#### NeighbourhoodPlanning

From:	Jeremy Farrelly
Sent:	24 May 2023 15:25
То:	NeighbourhoodPlanning
Subject:	Blandford + Neighbourhood Plan Review
Attachments:	Completed Response Form - 24 May 2023.pdf; Blandford VD final (January
	2023).pdf; Reg 16 Reps to Blandford + Neighbourhood Plan Modifications Review
	- March 2023 - 24-05-2023.pdf

Dear Sir / Madam

On behalf of my client, Wates Developments Ltd, I attach representations in respect of the above.

These comprise the following:

- 1. Completed Response Form
- 2. Covering Letter
- 3. Vision Document Land off Black Lane, Blandford Forum

I would be grateful if could you confirm receipt of this e-mail / attachments and also keep me informed of the next stages of the Examination process.

Kind regards

Jeremy Jeremy Farrelly BA (Hons) UPS DUPI MRTPI Director of Planning

26 Chapel Street Chichester West Sussex PO19 1DL



www.genesistp.co.uk



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## BLANDFORD + NEIGHBOURHOOD PLAN REVIEW

### Regulation 16 Consultation Friday 14 April 2023 until Friday 26 May 2023

## **Response Form**

The proposed modified Blandford + Neighbourhood Plan has been submitted to Dorset Council for examination. The modified neighbourhood plan and supporting documentation can be viewed on Dorset Council's website: <a href="https://www.dorsetcouncil.gov.uk/blandford-neighbourhood-plan">https://www.dorsetcouncil.gov.uk/blandford-neighbourhood-plan</a>

#### Please return completed forms to:

- Email: NeighbourhoodPlanning@dorsetcouncil.gov.uk
- Post: Community Planning Team, Spatial Planning, Dorset Council, County Hall, Colliton Park, Dorchester, DT1 1XJ
- **Deadline:** End of Friday 26 May 2023. Representations received after this date will not be accepted.

## Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule and privacy policy (www.dorsetcouncil.gov.uk/privacypolicy). Your data will be destroyed when the plan becomes redundant.

	Personal Details *	Agent's Details *
Title		Mr
First Name		Jeremy
Last Name		Farrelly

Job Title(if relevant)		Director of Planning
Organisation (if relevant)	Wates Developments Limited	Genesis Town Planning Ltd
Address		26 Chapel Street Chichester West Sussex
Postcode		PO19 1DL
Tel. No.		
Email Address		

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

## Part B – Representation

## 1. To which document does the comment relate? Please tick one box only.

$\checkmark$	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

**2.** To which part of the document does the comment relate? Please identify the text that you are commenting on, where appropriate.

_	Location of Text		
Whole document			
Section			
Policy	Policy B2 – Land North and East of Blandford		
Page			
Appendix			

## 3. Do you wish to? Please tick one box only.

	Support
$\checkmark$	Object
	Make an observation

## 4. Please use the box below to give reasons for your support or objection, or to make your observation.

Please see a	ttached covering	g letter and Vis	sion Document	t	

### 5. Please give details of any suggested modifications in the box below.

Please see attached covering letter and Vision Document

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? *Please tick one box only.* 

$\checkmark$	Yes
	No

Signature:	Date:	24 May 2023
If submittin	g the form electronically, no signature is required.	0



## Land off Black Lane Blandford Forum



Land north of Black Lane Blandford Forum



## CREATING TOMORROW TOGETHER

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# Wates



Land north of Black Lane Blandford Forum



## 1. Introduction

This vision document has been prepared by Wates Developments to support the promotion of Land North of Black Lane, Blandford Forum, for residential development. This document has been prepared with the support of advice from Genesis Town Planning, SLR consulting, Motion Transport Consultancy, Simon Jones Associates, RSK Engineering and Re-Format architects.

Wates Developments has a controlling interest in the site, which extends to 9ha on the edge of Blandford Forum. The site is proposed as a draft option for residential development in the emerging Dorset Local Plan and is immediately adjacent to an allocation in the Blandford+ NP. The site is immediately adjacent to land controlled by Wyatt Homes which forms the allocation in the B+NP and which is subject to a current planning application for 520 homes.

Blandford Forum is the main service centre in central Dorset with an extensive rural hinterland and is by definition a sustainable location for development. This sustainable site can deliver 80-90 dwellings in support of Dorset's housing targets. This document sets out the sites key technical and design considerations and the illustrative concept plan.



Wates' approach to sustainability is encapsulated in its Guiding Framework and in the Group's purpose of inspiring better ways of creating the places, communities, and businesses of tomorrow. Our belief that business, done well, can be a force for good is reflected in our drive to create tangible social, environmental, and economic benefits for the people and communities we serve.



## 2. Wates Developments

Wates Developments is an expert in land, planning and residential development throughout Southern England.

