

## Blandford + Neighbourhood Plan - Submission Plan – Summary of Representations

Blandford Forum Town Council submitted the Blandford + Neighbourhood Plan (2011–2033) to North Dorset District Council for independent examination in January 2019. People were given six weeks from 15 February to 29 March 2019 to comment on the content of the plan or how it was produced. At the close of the public consultation 16 representations were received.

The following table is a summary of the representations received, as required by Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendums) Regulations 2012. Copies of the original full representations, as they were submitted to North Dorset District Council, are available online from: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/blandford-v2/blandford-neighbourhood-plan-version-2.aspx>

Rep ID	Respondent	Summary
BLAN01	Barry Watson	<p>IN SUMMARY: A re-think of this new Blandford development plan (BNP) requires serious attention and rigorous scrutiny by critical experienced examiners / planners to apply intelligent thought and application of common sense processes to achieve a total clear perspective of this scope published in the development proposal. One trusts the decision-making process to be executed by the examiners takes commensurate account of previous long-standing agreements? Furthermore, although the road map ahead is unclear and quite unpredictable, Blandford, at this juncture needs strong leadership to create a happy, prosperous and an attractive integrated town-scape for any future population to enjoy, to be satisfied and be proud of. Trust this rendering in response to the BNP is understood? Finally, my recommendation to the decision-maker on the team is to withdraw at this juncture before any more resource is expended. Mr Examiner, many people urge you to REJECT this poorly conceived and ill thought out plan for additional housing on land to the north and east of Blandford Forum.</p> <p>The full response can be accessed via the following link: <a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/barry-watson-redacted.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/barry-watson-redacted.pdf</a></p>
BLAN02	Clemdell Limited	<p>Clemdell Limited raises an objection to Policy B2 in the plan and set out that Policy B2 should be deleted together with its supporting text.</p> <p>Clemdell Limited also raises an objection to Policy B8 in the plan and states that Policy B8 should be amended as follows:                      “The loss of established ground floor A1 Retail floorspace or of an active frontage as a result of a change of use in the Primary Shopping Area will be resisted.</p>

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>The following ground floor uses <u>that will be supported include</u>:</p> <p>Outside the Primary Shopping Area <del>but</del> within <u>such part of the Town Centre Area with existing shopping commercial frontage</u>:</p> <ul style="list-style-type: none"> <li>• Shops and retail outlets (A1);</li> <li>• Professional services (A2);</li> <li>• Food and drink (A3);</li> <li>• Drinking establishments (A4);</li> <li>• Hot food and takeaways (A5);</li> <li>• Health and Public Services (D1);</li> <li>• Entertainment and leisure (D2); and</li> <li>• Business (B1).</li> </ul> <p><u>In the Town Centre Area:</u></p> <p>and Residential (C3) use <u>s which does not replace an existing ground floor shopping commercial frontage on upper floors only.</u>"</p> <p>Clemdell Limited’s full response can be accessed via the following link: <a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/clemdell-combined-redacted.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/clemdell-combined-redacted.pdf</a></p>
BLAN03	Cranborne Chase AONB	<p><b>1. General comments, recommendations, and advice</b></p> <p>2. The relevance of this nationally designated Area of Outstanding Natural Beauty to this consultation is set out in Annex 1 to this response. Annex 2 lists the organisations that make up the Cranborne Chase AONB Partnership Board.</p>

3. The Local Authority partners have formally adopted the Cranborne Chase and West Wiltshire Downs AONB Management Plan 2014 – 2019. It is accessible on our website at <http://www.ccwwdaonb.org.uk/publications/aonbmanagement-plan/>. The Plan is a material planning matter. The Reviewed Management Plan 2019 – 2024 has recently been adopted by the Shadow Dorset Council and will be effective from 1st April 2019.
4. This consultation response has been prepared under delegated authority.
5. This AONB team has met with members of the Blandford + group and some of their advisors. It does, however, seem that the advice and comments from the AONB have been ignored.
6. The AONB is very concerned that the inaccuracy of the documents submitted may mislead consultees and the general public. For example, the Basic Conditions Statement states, on page 7, that ‘Blandford is completely enclosed by AONBs’. That is clearly incorrect but it is repeated again on page 10. In the Neighbourhood Plan itself the Foreword refers to the Examiner of the original Neighbourhood Plan indicating that two key policies should be removed, namely the one in relation to educational infrastructure in the northern part of the Town and conserving Crown Meadows. In fact the Examiner indicated that the policy to allocate substantial areas in the north and north-eastern part of the neighbourhood area for housing and community facilities, partly in this AONB and partly in the setting of this AONB, should be removed. These examples of lack of accuracy in the documents put a serious question mark over the clarity and accuracy of all of the documents and indicate that they have not been properly prepared.
7. This AONB notes that the plan area comprises Blandford Forum, Blandford St Mary, and Bryanston. The Plan Group states that it is seeking to take forward the Local Plan Review in advance of that review being completed. It does, therefore, appear that the Neighbourhood + Plan seeks to anticipate the findings and outcomes of the Local Plan Review. It appears to anticipate strategic policies in the Local Plan and to pre-empt strategic policies by proposing development allocations that are clearly of a strategic scale.
8. The inter-relationship with the Local Plan Review appears to be a clear situation of the tail wagging the dog. To contemplate strategic allocations to meet the needs of the District by only considering land availability within the restricted area of Blandford Forum, Blandford St Mary and Bryanston would obviously run up against a shortage of suitable land. In order to consider the scale of development that would meet the needs of the District wide Local Plan

Review the area of search needs to be larger. Put another way, the Blandford + area is too small to consider strategic allocations. Indeed it is noticeable that the Neighbourhood Plan does not follow the guidance in the NPPF, paragraphs 68 and 69, to identify opportunities for small and medium scale development (no larger than one hectare).

9. It is also surprising that Blandford Camp, which has such a significant social and economic impact on the Town, is excluded from both the neighbourhood area and the consideration of the influences upon Blandford.

10. The AONB is fundamentally concerned that the Neighbourhood Plan as submitted is simply resubmitting policies that were found at the examination of the previous plan to be unsatisfactory. A proposal to provide some 400 dwellings in the north and north-east of Blandford, on the outside of the Bypass, using a perceived need for a primary school as the argument for the additional dwellings is not only a circular argument but simply a re-presentation of the policy that was found previously to be unsatisfactory. It appears that a lot of public time and money has been expended on recycling the previously rejected policies. It could be argued that the disregarding of the conclusions of the examination of the previous Neighbourhood Plan is a waste of public resources. The other, acceptable, policies could have been taken forward and put in place some time ago.

11. However, despite significant housing development being granted planning permission in the southern sector of the neighbourhood area the Neighbourhood Plan uses an assessment for a new school in the Town as the 3 vehicle for promoting additional development in the north and north-east sectors of the area. As I have indicated that becomes a circular argument with the potential of the 400 dwellings in the northern part of the area creating a need for more school places. The Neighbourhood Plan does not argue that an additional school should be provided in the northern sector without the additional 400 dwellings so clearly the two developments are co-dependant.

