



Blandford + Neighbourhood Plan
2011 – 2033

Site Selection Background Paper
Updated January 2019

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Appendix A – Urban Vision Enterprise CIC Blandford + Neighbourhood Plan Options for Moving Forward November 2017

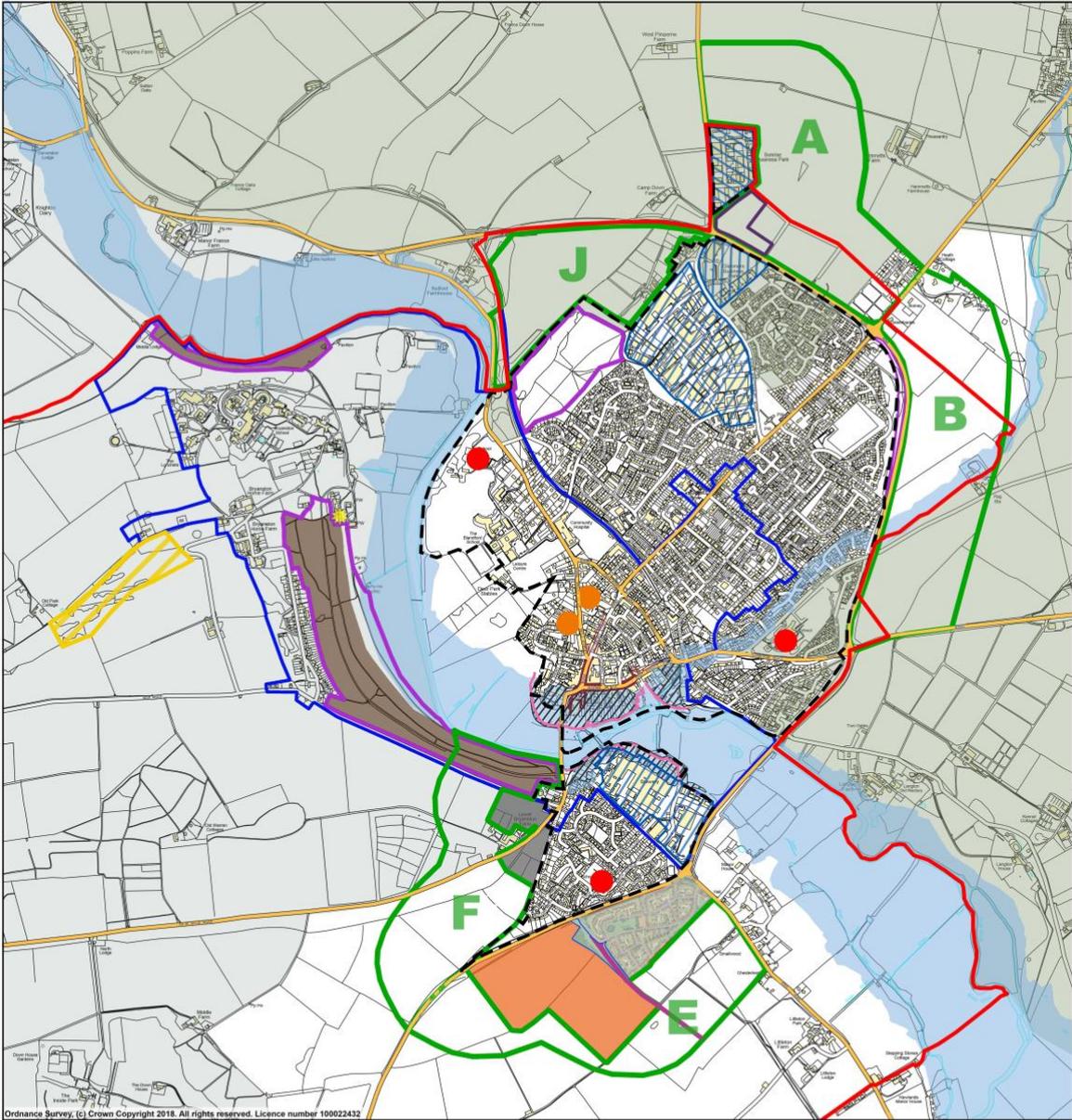
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1. Introduction

- 1.1 This paper sets out the basis of consideration of spatial options and site selection in the neighbourhood plan. It should be read alongside the Sustainability Appraisal Final Report (AECOM: January 2019)
- 1.2 The Blandford+ NP Version 2 (B+NP) is being prepared as part of a shared strategy with the Local Planning Authority (LPA), North Dorset District Council (NDDC). The B+NP Steering Group (SG) and NDDC have agreed the following land use specification to inform the plans spatial options. The specification, which adheres to the provisions of paragraph 23 and 66 of the 2018 National Planning Policy Framework requires the Plan to allocate land within the designated area for the following:
 - at least 400 homes over and above commitments and allocations in the North Dorset Local Plan Part 1 (Note: the 'indicative housing number' provided by NDDC)
 - at least a 2FE primary school with space for expansion to 3FE
 - at least 2Ha of B1-B8 employment land
 - the delivery of the necessary highway and green infrastructure.
- 1.3 The decision to proceed with a revised version of the neighbourhood plan was made following material changes in the planning circumstances, updated evidence of needs in the neighbourhood area and the loss of the five-year housing land supply (5YHLS) in the District following the examination of the Blandford + Neighbourhood Plan (B+NP1). The options in taking the first version of the plan forward following examination were set out in a report produced by Urban Vision Enterprise CIC in 2017 (see Appendix A). Following discussions with North Dorset District Council in early 2018 a shared strategy was agreed to support this approach.
- 1.4 While the shared strategy and new evidence has influenced the scope and breadth of the neighbourhood plan, a key element of this strategy remains the critical delivery of a new primary school.
- 1.5 The National Planning Policy Framework (NPPF) requires Neighbourhood Plans to be prepared to support the strategic development needs of the area (NPPF 2018 (§13 and 23). The principle of a Neighbourhood Plan being brought forward before an up-to-date Local Plan is in place is established in Planning Practice Guidance (ID: 41-009-20160211). It requires the qualifying body and the local planning authority to discuss and agree the relationship between the policies in the emerging neighbourhood plan, the emerging Local Plan and the adopted development plan.
- 1.6 The shared strategy supports the role of the Neighbourhood Plan in making all site allocations (see Appendix B) and other area-specific policies to supplement the North Dorset Local Plan Review, with the adopted North Dorset Local Plan providing the strategic policy framework for the neighbourhood plan along with the reasoning and evidence underpinning the Local Plan Review.

- 1.7 There is common ground that both Blandford + and NDDC wish to see the sustainable growth of Blandford to continue to be plan-led and to contribute positively to the objectively assessed needs. The basis for the working relationship was the acknowledgement that the Neighbourhood Plan will come forward more quickly than the Local Plan Review, but the starting point for the neighbourhood plan would be the Local Plan Review Issues and Options Consultation (IOC) document and its Sustainability Appraisal (SA).
- 1.8 Selecting sites to allocate for development was undertaken as an iterative process alongside work on the sustainability appraisal, updating evidence of local needs, land availability (including consideration of previously developed land), assessment of environmental constraints (see Fig A), deliverability and the community's priorities.
- 1.9 In addition to the various environmental constraints including the Dorset and the Cranbourne Chase and West Wiltshire Downs Areas of Outstanding Natural Beauty (AONBs) and extensive heritage assets, there is the constraint imposed by land availability. All allocation sites and policies need to be available at the right time and on terms that are acceptable to the land owner. With no prospect of the local authority being willing to compulsory purchase land, the Plan will rely upon negotiating policies with private land interests and by mutual agreement.
- 1.10 This paper demonstrates how the site selection process has applied the Councils responsibilities, relevant planning policies, and the sustainability of a number of spatial options and taken these considerations into account in selecting an appropriate strategy and selecting sites to accommodate the land use specification.



B+ NP Constraints Plan

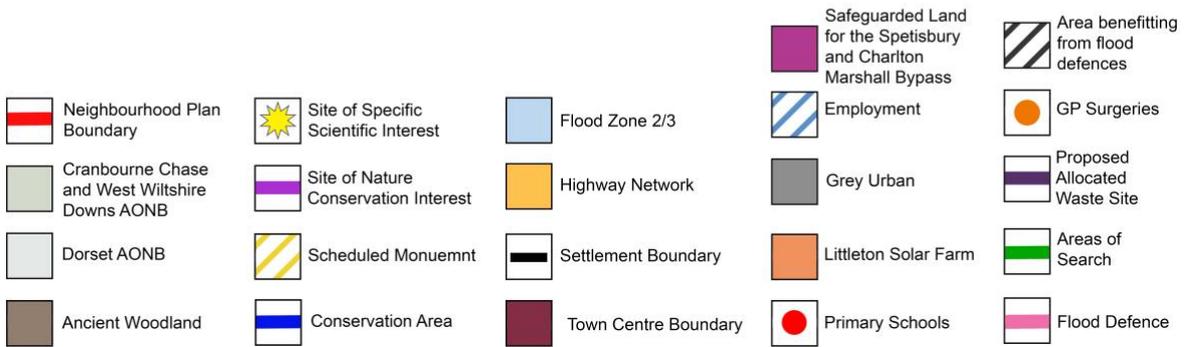


Fig A: Constraints Plan

2. Planning Context and the Countryside and Rights of Way (CROW) Act

- 2.1 The National Planning Policy Framework (NPPF) published by the Government is an important guide in the preparation of local plans and neighbourhood plans. In July 2018 the Government published an updated NPPF and it has been agreed with NDDC to submit the Plan for examination under the 2018 Framework.
- 2.2 Section 39(2), Planning & Compulsory Purchase Act 2004 states that local development documents must contribute to the achievement of sustainable development, defined as an economic objective, social objective and environmental objective¹. For plan-making this means that the presumption in favour of sustainable development is applied unless any adverse impact outweighs the benefits, and where other parts of the framework specifically restricts development which includes major development in AONBs.
- 2.3 The NPPF requires that 'great weight' should be given to conserving landscape and scenic beauty in AONB's and applications for 'major development' should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest².
- 2.4 An example of the application of the exceptional circumstances and public interest tests is established in the recovered appeal at Steart Farm, Bucks Cross, Bideford, Devon (APP/W1145/A/14/2228355 & APP/W1145/E/14/2228356 16 Feb 2016). Paragraphs 36 – 41 of the appeal decision sets out the balancing exercise undertaken by the Secretary of State in relation to the three tests set out in NPPF paragraph 116 (the predecessor policy to paragraph 172 in the 2018 framework).
- 2.5 The Countryside and Rights of Way Act 2000 also contains provisions relating to AONBs. Section 85 requires the Councils³ to 'have regard' to the purposes of AONBs. In applying this duty, the Councils have applied a logical framework to the consideration of the spatial options. The tests it has applied in consideration of the requirements in the NPPF are set out in Section 6 of this report.
- 2.6 As concluded in the UVECIC Note (Appendix B), planning is a balancing exercise. the National Planning Policy Framework must be considered in its entirety, rather than applying different parts of the Framework in isolation.

¹ Paragraph 8, NPPF 2018

² Paragraph 172, NPPF 2018

³ The term the 'Councils' meaning Blandford Forum Town Council, Blandford St Mary Parish Council and Bryanston Parish Council.

3. Sustainable Development Strategy for Blandford

- 3.1 The supporting text to Policy 16 of the North Dorset Local Plan (NDLP1) defines the sustainable development strategy for Blandford and the role of the neighbourhood plan in the following terms:

"Blandford's role as the main service centre in the southern part of the District will be maintained. Housing growth will be matched by employment growth and the provision of supporting infrastructure with the aim of increasing self-containment and reducing the need for commuting, particularly to the South - East Dorset conurbation." (paragraph 8.10)

"The strategy for the town will see the building out of sites already allocated for development or with planning permission in the early part of the plan period, with additional greenfield sites beyond the bypass being brought forward after that date. New development will be supported by the necessary grey, social and green infrastructure, both to meet the overall needs of the town and the more local needs associated with each new development area." (paragraph 8.11)

"Blandford Town Council together with Blandford St Mary and Bryanston Parish Councils have established a single neighbourhood area to cover all three parish areas. The three local councils are working together, under the name Blandford +, to produce a single neighbourhood plan. This will deal with non-strategic matters to supplement the policies contained in this Local Plan, which can include additional greenfield sites beyond the bypass." (paragraph 8.13)

- 3.2 The Neighbourhood Plan vision sits foursquare with this strategy and the role of plan making in meeting local needs, and in so doing contributing to the three objectives of sustainable development.
- 3.3 The IOC document proposes to continue this strategy, setting out that the four main towns in North Dorset, which includes Blandford, will remain the main focus for growth, both for the vast majority of housing and other development, (paragraph 6.2). Its initial SA assessment of the strategy is favourable.

Housing

- 3.4 Policy 16 of the NDLP1 states that Blandford is expected to deliver at least 1,200 homes in the period 2011-2031. In addition to infilling and redevelopment within the settlement boundary, this figure will be met through the mixed-use regeneration of the Brewery Site and development of land to the south east and west of Blandford St Mary. The NDLP1 does not put a cap on development in Blandford or suggest that 1,200 is the maximum amount of homes it will be expected to deliver.
- 3.5 The IOC document also sets out the housing and employment needs currently being considered in the Local Plan Review. It states that the Eastern Dorset Strategic Housing Market Assessment (2015) and the Housing White Paper (published February 2017) has led to a review of housing need and for the whole of the district this means an increase in the housing need figure to 366

dwellings per annum⁴. The plan 'specification' sets out an indicative requirement for the neighbourhood plan to allocate at least 400 homes based on the upper objectively assessed need (OAN⁵) with the same District spatial strategy.

- 3.6 NDDC has confirmed that Blandford's position in the settlement hierarchy and its function as a main service centre in the south of the District will not change. Blandford will continue to accommodate additional housing growth to contribute to the district's needs. The principle of the B+NP allocating housing, in addition to that planned for in NDLP1, is therefore established.
- 3.7 In advance of the detailed emerging spatial strategy for the District, the Neighbourhood Plan process began with an assessment of spatial options based on the IOC preferred 'Areas of Search', using a bottom up approach to resolve the matter within the Neighbourhood Plan timetable.
- 3.8 The Steering Group and NDDC also agreed a land use specification for the site allocations and it was this that formed the basis of an informal consultation on spatial options in July 2018⁶. The options were developed based on an assessment of the available land with the required area to accommodate the quantum of development in the 'specification'.
- 3.9 Adopting this approach would also make it effectively impossible for the Local Plan Review to arrive at a larger housing number for the designated area which in turn would reduce the risk of potential 'non-conformity'. The Steering Group requested NDDC provide an indicative housing figure (approximately 400 homes) for the Neighbourhood Plan to allocate in line with the new provisions of NPPF paragraph 66.