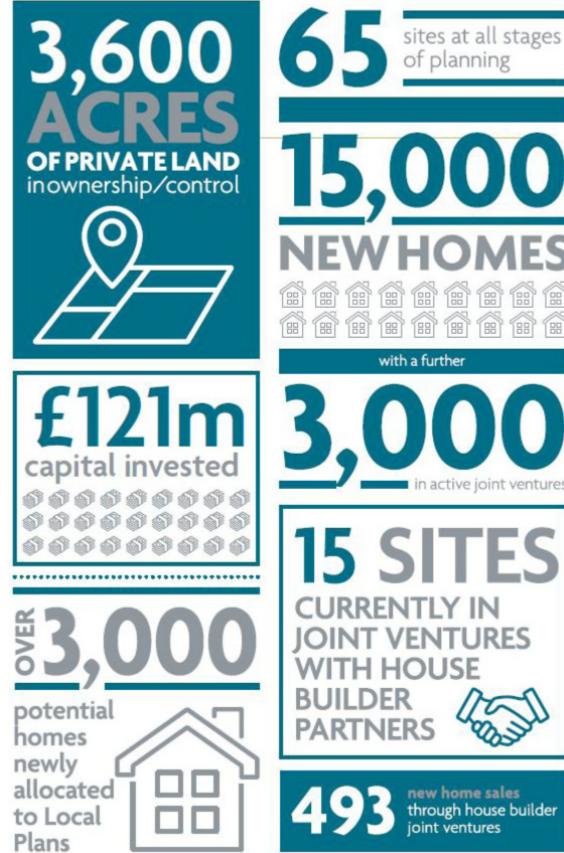
As a family owned business Wates shares a deep sense of responsibility to provide outstanding projects for customers which make a long-lasting difference to the communities in which it works. From delivering affordable housing, new schools, through to retail and commercial interiors, heritage sites and residential development jointly with partners, it is in a unique position on to make a positive impact for the long-term.

## Wates Developments in Dorset

Wates Developments previously promoted land in Blandford Forum. The now built-out residential development is located to the north of Wimbourne Road and sits within the bypass. The site falls within the AONB, along with the school adjacent (Archbishop Wake CofE School). Wates and Persimmon Homes worked positively with the NDDC and key stakeholders to bring the site forward. The application had a positive officers recommendation and was approved at committee in 2011. The site was developed by Persimmon Homes and provided 77 homes in total with 31 (40%) being affordable along with open space and S106 contributions.



Wates Developments and Persimmon Homes site at Diamond Way, **Blandford Forum** 



## 2. Site Context

Wates has an interest in approximately 100 hectares (247 acres) of land located to the east of Blandford Forum. This vision document focuses on the northern parcel of land (known as Land to the north of Black Lane) which is approximately 9ha (22.2 acres) in size.

Approximately three quarters of this land parcel is located to the north of Pimperne Stream. The stream forms the northern boundary of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB). Vehicular access into this land parcel is directly onto Black Lane via a field gate located midway along the southern boundary.

This land parcel, plus other land to the north and north-east, is identified as Preferred Site/ Proposed Allocation under BLAN7: Land north-east of Blandford Forum of the emerging Local Plan for approximately 680 dwellings and 4.7ha of employment land. Parts of this proposed allocation are also the subject of Policy B2 of the made Blandford + Neighbourhood Plan which allocates the land for approximately 400 dwellings, new primary school, community hub, allotments etc. A hybrid planning application for up to 520 homes with employment, community and education uses along with public open space is awaiting determination.

The built-up area boundary of Blandford Forum abuts the western edge of the Bypass (A354) and the town centre is located approximately 1.0km to the west. Black Lane and Wimbourne Road provide direct access into the town centre.



Location plan with extent of Wates land interest



Location plan - land to the north of Black Lane

## 3. Planning

Blandford Forum is the main service centre in central Dorset with an extensive rural hinterland and is by definition a sustainable location for development.

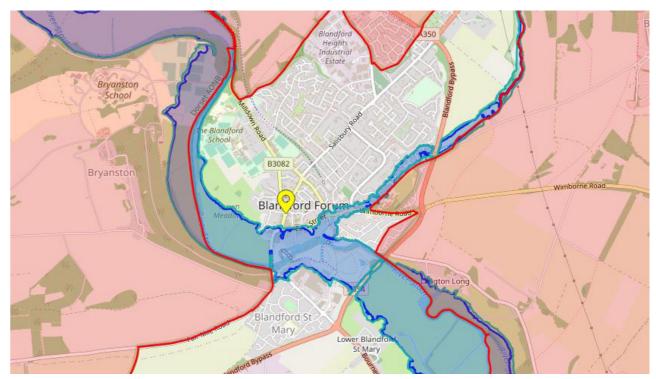
Blandford Forum is surrounded by AONB and is constrained by floodplain in certain areas, limiting options for growth. The plan to the right shows the AONB in pink and the areas within floodzones 2 and 3 in blue. Land to the north of Black Lane is only partly within the Cranbourne Chase AONB and 60% of the site is in flood zone 1.