#### **Detailed Comments**

Policy B1 seeks to extend the settlement boundary. The extension of the settlement boundary beyond the Bypass to the north and north-east takes in land in this AONB and within the setting of this AONB. The AONB sees such allocations in nationally designated landscapes and the setting of nationally designated landscapes as strategic matters, in conflict with the adopted Local Plan and the AONB Management Plan and **this AONB OBJECTS to that aspect of Policy B1.**

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>Policy B2 proposes extensive, strategic scale, development to the north and north-east of Blandford within this AONB and the setting of this AONB. That development would be separated from Blandford by the Bypass and consequently access to and from that development would be significantly restricted. Not only would such development urbanise sections of the AONB and the setting of the AONB, but it would also urbanise the currently predominately rural Bypass. If the development beyond the Bypass proceeds the Bypass will no longer be performing that function and will be dividing new development from the existing town. Both the NPPF and policy 4 and 16 of the Local Plan indicate the environment will be protected and enhanced; development at the scale proposed would do neither. <b>This AONB OBJECTS to Policy B2.</b></p> <p>Policy B3c relates to land adjacent to Sunrise Business Park. There is no exceptional or overriding reason for extending Sunrise Business Park into the nationally designated Area of Outstanding Natural Beauty. <b>The AONB OBJECTS to Policy B3c.</b></p> <p>Chapter 6 on Implementation does not provide for any developer contributions for conserving and enhancing either Area of Outstanding Natural Beauty. The Neighbourhood Plan does, however, seek to allocate significant areas for development within the Cranborne Chase AONB and its setting. Any developer contributions arising from developments within the AONB or its immediate setting should be directed to AONB purposes for conserving and enhancing the AONB. This AONB does, therefore, identify a significant shortcoming in Chapter 6 on Implementation and therefore seeks an amendment. <b>Without such an amendment this AONB OBJECTS to that part of the Neighbourhood Plan.</b></p> <p>To conclude, this AONB Partnership is of the view that whilst there are some positive elements within the Blandford + Neighbourhood Plan there are fundamental flaws and, as you would have seen, <b>this AONB Partnership OBJECTS to a number of policies.</b></p> <p>The AONB Partnership’s full response, including all of its detailed comments, can be accessed via the following link:  <a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/cranborne-chase-aonb-redacted.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/cranborne-chase-aonb-redacted.pdf</a></p>
BLAN04	Davis Family	<p>On behalf of the Davis Family (clients), we wish to make the following representations regarding Policy B3 – Employment and specifically about Land adjacent to Sunrise Business Park (the Site).</p>

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>Our clients, the land owners, support the development of the site for employment uses. We are actively liaising with Dorset Council on the provision of the Waste site immediately adjacent to the existing Business Park. This development is unlikely to be on all of the L shaped land identified in the Waste Plan. Any remainder land, or all of the land should the Waste Site not be pursued on this site, we concur is appropriate to be allocated in the Neighbourhood Plan 2 for employment uses B1, B2 and B8.</p> <p>The Davis Family’s full response, including suggested changes to the wording of Policy B3 can be accessed via the following link:</p> <p><a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/davis-family-combined-redacted.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/davis-family-combined-redacted.pdf</a></p>
BLAN05	Dorset AONB	<p>Thank you for consulting the Dorset AONB Team. The Team operates a planning protocol with the local authorities responsible for decisions affecting the designated area. This protocol states that we will provide advice when a proposal may result in a ‘significant’ effect on the AONB. On this occasion, the NDP does not propose policies that would significantly impact upon Dorset AONB. However, it does propose policies that would significantly affect the Cranborne Chase AONB, who I expect will make a detailed representation.</p> <p>As discussed during the pre-submission stage, the amount of development that the NDP proposes within an AONB is a significant issue. It is foreseeable that the approach proposed would lead to ‘major development’, as defined by NPPF 172, which stated that: “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 Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development<sup>55</sup> 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.”</p> <p>Case law has demonstrated that all three aspects of the test must be satisfactorily addressed in order for exceptional circumstances to be considered to exist. As you will be aware, I have already expressed my reservations about the NDPs ability to satisfy such a test. The NDP seeks to pre-emp the wider Local Plan review process, which will consider strategic</p>

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>housing allocations at a wider scale. The Partial Review could satisfy housing need in the Plan area without major development sites being allocated within AONBs.</p>
<p>BLAN06</p>	<p>Dorset County Council</p>	<p>Having been engaged in the evolution of the plan we are generally supportive of the plan, as a whole, as submitted.</p> <p>We have two observations, one for a minor modification which we requested at an earlier stage, but which hasn't been incorporated - relating to the interrelationship between the NHP and the Waste plan</p> <p>and</p> <p>2 an update to the text as a consequence of the Waste Plan's progress as below.</p> <p>Blandford + Neighbourhood Plan 2 – Consultation on the Submitted Plan (February 2019)</p> <p>Response from the Mineral &amp; Waste Planning Authority (DCC)</p> <p>Thank you for consulting the Mineral and Waste Planning Authority.</p> <p>Background</p> <p>Since our response to the Blandford+ NP2 in December 2018, the waste planning authority has received the Inspector's report on the Bournemouth, Dorset and Poole Waste Plan. This confirmed that the Plan provides an appropriate basis for waste planning in the area, provided that a number of main modifications are made to it. It is anticipated that the Waste Plan will be adopted in June 2019. As stated previously, the Waste Plan allocates a site for the development of a new waste management centre on land immediately south-east of Sunrise Business Park (Inset 2 of the Plan). The site is allocated through Policy 3 of the Plan. The neighbourhood plan should be in conformity with the Bournemouth, Dorset and Poole Waste Plan once it is adopted, as part of the development plan. The Blandford + group may like to update paragraph 3.20 of the B+NP2 to reflect the latest position with the Waste Plan.</p> <p>Policy B2 – Land North and East of Blandford Forum</p> <p>It is noted that our previous comments in relation to Policy B2 of the B+NP2 have not been incorporated into the submission plan. These are copied below for reference.</p> <p>We would request that the inspector considers inclusion of the suggested text to policy B2.</p> <p>"The policy and accompanying text should refer to the allocated site for a waste management centre on land adjoining the B2 mixed use land. Development on this land should not prejudice the operation of the waste management centre (Inset 2 of the Waste Plan) and sufficient safeguards should be put in place to ensure there is no adverse effect from the siting of a school or housing on the operation of the facility and likewise so that there is no adverse impact from the waste management facility on the new development. This could be through design, layout and mitigation such as screening for</p>