Employment

- 3.10 Policy 4 of the NDLP1 establishes that Blandford's employment needs should ensure housing and employment growth go hand in hand to contribute to sustainable development and self-containment.
- 3.11 The mixed-use regeneration of the Brewery site is now expected to deliver no more than the constructed new brewhouse and retention of the industrial units beyond the eastern boundary of the application site. Part of the development off Shaftesbury Lane has been used for the construction of a new supermarket (using 1.5 ha of the available employment land).
- 3.12 The IOC document indicates an employment land deficit in Blandford, and this is corroborated by the NDDC Annual Monitoring Report 2017 which shows a significant decline in available employment land (3.46 ha).

⁴ Subject to review once the governments housing need methodology is finalised

⁵ 366 dwellings per annum: North Dorset Local Plan Review Issues and Options paragraph 5.8 (Nov 2017)

⁶ B+NP2 Preliminary Development Options Note, July 2018

3.13 In addition to the need for employment growth to match housing growth, the research undertaken by the SG as evidenced in its B+ Commercial Situation report (included in the evidence base) states:

“There is no current requirement for the larger industrial units and the situation will probably remain unchanged over the next few years. The same is not true for smaller units at 2,000sq ft and below which is very buoyant, and units go as soon as they appear on the market. This requirement is expected to grow over the next few years.”

3.14 The recent building out of flexible workspace from 240 sq. ft. to 20,000 sq. ft. to suit a variety of requirements and uses at the ‘Grainstore’ on the existing Blandford Heights Industrial Estate further demonstrates that there is current demand for these higher employment density uses. Therefore, the employment strategy the plan has adopted is threefold:

- Safeguard existing employment land wherever possible
- Identifying at least 2 Ha of new employment land to address the deficit and help balance demand with housing growth;
- Consider how existing employment land might serve a more sustainable and higher wage local economy by offering a greater proportion of B1 office and small flexible type workspace. (Having a higher employment density will in turn reduce the pressure to find new greenfield employment land on the edge of the settlement)

Social and Community Infrastructure

3.15 The Local Plan Review confirms that new development will be supported by the necessary grey, social and green infrastructure, both to meet the overall needs of the town and the more local needs associated with each new development area. Policy 14 and 16 of the adopted Local Plan confirmed the need to address education capacity, and additional capacity has been provided for, but the options for increasing primary capacity outlined in Policy 16 are no longer considered reasonable or sufficient.

3.16 Discussions with the Local Education Authority (LEA), the Dorset Clinical Commissioning Group and local GP practices have confirmed there are immediate and growing pressures on primary school provision and GP services. The LEA has confirmed⁷ there is now a critical need for a new 2FE primary school with space for expansion to 3FE to accommodate additional pupils as new development takes place over the plan period. Similarly, there is a need for expansion of GP services and also facilities to service an outlying catchment and the clinical needs of an ageing population within the area as a whole.

3.17 As a result, it is essential that the Neighbourhood Plan allocates suitable land for a new primary school and contains a policy supporting the increase in capacity of GP facilities to serve the area.

⁷ Pupil Place Planning Statement: Dorset CC (updated October 2018)

4. Developing the Neighbourhood Plan Spatial Options

- 4.1 The NDDC IOC document was accompanied by a 'Call for Sites' to update the evidence on land availability.
- 4.2 Given the constraints within and around the designated neighbourhood area, NDDC advised that the Neighbourhood Plan should adhere to the Sustainability Appraisal of the IOC, which concluded that Areas A, B, E, F and J (see Fig B below) are those that may be the location of site allocations, having excluded the other Areas for one reason or another.

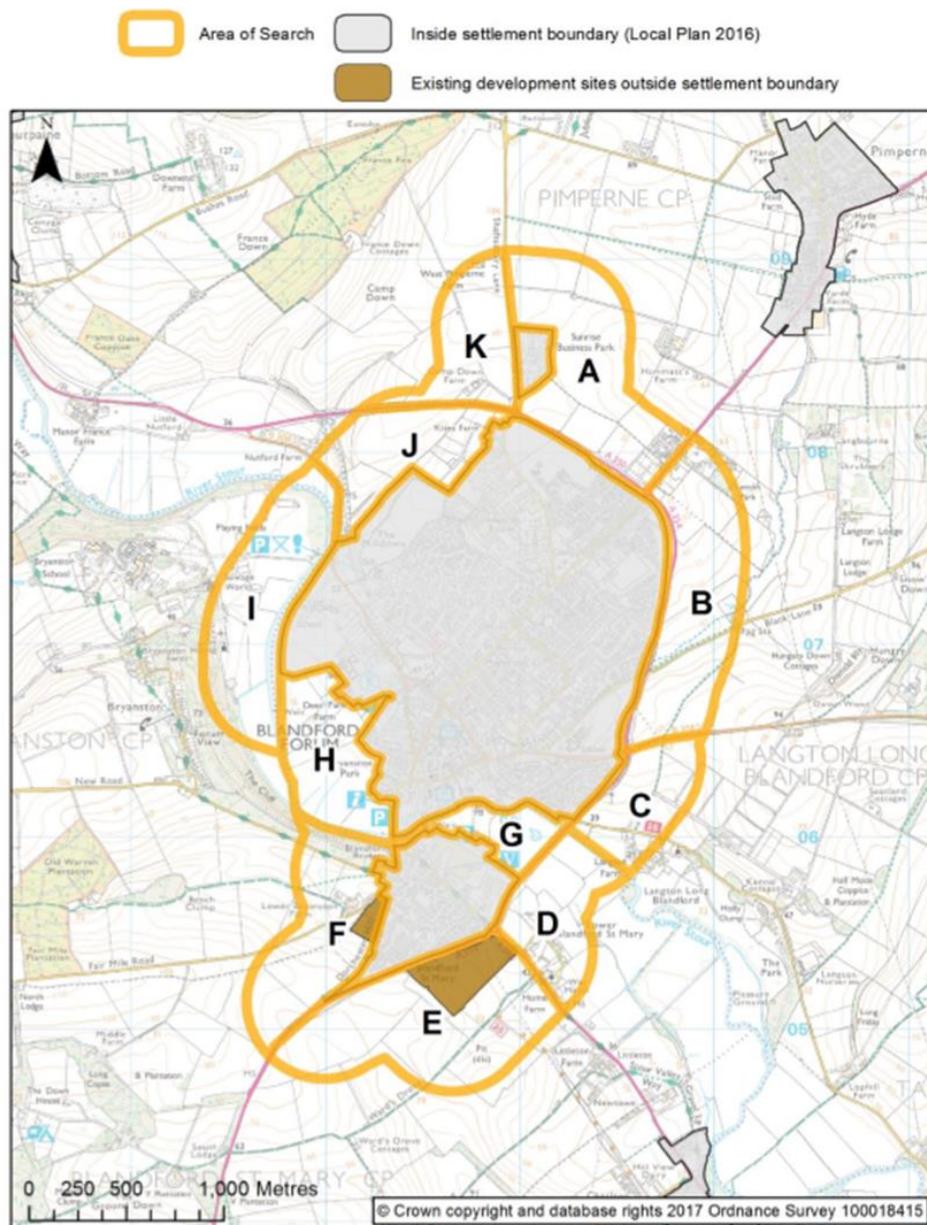
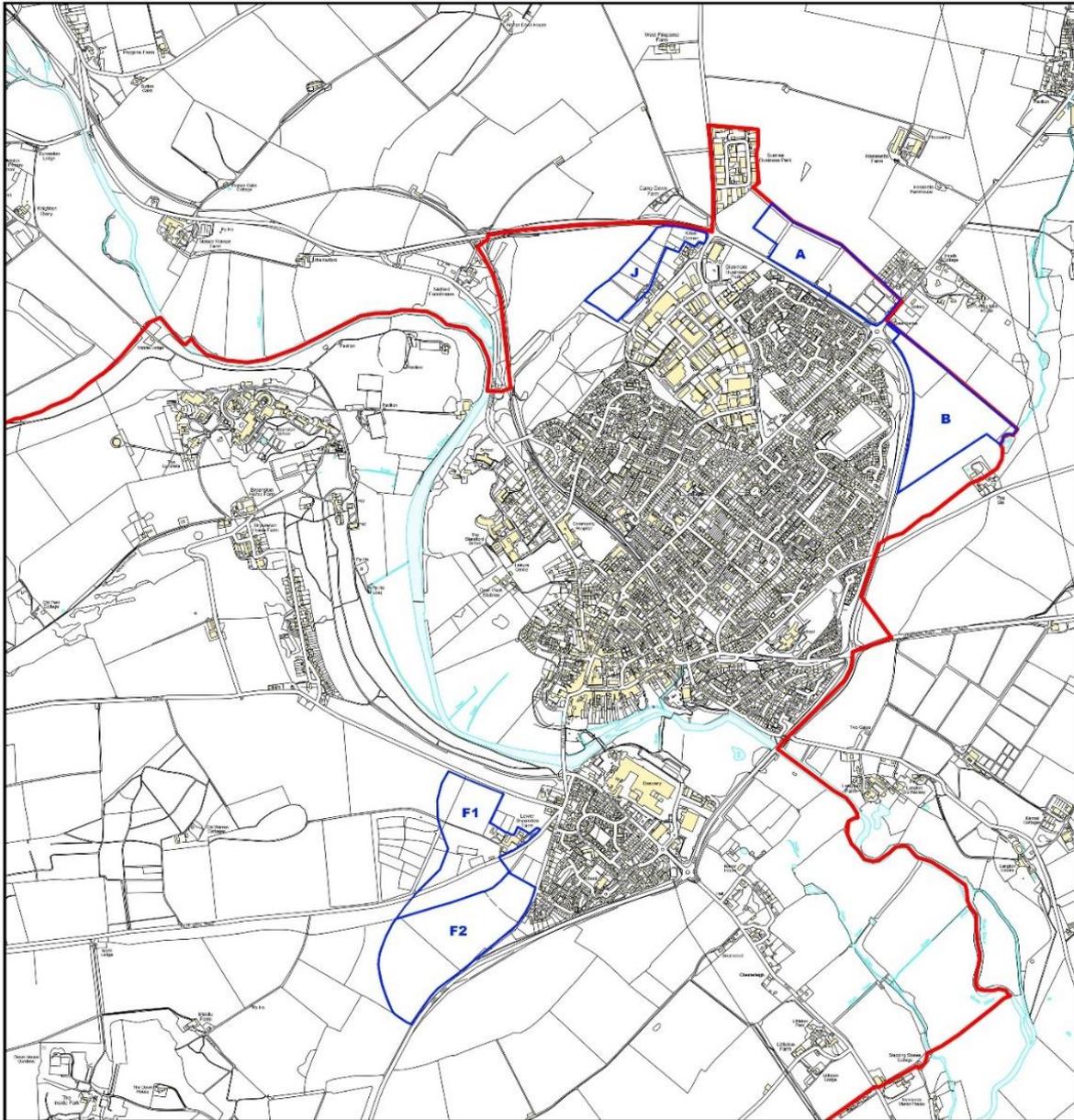


Fig B: IOC Map 6.2: Blandford – Areas of Search

- 4.3 The specification requires the Plan to allocate land within the designated area for:
- at least 400 homes over and above commitments and allocations in the North Dorset Local Plan Part 1
 - at least a 2FE primary school
 - at least 2Ha of B1-B8 employment land
 - the delivery of the necessary highway and green infrastructure.
- 4.4 It was also agreed with the District Council that the Neighbourhood Plan will select its preferred allocations by applying four tests:
- Sustainability Appraisal (undertaken by AECOM);
 - Deliverability (comprising an assessment of availability, achievability and viability);
 - AONB suitability (in respect of the obligations of NPPF Paragraph 172 and the CROW Act 2000); and
 - Community opinion (comprising informal and statutory consultation activities).
- 4.5 In order to identify sites that were available to deliver the 'specification' the Steering Group has been working closely with NDDC through a series of progress meetings. The Land Availability paper (Appendix C) establishes the land identified for further consideration in the plan. Sites were sourced from the NDDC 'Call for Sites' submissions (2017 and 2010), which included sites within and outside the LP1 settlement boundary and the NDDC Brownfield Register. The Land Availability paper demonstrates a preliminary capacity assessment of the sites that reflects each 'Area of Search'.
- 4.6 The paper estimates that the total amount of available 'previously developed land' within the Local Plan 1 settlement boundary has a potential yield of approximately 82 dwellings. It is therefore considered reasonable to assume a yield of about 100 dwellings will come forward on previously developed land during the plan period within the settlement boundary.
- 4.7 Following this exercise, the Steering Group wrote to landowners who had responded to the NDDC 'call for sites' to confirm their land was available for consideration as part of the assessment of spatial options in the neighbourhood plan. This provided an up to date supply of available land.
- 4.8 In addition, a review of the NDDC Annual Monitoring Report 2017 'Housing Trajectory forecasts' indicate delivery of 1,311 homes in the LP period (2011 to 2031) against the LP1 target of at least 1,200. The trajectory identifies 706 dwellings to the south and south west of Blandford of which 491 have either been consented or are subject to planning. The trajectory includes:
- 126 dwellings at Dorchester Hill - permission for 61 dwellings approved in Feb 2017 (2/2015/0813/FUL)
 - 500 dwellings at St Marys Hill - of which outline consent for access and the principle of development for 350 dwellings was given in November 2016 (2/2015/1935/OUT).

- 80 dwellings at Lower Bryanston Farm, application 2/2017/1919/OUT submitted Dec 2017
- 4.9 Therefore, the residual 215 dwellings (about 7ha land) still needs to be accommodated. The full site area of Dorchester Hill, in addition to the site submitted as part of the 2/2015/0813/FUL was excluded from the final sites to be considered in Area F1.
- 4.10 Section 4 of the Sustainability Appraisal Report provides a full description of how the four spatial options were derived. The Land North West of Ward's Drove, part of the original option 3 land (in Area E), was subsequently excluded with agreement of NDDC as it was already committed land in the adopted Local plan. The remainder of the Area E land was unable to contribute to either the full specification or part specification of 300 homes and a primary school. And in validating the remaining land to the east of Wards Drove with sufficient capacity to accommodate the specification, it would result in a significant decrease in the separation (and the potential for coalescence) between the committed land at St Mary's Hill and the village of Charlton Marshall and be within the setting of the Grade II Littleton House. While this area is not within an AONB it was also not confirmed as available. For these reasons, Area E land was not taken forward for further consideration as a spatial option.
- 4.11 Therefore, the Spatial Options (see Fig C) were validated as follows and an initial high-level sustainability assessment undertaken (see Section 4 SA Report):
- Option 1. Focus growth to the north of Blandford Forum in Area A and B to deliver the full specification
 - Option 2: Focus growth to the south west of Blandford St Mary in Areas F1 and F2 to deliver the full specification
 - Option 3: Dispersed approach: Accommodating 300 homes and a primary school in Area F1 to the south west of Blandford with employment land in Area J
 - Option 4: Dispersed approach: Accommodating 300 homes and a primary school in Area F2 to the south west of Blandford with employment land in Area J
- 4.12 All options are considered plausible in principle and it is not considered there are any other options available to deliver the 'specification'. All options require the release of further greenfield land as envisaged by Policy 16 of the adopted Local Plan and are located in areas of landscape and heritage sensitivity including land within one or other AONB.
- 4.13 This stage in the site selection process concluded that each option would deliver the full specification on one or more sites, based on an assessment of the available land with the required area to accommodate the quantum of development in the 'specification'. We are aware however that part of Area J is currently being promoted for residential purposes.