North Dorset Local Plan Part 1 identifies the settlement as one of the main locations of growth which is reflected in Policy 16 which sets out detailed specifications for development in this area. NDDC undertook a review of sites around the existing settlement boundary. Paragraph 6.18 confirms land at north east Blandford (referred to as Areas A and B) as having development potential.

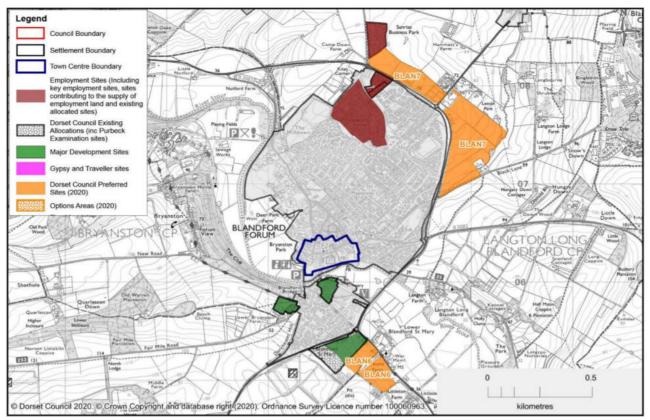
The land to the north of Black Lane, plus other land to the north and north-east, is identified as Preferred Site/ Proposed Allocation under BLAN7: Land north-east of Blandford Forum of the emerging Dorset Council Local Plan for approximately 680 dwellings and 4.7ha of employment land.

Blandford + Neighbourhood Plan Group carried out their own independent site assessment process, underpinned by extensive technical and landscape evidence. This resulted in land to the NE of the site being allocated in the made Blandford + Neighbourhood Plan for approximately 400 dwellings, new primary school, community hub, allotments etc.

The other land forming part of the allocation controlled by Wyatt Homes to the north is also subject to a current planning application by Wyatt Homes for 520 homes, with significant employment, education and community facilities.



Dorset Local Plan interative map showing AONB (red) and flood zones 2 and 3



Proposed allocations Dorset Local Plan Options Consultation (Jan, 2021)

## 4. Landscape

The northern part of the site (the parts located to the north of Pimperne Brook) is not within any designations for valued landscapes, such as local landscape designations or National Parks. The southern part of the site (to south of the Pimperne stream and north of Black Lane) falls within the Cranbourne Chase and West Wiltshire Downs AONB.

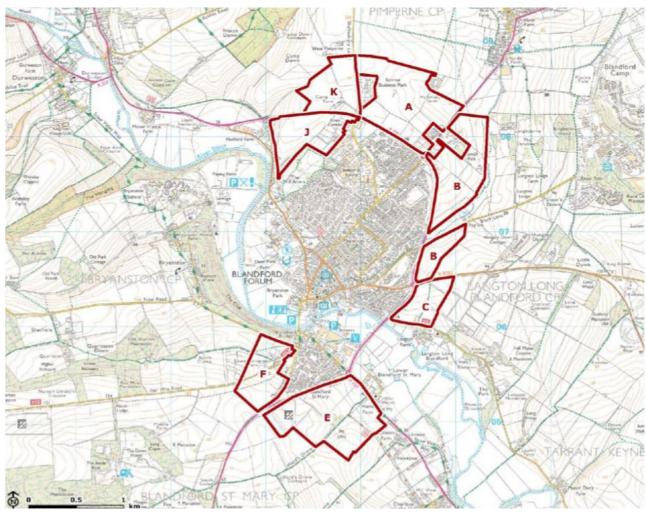
The North Dorset Landscape and Heritage Study (October 2019) overall assessment of landscape sensitivity for Area B (both parts) is defined as moderate – high. This area covers most of the proposed BLAN7 allocation plus two of the fields to the south of Black Lane. Figure 8.13 : A table showing the reasons for either retaining or discounting the general areas for development surrounding Blandford on page 87 of SA Report confirms that "Whilst there are landscape sensitivities relating to the sloping landform and location within the AONB, and a medium heritage sensitivity, the site is considered to have development potential".

The LVA undertaken by SLR (2019) confirms that in terms of the context of the landscape the site has no cultural associations, and there is no formal recreational access across the site. The landscape within the site is not fully representative of the wider landscape characteristics identified for the AONB.

The overall potential landscape effects of the proposed development are likely to result in localised landscape effects. These, however, would be limited by sensitive design which positions the proposed residential development to the northern part of the site, towards the proposed mixed use Policy B2 allocation (now the proposed Local Plan BLAN7 allocation) to the north and away from the more sensitive edge of the AONB. The proposed landscape parkland in the larger portion of the site, to the south, would provide a buffer area and would be designed to enhance and reinforce landscape elements and features.