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>example, the detail of which should be determined at the application stage. The accompanying text should specifically refer to Policy 24 of the Waste Plan.</p> <p>The Waste Planning Authority recommends the addition of the following criterion to Policy B2: ‘It is demonstrated that the proposal would not adversely impact on the operation of a waste management centre on adjoining land’.</p>
BLAN07	Dorset CPRE	<p>Re: “At least 1,700 homes will be provided at Blandford Forum and Blandford St Mary during the period 2011 - 2033. In addition to infilling and redevelopment within the settlement boundary, Blandford’s housing needs will be met through: j. the development of land to the north and east of Blandford Forum”.</p> <p><b>The Pimperne Neighbourhood Plan 2016-2031 was officially 'made' by North Dorset District Council's Full Council on 25 January 2019. In this Plan, specific areas have been suggested for housing development. It is clear from the Pimperne Neighbourhood Plan that there is a very strong desire to keep the area between Pimperne village and Blandford free from any major housing developments which would close the gap between the village and Blandford Town.</b></p> <p>“Policy LC Landscape Character: g) Development should not harm the views of Pimperne village as appreciated on the approach from the south along the Higher Shaftesbury Road, or reduce the open nature of the gap between Blandford Forum and the village of Pimperne, as indicated on Map 2, and should respect the treed and distinctive character of Letton Park within this gap”.</p>
BLAN08	Hallam Land Management	<p>On behalf of our client, Hallam Land Management (HLM), we submit representations to the Regulation 16 Consultation on the Blandford + Neighbourhood Plan 2 (B+NP2).</p> <p>HLM promotes and delivers schemes across the UK and has an established reputation in delivering new investment in homes and infrastructure. HLM control land within the Neighbourhood Plan area to the south east of Blandford St Mary and welcome the Parish Councils’ preparation of the Plan to enable the local community to influence development in their local area.</p> <p>HLM has previously submitted representations to the Regulation 14 Consultation (letter dated 18th December 2018) which provided broad support for the Plan as a positive framework to help manage growth within the Plan area and to ensure its policies are consistent with the NPPF objectives, namely to boost the supply of housing.</p>



Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>This letter does not intend to repeat those comments made previously in relation to the appropriateness of the spatial strategy, with particular reference to current Local Plan Policy 16, but trust our previous comments will be taken into consideration as they remain relevant to the examination of the Plan.</p> <p>In summary, HLM recognises that the draft B+NP2 takes a proactive and positive approach to plan-making, in light of the current review of the North Dorset Local Plan, to present a strategy for growth that is understood to be shared by North Dorset District Council and reinforces the role of the role of Blandford Forum (and St Mary) as one of the main locations identified for growth. It presents a sound approach to meeting existing committed housing needs and to accommodate additional housing numbers beyond that directed in the LPP1.</p> <p>Our previous representations identified an opportunity for additional clarity to be given to the wording relating to ‘Meeting Housing Needs’ (Part 5 Vision) specifically in relation to bullet ‘j’ (previously referred to as ‘k’ in the Pre-Submission Plan November 18), to better define the ‘land south east of Blandford St Mary’.</p> <p>HLM supports the additional clarification now provided by inclusion of a reference to land ‘north west of Wards Drove’, in the Submission Draft, which is considered to better reflect existing areas for committed growth in LPP1 and the evidence base for the B+NP2 (including the Site Selection Background Paper – and its appendix C land Availability Paper).</p> <p><b>Policy B1 – Blandford Forum &amp; Blandford St Mary Settlement Boundary</b></p> <p>HLM reiterates its support to the approach taken by B+NP2 to amend the settlement boundary to reflect the development strategy as proposed to meet the sustainable growth requirements identified by the Plan.</p>
BLAN09	Historic England	<p>Thank you for your Regulation 16 consultation on the submitted version of the Blandford + Neighbourhood Plan.</p> <p>Our attention in previous responses has focused on policy B1 (now B2) which proposes a significant site allocation on the edge of the town. Our emphasis has been to highlight the need for appropriate evidence to demonstrate that relevant heritage considerations have featured in the policy formulation process in order to demonstrate conformity with national and local policy for the protection and enhancement of the historic environment.</p>

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>We attach correspondence relating to the Regulation 14 consultation on the pre-submission version of the Plan which highlights the suggested likelihood of the site allocation causing harm to designated heritage assets and the need primarily to avoid this, or demonstrate that it is necessary in the interests of the public benefits it will deliver and the least harmful of the possible options available, and that any harm will be minimised and optimally mitigated.</p> <p>We note that since our last correspondence additional reports have been produced or updated and submitted with the Plan (eg Sustainability Appraisal &amp; Site Selection   background paper, both dated January 2019).</p> <p>In the circumstances we are happy to leave consideration as to the appropriateness of the evidence base to support this policy to the discretion of your authority. There are no other comments on the Plan we wish to make.</p> <p>The full response, including Historic England’s response to the regulation 14 consultation, can be accessed via the following link:</p> <p><a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/historic-england-combined-redacted.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/historic-england-combined-redacted.pdf</a></p>
BLAN10	James Atkins	<p>I have looked at the town plan but I am not sure if the area around the old stables off White Cliff Mill Street is now available for housing development.</p> <p>If this is the case we are concerned about the extra amount of traffic coming through the Market Place.</p> <p>We would suggest that if any planning is ever allowed, it should be a condition that White Cliff Mill Street should be made into two way as far as Eagle House Gardens</p>
BLAN11	Natural England	<p>Policy B1 – Settlement Boundaries and Policy B2 – Land North &amp; East of Blandford Forum Objection – Impacts relating to permanent adverse impacts on the Cranborne Chase AONB. The submitted Neighbourhood Plan includes a significant urban extension comprising 400 new homes located beyond the A354 Blandford bypass in a rural locality within, and within the setting, of the Cranborne Chase AONB, a designation of national importance with the highest status of protection in relation to landscape and scenic beauty.</p> <p>Natural England strongly recommends that the Cranborne Chase AONB team are fully consulted on any implications of the proposed Policy B1 and B2 on the AONB. Their knowledge of the location and wider landscape setting of the proposed allocation should help to confirm its significance in terms of impacts on the purposes of the AONB designation. They will also be able to advise on the implications of the proposed development in relation to the aims and policies set out in the AONB management plan.</p>

	<p>In exercising or performing any functions in relation to, or so as to affect, land in an AONB, all public bodies, local planning authorities and Natural England, have a duty to have regard to the statutory purpose of AONBs, which is the purpose of conserving and enhancing the natural beauty of the area (Section 85 Countryside and Rights of Way Act, 2000). Local planning authorities are required to take such action as appears to them to be expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty and amenity of an AONB to the extent that it lies within their area (Section 84(4) Countryside and Rights of Way Act, 2000). It is against this duty, and with regard to national and local planning policy, that the proposals must be measured.</p> <p>In weighing up the benefits of any policy against the impact to the AONB your authority should have particular regard to the provisions of the National Planning Policy Framework 2019 (NPPF). In particular, Paragraph 172 which states that,</p> <p><i>“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 Broads. 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.</i></p> <p><i>Consideration of such applications should include an assessment of:</i></p> <ul style="list-style-type: none"> <li><i>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;</i></li> <li><i>b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</i></li> <li><i>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”</i></li> </ul> <p>The Planning Practice Guidance provides further guidance on impacts on the protection of nationally designated landscapes:</p> <p><a href="http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/landscape/">http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/landscape/</a></p> <p>Natural England advises that Policy B2 provides for a development that should be considered as “major” in the context of NPPF paragraph 172 and so any proposals should be required to meet the policy’s “exceptional circumstances” test. Exceptional circumstances will not exist unless all three criteria (i.e. the national and local need, cost and scope for developing elsewhere, and the environmental effect and scope for moderating it) can be satisfied.</p> <p>Natural England considers that Policy B2 (and enabling Policy B1) will inevitably lead to a significant and permanent detrimental effect on the protected landscape of the Cranborne Chase AONB. This assessment is shared by both Cranborne Chase AONB Team and the submitted Sustainability Assessment (SA) acknowledges that the landscape impacts</p>
--	---