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B+NP2 Spatial Options Plan June 2018



Fig C: Spatial Option Plan

5. Constraints

- 5.1 The Sustainability Appraisal Scoping Report (AECOM; June 2018) defines the broader context of the designated area including the environmental, social and economic baseline. The Constraints Plan (Fig A) identifies the location of many of the significant local environmental constraints.

Area of Outstanding Natural Beauty (AONB)

- 5.2 The Cranborne Chase and West Wiltshire Downs AONB lies to the north and east of Blandford and the Dorset AONB lies to the west and south-west. Parts of the existing built-up area of Blandford lie within both AONBs.
- 5.3 Both AONBs were invited to respond to the informal consultation in July 2018. Their submissions set out their concerns about the neighbourhood plan making site allocations and the potential effects further large scale development in Blandford would have on the landscape. Subsequently, representatives of both AONBs were invited to a meeting with the SG and NDDC (held on 23 October 2018) in order to discuss these concerns and to explore how these concerns may be resolved, and also how Blandford may grow sustainably while seeking to balance these broader objectives with the effects of growth on the AONBs.

Historic Environment

- 5.4 The Blandford Forum, Blandford St Mary & Bryanston Conservation Area was designated on 12 October 1990. It does not currently have a Conservation Area Appraisal; however, there is currently an appraisal for the town centre area of Blandford Forum and it is expected to be completed in the near future. This in turn will assist in the production of a Conservation Area Management Plan.
- 5.5 The B+ Neighbourhood Area contains over 200 listed buildings including:

Grade I:

- Church of St Peter and St Paul, Blandford Forum
- Town Hall and Corn Exchange, Blandford Forum
- Pump House, Blandford Forum
- The Old House, Blandford Forum
- Greyhound House, Blandford Forum
- Coupar House, The Plocks, Blandford Forum
- 18-20 Market Place, Blandford Forum
- 26 Market Place, 72 East Street, Blandford Forum
- The Portman Chapel, Bryanston
- Bryanston School, Bryanston

Grade II*:

- Lime Tree House, Blandford Forum
- Lyston House, 32 East Street, Blandford Forum
- 1 Market Place, Blandford Forum

- 9 Market Place, Blandford Forum
- Eastway House, 5 East Street, Blandford Forum
- Dale House, Salisbury Street, Blandford Forum
- Church of St Mary, Lower Blandford St. Mary
- The Manor House, Lower Blandford St. Mary

Scheduled Monuments

- St Leonard's Chapel, Blandford Forum
- Field system in Old Park, Bryanston

Protected habitats/species

5.6 The Constraints Plan identifies the locations of Sites of Specific Scientific Interest, Sites of Nature Conservation Interest and Ancient Woodland. In addition, there is well documented evidence of a rare colony of Greater Horseshoe Bats in Bryanston and in proximity to Area E around Lower Bryanston Farm.

Infrastructure

5.7 From the outset of plan making in 2014, the B+ Neighbourhood Plan Steering Group was driven by the need to correct the social and other infrastructure weaknesses in the town. It was committed to address in the production of the Neighbourhood Plan and in working with NDDC in updating its Infrastructure Delivery Plan. The weaknesses include Early Years, Primary and Secondary School Provision, GP Provision and necessary highways and green infrastructure provision.

Flood Risk

5.8 NDDC have updated the Strategic Flood Risk Assessment (February 2018) and this has been shared with the SG and it has been used as evidence in the preparation of the plan and the sustainability appraisal.

Deliverability

5.9 In addition to the various environmental constraints, there is the constraint imposed by land availability. All allocation sites and policies need to be available at the right time and on terms that are acceptable to the land owner. With no prospect of the local authorities being willing to compulsory purchase land, the Plan will rely upon negotiating policies with private land interests by mutual agreement.

5.10 This is particularly the case to support the release of land to address the critical educational needs faced by the town. Dorset County Council have updated their Pupil Place Planning Statement to outline how they progress their Business Case for a new school and how they bring together various funding mechanisms to secure delivery. They confirm funding is derived from a combination of S106 contributions that have been generated and then

securing further funding, through its own, or other central government funding streams. This provides the financial envelope required to build the school.

5.11 DCC also confirm that work on the Business Case is dependent on certainty that the educational land is to be allocated. This triggers the funding envelope being guaranteed through the relevant committee structures at the County Council and would take place when a feasibility is authorised and DCC signs off that the project is to go live and a contractor to be engaged. The aim of the Neighbourhood Plan is therefore to provide sufficient certainty for the Education Authority to proceed with this work through a site allocation for a new school,

5.12 Dorset County Council confirm the following contributions have been made in respect with NDLP1 allocations with further sites in the pipeline

Site	Developer	No	S106 Date	Value
Dorchester Hill	Persimmon Homes 61 dwellings	15/813	Feb 2017	£335,188 (£110,952 Primary) (£224,236 Secondary)
St Mary's Hill	Bellway 350 dwellings	15/1935	Nov 2016	£2,126,059 (£706,059 Primary) (£1,420,000 Secondary)

6. Assessing Alternative Options

- 6.1 Fundamental to the shared strategy with NDDC is the agreement that the B+NP would select its preferred site allocations from the four spatial options set out in paragraph 4.11 of this paper and by applying the four tests set out in paragraph 4.4.
- 6.2 Given the Blandford Conservation Area covers a large part of the town; the River Stour flood plain is extensive, and the two AONBs encircle much of the town, it soon became apparent that an appropriate balance would need to be struck between economic, social and environmental objectives and that the opportunity for the local community to define what it considers to be sustainable development, provided by the Localism Act, is not missed.
- 6.3 Table A below summarises the methodology that has been followed to identify sites that would accommodate the specification and in addressing the four tests.

Stage 1	Identification of available land in areas of search (See Section 4 of this Report)
Stage 2	Using criteria to rule out sites e.g: <ul style="list-style-type: none"> - Committed land in the NDLP1 - Capacity assessment of available land to determine the extent to which land could accommodate the specification (see Section 4 of this report and Appendix C – B+ Land Availability Paper)
Stage 3	Suitability A high level sustainability appraisal of the spatial options to highlight the potential impacts of each Spatial Option. (See SA Report)
Stage 4	Availability and achievability (including viability) Landowners in areas A and B, F1 and F2 confirmed that the land under their control will be made available in the plan period for the mix of uses in the specification and in a way that can accommodate any necessary landscape, design or access mitigation measures in principle terms, and that there either was or was a willingness for an equalisation agreement for those options where it was required.
Stage 5	

	Addressing constraints Sustainability effects (SA Report) AONB tests (Section 6 of this paper)
Stage 6	Community Opinion (Section 6 of this paper)
Stage 7	Selecting the preferred option (SA Report/Site Selection Background Paper)

Table A: Outline of methodology used

Deliverability, comprising an analysis of availability, achievability and viability

- 6.4 The NPPF defines deliverability as sites that are available (those that are available for development now), suitable (offer a suitable location), and achievable (have a realistic prospect of being developed within 5 years).
- 6.5 Planning Practice Guidance⁹ defines the role of the assessment of such sites as providing information on the range of sites that are available to meet need. Planning Practice Guidance¹⁰ also sets out that neighbourhood plans may use the methodology of the assessment of land availability, but that any such assessment should be proportionate. It was agreed with NDDC that the assessment of spatial options and the SA would be sufficient to assess available land.
- 6.6 Section 4 of this paper describes the process that has been followed in establishing land availability. To consider the suitability of the identified sites, an initial sustainability appraisal of the spatial options provided a preliminary indication of their effects.
- 6.7 Landowners for Spatial Options 1 and 2 confirmed that the land under their control would be made available in the plan period for the mix of uses in the specification in a way that could accommodate any necessary landscape, design or access mitigation measures in principle terms, and that there either was or was a willingness for an equalisation agreement for those options where it was required.
- 6.8 It was therefore established that the sites included in the Spatial Options were deliverable however it was also necessary for all of these options to overcome constraints in terms of sustainability effects and then to determine whether exceptional circumstances might exist should 'major development' fall within any land that fell within an AONB.

⁹ Planning Practice Guidance PG ID: 3-003-20140306

¹⁰ IBID ID: 3-004-20140306

'Exceptional circumstances and public interest' tests

- 6.9 Blandford's extensive landscape assets and environmental constraints (as described in section 5) have had a profound effect on the direction and scale of recent growth of the town. In the past, environmental capacity was measured using the 'bypass' as the limit to development of the town. However, the construction of Sunrise Business Park, a new supermarket, the proposed location of a new waste management facility, and the reference to greenfield sites being brought forward at Blandford Forum 'beyond the bypass' as a modification to the North Dorset Local Plan Part 1, all indicate that incursions into sensitive landscape areas is the reality and will remain so if evidenced local needs are to be met and Blandford is to retain its role as a main service centre.
- 6.10 Policy 16 of the North Dorset Local Plan 1 acknowledged this challenge, as did the North Dorset District Wide Local Plan (1st Revision January 2003) in its commentary on the environmental capacity of Blandford (Part 2: Local Area Policies Section 2.2). However, as AONB's are protected landscapes, national planning policy states that great weight should be given to conserving their landscape and scenic beauty and planning applications for major development should be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest¹¹.
- 6.11 However, Government policy as set out in NPPF (2018) and Planning Practice Guidance also states:
- §80 "...significant weight should be placed on the need to support economic growth and productivity..."*
- §94 "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities...Local Planning Authorities should give great weight to the need to create, expand or alter schools through the preparation of plans..."*
- Planning Practice Guidance "Planning for Schools Development Statement"..."*It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations.*"
- 6.12 The sustainable development strategy for Blandford, as defined by Policy 16 of the adopted Local Plan, seeks to ensure that Blandford's role as the main service centre in the southern part of the district is maintained. To ensure conformity with the strategic policies of the Local plan the neighbourhood plan will need to demonstrate a balanced strategy which supports local housing, employment and critical social infrastructure needs (particularly primary school place provision and GP services) along with the widely acknowledged natural and historic environment that characterises Blandford. It is the resolution of the social infrastructure deficits which remain uppermost in the minds of the local community. The challenge for the Plan is to secure these identified needs while mitigating effects on the town's heritage and landscape assets.

¹¹ Paragraph 172 of the NPPF 2018

6.13 The Councils have long sought to address these social and other infrastructure weaknesses, particularly in the northern part of the town where housing expansion over recent years has not been accompanied by supporting social or commercial infrastructure. Dorset County Council, the Local Education Authority, have updated their Pupil Place Planning Statement, and established the need for early years, primary and secondary school provision in Blandford to update the strategy in the adopted Local Plan. The statement confirms that the provision of new primary school places in Blandford is now critical and having discounted all other options, the Education Authority's preferred approach is to locate a new primary school in the north of the town on land in Option 1.

6.14 Paragraph 172 (NPPF 2018) is explicit that planning permission should be refused for major development in an AONB except in exceptional circumstances and where it can be demonstrated they development is in the public interest. Both the Dorset AONB and Cranbourne Chase and West Wiltshire Downs AONB referenced this policy in their submissions to the informal consultation. To apply this policy the Councils are required to exercise planning judgement considering:

- a) whether there are exceptional circumstances justifying development at a particular site; and
- b) whether development at a particular site would be in the public interest.

6.15 To answer these questions the NPPF states that account should be taken of a number of further tests and these are presented under the following three headings in respect of Option 1:

Test 1: 'The need for the development, including in terms of national considerations, and the impact of permitting it, or refusing it, upon the local economy'

6.16 To meet the 'Basic Conditions', the Councils are legally obliged to take account of the objective of contributing to achieving sustainable development in their neighbourhood plan-making. The NPPF states that for plan-making this means positively seeking opportunities to meet development needs for their areas and Section 3 of this paper set out these needs.

6.17 National considerations include, the need to plan for new homes and the need to 'create the conditions in which business can invest, expand and adapt (NPPF paragraph 80). National considerations also include schools development as described above.

6.18 The first test also states that councils should consider the impact of any decision on the local economy. The Local Plan Review employment evidence has clearly indicated the deficit in employment land in Blandford to which the land use specification seeks to address. The Western Dorset Economic Growth Strategy¹² (2017 to 2033) establishes the economic benefits of growth and the

¹² An Economic Growth Strategy for: North Dorset, West Dorset and Weymouth & Portland 2017 to 2033. Available at www.dorsetforyou.gov.uk

sustainability appraisal confirms that 'no growth' would stifle the local economy. The UVE CIC Report (Appendix B) explores this further.

- 6.19 On the basis of the available information including the sustainability appraisal, and taken as a whole, the allocation policies in the Submission plan (Policy B2 and B3) are likely to have a positive effect on the local economy. Although it should be noted that land to the north east of Blandford lies outside the AONB and therefore this and the following two tests do not apply.

Test 2: 'the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way'

- 6.20 As the UVE CIC Report (Appendix B) and Land Availability Report (Appendix C) confirm there is very limited scope for meeting Blandford Forum's growth requirements unless surrounding land is developed and there is limited availability of land with the capacity and in a suitable location to meet the evidenced employment and educational needs of the area.
- 6.21 On the basis of existing evidence and the sustainability appraisal of all options, all of which are constrained in some way or another as established by the landscape evidence that supported the adopted Local Plan, there are considered to be no better options for meeting needs locally than those considered in the Sustainability Appraisal Report.
- 6.22 The Pupil Place Planning Statement (Updated Oct 2018) confirms that further delays to the LEA's ability to plan for a new school are likely to have a critical impact on their ability to meet their statutory obligations. The LEA also confirms all alternative options have been exhausted and that temporary accommodation that has been created in recent years to manage pressures is now full. Similar circumstances applied in the Steart Farm, Bideford, recovered appeal (referred to in Appendix B), and the Secretary of State afforded significant weight to the need for a school notwithstanding its "permanent and inevitable landscape impact".
- 6.23 The release of land for a new school of sufficient area to meet the LEA's needs and in a location that best serves the overall needs of the town is a key component of Policy B2. Its deliverability is also reliant on the land being made available for this purpose. This has been confirmed by the land owner and Policy B2 drafted to secure the release of land for educational purposes.
- 6.24 On balance, the Councils evidence indicates there are no alternative sites outside the AONB that are capable of meeting the towns educational needs and that the Councils are satisfied there is no scope for delivering all elements of Policy B2 elsewhere or meeting the needs in some other way.