View from site access on Black Lane looking NW into the site



Assessment Areas - North Dorset Strategic Landscape and Heritage Study (October 2019)

Land north of Black Lane Blandford Forum

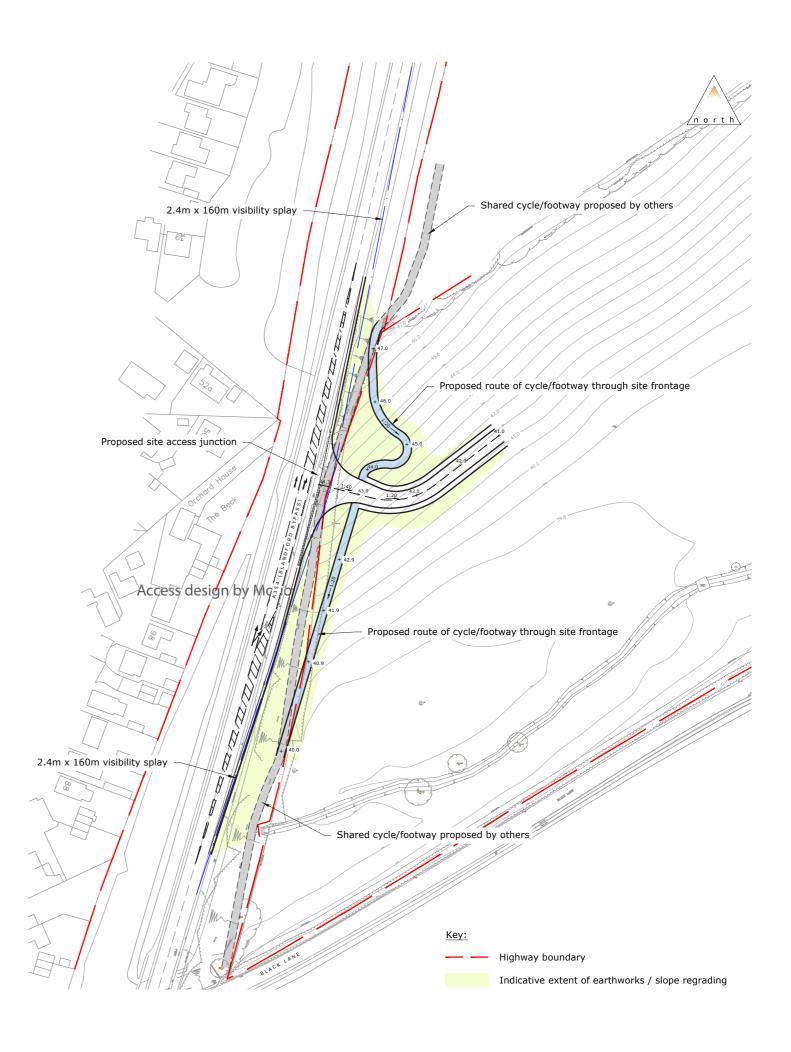
## 5. Highways

The main vehicular access into the site can be achieved by creating a new junction onto the A354 (shown on the right). There is also potential to provide a new cycle / footway alongside the A354 provided by others into into Blandford Forum. This access arrangement is relatively understated and could be assimilated into the landscape without causing unacceptable harm to the appearance or character of the AONB.

In terms of pedestrian and cycle connections the land north of the site is approximately 1.9km from the town centre. It would be possible to walk this in about 20 to 25 minutes or cycle in approximately 10 minutes. There is a dedicated footway on the southern side of the Black Lane which is wide enough to accommodate two passing pedestrians. There is also an existing verge on the northern side of Black Lane and the bridge where the lane passes under the by-pass.

The development of the promotion land could facilitate either an upgrade of the existing footway along Black Lane to a shared cycleway/footway or incorporate a new link within the proposed development site such as part of a riverside walk/cycleway. To the south-east of the by-pass bridge, the road becomes residential in nature and leads to the centre of Blandford Forum.

There is also potential for a pedestrian/cycle/emergency access through to the land to the north. This would create a cohesive scheme and ensure safe and convenient routes for pedestrians and cyclists to use, benefiting residents of land to the north when accessing the existing town and residents within the site to access new infrastructure to the north.



## 6. Flood Risk Mitigation

Based on Environment Agency (EA) Flood Zone mapping the site falls within the following flood zones:

• Approximately 25% of the site lies within Flood Zone 3 (annual probability of river or sea flooding is classified as greater than 1 in 100 from fluvial sources or greater than 1 in 200 for tidal sources);

• Approximately 15% of the site lies within Flood Zone 2 (annual probability of flooding is classified as greater than 1 in 1000 but less than 1 in 100 (1 in 200 for tidal sources); and

• Approximately 60% of the site lies within Flood Zone 1 (less than 1 in 1000 annual probability of river or sea flooding)

These flood risk areas have been taken into account in the updated masterplan which shows that built development will be located within Flood Zone 1, and therefore at low risk of fluvial flooding for both the present day and future scenarios. The main vehicular access passes through Flood Zones 2 and 3 and is therefore considered to be at high risk of flooding.