of the proposed allocations (including Policy B2) has the “potential to be significant”. Further, we consider Policy B2 clause vii) to be unattainable as it will not be possible to bring forward a design and landscape scheme that will “satisfactorily mitigate any adverse impacts upon the AONB”, rather such mitigation may help to moderate some impacts but will not remove harm to the AONB. Indeed, the Policy B2 limits the potential for further moderating landscape impacts by only providing for a relatively modest level of landscape mitigation. In our view a development of this scale within a rural locality on land designated as AONB should be seeking to enhance and strengthen local landscape character, while providing substantive biodiversity and public access benefits. This would need to include measures designed to improve the screening and setting of the planned and existing development located to the north of the bypass, along with measures to protect and enhance the Pimperne Brook corridor. Further, Natura England recommends that given the policy would lead to unavoidable harm to the Cranborne Chase AONB consideration should also be given to providing for a landscape compensation fund for strengthening landscape character within the Cranborne Chase AONB and the Dorset Downs and Cranborne Chase National Character Area.

In respect to the exceptional circumstance tests as set out in NPPF (2019) paragraph 172 consideration should also be given to ensuring the total quantum of development within and within the setting of the AONB is kept to an absolute minimum, whilst also ensuring that any allocations are located in the least damaging locations with respect to the AONB designation. For example, development on AONB land within the bypass may be relatively less harmful to landscape interests than the proposed B2 allocations located outside the bypass. Such assessments should include landscape and visual impact assessment undertaken in close consultation with the Cranborne Chase AONB Team.

Natural England, however, welcomes the requirement to provide a biodiversity strategy as set out at Policy B2 clause ix). Since the drafting of the current iteration of the neighbourhood plan the NPPF (2019) Paragraph 170 has been amended so that new development is now required to provide for biodiversity net gains, without the caveat “where possible”. We would therefore recommend Policy B2 clause ix) is amended to bring it in line with current national policy. It is worth noting here that while the provision of net gain may not always be possible on site it is always possible to provide additional net gain benefits off site, either directly, or through the provision of funding for biodiversity measures elsewhere.

Natural England notes that following examination in 2017 of the then Blandford + Neighbourhood Plan Policy 1 was recommended for deletion by the Independent Examiner's Report on the grounds they were not in line with National Policy and Guidance, or in general conformity with the Strategic Policies of the Development Plan. Natural England considers that the new Policy B2 is substantively the same as the previous policy recommended for deletion. Further Policy B2 remains neither consistent with local, or national policy, and therefore fails the basic conditions required of a Neighbourhood Plan as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

The merger of local councils in Dorset and the forthcoming review of the local plan policies will provide an important opportunity to more fully access the new wider Dorset Council’s housing needs and will afford greater opportunities for delivering the quantum of housing required while avoiding, or further minimising significant harm to nationally protected

	<p>landscapes. A review of housing needs across the new Dorset Council’s area would also help ensure the requirement, as set out in NPPF Paragraph 172, to further consider the scope for developing outside the designated area, or meeting the need for it in some other way is fully explored prior to allowing any further significant allocations within Dorset’s nationally protected landscapes.</p> <p><b>Policy B2 - Soil and Agricultural Land Quality</b></p> <p>Natural England is concerned that the proposed Neighbourhood Plan Policy B2 will harm over 20 ha of land with soils classified as ‘best and most versatile’ (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF 2019) Paragraph 170. The Neighbourhood Plan Sustainability Appraisal states that Policy B2 is predicted to have “a long term significant negative effect in relation to this SA theme due to the permanent loss of best and most versatile agricultural land”.</p> <p><b>Policy B3 – Employment (b) Land off Shaftesbury Lane</b></p> <p>The policy provides for a significant urban development within the Cranborne Chase AONB, but is contained within the A354 Blandford bypass. Natural England advises that the current proposals should be considered as “major” in the context of NPPF (2019) paragraph 172 and so any development proposals should be required to meet policy’s “exceptional circumstances” test. Exceptional circumstances will not exist unless all three criteria (i.e. the national and local need, cost and scope for developing elsewhere, and the environmental effect and scope for moderating it) can be satisfied.</p> <p>In this case, however, the principle of development in this locality has previously been considered by the adopted local plan. Given the locality within the bypass and its close association with existing developed areas Natural England considers that the allocation with appropriate biodiversity and landscape mitigation measures are unlikely to have a detrimental effect on the environment, landscape or recreational opportunities. Indeed with appropriate landscape mitigation measures the allocation is likely to have the potential to help improve the appearance of the existing development from the wider views within the AONB. On this basis Natural England has no objection to the allocation.</p> <p>The final scheme for the site should also be supported by a DCC NET approved Biodiversity Mitigation and Enhancement Plan.</p> <p><b>Policy B3 – Employment (c) Land adjacent to Sunrise Business Park</b></p> <p>The policy provides for an extension to the Sunrise Business Park on land within the Cranborne Chase AONB. Consideration of the proposals should include an in combination assessment of landscape impacts with the existing waste transfer allocation and additional allocations set out in Policy B1 and B2.</p>
--	---

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>Natural England strongly recommends that the Cranborne Chase AONB team are fully consulted on any implications of the proposed Policy B3 on the AONB. Their knowledge of the location and wider landscape setting of the proposed allocation should help to confirm whether or not it would impact significantly on the purposes of the designation. They will also be able to advise whether the development accords with the aims and policies set out in the AONB management plan.</p> <p>While some extension of the Sunrise Business Park might be acceptable this should only be where the authority is satisfied that there are no alternative less harmful locations available. In our view any allocation that further extends the facility should also provide opportunities for substantive landscape buffering for the extension, the existing Sunrise Business Park and allocated Waste Transfer Site, with the clear aim of further moderating the landscape impacts of the existing employment uses within the locality.</p> <p>The full response, including in relation to other policies and the Habitats Regulations Assessment, can be accessed via the following link:</p> <p><a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/natural-england-redacted.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/natural-england-redacted.pdf</a></p>
BLAN12	North Dorset District Council	<p>North Dorset District Council (NDDC) welcomes receipt of the submission version of the Blandford + Neighbourhood Plan 2011 - 2033. As set out in the submitted material, including the plan itself, the plan has evolved from an earlier iteration that was subject to examination but subsequently withdrawn. Whilst NDDC raised concerns in respect of certain parts of the first version of the plan circumstances have changed significantly since that plan was subject to examination.</p> <p>As is evident from the submitted documents, NDDC has worked closely with the Blandford + Neighbourhood Plan Group (NPG) and the Qualifying Body (QB) (Blandford Forum Town Council) on the development of this version of the plan. This includes in respect of Policy B2 which allocates land to the North and North East of Blandford Forum for a mix of residential, education, community and allotment uses. Given the policy proposes a two form entry primary school there has also been close working with Dorset County Council (DCC), the local education authority covering the neighbourhood plan area. As a result of the close cooperation with the other parties involved, especially the NPG and QB, NDDC has a fairly limited number of comments regarding the submission version of the plan.</p> <p>Given the context set out above, and taking into account the large amount of consultation that has taken place with the local community, this response seeks to provide constructive comments relating to finalising the plan. For ease of reference, comments are set out according to the paragraphs/policies etc. in the submission version of the plan. The comments made in this response should not be seen as exhaustive and officers continue to encourage an on-going dialogue with the NPG and the QB regarding finalising the plan.</p>