Test 3: 'any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated'

- 6.25 The Councils seek to conserve, sustain and enhance the natural and historic environment of the town. They have considered the impact on these features and designations from a number of evidence sources and the policies in the Submission Plan reflect this approach.
- 6.26 The Councils have also considered evidence on the potential landscape and visual effects of development that relate to each of the spatial options, they include:
- Landscape impact assessments of sites in Blandford undertaken in 2010 to inform the Local Plan and which considered potential impacts on AONB landscapes.
 - The Dorset AONB Partnership consultation response to the informal consultation in July 2018¹³ including landscape comments related to areas F and J
 - The Cranbourne Chase and West Wiltshire Downs AONB consultation response to the informal consultation in July 2018¹⁴ including landscape comments related to areas A and J, and Area B outside the AONB.
- 6.27 Both AONB Partnerships consider that all options are likely to have a detrimental effect on the landscape. They also stated the need to address the tests set out in NPPF paragraph 172. The Dorset AONB also suggest it will not be possible for the neighbourhood plan to successfully meet these tests in advance of the Local Plan Review. The meeting with both AONB's on the 23rd October explored this point further, but as the UVECIC report sets out in Appendix B and this paper concludes, the Councils come to a different view.
- 6.28 The landscape effects of the neighbourhood plan policies have been tested in the following ways. First, through the IOC which used the existing local plan evidence to arrive at its conclusions and the selection of its preferred areas of search. Second, through the sustainability appraisal of the spatial options, and third, through the appraisal of policies B2 and B3.
- 6.29 The SA concludes that all development has the potential to impact negatively upon the special qualities of the AONB, to alter views of the AONB and also detract from its character. It also concludes that the options would lead to economic and social benefits. In Option 1 in particular, the provision of a school to serve the northern part of the town, where it has been demonstrated the need exists, and the allocation of employment land would contribute positively to the economic and social role of the plan.
- 6.30 The cost of providing a school elsewhere in the neighbourhood area, through alternative spatial options, would not satisfy this test of exceptional circumstances as these alternative locations are not considered by the LEA to

¹³ See B+NP2 Informal Public Consultation Appendix G in the evidence base

¹⁴ See B+NP2 Informal Public Consultation Appendix H in the evidence base

be the right location for a school to meet their needs. All options would result in a detrimental effect on the character of the AONB, however given a number of recent developments have been approved within the CCWW AONB, it has been demonstrated that such effects can be effectively moderated.

6.31 Given incursions into the CCWW AONB have been approved over many years, and pressure on the CCWW AONB was anticipated through technical work on the Regional Spatial Strategy, it had been anticipated that the CCWW AONB Management Plan would have addressed this issue and come to a view on how development pressure on the urban fringe of the AONB would be managed and issued guidance accordingly. Such pressures have for example been acknowledged in the North Wessex Downs AONB Management Plan, through their Position Statement on Setting, and the multi-agency Swindon Urban Fringe Action Plan.

Conclusion of the NPPF 172 Tests

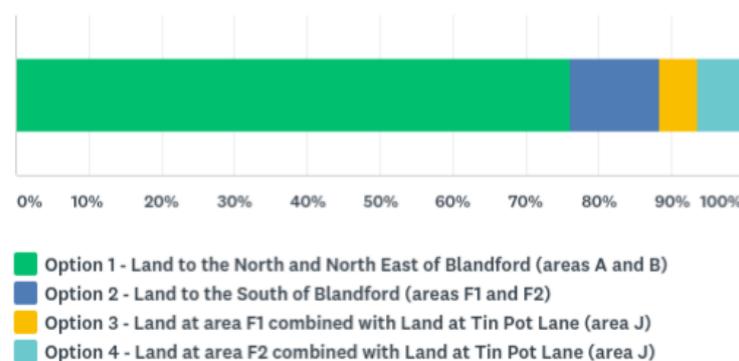
6.32 In-line with their CROW Act 2000 obligations and the provisions of the NPPF, the Councils have afforded great weight to the AONBs in the Blandford + Neighbourhood Area and the allocations in B+NP Submission Plan are considered by the Councils to meet the exceptional circumstances and public interest tests.

Community opinion, comprising a series of informal and statutory consultation activities

6.33 An informal consultation exercise took place in July 2018 where the community was consulted on the scope of the Neighbourhood Plan. Each emerging policy was described which included the spatial options for the Neighbourhood Area. A Preliminary Development Options Report July 2018, See Appendix B, accompanied the consultation material to provide the community with information in order to provide their opinion on the spatial options.

6.34 The results of the informal consultation in terms of the spatial options are demonstrated that the test of community opinion at this stage indicates a majority support for Option 1 (Area A + Area B).

Q4 Which Development Option do you prefer?



6.35 Following the informal consultation, statutory consultations will now take place in the form of the Regulation 14 consultation period which will be carried out by the Steering Group on behalf of the Qualifying Body. The outcome of that consultation will inform the preparation of the Submission Plan which will be subject to a further statutory consultation at Regulation 16 stage and carried out by NDDC.

7. Conclusions

- 7.1 This paper demonstrates how the site selection process has applied the Councils responsibilities, national/local planning policies, the three tests in paragraph 172 and the sustainability appraisal of spatial options in reaching a conclusion on its preferred option and the allocations in the Submission Plan.
- 7.2 The essence of the strategy for Blandford agreed with NDDC is that it will maintain its role in the south of the District as the main service centre. To achieve this, it will develop in a sustainable way to ensure that housing, employment and social infrastructure needs are met. Increasing self-containment will have environmental benefits and strengthen its function as a market town.
- 7.3 Growth options for Blandford are limited by the environmental constraints facing development in the town, in particular AONB landscapes and flood risk, chiefly from the River Stour. With careful design and the mitigation of environmental impacts it is considered that sustainable growth can be achieved.
- 7.4 The Councils are well aware of the importance of protecting designated landscapes but face the difficult decision of balancing such concerns with the need for the neighbourhood plan to contribute toward sustainable development which has an economic, social and environmental objective¹⁵ and evidence of the critical need for new educational provision in an area of Blandford with an acknowledged under provision and homes and jobs to meet future needs. In order to achieve this and adhere to sustainable development principles it is inevitable that some areas in one or other AONB will be affected. This reflects similar conclusions set out in the Inspectors report on the examination of the West Dorset, Weymouth and Portland Joint Local Plan.
- 7.5 The selection of the preferred option and policies in the Submission Plan have been undertaken as an iterative process alongside work on the Sustainability Appraisal, the updating evidence of local needs, consideration of land availability (including previously developed land), consideration of environmental constraints (see Fig A), deliverability and the community's priorities.
- 7.6 This paper demonstrates the Councils have also taken into account the policies of the National Planning Policy Framework (2018) as a whole as well as specific policies in the Framework which might indicate that development should be restricted (paragraph 11) and also policies that relate to conserving and enhancing the natural environment (paragraph 172). Case law also makes clear the importance of providing a clear justification to demonstrate that the Councils have given great weight to conserving landscape and scenic beauty in an AONB.
- 7.7 The Councils believe this background paper sets out clear reasoning for their decision and the exceptional circumstances to justify its conclusions and forms a sound basis for justifying its selection.

¹⁵ NPPF 2018 paragraph 8

- 7.8 In reaching this conclusion it is acknowledged that some development will be allocated within the Cranborne Chase and West Wiltshire AONB – adjacent to the proposed Waste Recycling Centre in the recently examined Dorset Waste Plan – and could only be justified where proposals for development are balanced against the policies set out in the National Planning Policy Framework as a whole. Ultimately, the decision to proceed with option 1 is a matter of planning judgement taking a number of factors into account including the three NPPF paragraph 172 tests (should these be applicable¹⁶), balancing these with the exceptional circumstances that prevail in Blandford and evidence that demonstrates that the need for development is in the public interest.
- 7.9 In making this judgement an assessment has also been made that the critical delivery of a new school may only be secured by the comprehensive release of land and that community opinion will decide ultimately whether or not this plan is 'made'.

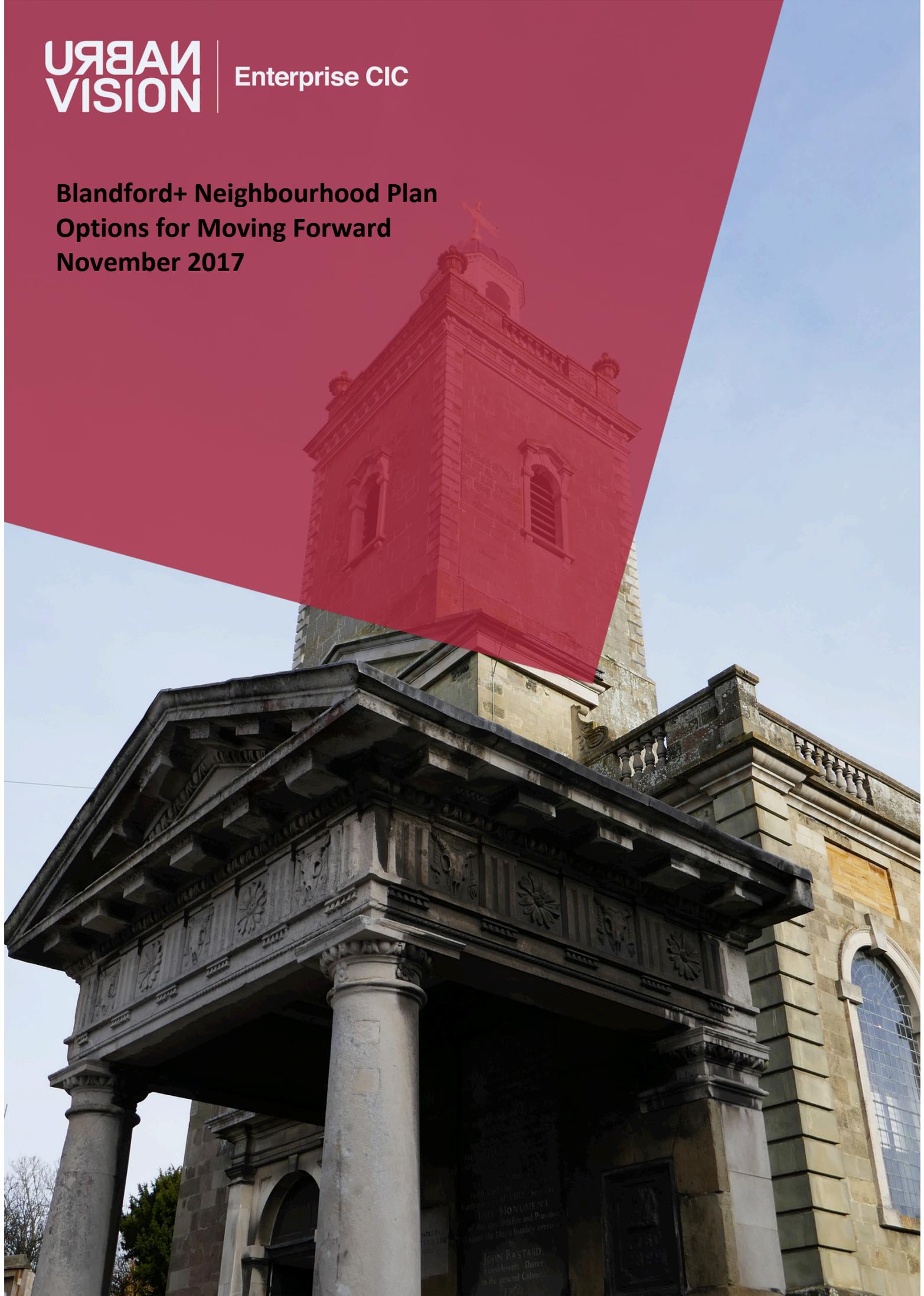
¹⁶ NPPF 2018 footnote 55.

Appendix A – Urban Vision Enterprise CIC Blandford + Neighbourhood Plan
Options for Moving Forward December 2017

**URBAN
VISION**

Enterprise CIC

**Blandford+ Neighbourhood Plan
Options for Moving Forward
November 2017**



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1. Introduction

1.1 Purpose of the Report

Urban Vision Enterprise CIC has been appointed to consider options for moving forward with the Blandford+ Neighbourhood Plan.

The main matters of contention are the Examiner's recommendations:

- To delete Policy, which allocates sites to the north of Blandford for housing, a school and other purposes;
- To delete a proposed Local Green Space designation for Crown Meadows.

1.2 Status of the Report

This report forms part of a technical support packages, commissioned by Locality. The report contains informal advice and suggests options for the Blandford + neighbourhood planning bodies, to help them in deciding how to move forward. The advice given in the report is based on the opinions of the author.

This is an informal report and it does not form part of the statutory neighbourhood planning process or have any legal status within that process.

1.3 Authorship

This report has been prepared by Dave Chetwyn, MA, MRTPI, IHBC, FInstLM
Managing Director of Urban Vision Enterprise CIC.

2. Methodology

2.1 Review of Documentation

An initial review of documentation was undertaken prior to the telephone interviews with the Town Council and local planning authority. A more detailed review was undertaken prior to the site visits and meetings with representatives of the town and parish councils and local planning authority.

The main documents reviewed were:

Blandford + Neighbourhood Plan 2015-2031 - Submission Plan
July 2016

Sustainability Appraisal Report (Incorporating Strategic Environmental Assessment)
July 2016

Blandford + Neighbourhood Plan 2015 - 2031 Basic Conditions Statement
July 2016

Independent Examiner's Report of the Blandford + Neighbourhood Development Plan
July 2017

North Dorset Local Plan Part 1, 2011 -2031
January 2016

Other supporting documents.

2.2 Telephone Interviews

Telephone contact was made on Tuesday 14th November 2017 with Leani Haim, Assistant Town Clerk of Blandford Forum Town Council.

Telephone contact made on Tuesday 14th November 2017 with Ed Gerry, Planning Policy Team Leader of the Dorset Councils Partnership, which serves North Dorset District Council.

A telephone interview was held between Dave Chetwyn and Leani Haim on Thursday 16th November 2017.

At the request of the neighbourhood plan bodies, a telephone interview was held on 17th November 2017 between Dave Chetwyn and Neil Homer, planning consultant.

A telephone interview was held on Monday 20th November between Dave Chetwyn and Deborah McCann, Independent Examiner.

2.3 Site Visit and Meetings

Visits to the Policy 1 sites were undertaken on 21st November 2017.

A meeting was held at 10.00 a.m. on 21st November 2017 with Leani Haim and elected representatives from the neighbourhood plan bodies:

Cllr Bobbie Church, Bryanston Parish Council
Cllr Doc Addison, Blandford St Mary Parish Council
Cllr Roger Carter, Blandford Forum Town Council
Cllr Haydn White, Blandford Forum Town Council

A meeting was held at midday on 21st November 2017 with Ed Gerry, representing North Dorset District Council.