Although it is clear that parts of the site are at risk of various forms of flooding, this risk is mitigated in a number of ways including:

a) Directing all residential development to Flood Zone 1.

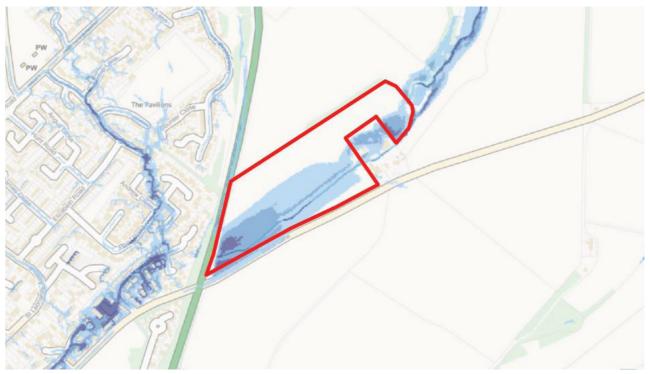
b) Ensuring finished floor levels are located 600mm above the modelled 1 in 100 year plus climate change level.

c) To ensure the development remains accessible during the design flood event, a safe route of access and egress will be provided for both pedestrians and emergency vehicles.

d) Surface water runoff can be attenuated on site to ensure that runoff rates can be limited to the current greenfield rate. This requirement has been incorporated into the updated masterplan.



Environment Agency 'Flood map for Planning'



Environment Agency 'Flood map for surface water'

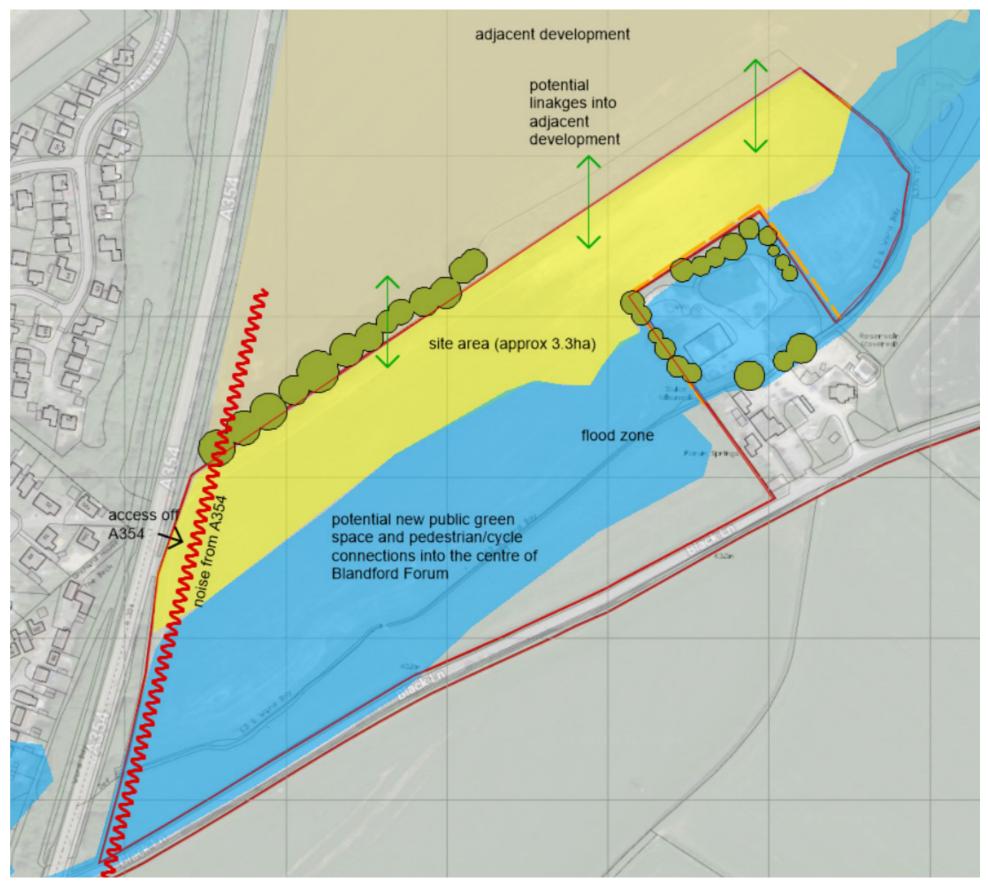
# 7. Constraints & Opportunities

Constraints:

- Areas at risk from flooding
- Noise from bypass
- TPO tree belt
- AONB to the south of Pimperne Stream
- Neighbouring Water Treatment Works

## Opportunities:

- Access onto A354 and connectivity into existing town
- Current application under consideration to the north with significant community infrastructure
- Area at risk from flooding to be used as parkland and recreational area set back from Black La**ne**



Constraints plan

Land north of Black Lane Blandford Forum

## 8. Concept layout



## 9. Wider Masterplan

• Comprehensive scheme of 520 dwellings (Wyatt application) and 80-90 dwellings on land north of Black Lane.