		<p>NDDC’s full response, including its detailed comments, can be accessed via the following link:  <a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/nddc-combined.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/nddc-combined.pdf</a></p>
<p>BLAN13</p>	<p>Pimperne Parish Council</p>	<p><b>1. Recognition of constraints relevant to Pimperne.</b></p> <p>We feel it would be appropriate to include the various planning constraints defined in the Pimperne Neighbourhood Plan on this constraints plan as this map is intended to show constraints in the adjoining area that could be impacted by development, and that the Neighbourhood Plan has been made and would therefore be a material planning consideration. The map should therefore reflect -The important gap between Blandford and Pimperne -The safeguarded Employment area at the Taymix/ Yarde Farm location -The revised settlement boundary (note this includes the allocated sites) -The LGS designation of the playing fields.</p> <p><b>2. Inappropriate references to development within Pimperne Parish.</b></p> <p>Despite raising concerns previously, it is disappointing to see that the Blandford Plus Neighbourhood Plan continues to make reference to development potential in Pimperne Parish, which is clearly at odds with the Pimperne Neighbourhood Plan.</p> <p>Areas A and B on the B+ NP Constraints plan on pg 16 include areas of search within Pimperne Parish whereas it is not within the ability of the Neighbourhood Plan to allocate such land for development. Although it is understood that this may have been based on the Local Plans Review Options paper, it is clear that these are not options for the Neighbourhood Plan and the map should be amended to only show the areas of the search that are wholly within the Neighbourhood Plan area.</p> <p>Para 5.10 recognises that “the land made available for development in relation to policy B2 extends beyond the town boundary into the neighbouring parish of Pimperne. It will be for the Local Plan review to determine if that land shall be allocated”. The Policy B2 part viii references “no dependency of the land release for the Phase 1 Scheme on the Phase 2 scheme which lies outside the Neighbourhood Plan boundary within the adjacent parish of Pimperne”. It is suggested that as a minimum the reference 5.10 is deleted (as it is not relevant to the Blandford + NP and is considered to be encouraging growth that Pimperne residents would clearly see as contravening their Neighbourhood Plan) and that the criteria xiii is redrafted as follows: “a planning obligation to secure the release of all land necessary for the supporting infrastructure, the 2FE primary school and other community facilities following outline planning consent for the development within the Blandford + Neighbourhood area and prior to the commencement of that scheme” to similar remove any reference to further phases outside of the NP area.</p>

Para 5.25 goes on to state that “the policy acknowledges that part of the housing land north east of the town lies beyond the designated neighbourhood area in Pimperne Parish. The examiner for the recent examination of the Pimperne Neighbourhood Plan which identifies a local gap policy for this land recognised Blandford Forum’s role as a major service centre in the south of the district needing to accommodate growth. The examiner also noted that the land that is within the Pimperne Neighbourhood area could accommodate growth sensitively whilst retaining an important landscape gap between Blandford Forum and Pimperne. It therefore defines that part of the scheme within the Blandford +neighbourhood area as phase 1 and that part beyond the designated boundary as phase 2 and requires that no part of the delivery of phase 1 depends on the delivery of phase 2, while recognising the need for a comprehensive masterplan for the whole of the site”.

Firstly, the reference to the Examiner is misleading as para 5.35 of the Examiner’s report (which states that part of this site is within the Pimperne Neighbourhood Plan area could be accommodated sensitively whilst retaining an important landscape gap between Blandford Forum and Pimperne) is the Examiner’s summary of the objector’s representation. His opinion is clearly expressed in 5.38 where he states that “I consider that the distance quoted in PNP between Pimperne village and Blandford Forum as being less than a mile along the A354 (plan page 4, first paragraph) is a reasonable indication of the relationship between the two settlements, and it is clearly seen by the residents of the parish of Pimperne as having a fragility that needs careful consideration” and in para 5.39 he sets out that this cross-boundary issue is not something that falls within his remit to examine.

Secondly, as referenced above, there should not be reference to development within Pimperne Parish as part of the proposals. It is therefore suggested that the entire second part of this paragraph (from “in addition, the policy acknowledges that part of the housing land north east of the town lies beyond the designated neighbourhood area in Pimperne Parish” onwards) is deleted.

**3. Uncertainty over Impacts.**

There has been no transport study carried out in terms of whether the highways impact of this level of development can be suitably mitigated. The only information available is based on an EIA scoping report that suggests that the development would fall under the threshold 30% increase(or other sensitive areas affected by traffic exceeds 10%) but this is not backed up by any empirical evidence. The report is suggesting that the following works may be required to facilitate the proposed development:

- New site access roundabout on the A354 Blandford-by-pass.
- New pedestrian links from A354 Blandford-by-pass to Black Lane



	<ul style="list-style-type: none"> <li>- New pedestrian links from Blandford-by-pass to Preetz way.</li> <li>- Works to the existing A354/ A350 roundabout to increase capacity.</li> <li>- Improvements to pedestrian facilities at the existing A354/ A350 roundabout and associated approaches.</li> <li>- Improvements to the existing site access junction on the A354 Salisbury Road.</li> <li>- Various measures to encourage lower vehicles speeds along the Blandford-by-pass.</li> <li>- New pedestrian link to the existing footbridge over the A350 Blandford-by-pass. It is notable that the scoping opinion disagrees with a number of issues that were proposed to be ‘scoped out’ of any EIA, including the need for Water Resources, Drainage and Flood Risk, Cultural Heritage, Air Quality, Noise and Light Pollution (in addition to landscape and biodiversity).</li> </ul> <p>Landscape impact is recognised as a key consideration and Natural England have advised that consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> <li>-The need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.</li> <li>-The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way.</li> <li>-Detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</li> </ul> <p>It is clear that the current evidence supporting the NP does not include this level of information.</p> <p><b>4. Uncertainty over allotments</b></p> <p>“The principle to relocate the existing allotments to accommodate the allocation has already been discussed with the Town Council and negotiations continue with the land interests”. Policy B2 V states that “The Lamperd’s Field Allotments are relocated to a single location to the west of their current position and comprise land of approximately 2.5 hectares and ancillary facilities that meet or exceed the of the existing site</p> <p><b>5. Treatment of alternatives and the SEA</b></p> <p>There is a “chicken and egg” reference to school in that the NP argues in 3.16 That DCC ‘prefer’ the northern option, yet the DCC paper makes clear that the northern option is preferred due to the intended strategy of the NP. It also gauges its</p>
--	---

assessment on the potential for a further 260 houses in the Pimperne Parish. Furthermore there does not appear to have been consideration of the use of the site in Area J as a potential school site.