2.4 Outcomes

Various options for moving forward were discussed at the two meetings on 21st November 2017.

The reappraisal of the land supply for housing to 3.42 years is clearly a significant change since the Examination took place.

The local planning authority does intend to follow the Examiner's recommendations and delete Policy 1 and the Crown Meadows Local Green Space designation.

Deletion of Policy 1 is unlikely to be palatable to the neighbourhood plan bodies. This is central to the Neighbourhood Plan's growth strategy.

Notwithstanding these clear differences, there is a commitment on both sides to working together in a constructive manner to find a way forward.

The options in question are set out in this report.

3. The Independent Examination

3.1 Proceeding to Referendum

The next step is for North Dorset District Council to determine whether or not to allow the Neighbourhood Plan to proceed to referendum, with modifications if necessary. Normally, local authorities follow the recommendations of the independent examiner's report. North Dorset District Council has indicated that it intends to follow the Examiner's recommendations.

If a neighbourhood plan's qualifying bodies are unhappy with proposed modifications to their neighbourhood plan, they have the option of withdrawing the plan.

3.2 The Examiner's Report

The Independent Examiner's Report (18th July 2017) was prepared by:

Deborah McCann BSc MRICS MRTPI Dip Arch Con Dip LD.

A hearing was held on 10th April 2017. Section 6 of the report deals with the site visit and hearing. The focus of the hearing was on Policy 1, Local Green Space and the referendum area.

At the hearing, the local authority argued that Policy 1 of the Neighbourhood Plan was not in general conformity with the strategic policies of the Local Plan Part 1 (LPP1) in terms of the location of the proposed development. Also, the impact of potential development had not been fully considered, e.g. landscape impact.

There was some discussion of whether a neighbourhood plan could bring forward the site allocation.

In my opinion, the legitimate question is whether a neighbourhood plan is in general conformity with strategic local policy (in this case, Policy 16 of the LPP1), not whether one plan or the other is the correct vehicle for making site allocations. Both local plans and neighbourhood plans can make site allocations and some neighbourhood plans do make significant site allocations. The ability of neighbourhood plans to make site allocations was established by the Court of Appeal in *R (Larkfleet Homes Ltd) v. Rutland County Council* [2015] EWCA Civ 597.

It is crucial to note a change in circumstances, since the report was issued. In Paragraph 6.2.1 on page 9, it states:

"It was confirmed that North Dorset District Council has a five year housing land supply".

This has since been revised to a 3.42 year land supply. This is something for North Dorset District Council to take into account.

The Examiner concludes that the Neighbourhood Plan would meet the basic conditions, subject to modifications. The Examiner's summary of findings was as follows:

1. *I find the Blandford + Neighbourhood Plan and the policies within it, subject to the recommended modifications does meet the Basic Conditions. The modifications I recommend include the deletion of Policy 1.*
2. *I am satisfied that the Referendum Area should be the same as the Plan Area, should the Blandford + Neighbourhood Development Plan go to Referendum.*
3. *I have read the Blandford+ Consultation Statement and the representations made in connection with this subject. I consider that the consultation process was robust and that the Neighbourhood Development Plan and its policies reflects the outcome of the consultation process including recording representations and tracking the changes made as a result of those representations.*
4. *I find that the Blandford + Neighbourhood Development Plan can, subject to the recommended modifications which includes the deletion of Policy 1 proceed to Referendum.*
5. *At the time of my examination the adopted local plan was the North Dorset Local Plan Part 1 (NDLP1) adopted in January 2016 including saved policies of the North Dorset District-Wide Local Plan (2003).*

3.3 Deletion of Crown Meadows

With regard to designation of Crown Meadows, the examiner states:

"Although conservation area status does not provide the same level of protection as that afforded by a Local Green Space designation it does provide a protective framework for the consideration of any development proposals".

Local Green Spaces are concerned with community value and the designation often precludes much development. Conservation Area status is covered by different legislation – The Planning (Listed Buildings and Conservation Areas) Act 1990. This is concerned with 'special architectural or historic interest'. Also, conservation areas are often a focus for development and regeneration. So the issue may be more one of the kind of protection rather than the level of protection.

The Examiner's conclusion is:

"My conclusion is that the area of the Crown Meadowss proposed, as a Local Green Space does not meet the tests set out in the NPPF for the reasons given above. In order for Policy 10 to meet the Basic Conditions proposed Local Green Space 4. Crown Meadowss must be deleted. I understand that this is likely to be disappointing to the community who has so strongly supported this proposed Local Green Space".

Whilst Local Green Space designation is unlikely to be appropriate for Crown Meadowss, it may be appropriate to consider other policies to shape development.

3.4 Deletion of Policy 1

The examiner states:

“Policy 1 does not meet the Basic Conditions for the following reasons:

- 1. It does not have regard to National Planning Policy and Guidance in that it fails to have regard for paragraphs 115 and 116 of the NPPF.*
- 2. It is not in general conformity with the Strategic Policies of the Development Plan. In addition, I consider Policy 1 to be a strategic allocation, which should be more appropriately considered in Part 2 of the Local Plan process. On the basis it does not meet the Basic Conditions and the policy should be deleted”.*

The Examiner expresses concerns over the SA/SEA. The report includes the following:

“Despite my concerns as highlighted above, subject to the recommended modifications including the deletion of Policy 1 I am satisfied that the Blandford + Neighbourhood Development Plan addresses the sustainability issues adequately.

The Neighbourhood Development Plan is required to take cognisance of the European Convention of Human Rights and to comply with the Human Rights Act 1998.

I am satisfied that the Blandford + Neighbourhood Development Plan has done so.

I am therefore satisfied that the Blandford + Neighbourhood Development Plan subject to modification meets the basic conditions on EU obligations”.

It should be noted that the comment on sustainability is based on the deletion of Policy 1.

Regarding national policy and strategic local policy, the report states:

“On balance, having considered in great detail the relevant policy documents, the written representations received and the oral representations at the Hearing I consider that Policy 1 does not meet the Basic Conditions for the following reasons:

- 1. It does not have regard to National Planning Policy and Guidance in that it fails to have regard for paragraphs 115 and 116 of the NPPF.*
- 2. It is not in general conformity with the Strategic Policies of the Development Plan. In addition, I consider Policy 1 to be a strategic allocation, which should be more appropriately considered in Part 2 of the Local Plan process.*

On the basis it does not meet the Basic Conditions and the policy should be deleted”.

As stated previously, both local plans and neighbourhood plans can make site allocations. In my opinion, the issue is one of ‘general conformity’ against adopted strategic local policy, and not a question of whether the neighbourhood plan can make such a site allocation.

3.5 Policy 1 - Issues to be addressed

There were a number of issues raised during the independent examination, by both the Examiner and the local planning authority. These are described in the report.

If the Neighbourhood Plan were to be revised and to repeat the later stages of the neighbourhood plan legal process, these issues would need to be addressed. It should be noted that certain changes have occurred since the Examination, which would also need to be addressed. These include the adjustment of the housing land supply to 3.42 years and the clearer statement from the education authority on the location for a new school to address capacity and need in the north of Blandford.

Issues raised by the examination include:

- Regarding Paragraph 116 of the NPPF, exceptional circumstances need to be demonstrated to justify the allocation of land in the AONB. It may be useful to make references to recent planning decisions in the area involving development in the AONB;
- The Examiner considered that there was insufficient detail to measure the harm to the AONB. This included consideration of agricultural land classification, air quality, and landscape impact;
- Concerns were raised over the limited site options considered by the SA/SEA. This focuses on the sites put forward by Policy 16 of the LPP1 and the sites covered by Policy 1 of the neighbourhood plan proposal. Additional sites should be considered. The sites identified in the 'Issues and Options' paper may be useful in guiding this process;
- There is a need to consider the cumulative impacts of growth relating to Policy 16 in LPP1 and Policy 1 in the neighbourhood plan. The SEA had considered the sites as alternatives rather than considering cumulative impact;
- The viability and deliverability of the school needs to be addressed.

In applying Policy 116 of the NPPF, the following would need to be addressed:

- *“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”.*

4. The Local Plan Process

4.1 Local Plan Part 1

The 'North Dorset Local Plan Part 1, 2011 -2031' was adopted in January 2016.

Paragraph 8.6 states:

'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. Effectively, they function as a single settlement which is the main service centre for the southern part of the District.

Policy 16 deals with Blandford.

On growth, the policy includes:

"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.*

Growth will be taken forward in ways which respect the town's environmental constraints, support its role, function and identity, and contribute to making it more self-contained. Blandford's distinctive natural and historic character will be retained and enhanced ...

... 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) ..."*

There is a clear preference for alternative sites to the ones proposed by Policy 1 of the Blandford Neighbourhood Plan proposal.

The recent revision of the housing land supply to 3.42 years clearly has implications which may lead to the revision of the housing figure.

This may also have implications for site allocations, given the possibility of Blandford needing to accommodate higher levels of growth. Whilst Policy 16 is strategic local policy,

additional sites may need to be allocated, rather than relying on those identified in Policy 16.

There may also be implications for development management. The adjustment of the housing land supply figure is a material consideration that may justify a departure from Policy 16 determination of planning applications. This is an important consideration.

On supporting infrastructure, the policy states:

“social infrastructure to support growth will include: ...

- v the extension of the Archbishop Wake school and either extension of the Milldown school or provision of a new 2 forms of entry primary school; and*
- w a new doctors’ surgery or the expansion or relocation of existing doctors’ surgeries ...”*

Policy 14 also deals with social infrastructure, including schools.

The County Council has since stated a clearer preference for a new school north of Blandford.

The neighbourhood plan bodies have highlighted Policies 2 and 14 of the Local Plan and expressed concern over a possible narrow focus on Policy 16 and housing.

Policy 2 puts forward the core spatial strategy. This includes:

“The settlement boundaries defined around the four main towns, Stalbridge and the larger villages in the North Dorset District-Wide Local Plan 2003 and proposals maps are retained and, in conjunction with Policies 16, 17, 18, 19 and 21 of this document, which identify the broad locations for housing and employment growth and regeneration, will continue to be used for development management purposes until reviewed either: through site allocations in Part 2 of the Local Plan or a neighbourhood plan. The settlement boundaries defined around all other settlements in the North Dorset District-Wide Local Plan 2003 and proposals maps are removed and these settlements will be subject to countryside policies unless new settlement boundaries are defined in neighbourhood plans or in Part 2 of the Local Plan”.

This is interesting, especially with regard to the discussion at the hearing over the appropriateness of the neighbourhood plan in making a significant site allocation.

4.2 Issues and Options Consultation

Notwithstanding the recent adoption of the Local Plan Part 1, work is underway to prepare a new Local Plan, including replacement of the Part 1 plan.

As part of this process, the local planning authority has issued an ‘Issues and Options’ paper. This identifies various sites around the periphery of Blandford. Some of these are rejected in the paper. However, sites A and B are left open for consideration and these include most of the land proposed for allocation by Policy 1 of the Blandford Neighbourhood Plan proposal.

This does suggest that there is scope for developing a shared strategy through close joint working between the neighbourhood plan bodies and the local planning authority. This could be realised through the revision of the Blandford Neighbourhood Plan proposal and/or the Local Plan process.

There is also the possibility of pre-emptive action by through the submission of planning applications. This could pre-empt both the neighbourhood plan and local plan processes.

5. Options for Moving Forward

5.1 Options

This section of the report puts forward 6 options for moving forward. Four of these options relate to the Neighbourhood Plan itself, one relates to the Local Plan process, and one relates to potential planning applications.

5.2 The Neighbourhood Plan

The decision on whether the plan should proceed to referendum and the modifications necessary now lies with North Dorset District Council, as local planning authority. North Dorset District Council has given a strong indication that it will follow the Examiner's recommendations closely.

This leaves various options open to the neighbourhood plan bodies. The local planning authority is currently considering modifications to the Neighbourhood Plan, so a decision on whether to allow the plan to proceed or to withdraw the plan needs to be taken as soon as possible.

Option 1 – Negotiations with the LPA

The NP bodies could seek to make the technical case to proceed to referendum with Policy 1 in place, or slightly modified.

The Local planning authority has indicated that it would be uncomfortable with departing from the Examiner's report, not least due to the potential for legal challenge.

Therefore, this option is probably not viable.

Option 2 – Allow the Neighbourhood Plan to Proceed

The NP bodies could allow the Neighbourhood Plan to proceed to referendum, with Policy 1 deleted.

Policy 1 is at the core of the Neighbourhood Plan's growth strategy. So proceeding without this policy would fail to meet the fundamental aspirations of the plan-making bodies.

Option 3 – Withdraw the NP and Abandon

The neighbourhood planning bodies have the legal right to withdraw the Neighbourhood Plan.

The Neighborhood Plan could be abandoned. Given the work that has already gone into the plan, and the wish to take Policy 1 forward, this Option is unlikely to be attractive.

Option 4 – Withdraw and Modify the Neighbourhood Plan

The Neighbourhood Plan could be withdrawn and modified and the evidence base and consideration of options could be strengthened. This would allow Policy 1 and Crown Meadows to be revisited, taking account of the issues raised at the examination stage. The issues set out in Paragraph 3.5 of this report would need to be addressed. For Crown Meadows, alternative means of protection could be considered.

If the NP were to be modified, it would need to go through the following stages (time estimates in brackets):

- Collection of additional evidence and modification (12-16 weeks)
- Regulation 14 consultation (6 weeks)
- Consideration of responses (2-4 weeks)
- Submission of the NP, with supporting documentation (2 weeks)
- Publicity (6 weeks)
- Examination (6-8 weeks)

If successful at examination, the plan could then proceed to referendum. Overall, this would take the best part of a year. There would most likely be consultancy costs to cover. Technical support may be available through the current national support programme, for example with site appraisals and viability assessment.

Policies 2-6

If the neighbourhood plan is withdrawn and modified, in addition to revisiting Policy 1 and Crown Meadows, certain other changes could be considered.

The site allocations in policies 2-6 are actually sites within the settlement boundary, which was defined by Local Plan policy. Therefore, policies 2-6 are planning policies for specific sites, rather than site allocations.

Confusingly, the settlement boundary is not included in the neighbourhood plan. This creates a lack of clarity over the status of the sites in question and whether or not the intention is to modify policy on the settlement boundary.

Paragraph 17 of the NPPF, which requires plans to:

“provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency”.

From discussion with the neighbourhood plan bodies and their consultant, it is clear that there is no intention to modify the settlement policy. Therefore, the term “site allocation” from policies 2-6 could be deleted and replaced by recognition that the sites are within the settlement boundary (a plan of which should be included in the neighbourhood plan). They may be described as site-specific development policies, rather than site allocations.

