*.



Appendix Contents

Appendix A - - Photograph of West Blandford St Mary



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View from bridleway to the west of Blandford St Mary looking eastwards