Option 1 was put forward on the basis that it would “deliver the full specification” including 2ha of employment land, whereas this is not the case. Option 3 and 4 included employment in Area J as part of a disperse approach, but this dispersed approach was not considered for Area A or B.

The SEA is based on the assessment of reasonable alternatives based on the Issues and Options consultation proposals of the Local Plan Review. At that time Pimperne Parish Council raised concerns about the accuracy of the assessment (<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/northdorset/local-plan-review/pdfs/issues-and-options-consultation-responses/pimperne-pc-19-1-18-redacted.pdf>) which do not appear to have been addressed.

The table on the attached sheet simplistically assigns a number value to each impact, and assesses the mean average. The SEA proposes that areas, A,B,E,F and J as possibly having some development potential – and the rest discounted. Yet it is clear from the table that site K (which is wholly within Pimperne Parish and therefore not able to be progressed through the Blandford + Neighbourhood Plan) scored more favourably, and sites C and D are not dissimilar in terms of their overall impact compared to F (although no land in area D appears to have been shown as available, and C is also outside of the Neighbourhood Plan area).

Furthermore option E (arguably the most sustainable site) was disregarded on the basis if the likely 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.

On the basis the SEA and approach to consultation appears flawed and shows the difficulty inherent in assessing the most sustainable option for the town’s growth when some of the options are discounted due to the administrative boundary dictating the plan area.

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

Used	Biol	Soil	Water	Air	Clim	Land	Hist	Comm	Hous	Econ	Mean	Logical
A	0	-1	-1	0	0	-2	-1	0	2	0	-0.3	A
B	0	0	-2	0	-2	-2	-1	0	2	0	-0.5	B
C	0	0	-2	0	-2	-2	-2	0	2	0	-0.6	C
D	-1	0	-2	0	-2	-2	-1	0	2	0	-0.6	D
E	0	0	0	0	0	-1	-1	0	2	0	0.0	E
F	-2	0	-1	0	-1	-2	-2	0	2	0	-0.6	F
G	-1	0	-2	0	-2	-2	-2	0	2	0	-0.7	G
H	-2	0	-2	0	-2	-2	-2	0	2	0	-0.8	H
I	-2	0	-2	0	-2	-2	-2	0	2	0	-0.8	I
J	-2	0	-1	0	-1	-2	-1	0	2	0	-0.5	J
K	0	0	0	0	0	-2	-1	0	2	0	-0.1	K

Pimperne Parish Council's full response can be accessed via the following link:  
<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/pimperne-parish-council-updated-version-redacted.pdf>

BLAN14	Simon Sherbrooke	<p>The Bypass has been an enormous benefit to Blandford- and should be preserved as such - a bypass. Apart from the removal of through traffic, with the Bypass, the centre of the town can be (and is) closed off for the May Fair, the carnival (in September), the Christmas Fair and also ceremonies in the Market Place, particularly associated with Blandford Signals Camp such as Armistice Day. If it were not for the Bypass, that would be impossible.</p> <p>The Bypass is frequently "full" with traffic queuing at many of the (four) roundabouts. Approach to Hill Top Roundabout (from Pimperne and so past Bolney) is fraught. Travelling westwards from Pimpeme towards Blandford, after an initial length of flat road, the ground slopes upwards in a straight line before the last few hundred level metres before Hill Top Roundabout. By the time the traffic has got to the brow it is speeding (notwithstanding a 40mph restriction/sign) and so there are frequent concertina traffic collisions on the stretch to the roundabout. Making the brow yet more fraught there is, in effect a settlement on both sides of the A354-Letton Close and Letton Park</p> <p>- with each having (its sole) access at about the brow.</p> <p>The Bypass provides a visual and actual limit to the (eastern) extent of the town, indeed a gateway. It should be retained as such. But the Councils propose to degrade the Bypass. First, it is proposed, by a roundabout between</p>
--------	------------------	--

Two Gates and Hill Top roundabouts to access Area NE and secondly at least one slip road to and/or from the envisaged Waste Station.

In (the latter part of) 2018 there was a request to North Dorset District Council for a scoping opinion as to 700 dwellings, Primary School etc on Areas N and NE. The response by Cranbome Chase AONB included

*The site [ie Areas N and NE] is effectively divided into two and both of these parts are outside of the bypass to Blandford which appears to negate the purpose and function of the bypass.*

Whilst not merely a matter for the Councils, the A350 is "the road" between Poole (with its port) and the M4, the motorway between Bristol and London, and as such is a national strategic road. It would be stupidity to degrade that highway.

Paragraph 3.18 of the Councils' Submission Plan

The Councils submit they (the Councils) have long sought to address the social and infrastructure weaknesses "particularly in the northern part of the town where housing expansion over recent decades has not been

accompanied by supporting social or commercial infrastructure" and Dorset County Council as the Local Education Authority has updated its Pupil Place Planning Statement - "that the provision of new primary school places in

Blandford is now critical and having discounted all other options their preferred option is to locate a new primary school and enabling development within and in the setting of the [Cranbome Chase and West Wiltshire] AONB

in the north of the town beyond the bypass. They have concluded there is no other land available in Blandford to accommodate the new school".

While I appreciate that the education authority has been Dorset County Council, this is an extraordinary statement/claim.

During those "recent decades" much of the north east quadrant of the Town - the land north of Salisbury Road, east the Town's cemetery which is on the east side of Shaftesbury Lane and west of the Bypass has been filled by housing, an industrial estate and a supermarket but which would have been available for such a further primary school. And in part still is:-

- a. The Councils' Submission Plan 2011-2033 contains Policy 16: Blandford of North Dorset District Council (NDCC). I cannot see the date thereof but it almost concludes with

*In the period up to 2031, social infrastructure to support growth will include*

	<p>v <i>the extension of the Archbishop Wake school and either extension of the Mil/down school or provision a new 2 forms of entry primary school.</i></p> <p>b. In the mid 2000s Blandford schools moved from three to two tiers and at the same time Archbishop Wake Primary School was closed. At the preceding public enquiry I made the point that with increasing population, closing a school was shortsighted. I was told there was no need for the school.</p> <p>c. (With forethought) the northern part of that northeast quadrant of Blandford could easily have accommodated a primary school – Glenmore Industrial Estate has only recently been developed and the Lidl supermarket even more recently. Even today, between that supermarket and the present extent of the Glenmore Industrial Estate is an area of land which appears to me to be large enough to accommodate a primary school.</p> <p>Even if that last area of land is unavailable or inappropriate for a new primary school there is a further alternative.</p> <p>At the end of this month, March 2019, is the conclusion and coming into full effect of the merger of North Dorset District Council and five other district councils plus the disappearance of Dorset County Council and the absorption of its functions, including education, into that new unitary council. As part and parcel of those changes, NDDC's offices in Blandford, <i>Nordon</i>, (on Salisbury Road) become redundant and the relevant council has been thrashing around, for some time, as to what to do with Nordon. But Nordon could be a further alternative for the apparently critically needed primary school. It is in Blandford (rather than the proposed site of beyond the Bypass) and in the northern part of the town. The existing buildings would no doubt need to be altered but the basic infrastructure is already there. And from the beginning of April 2019 Nordon will be owned by the body responsible for education.</p> <p>In any event, I would not want as a parent of primary school pupil (and often with one or more younger children in tow) to walk back and forth across the elevated pedestrian bridge, with traffic roaring past underneath and often a gale blowing, from the housing within the Bypass, Badbury Heights, to a school within Area N. Additionally, any school beyond the Bypass would not be part of the community but "off away over the bypass".</p> <p>And I submit any school but most of all a primary school should be within the Town envelope and so within the Bypass the Bypass should be the limit of the town and especially of social infrastructure.</p> <p>The Councils' Submission Plan is silent as to how any school in Area N would be accessed vehicularly. (Other than by a slip road off the Bypass) this would necessarily be from Sunrise Roundabout or Hill Top Roundabout, or both. In either event such would require a fifth spur to the roundabout, with, in the latter case, implications for the possible safe crossing of the roads to/from the roundabout - see below for "Access to land outside the Bypass".</p>
--	--