5.3 The Local Plan

As mentioned, the Local Plan process is continuing, including proposals to replace the Part 1 document.

An Issues and Options consultation was issued on 27th November 2017, to gain views to inform the spatial strategy of the Local Plan. This includes consideration of various sites around Blandford, including the sites that are the subject of Policy 1 of the neighbourhood plan.

Obviously, the adjustment of the housing land supply to 3.42 years has significant implications for site selection. The review of the Local Plan will need to take this into account.

The neighbourhood plan bodies could make constructive representations on the consultation document, drawing on the work done for the Neighbourhood Plan. This could emphasise the problem of single use housing development in the north of the area and the need for supporting community infrastructure.

Also, the Bypass is an expensive piece of transport infrastructure, already in place. This clearly helps with viability in terms of bringing forward adjacent sites for development.

The Country Council's clearer preference for the site to the north of the area is a further factor.

The AONB is still a key factor. However, Blandford is constrained by the Cranborne Chase and West Wiltshire Downs AONBs and other constraints. Some incursions into the AONB are almost inevitable, and this is illustrated by the local planning authority's granting of planning permissions in the AONB, including for housing and retail facilities.

Option 5 – Respond to the Issues and Options Consultation

The NP bodies could make robust representations on the Issues and Options consultation, making the case for sites A and B identified in the document (or part thereof) to be allocated as proposed by Policy 1 of the NP.

The consultation was launched on 27th November 2017 and the closing date for responses is 22nd January.

5.4 Planning Applications

Developers may submit planning applications for some or all of the Policy 1 sites. The lack of 5-year land supply would clearly be a factor. Developers would need to provide supporting information to address the same kind of issues raised through the neighbourhood plan independent examination with regard to Policy 1.

Option 6 – Liaise with Potential Developers

Close liaison with prospective developers may help to ensure that any planning application shares the aspirations of the neighbourhood plan bodies, as far as possible. There is no way of knowing when and if such an application would be submitted, so early engagement with the land owner would be required.

If a planning application is submitted, representations could be prepared and submitted within the publicity period.

6. Conclusions and Recommendations

6.1 Conclusions

There are various options open to the neighbourhood planning bodies, with regard to the neighbourhood plan, making representations through the local plan process and seeking to influence the landowners and potential developers.

There have been some changes since the independent examination, including the adjustment of the housing land supply to 3.42 years and clearer support for the school site. In addition, the local planning authority's Issues and Options consultation appears to indicate that other sites are being considered, beyond those covered by Policy 16 of the part 1 Local Plan.

Through the various discussions and meetings, it has become apparent that there have been tensions between the neighbourhood planning bodies the local planning authority. Such tensions are common and understandable; planning involves choices and is often an emotive subject. Securing the best outcomes for the community is more likely to be achieved if a shared strategy can be developed through close, cooperative working between the neighbourhood plan bodies and the local planning authority, representing the two tiers of policy making.

6.2 Recommendations

Given the importance of Policy 1 to the neighbourhood plan bodies, Option 4 appears to be the best way forward, but this will need careful consideration. Options 5 and/or 6 could be pursued in parallel.

If Option 4 is chosen, modifications and additional evidence will need to address the concerns set out in the Examiner's report.

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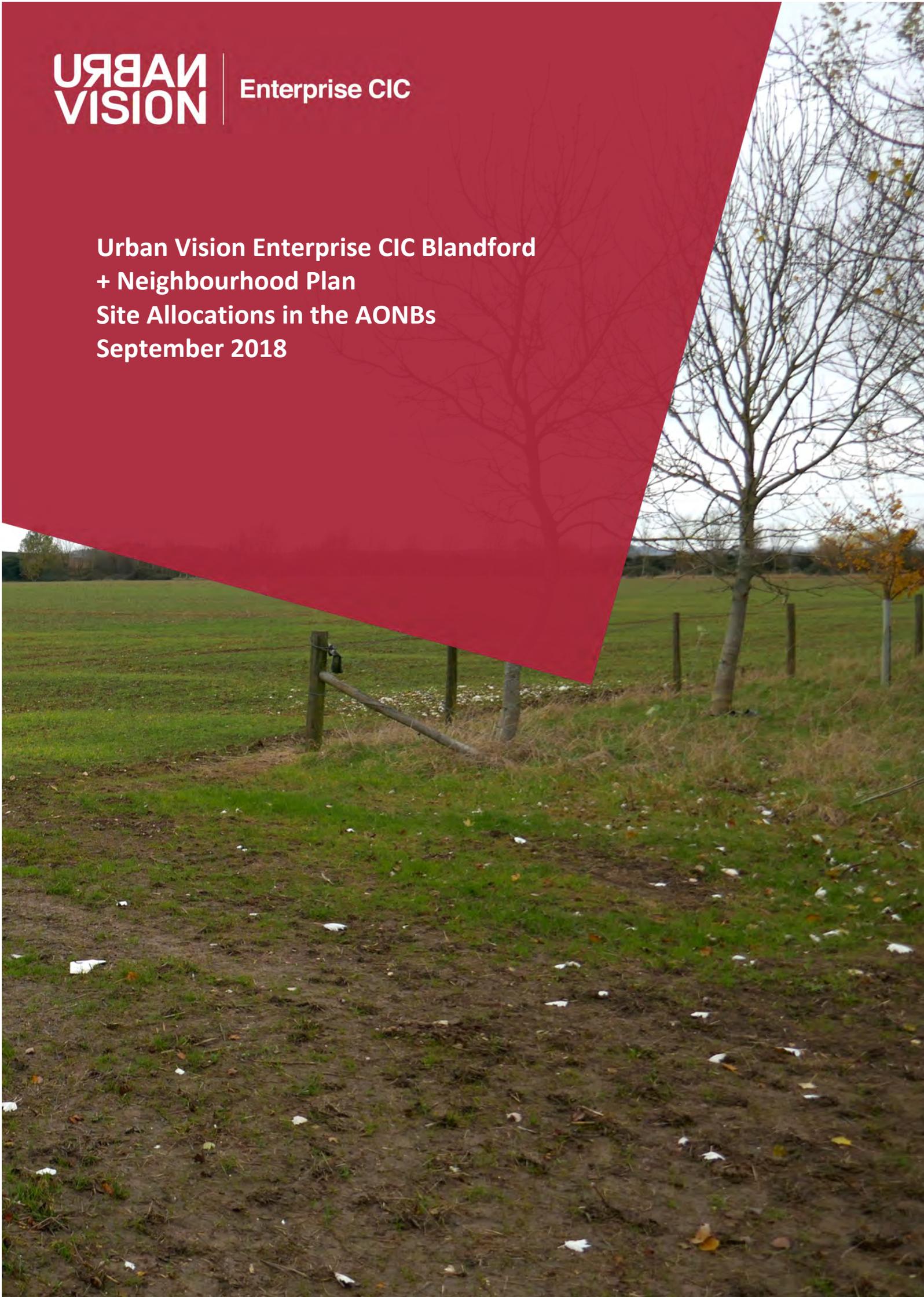


Appendix B – Urban Vision Enterprise CIC Blandford + Neighbourhood Plan
Site Allocations in the AONBs September 2018

**URBAN
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Enterprise CIC

**Urban Vision Enterprise CIC Blandford
+ Neighbourhood Plan
Site Allocations in the AONBs
September 2018**



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1. Introduction

Urban Vision Enterprise has been asked to comment on the proposed site allocations in the Blandford+ Neighbourhood Plan, involving land within the AONB.

It has been suggested that the neighbourhood plan is premature, as the North Dorset Local Plan is being reviewed and this includes considering growth options around Blandford at the same time as growth in other parts of the local plan area.

Also, the requirements of Paragraph 116 of the NPPF (now Paragraph 172 of the NPPF 2018) have been raised.

The following text examines the questions of prematurity and the requirements of the NPPF.

2. Prematurity and Site Allocations

2.1 Site Allocations in Neighbourhood Plans

There is no question over the legitimacy of a neighbourhood plan as the means to making site allocations. This is confirmed by the National Planning Policy Framework (NPPF) 2018. It was tested also in the Court of Appeal in R (Larkfleet Homes Ltd) v. Rutland County Council [2015] EWCA Civ 597.

The question is not whether a neighbourhood plan can make site allocations, but whether such allocations meet the Basic Conditions. Planning Practice Guidance (PPG) states that the evidence underpinning local plans can be part of the evidence base for neighbourhood plans.

Government legislation and policy imposes no requirement for neighbourhood plans to wait for local plans to be updated. This issue was tested in DLA Delivery v Lewes District Council [2017] EWCA Civ 58. There are hundreds of examples around the country of where neighbourhood plans are proceeding or emerging in parallel to local plans.

2.2 Meeting the Basic Conditions

From UVE's involvement with Blandford Forum over the past 18 months, it is apparent that the Blandford+ neighbourhood planning bodies are working in close liaison with the local planning authority. This is obviously good practice.

There has been a public consultation on growth options for Blandford Forum, run by the local planning authority, with the outcomes being given full consideration by the neighbourhood plan bodies.

Whilst the neighbourhood plan would be tested for general conformity against the adopted local plan, it is clear that there is also congruence between the emerging growth strategies in both local plan and the neighbourhood plan.

Importantly, the selection of sites is being based on recent evidence of local need. Our understanding is that the local planning authority is maintaining its overall spatial strategy, which concentrates development in the four main towns in the district. Paragraph 66 of the NPPF provides for local planning authorities to set an indicative housing figure for neighbourhood areas.

The neighbourhood plan requires an SEA, but an SA is currently being prepared/updated in parallel to revision of the neighbourhood plan. This includes and goes beyond the scope of SEA.

One of the basic conditions requires neighbourhood plans to help achieve sustainable development. Precluding growth around the town itself would clearly

present difficulties in terms of meeting this requirement (see part 3 of this document).

2.3 Options for Growth

The comments of the AONB bodies on the emerging local plan (which is looking at options for growth) are noted. However, the NPPF requires plans to cater for growth to meet local need. This applies to local plans and neighbourhood plans.

For Blandford Forum, no-growth or limited-growth options would not be likely to be realistic. It would fail to have regard to a range of NPPF policies and the need to help achieve sustainable development.

The Grimsey 2 Report highlights the changes that are occurring in town centres. For the historic town of Blandford Forum, no-growth or limited-growth options would cause considerable social, economic and environmental harm. A neighbourhood plan with a no-growth or limited-growth approach would run a high risk of failure at examination, potentially against all four of the basic conditions.

3. National Policy

3.1 Paragraph 172 of the NPPF

Paragraph 172 of the NPPF 2018 states”

“172. Great weight should be given to conserving and enhancing 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 these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁵⁴. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) 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;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.*

Paragraph 172 clearly places a firm requirement in considering development of sensitive landscapes, requiring other options to be given full consideration.

At the same time, no-growth or limited-growth options would cause considerable social, economic and environmental harm to Blandford Forum town centre and its hinterland. This must be a factor in the interpretation of Paragraph 172. It is clearly not the intention of Paragraph 172 to impose stagnation on towns or to prevent growth to meet local need, if there are other realistic options.

Blandford Forum is closely enclosed by AONBs, which is an important factor in applying Paragraph 172. The economic harm of stagnation must be considered against a). In considering b), there is clearly very limited scope for meeting Blandford Forum’s growth requirements unless surrounding land is developed. In considering c), it is obviously necessary to consider impacts in allocating sites and to consider how impacts can be ameliorated. However, failing to meet growth requirements would also cause harm, including economic and environmental harm in terms of the viability and conservation of the historic town centre and its listed buildings.

An example of the application of ‘exceptional circumstances’ and public interest tests (to which the Pimperne Neighbourhood examiner has also recently commented) set out in the NPPF is the recovered appeal at Steart Farm, Bucks Cross,

Bideford, Devon (APP/W1145/A/14/2228355 and APP/W1145/E/14/2228356) 16 Feb 2016. The decision statement sets out the balancing exercise in relation to the three NPPF Paragraph 172 tests (see Paragraphs 36 - 41).

3.2 Basis for Site Allocations

The neighbourhood plan steering group has agreed that the Neighbourhood Plan will select its site allocations by applying four tests:

- Sustainability effects, using its own SA undertaken by AECOM
- Deliverability, comprising an analysis of availability and achievability
- AONB suitability, in respect of NPPF tests and CROW Act obligations
- Community opinion, comprising a series of informal and statutory consultation activities, commencing in July 2018.

The means by which a preferred option for site allocations will be reached is by applying these tests to a number of spatial development options.

4. Conclusions

There is no legal basis for holding back the neighbourhood plan or leaving site allocations to the local plan. The question is whether the neighbourhood plan, including site allocations, meets the basic conditions and this will be tested through the independent examination. In fact, the main risk here would be if the plan failed to cater adequately for growth to meet local need.

Planning is a balancing exercise. The National Planning Policy Framework must be considered in its entirety, rather than applying different parts in isolation. Paragraph 172 is a significant policy that must inform the site selection process. But other parts of the NPPF on housing, town centres, historic environments, employment, infrastructure and other relevant matters must also be considered.

Paragraph 172 should not be interpreted as an overriding policy, but as part of the wider policy context of the NPPF, including the overall objectives for sustainable development. It should not be interpreted as precluding development in the AONBs, but of considering impacts on the AONBs, considering amelioration, and balancing impacts against the social, economic and environmental impacts of precluding growth.

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Appendix C – Blandford + Land Availability Report

Blandford + Land Availability Paper

1.1 This paper demonstrates the land that is available for development in the Blandford + Neighbourhood Plan Area, and which sites have been taken forward for further analysis that will eventually form part of the allocations in the neighbourhood plan.

1.2 Blandford + has been working closely with the Local Planning Authority, North Dorset District Council (NDDC), to share evidence in preparation for the Neighbourhood Plan and the Local Plan Review. Submissions from the latest Strategic Housing and Economic Land Availability Assessment (SHELAA) in 2017 have been provided, in a redacted format, to Blandford +. These submissions are listed below and are identified on the Blandford + Land Availability Plan, see Appendix A:

1. Market Place, Blandford Forum
2. Shorts Lane, Blandford Forum
3. Land at Tin Pot Lane (Upper Site), Blandford Forum
4. Land at Tin Pot Lane (Lower Site), Blandford Forum
5. Land at West Blandford, Blandford Forum
6. Land to the south of 62 Salisbury Street, Blandford Forum
7. Land to the north east of Blandford Forum
8. Land to the rear of Georgian Passage, 61-69 East Street, Blandford Forum
9. Land west of Bournemouth Road (North of Ward's Drove), Blandford St Mary

1.3 NDDC are contacting the owners of these submissions and requesting that they contact Blandford + direct, as the information was only provided in a redacted format, leaving the Neighbourhood Planning Group unable to contact landowners.