- Sustainable site with links to the existing town along Black Lane
- Potential to upgrade the existing footway alongside Black Lane to a 3 metre pedestrian/cycle facility into Blandford Forum
- No residential development within AONB
- Residential development excluded from floodplain
- New recreational parkland along Pimperne Stream providing buffer to AONB
- Continuation of riverside parkland through to the adjacent development
- Potential link with Wyatt application to the north creating a cohesive scheme
- TPO belt retained and enhanced



Layout shown on wider masterplan

Wates House Station Approach Leatherhead Surrey KT22 7SW

## Tel:

www.wates.co.uk





Land north of Black Lane Blandford Forum

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## G E N E S I S O W N PLANNING

**Community Planning Team** Spatial Planning Dorset Council County Hall Colliton Park DORCHESTER DT1 1XJ

#### By email only: NeighbourhoodPlanning@dorsetcouncil.gov.uk

Our ref: JJF/18150

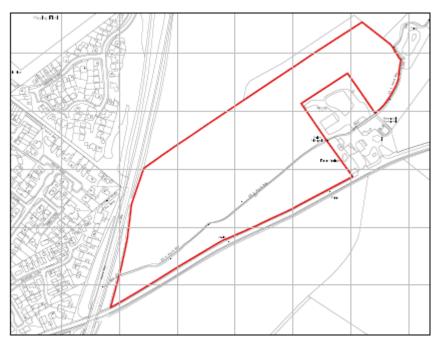
24<sup>th</sup> May 2023

Dear Sirs

#### Blandford + Neighbourhood Plan Review - Regulation 16 Consultation

I write on behalf of Wates Developments Limited which has an interest in land located to the north of Black Lane, Blandford Forum and to the south of the Policy B2 - Land North and East of Blandford Forum allocation in the 'made' Blandford + Neighbourhood Plan 2011-2033.

The Wates land interest is approximately 9.0 hectares in size and is edged red on the plan below:



The comments below are in response to the current Blandford + Neighbourhood Plan Review Regulation 16 Consultation.

Genesis Town Planning Ltd • 26 Chapel Street • Chichester • West Sussex • PO19 1DL enquiries@genesistp.co.uk 01243 534050 www.genesistp.co.uk

Registered in England Company No: 6849869





#### 1 Development Plan Context

The National Planning Policy Framework (NPPF) of July 2021 sets out the economic, social and environmental roles of achieving sustainable development through the planning system, including making efficient use of land.

Paragraph 60 of the NPPF confirms that to support the Government's objective of significantly boosting the supply of homes it is important that a sufficient amount and variety of land can come forward where it is needed. Paragraph 61 states that to determine the minimum number of homes needed strategic policies should be informed by a local housing needs assessment conducted using the standard method in national planning guidance.

The existing Development Plan documents covering Blandford Forum and its surroundings comprise the following:

- the North Dorset Local Plan Part 1 (adopted in January 2016);
- 'saved' policies of the North Dorset District Wide Local Plan of 2003; and
- the 'made' Blandford + Neighbourhood Plan 2011-2033.

Policy 16 of the adopted North Dorset Local Plan Part 1 sets out the planning strategy for Blandford. Paragraph 8.12 of the explanatory text refers to the building out of the allocated and permitted sites in the early part of the plan period, with additional greenfield sites beyond the bypass being brought forward after that date. The strategy also seeks to ensure that Blandford's role as the main service centre in the southern part of North Dorset district is maintained.

Since the Local Plan Part 1 was adopted in January 2016, the Blandford + Neighbourhood Plan 2011-2033 was 'made' in June 2021. This plan includes *Policy B2 – Land North and East of Blandford* which allocates this land for a mix of residential (approximately 400 dwellings), education, community and allotment uses. The southern edge of this allocation abuts the land to the north of Black Lane in which Wates Developments has an interest. The Wates land was promoted for additional housing and open space for inclusion as part of the Policy B2 allocation in the later stages of the now made Neighbourhood Plan consultations in 2018 and 2019.

The Examiner's Report was published in January 2020. In paragraph 9.15 of the report the Examiner commented that as this land was promoted late in the consultation process of the emerging Neighbourhood Plan it had not been consulted on or been subject to the Sustainability Appraisal (SA) process. The Examiner went on to comment that *"it is not possible to know what opinion in the neighbourhood plan area might have been and nor is it possible to know what effect there might have been on the weighing of development options."* 

In paragraph 9.16 he felt that it would be inappropriate to undertake further public consultation and a revised SA process in the context of the Wates land as this would delay the Neighbourhood Plan process. These were important considerations especially as there was not an identified five-year housing land supply in this part of the Dorset Council area. Overall, the Examiner felt that there was no justification for delaying the process of putting the Neighbourhood Plan to a referendum. He suggested that Wates should put forward its site to Dorset Council for consideration in the preparation of the new Dorset Local Plan which it had already done.