Indeed in the case of Hill Top Roundabout, development of either or both Area N and Area NE would require either Hill Top Roundabout to have six spurs - the existing four plus one for each of Area N and Area NE or alternatively other substantial work to the roundabout or at least a slip road into/out of the Area.

Section 5 of the Councils' Submission Plan - "Vision, Objectives & Land

Use Policies"

The second section of this - page 27 - is "Maintaining our Special heritage and landscaping Character and Addressing the Challenges of Climate". I don't see how development outside the Bypass would

either "maintain Blandford's special heritage or its landscape heritage" as development beyond the Bypass would detract from both

or "address the challenges of climate change" as development beyond the Bypass would not discourage car use.

Paragraph 5.8 of the Councils' Submission Plan

This claims that "the spatial plan focuses growth on building Blandford Forum into a more successful town". I say that would be achieved by more employment rather than more housing. Many of the town's people work in neighbouring towns- Poole, Dorchester, Gillingham, Salisbury.

However the roads to Poole and Gillingham are entirely inadequate for the existing traffic. Poole is by way of Charlton Marshall and Spetisbury and the road to Gillingham albeit being the A350, between Blandford and

Shaftesbury (despite, as set out above it being of national strategic importance) is hardly more than a country lane.

Housing need

The Councils claim there is a need for the housing envisaged for Area N and Area NE. However at least according to Dorset CPRE, the Councils' "allocation" has already been met. I refer to the attached copy of its letter of 25 October 2018 to North Dorset District Council.

Paragraph 5.88-8 of the Councils' Submission Plan

Policy B15- Tourism

The Policy states it "is intended to support the growth of the tourist economy". It is difficult to see how this will be achieved by extending the town into the country beyond the Bypass. Blandford declares itself to be "A Unique Georgian Town". It is but that

status will be diminished by development outside the Bypass- there will be the historic centre but that will be buried by the surrounding acres of modern building.

Paragraph 5.12 of the Councils' Submission Plan

Just because Blandford's "historic growth pattern" has been to the north east is no reason for such to continue and anyway such historic growth was before the Bypass. Any town can have natural constraints. Blandford has always had one to the south ... the River Stour. For the last thirty years it has had another to the east and north ... the Bypass.

Development beyond the Bypass would not create "a new town gateway": rather it would destroy the existing gateway of entry into the town namely the beginning of the town after one has come over/off the Bypass.

The paragraph concludes by stating that development outside the Bypass would reinforce "the strategic importance of Salisbury Road for both new and existing communities". I don't know what this is meant to mean and what the "new and existing communities" are. It would be stretching reality to think of any housing outside the Bypass to be part of the community of Blandford.

Access to land outside the Bypass

Paragraph 5.19 of the Councils' Submission Plan concludes with

*It [ie the land beyond the Bypass being Area NE] can be safely accessed from both the bypass A350/A354 roundabout [Hill Top] and by the A354 Salisbury Road and there are opportunities to establish a safe pedestrian and cycling crossing of the bypass to connect the development with Preetz Way.*

This is at best nonsense and at worst simply disingenuous.

First of all Hill Top Roundabout. Housing east of the Bypass could not be safely accessed (by pedestrians and cyclists) without pedestrian crossings safeguarded by traffic lights.

When I walk into Blandford (or walk to the neighbourhood shops on Salisbury Road) I cross the A354 to the pavement on the north side of the road and so approach Hill Top Roundabout from the north east. Crossing the first part of the Bypass ie the carriageway carrying the traffic from Sunrise Roundabout is safe enough - I can see such traffic and it can see me but the

second half is hazardous as much of traffic from Two Gates Roundabout zooms up to Hill Top Roundabout with the intention of speeding straight on.

Safe (pedestrian) access to/from housing (let alone a school) in Area N or Area NE into Blandford would require a pedestrian crossing supported by traffic lights on the Bypass. Hill Top Roundabout would be a danger spot and a bottle neck.

Secondly, "a safe pedestrian and cycling crossing of the Bypass to connect development with Preetz Way". This would require either an elevated way which would be highly unsightly/out of character or a pedestrian crossing accompanied by lights. But such a crossing would be several hundred metres from Hill Top Roundabout and about twice as far from Hill

Top Roundabout so that by the time the traffic got to the crossing/lights it would be travelling at a minimum of 40/50mph. (The distance between the two roundabouts is about eight tenths of a mile.) It would be an accident blackspot. And seriously degrade the traffic effectiveness of the Bypass (which was why it was built).

Blandford's open spaces

The Councils Submission Plan lists "Local Green Spaces" Policy B 10 (page 46) and Policy B14 is *The River Stour Meadows* (pages 52/3).

The free availability of the eastern part of Stour Meadows - adjacent to the southern origin of the town, and The Mill down - against the north western edge of the town are hardly mentioned. They are Blandford's "commons" or parks. Indeed, they are gems. Areas N and NE are as far from these two wide open spaces as is possible.

The Councils' Policy B9 - Green Infrastructure network

Paragraph 5.54 requires that all development proposals that lie within the Green Infrastructure Network or adjoin it should consider how to improve or at very least not undermine green spaces and habitats.

I am sure that development of Area NE will damage the habitats and living/feeding space of the buzzards (*buteo buteo*) which nest in the copse approximately half way between one end and the other of this area.

Area N

North Dorset District Council's plan for this land (apart from allotments, which were moved about a dozen years ago from land, in the town, on the west side of Shaftesbury Lane, which has been unused ever since) was as playing fields which is presumably the reason for the (shut) pedestrian bridge from Bad bury Heights (across the Bypass).

Playing fields would be a suitable use for land outside the Bypass and in the vicinity of AONB land.

The Councils state such proposed use has been abandoned but provide no explanation for this. If the Councils really do have "Vision" and want Blandford to be successful and want to "promote healthy safe communities" the plan to have Area N as playing fields should be reinstated.

The limit of Blandford + and the boundary with Pimperne

The plan on page 16 of the Councils' Submission Plan, comes, I think, from an earlier proposal of the Councils: Areas A and Bare not defined but appear to include land outside the parishes of the Councils, specifically Pimperne.