1.4 As part of the Call for Sites to inform the latest SHELAA, NDDC requested that any sites that had been previously submitted in the 2010 Call for Sites should be withdrawn, otherwise they will be included in the list of sites available to be assessed for the next SHELAA report.

1.5 A list of sites that were submitted as part of the 2010 Call for Sites are listed below and are identified online at <http://explorer.geowessex.com/nddc/shlaa>:

10. Rear Larksmead House off Salisbury Rd, Blandford Forum
11. 47 & 49 Salisbury Street, Blandford Forum
12. 23, Orchard Street, Blandford Forum
13. 53 Salisbury Road, Blandford Forum
14. Mercury House Red Lion Yard, Blandford Forum
15. Former gas works/car park site Damory Street, Blandford Forum
16. 2 and 3, The Plocks, Blandford Forum
17. 2, Bayfran Way, Blandford Forum
18. Telstar Garage Bryanston Street and rear of 23 Salisbury Rd, Blandford Forum
19. 22, Market Place, Blandford Forum

20. Larksmead House 101 Salisbury Road, Blandford Forum
21. DCC Highway Depot Wimborne Road, Blandford Forum
22. The Auction Rooms 1a Alfred Street, Blandford Forum
23. Land rear of Ridgewood 8 St Leonards Avenue, Blandford Forum
24. Land Rear of The Stour Inn, Blandford St Mary
25. Land at Shaftesbury Lane, Blandford Forum
26. Land at rear of 16 Pigeon Close, Blandford St Mary
27. Ameys Garage & No. 10 Oakfield Street, Blandford Forum
28. Blandford Brewery, Blandford St Mary
29. Rear gardens off Salisbury Rd Kings and Queens Roads, Blandford Forum
30. Rear Presbtery Church Whitecliff Mill Street, Blandford Forum
31. Rear 42 to 54a Queens Road, Blandford Forum
32. Rear 133 to 141 Salisbury Road, Blandford Forum
33. Land At Beechwood Wilverly Gardens, Blandford Forum
34. Aga Dale Rosebank Lane, Blandford Forum
35. Land Between Preetz Way and Bypass, Blandford Forum
36. Adj York House Philip Road, Blandford Forum
37. Adj The Mount St Leonards, Blandford Forum
38. Rear Damory Lodge Damory Court Street, Blandford Forum
39. Land adj Wimborne Rd Fishers Close, Blandford Forum
40. Land Rear Kingston Close, Blandford Forum
41. Between Deer Park Holm & Deer Park House Whitecliff Mill Street, Blandford Forum
42. Rear 2 Bridge View Dorchester Hill, Blandford St. Mary
43. Rear 36 Beckett Close, Blandford St. Mary
44. Vale Park, Blandford St. Mary
45. Rear Bytheway Ashley and Bryants Cottages, Dorchester Hill, Blandford St Mary
46. Blandford Archway Garage Langton Road, Blandford Forum
47. Adj Bryanston Cottage, Blandford Forum
48. Rear Beechcroft Milldown Road, Blandford Forum
49. Adj Highgate House Damory Court St, Blandford Forum
50. Blandford School Milldown Building Milldown Road, Blandford Forum
51. Land at Deer Park Stables Whitecliff Mill Street, Blandford Forum (New submission Site no. 5)
52. Land adjoining 2 Park Place Whitecliff Mill Street, Blandford Forum
53. Phillip road, Blandford Forum
54. Archbishop Wake School Park Road, Blandford Forum
55. Land at Wimborne Road Black Lane, Blandford Forum
56. Land at Shaftesbury Lane (Phase 3b), Blandford Forum
57. Land North East of Blandford, Blandford Forum (New submission Site no. 7)
58. Rear of 4 & 6 Market Place, Blandford Forum
59. Land Off Birch Avenue, Blandford St. Mary
60. Blandford Land Adj A350/A354 Junction, Blandford St Mary
61. Dorchester Hill, Blandford St Mary
62. Lower Bryanston Farm, Bryanston
63. Rear of Milldown Road, Blandford Forum
64. Garages & Army Cadet Force Shed, Rear 13 Victoria St, Blandford Forum
65. 19 Salisbury Street, Blandford Forum

- 66. Adj 7 Alfred Street, Blandford Forum
- 67. Paynes Courtyard East Street, Blandford Forum
- 68. Adj Old Ford House Bournemouth Road, Blandford St Mary
- 69. 14 Edward Street, Blandford Forum
- 70. 6 Charles Street, Blandford Forum
- 71. 82 Salisbury Road, Blandford Forum
- 72. Farm Buildings at Littleton Lodge, Blandford St Mary
- 73. Land adj Sunrise Business Park (New submission Site no. 7)
- 74. Kites Farm Tin Pot Lane, Blandford Forum
- 75. Land at Blandford St Mary 1 (New submission Site no. 9)
- 76. Land at Blandford St Mary 2
- 77. Land at Blandford St Mary 3

1.6 NDDC has confirmed that no sites have been withdrawn.

1.7 The list was then assessed for sites that have already obtained planning permission and/or is already developed. This excludes site nos. 10, 12-18, 19-24, 26-28, 41, 50, 54-56, 58-61 from further assessment.

Sites identified as having housing or economic potential on previously developed land and/or within the LP1 settlement boundary

1.8 NDDC included all sites, regardless of size, in their SHLAA 2010. The SHLAA 2017 will only assess larger sites, of 5 dwellings or more. The draft revised NPPF encourages the inclusion of small sites (Paras 69-70) and therefore a total of the potential yield from small sites submitted has been calculated in Table A below.

1.9 Small sites have been defined as sites that would accommodate less than 10 dwellings and includes nos. 6, 11, 18, 25, 29-34, 36, 38-40, 42-49, 52, 64-67, 69-71 that are all within the LP1 settlement boundary.

Site No.	Site Name	Parish	Potential Yield
6	Land to the south of 62 Salisbury Street	Blandford Forum	1
11	47 & 49 Salisbury Street *(2/03/0007)	Blandford Forum	4
25	Land at Shaftesbury Lane *(2/03/0104) (Not identified on SHLAA Map but listed in report.)	Blandford Forum	6
29	Rear gardens off Salisbury Rd Kings and Queens Roads *(2/03/0178)	Blandford Forum	9
30	Rear Presbytery Church Whitecliff Mill Street *(2/03/0179)	Blandford Forum	2
31	Rear 42 to 54a Queens Road *(2/03/0181)	Blandford Forum	2
32	Rear 133 to 141 Salisbury Road *(2/03/0182)	Blandford Forum	4
33	Land At Beechwood Wilverly Gardens *(2/03/0183)	Blandford Forum	3
34	Aga Dale Rosebank Lane *(2/03/0184)	Blandford Forum	4

36	Adj York House Philip Road *(2/03/0188)	Blandford Forum	6
38	Rear Damory Lodge Damory Court Street *(2/03/0191)	Blandford Forum	8
39	Land adj Wimborne Rd Fishers Close *(2/03/0193)	Blandford Forum	5
40	Land Rear Kingston Close *(2/03/0194)	Blandford Forum	2
42	Rear 2 Bridge View Dorchester Hill *(2/03/0197)	Blandford St. Mary	2
43	Rear 36 Beckett Close *(2/03/0198)	Blandford St. Mary	2
44	Vale Park *(2/03/0199)	Blandford St. Mary	2
45	Rear Bytheway Ashley and Bryants Cottages, Dorchester Hill *(2/03/0200)	Blandford St. Mary	2
46	Blandford Archway Garage Langton Road *(2/03/0203)	Blandford Forum	2
47	Adj Bryanston Cottage *(2/03/0204)	Blandford Forum	4
48	Rear Beechcroft Milldown Road *(2/03/0206)	Blandford Forum	2
49	Adj Highgate House Damory Court St *(2/03/0207)	Blandford Forum	3
52	Land adjoining 2 Park Place Whitecliff Mill Street *(2/03/0404)	Blandford Forum	6
64	Garages & Army Cadet Force Shed, Rear 13 Victoria Rd *(2/03/0185)	Blandford Forum	Exclude - No Access
65	19 Salisbury Street *(2/03/0186)	Blandford Forum	1
66	Adj 7 Alfred Street *(2/03/0189)	Blandford Forum	Exclude – small landlocked site
67	Paynes Courtyard East Street *(2/03/0196)	Blandford Forum	Exclude - Inaccessible site in conservation area and within (unprotected) flood zone 3
69	14 Edward Street *(2/03/0323)	Blandford Forum	Exclude, Terraced house no net gain
70	6 Charles Street *(2/03/0335)	Blandford Forum	Exclude - Was on empty property register, now occupied. No net gain
71	82 Salisbury Road *(2/03/0337)	Blandford Forum	Exclude - Was on empty property register, now occupied. No net gain
Total potential yield from small sites			82

Table A: Potential Yield from small sites

*(2010 SHLAA Reference Number)

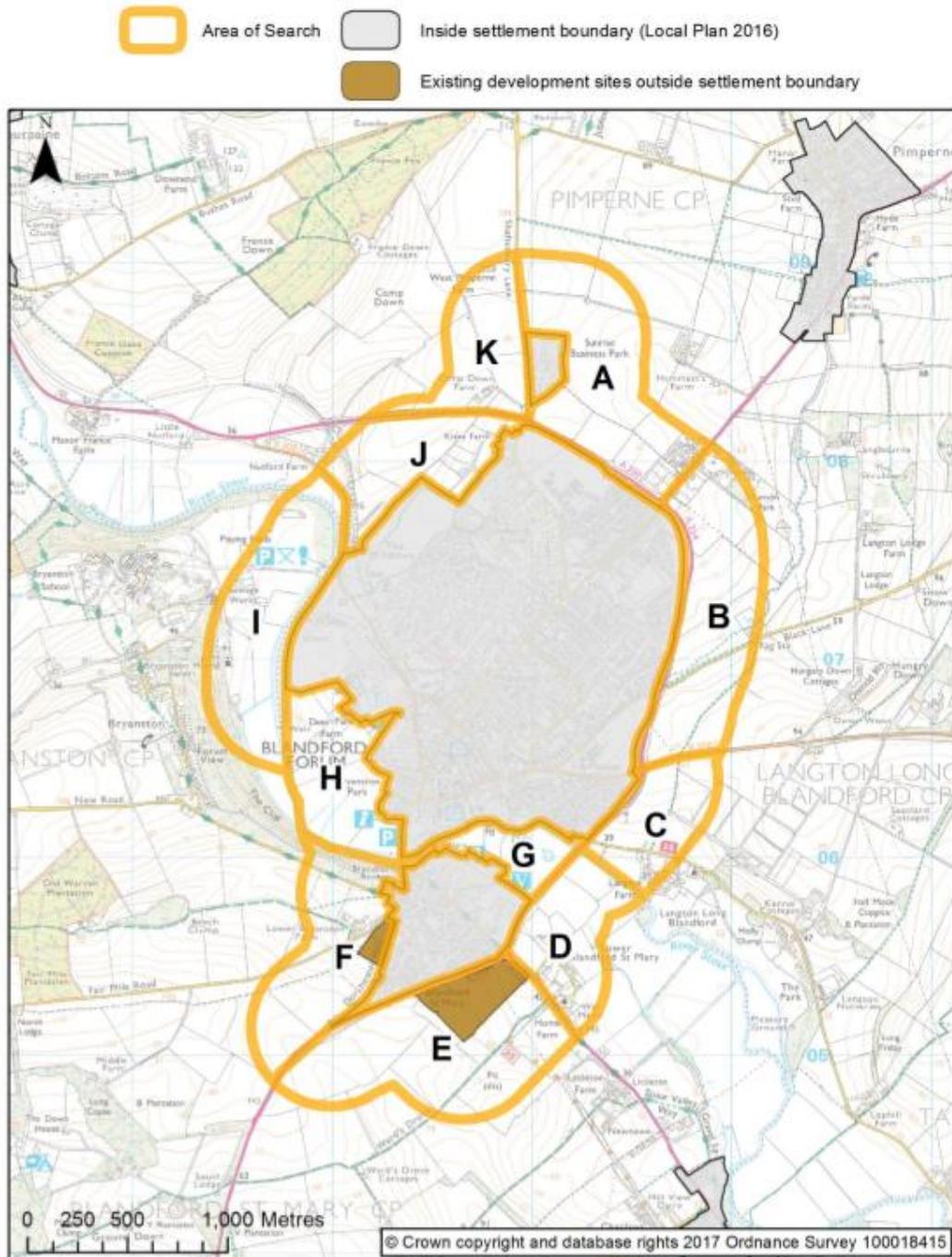
1.10 Additionally, the North Dorset Brownfield Land Register contains four sites within the Blandford + Neighbourhood Plan area. Two of these sites have already been discounted above (nos. 27, and 28) as they already have planning permission. The

third is already included as site no. 2, Shorts Lane and the final site is to be added to the list: Nordon Council offices, Salisbury Road, Blandford, Brownfield Land Register Reference 2-03-0608 with a potential yield of 30, however this site has already been included in the Annual Monitoring Report and cannot be re-counted.

1.11 Therefore, the total amount of land available on previously developed land and/or within the LP1 settlement boundary has a potential yield of 82. It is therefore considered reasonable to assume a yield of about 100 dwellings will come forward on previously developed land during the plan period.

Areas of Growth in the Blandford + Area

2.1 The areas for growth in the Blandford + area currently being considered are those that have been identified in North Dorset District Council's Issues and Options Paper 2018, see Plan A below.



Plan A: Blandford – Areas of Search

2.2 The Issues and Options Consultation Paper 2018 already identified that Areas C, D, G, H, I and K are not suitable for development and therefore only sites within the settlement boundary and within Areas A, B, E, F and J can be assessed further. This excludes nos. 5 & 51 (the same site), 72 and 77 from further assessment as they do not lie within an approved Area of Search assessed by NDDC.

2.3 Site nos. 57, 73, and 75 have been resubmitted as site nos. 7 (57,73) and 9 (75). The final list of sites to be assessed as part of the Blandford + Neighbourhood Plan Spatial Strategy from the SHLAA 2010 and SHELAA 2017 therefore includes site nos. 1-4, 7-9, 35, 37, 53, 62, 63, 68, 74 and 76.

2.4 It was recognised that the remainder of the land in Area F had not been submitted by landowners as part of NDDC's Call for Sites and the Neighbourhood Plan Group therefore contacted these landowners to enquire whether this land could be included in considerations for the Spatial Options in the Blandford + Neighbourhood Plan 2. The remainder of land in Area F is owned by two separate landowners, who have both confirmed that land could be made available and these sites have therefore been added to the final sites to be assessed as site nos. 78 and 79 and are identified on the Blandford + Land Availability Plan, see Appendix A.

2.5 The final list of sites to be assessed as part of the Blandford + Neighbourhood Plan Spatial Strategy have been listed into one final list in Table B below.