In January 2021, Dorset Council published the Dorset Local Plan Options Consultation. This plan proposed a draft allocation under Policy BLAN7 - Land North East of Blandford Forum for a mixeduse development of approximately 680 dwellings, 4.7 hectares of employment land, new primary school, community hub and green. This draft allocation included all of the Neighbourhood Plan Policy B2 allocation plus the Wates land north of Black Lane and additional land to the east of the Policy B2 allocation in Pimperne Parish. This draft allocation is shown on the plan extract below:



#### 2 Housing Requirement

One of the reasons cited in the Regulation 16 Blandford + Neighbourhood Plan Review consultation is to protect the plan area from unwanted development arising from Dorset Council's inability to demonstrate a five-year housing land supply. This means that certain policies within the adopted North Dorset Local Plan Part 1 are 'out of date'. This, combined with the made Neighbourhood Plan (NP) being over two years old in June 2023, means that reduced weight will be given to the NP in the planning balance as per paragraph 14 of the NPPF (July 2021).

Notwithstanding the above, it is important to note that the Government is expected to publish an updated NPPF later this Spring. This is likely to be followed by further changes to the NPPF later this year as the Levelling-up and Regeneration Bill progresses through Parliament. One of the proposed changes in the December 2022 consultation draft NPPF (in paragraph 11) includes increased protection for NP's from the current two years to five years. As such, Wates questions the merits of continuing with the NP Review when the current NP is likely to be protected until June 2026. On balance it would be prudent to delay the NP Review until there is greater certainty at the national level. This would potentially overcome the need to prepare a further review of the NP in the immediate future. This approach would also enable the emerging Dorset Council Local Plan to catch up and possibly be adopted in Spring 2026. This would then enable a full review of the NP based on and in conformity with an up-to-date Local Plan.

As the Local Plan Part 1 was adopted in 2016 it is now over five years old. As a consequence, the dwelling requirement in this plan is out of date in terms of calculating the five-year housing land supply and in respect of the overall dwelling requirement for the Dorset Council area. As set out in section 1 above, paragraph 61 of the NPPF confirms that the minimum number of homes required by strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance.

*Lichfields* – *Standard Method for Local Housing Needs (April 2022)* sets out the most up to date figures for the Standard Method. This uses new affordability data issued by the Office for National Statistics (ONS) and indicates that the dwelling requirement in the Dorset Council plan area is now 1,880 dwellings per annum (dpa). This represents an 87dpa (circa 5%) increase in the Standard Method figure compared to the 1,793dpa figure (30,481 dwellings over the 17-year plan period 2021-2038) set out in the Dorset Local Plan Options Consultation of January 2021.

It is noted that Appendix 2 of the Options Consultation proposed a minimum dwelling requirement of 1,497 homes for the Blandford + (including Bryanston and Blandford St Mary) NP area. It is important to note that this requirement figure is a minimum figure and therefore can be exceeded. As a consequence of the updated April 2022 Standard Method figures it is reasonable to expect that the dwelling requirement for the Blandford + NP area will be greater than the previously identified 1,497 homes, especially as Blandford Forum is the fourth largest centre in the Dorset Council plan area which is reflected by its position in the Settlement Hierarchy (Tier 2 - Towns and other main settlements). Applying a circa 5% uplift to the Option Consultation dwelling requirement for the Blandford + NP plan area (1,491 + 5% = 1,572) results in a need to allocate additional land to accommodate at least an additional 75 dwellings in the Neighbourhood Plan Review.

With regard to the current housing land supply position in the Dorset Council area there is only a 4.87 year supply. This is confirmed in paragraph 3.3 of Agenda Item 10 (re: Application P/OUT/ 2022/000536 – Erection of up to 7 dwellings on land at Lower Blandford Road, Shaftesbury) which was considered by the Planning Committee (North) on 18<sup>th</sup> May 2023. As a result there is a need to provide additional housing land now to help Dorset Council meet its housing target. This could be achieved by making additional housing allocations in the Blandford + Neighbourhood Plan Review.

#### 3 Proposed New Allocation on Land to North of Black Lane, Blandford Forum

As a result of the above comments, the Blandford + NP Modification Plan should allocate the Wates land to the north of Black Lane for a mix of housing and public open space, particularly if the Council continue with this process, despite pending changes to the NPPF. As the southernmost part of this land falls outside the NP plan area the southern part of the site (to the south of Pimperne Brook) would need to be allocated as part of the emerging Dorset Council Local Plan.

The allocation of the Wates land represents a logical extension to the existing Policy B2 allocation. Only the northern part of the land would be developed with the rest of the land providing additional landscape planting and an attractive parkland setting to the new development to the north. Such an approach would not result in overdevelopment in this area. This site is highly sustainable and its allocation in the modified NP would be entirely consistent with Policy BLAN 7 of the emerging Dorset Council Local Plan and would make the NP more robust by virtue of having identified a new allocation. It would help provide much needed market and affordable housing in one of the most sustainable settlements in the Dorset Local Plan plan area and location at Blandford.