Pimperne's own representations to the Councils' earlier proposal included

*Despite raising concerns previously, it is disappointing to see that the Blandford Plus Neighbourhood Plan continues to make reference to development potential in Pimperne parish, which is clearly at odds with the Pimperne Neighbourhood Plan.*



*Areas A and B on the B + NP Constraints plan on pg 2 include areas of search within Pimperne Parish whereas it is not within the ability of the Neighbourhood Plan to allocate such land for development.*

*Although it is understood that this may have been based on the Local Plans Review Options paper, it is clear that these are not options for the Neighbourhood Plan and the map should be amended to only show the areas of the search that are wholly within the Neighbourhood Plan area.*

(Although that point/representation was in December 2018, no such amendment has been made - viz the plan on page 16 of the Councils' Submission Plan.)

And so the statement in paragraph 3.24 of the Councils' Submission Plan, that Pimperne's plan "does not contain policies that are of direct relevance to the policies" of Blandford Councils is simply wrong.

While Pimperne does not extend as far west as the Bypass, there is a section of Blandford (parish) east of the Bypass. (The developable part of the section would be smaller than suggested by Barton Willmore, the planning consultants on behalf of the would be developers, because of the need for a bund against the Bypass to protect housing from the noise.)

The latter part of paragraph 5.1 0 of the Councils' Submission Plan acknowledges this. But once the limit of Blandford, the Bypass, is broken there will be little to stop further growth to the east, towards Pimperne (village). Indeed paragraph 5.25 of the Councils' Submission Plan envisages this - it refers to Phase 1 of development, in the parish of Blandford AND to Phase 2 which is beyond the parish boundary namely in the parish of Pimperne.

But Pimperne village/parish, which has already held its referendum on its local plan, wants to maintain the existing gap between itself and Blandford: it resolved to confine development to adjacent to existing building in the village. (Please see *Important Gap Policy Map 2* of Pimperne Neighbourhood Plan which I understand Pimperne Parish is providing with its response to the Councils' Submission Plan).

The Councils' Basic Conditions Statement

Table A Neighbourhood Plan & NPPF Conformity Summary – paragraph 172 c - page 8, seeks to show that development within the AONB – Badbury Heights Glenmore Industrial Estate, the retail development of Lidl, Sunrise Business Park and the proposed Waste Management Centre - "all demonstrate, allegedly, that the impact of development in or by the AONB ... can be moderated". This is misleading. The first three of those five cases are within the Bypass; the fourth predates even AONBs, let alone the Bypass - it started life as a chicken farm at least as long ago as the 1950s- and the fifth, the proposed Waste Management Centre, is still a proposal.

Conclusion

For these reasons I submit

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<ul style="list-style-type: none"> <li>• the Bypass must not be degraded by another roundabout and/or a pedestrian crossing (necessitated by development outside the Bypass);</li> <li>• building on/development of Areas N and NE (or either of them) would be wrong;</li> <li>• development should be within the Bypass</li> <li>• the critically needed primary school in the north of the town should be within the Bypass (and can be).</li> </ul> <p>Simon Sherbrooke’s full response, including the letter from Dorset CPRE, referred to above, can be accessed via the following link:</p> <p><a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/simon-sherbrooke-redacted.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/simon-sherbrooke-redacted.pdf</a></p>
BLAN15	Wates Developments Limited	<p>Wates makes the following suggested changes to Policies B1 and B2 of the Neighbourhood Plan:</p> <p>Suggested Change to Policy B2 – Land North and East of Blandford Forum</p> <p>Wates generally supports the proposed Policy B2 allocation of land to the North and North East of Blandford Forum for a mix of residential, education, community and allotment uses. Owing to the need to provide more housing in North Dorset/Blandford Forum and following consideration of the LVA report by SLR and the Technical Note on Transport matters by Motion there are sound reasons for either extending the existing Policy B2 allocation to the south to include the Wates land north of Black Lane or allocate the Wates land as a standalone development site for up to 90 dwellings, new public open space plus new vehicular, pedestrian and cycle access points onto Black Lane.</p> <p>The development option described above is shown on the attached indicative drawings prepared by Re-Format. These include:</p> <ul style="list-style-type: none"> <li>• Concept Layout (Drawing No 18130(AF)00.01 - Rev P07)</li> <li>• Proposed Context Plan (Drawing No 18130(AF)00.02 - Rev P03)</li> </ul> <p>In light of the above the comments my client suggests that the wording of Policy B2 - Land North &amp; East of Blandford is amended to reflect the comments made above.</p> <p>Suggested Change to Policy B1/Inset B - Blandford Forum &amp; Blandford St Mary Settlement Boundary</p>

Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>Based upon the comments made in paragraphs 4.2 to 4.4 above, the Settlement Boundary for Blandford Forum as shown on Inset B of the Policies Map should include the proposed development areas as shown on the Concept Layout (Drawing No 18130(AF) 00.01 - Rev P07) which forms part of these representations.</p> <p>Wates Developments Limited’s full response, including the documents referred to in the comments above, can be accessed via the following link:</p> <p><a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/wates-developments-limited-combined-redacted-reduced.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/wates-developments-limited-combined-redacted-reduced.pdf</a></p>
BLAN16	Wyatt Homes	<p>We consider that the Blandford + Neighbourhood Plan 2 has been well prepared and will meet Blandford’s housing need. The Neighbourhood Plan has allocated sites in sustainable locations which have good access to employment, local services and facilities.</p> <p>The Land North and East of Blandford Forum, allocated by Policy B2, is considered to be in a sustainable, accessible location. It is clear that the site will provide significant community benefits including the provision of a new primary school, relocated allotments, a community hub, affordable homes and an area of public open space. The site will also contribute to Blandford’s green infrastructure network and the future residents will contribute to the local economy and the vitality of the town centre.</p> <p>Whilst we understand the allocation of the section of the site within Pimperne Parish is out of the Blandford + Neighbourhood Plan’s control, we would like to highlight that this land is available, deliverable and developable and would not result in a detrimental impact on the gap between Pimperne and Blandford.</p> <p>Overall, it is considered that the Neighbourhood Plan meets the basic conditions required of a Neighbourhood Plan. However, prior to the Neighbourhood Plan being submitted for Examination, it would be beneficial to consider the points raised in these representations, to enable the Neighbourhood Plan to be robustly defended at Examination and have the greatest chance of proceeding to referendum.</p> <p>We trust that the representations provided are helpful. If the Neighbourhood Plan Steering Group would consider it beneficial to discuss the representations provided further, then please do not hesitate to contact us.</p> <p>Wyatt Homes full response, including its detailed comments in respect of policies in the plan, can be accessed via the following link:</p> <p><a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/wyatt-homes-reduced-redacted-reduced.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/responses/wyatt-homes-reduced-redacted-reduced.pdf</a></p>

## Blandford + Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

--	--	--

In addition to the regulation 16 consultation it should be noted that a consultation was held on a draft Decision Statement relating to whether the plan should proceed to referendum. The consultation was from Friday 8 May 2020 to Friday 26 June 2020 and 12 responses were received. The responses can be viewed via: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/blandford-v2/blandford-neighbourhood-plan-version-2.aspx>.