Site No.	Site Name	Parish
1	Market Place	Blandford Forum
2	Shorts Lane	Blandford Forum
3	Land at Tin Pot Lane (Upper)	Blandford Forum
4	Land at Tin Pot Lane (Lower)	Blandford Forum
7	Land to the North East of Blandford Forum	Blandford Forum
8	Land to the rear of Georgian Passage, 61-69 East Street	Blandford Forum
9	Land west of Bournemouth Road (North of Ward's Drove)	Blandford St Mary
35	Land between Preetz Way and Bypass	Blandford Forum
37	Adj The Mount St Leonards	Blandford Forum
53	Phillip Road	Blandford Forum
62	Lower Bryanston Farm	Bryanston
63	Rear of Milldown Road	Blandford Forum
68	Adj Old Ford House Bournemouth Road	Blandford St Mary
74	Kites Farm, Tin Pot Lane	Blandford Forum
76	Land at Blandford St Mary 2	Blandford St Mary
77	Nordon Council offices, Salisbury Road, Blandford	Blandford Forum
78	Land at Dorchester Hill, Blandford St Mary	Blandford St Mary
79	Land at Lower Bryanston Farm and Dorchester Hill, Bryanston and Blandford St Mary	Bryanston/Blandford St Mary

Table B: Final List of sites to be assessed in the B+ Spatial Options Studies

2.6 NDDC have agreed that the neighbourhood plan should proceed on the assessment of spatial options based on the I&O preferred 'Areas of Search' and by using a bottom up approach to resolve the matter within the neighbourhood plan timetable. The housing number will be the minimum that is necessary to deliver the full mix of land uses that form the specification below.

2.7 By agreeing the specification of non-housing land uses and optimising housing through capacity assessment of available land and using the SA to determine total capacity this would avoid delay to the neighbourhood plan programme. Adopting this approach would also make it effectively impossible for the Local Plan Review to arrive at a larger housing number for Blandford which in turn would reduce the risk of potential 'non-conformity'.

2.8 Based on the above and the review of Local Plan evidence, the following assumptions form the basis of the neighbourhood plan specification:

- The requirement to allocate land for at least 400 homes
- At least 2 Ha employment land
- 2FE primary school
- Delivery of the necessary highway and green infrastructure

2.9 While nothing is ruled out at this stage, given the mix and scale of uses set out above, the only realistic prospect for delivering a new school and employment may be part of a larger mixed-use scheme with a residential component. If this is the case, then policy(s) will need to ensure there is a comprehensive approach taken to the masterplanning of the scheme.

Land use capacity in the Blandford + Neighbourhood Area

3.1 Table C below demonstrates current indicative land use capacity within the Areas of Search and the LP1 settlement boundary as submitted by the landowners in the Call for Sites 2017 and/or indicated in the SHLAA 2010 and the Brownfield Register:

Indicative capacity:	Housing	Employment	Social Infrastructure
Brownfield Sites within Settlement Boundary			
1. Market Place		Leisure led retail and employment mixed-use development	with additional car parking
2. Shorts Lane	Flats for private rent, approximately 10 dwellings		
8. Land to the rear of Georgian Passage, 61-69 East Street	30 dwellings in 2017 Submission with potential for housing for older residents		
35. Land between Preetz Way and Bypass	30 dwellings in 2010 SHLAA *(2/03/0187)		
37. Adj The Mount St Leonards	20 dwellings in 2010 SHLAA *(2/03/0190)		
53. Phillip Road	16 dwellings in 2010 SHLAA *(2/03/0416)		
63. Rear of Milldown Road	Unknown *(2/03/0177)		
68. Adj Old Ford House Bournemouth Road	Unknown *(2/03/0201)		
Small Sites (see Table A)	82 dwellings		
Greenfield sites in preferred areas of search (A, B, E, F, J)			
3. Land at Tin Pot Lane (Upper)	Mixed residential (open and affordable), total of 23 dwellings.		
4. Land at Tin Pot Lane (Lower)	Mixed residential (open and affordable), total of 30 dwellings.		
7. Land to the North East of	Mixed use site comprising 400 dwellings (a further	employment,	education, allotments, and other mixed uses

Blandford Forum	250 dwellings in Pimperne),		
9. Land west of Bournemouth Road (North of Ward's Drove)	150 dwellings in 2017 Submission with mixed provision potential		
62. Lower Bryanston Farm	65 dwellings in 2010 SHLAA *(2/06/0541) 80 dwellings in EIA Screening		
74. Kites Farm, Tin Pot Lane	Unknown *(2/03/0526)		
76. Land at Blandford St Mary 2	Unknown *(2/03/0535)		
78. Land at Dorchester Hill, Blandford St Mary	Unknown		
79. Land at Lower Bryanston Farm and Dorchester Hill, Bryanston and Blandford St Mary	Unknown		

Table C: Indicative Land Use Capacity

*(2010 SHLAA Reference Number)

Preliminary Capacity Assessment

3.2 A preliminary capacity assessment of the sites that make up each Area of Search has taken place, see B+NP2 Spatial Options Plan at Appendix B. Section 4 of the Sustainability Appraisal Report provides a full description of how the final four spatial options were derived.

3.3 The Land North of Ward's Drove, part of the original option 3, was subsequently excluded with agreement of NDDC, as it is already committed to delivering the LP1 target. The remainder of the Area E land was assessed as being unable to contribute to either the full specification or part specification of 300 homes and a primary school. And in validating the remaining land to the east of Wards Drove with sufficient capacity to accommodate the specification, it was found to result in a significant decrease in the separation (and the potential for coalescence) between the committed land and the village of Charlton Marshall and also the Grade II Littleton House. While this area is not within an AONB it was also not confirmed as available.

3.4 For these reasons, Area E was not taken forward for further consideration. and the final options to meet the agreed specification are listed below:

- Option 1. Focus growth to the north of Blandford Forum in Area A and B to deliver the full specification
- Option 2: Focus growth to the south west of Blandford St Mary in Areas F1 and F2 to deliver the full specification
- Option 3: Dispersed approach: Accommodating 300 homes and a primary school in Area F1 to the south west of Blandford with employment land in Area J
- Option 4: Dispersed approach: Accommodating 300 homes and a primary school in Area F2 to the south west of Blandford with employment land in Area J

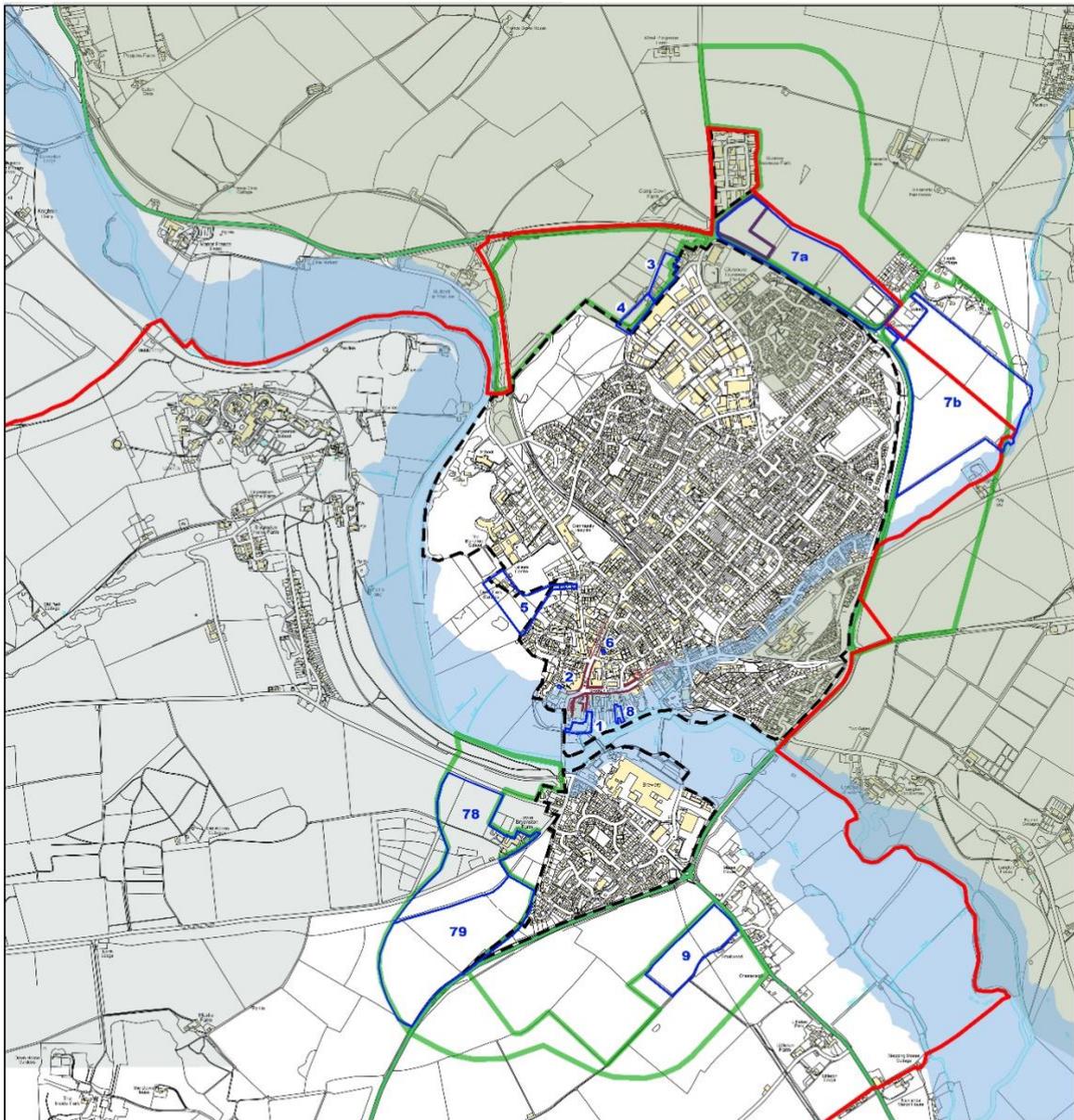
3.5 For all these options, we estimate that their housing quantum will be supplemented by at least 100 new homes on sites within the existing built up area of Blandford (Forum and St. Mary).

3.6 In relation to options 3 and 4, we have assumed that the employment land will either be allocated in Area J or be delivered through a criteria-based policy. Area J adjoins the town's main employment areas off Shaftesbury Lane with access to the strategic road network. If it is ultimately considered unavailable or unsuitable for this purpose, and options 1 and 2 are not preferred, then the Plan may, as a last resort, include a supporting criteria-based policy.

3.7 The B+NP2 will select site allocations by applying four tests:

- Sustainability effects, using its own SA (to be undertaken by AECOM);
- Deliverability, comprising an assessment of availability, achievability and viability;
- AONB suitability, in respect of the obligations of the CROW Act 2000; and
- Community opinion, comprising a series of informal and statutory consultation activities, commencing in July 2018

Appendix A

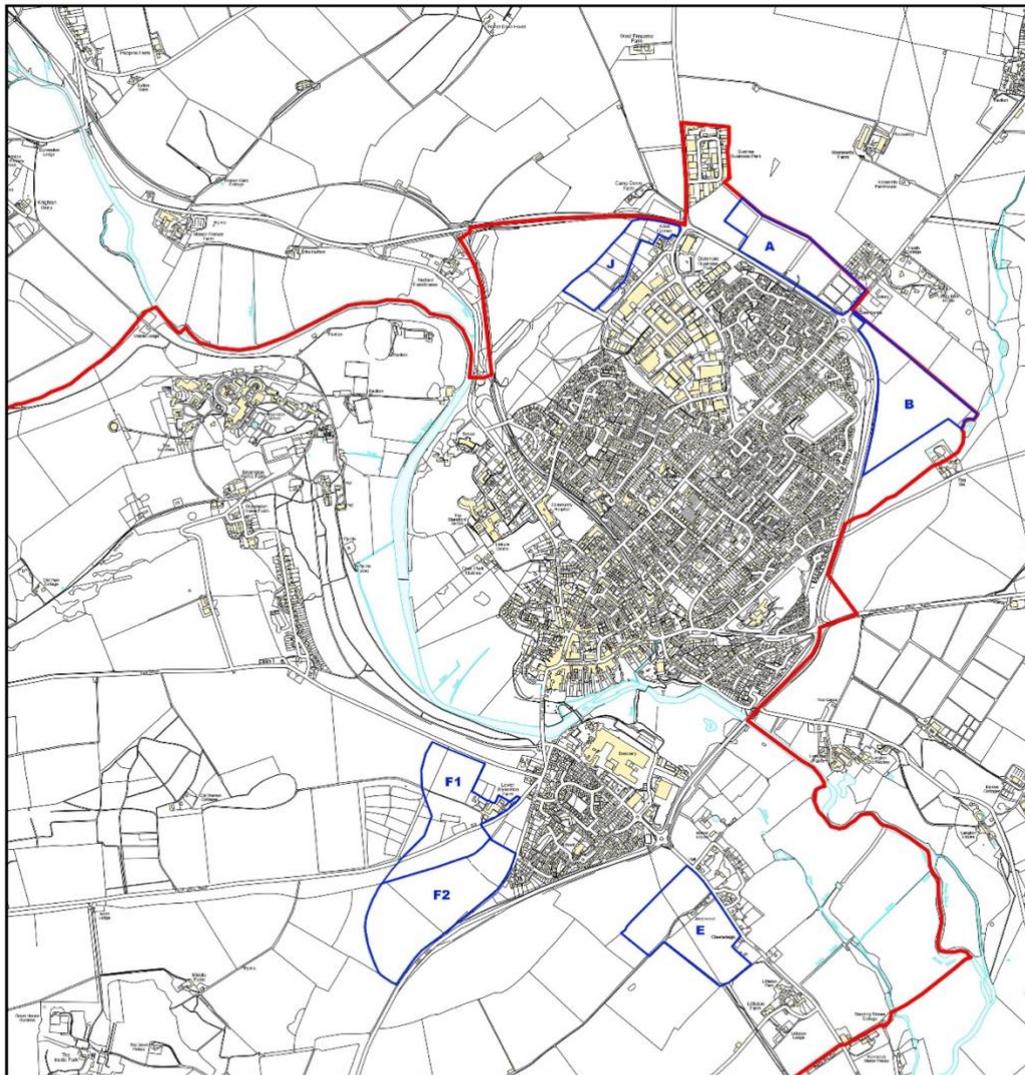


B+NP Land Availability Plan

- | | |
|--|--|
|  Neighbourhood Plan Boundary |  Sites |
|  Dorset AONB |  Areas of Search |
|  Cranbourne Chase and West Wiltshire Downs AONB |  Settlement Boundary |
|  Ancient Woodland |  Town Centre Boundary |

Appendix B

Preliminary Spatial Options Plan



**B+NP2 Spatial Options Plan
May 2018**