As part of previous representations to the Dorset Local Plan Options Consultation 2021, Wates produced a Vision Document for the Land to the north of Black Lane, which showed access directly from Black Lane. Whilst this still remains an option more detailed technical work has been carried out by Wates since then, including a pre-application discussions with the Highway Authority in connection with vehicular access. The Highway Authority has agreed in principle (subject to further modelling/ capacity work) that a direct access onto the A354 by-pass can be provided. Owing to this advice the original Vision Document and illustrative Concept Plan have been updated. A copy of the updated Vision Document is attached and an extract from the updated Concept Plan is reproduced below.



The Illustrative concept layout shows the following:

- Zonal areas for approximately 80 to 90 dwellings in the northern part of the site that falls outside the flood zone;
- A large area of public open space/parkland riverside walk in the central and southern areas which fall within Flood Zones 2 and 3;
- The retention of the existing TPO tree belt along the northern boundary;
- An extension of the existing tree belt along the northern boundary;
- New landscape planting along the southern edge of the residential area to create a softer rural edge with some views of the public open space/parkland riverside walk to the south;
- The creation of a new vehicular access from the A354 bypass;
- New public footpath and cycleway routes within the site which link into Black Lane and onwards to local services and facilities; and
- Potential pedestrian and cycling connection into the Policy B2 allocation to the north.

The remaining parts of this section consider the Wates land interest in the context of the main constraints and opportunities identified for it in Dorset Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) of September 2020; the Sustainability Appraisal (SA) Options Consultation of January 2021; and, the North Dorset Strategic Landscape and Heritage Study of October 2019. These are considered below.

#### Flood Risk

## The SHELAA Summary for the Site (Ref No. LA/BLFO/004) under the heading 'Flood Risk' states that "48.72% within Flood Zone 2 Affected by flooding from other sources including surface water".

Wates appointed the RSK Group to Prepare a Preliminary Flood Risk Appraisal in respect of the Land to the North of Black Lane. The purpose of the appraisal was to provide advice on the suitability of the site for future development, highlighting the key flood risk and drainage constraints and any opportunities for mitigation.

As a result of this technical work, all of the residential development has been located outside of the Flood Zone.

#### **AONB** Landscape

As part of the Local Plan 'Call for Sites' submission of October 2019 and the then pending Examination on the Blandford + Neighbourhood Plan in November 2019, Wates appointed the SLR Group to prepare a Preliminary Landscape and Visual Appraisal (LVA). The LVA assesses the landscape implications of a potential residential development and public open space on the land to the north of Black Lane.

The report notes that the northern part of the site (the parts located to the north of Pimperne Brook) is not within the Cranbourne Chase and West Wiltshire Area of Outstanding Natural Beauty (AONB) or any other designations for valued landscapes, such as local landscape designations or National Parks.

In summary the overall potential landscape effects of the proposed development are likely to result in localised landscape effects. These, however, would be limited by sensitive design which positions the proposed residential development to the northern part of the site, towards the mixed-use Policy B2 allocation (now forming part of the proposed Local Plan BLAN7 allocation) to the north and away from the more sensitive edge of the AONB.

The proposed landscape parkland in the larger portion of the site to the south would provide a buffer area and would be designed to enhance and reinforce landscape elements and features. This approach is consistent with the draft Blandford + Design Guidance and Codes Report. The site falls within the B10 - Edge of Town designation as shown on the Proposals Map Insert B and CA6. Edge of The Town in the Design Guidance and Code report. The proposed buffer area on the undeveloped parts of the site will help improve the green infrastructure network and create a pleasant transitional buffer between the new built form and nearby arable farmland. This will create an attractive entrance on the eastern side of the settlement. As such, the proposed development complies with the emerging Design Guidance and Code.

#### Tree Preservation Order (TPO) Trees

Parts of the northern boundary comprise a row of TPO trees. These trees would be retained as part of a development scheme especially as they provide a natural backdrop to the site and would also partly screen the proposed new housing on the land to the north.

There is also scope to extend the current tree belt further to the east to provide additional screening.

#### Accessibility and Access

As previously mentioned, Wates appointed Motion Transport Planning to consider how the proposed development can be accessed including the provision for sustainable modes of travel. Following preapplication discussions with the Highway Authority in connection with vehicular access it has agreed in principle (subject to further modelling/capacity work) that a direct access onto the A354 by-pass can be provided.

In addition to this, there is scope to introduce a riverside walk including attractive cycle/pedestrian routes in the vicinity of Pimperne Brook that link into Black Lane to the south. There is also potential to upgrade the existing footway alongside Black Lane to a 3-metre pedestrian/cycle facility into Blandford Forum. These access arrangements are relatively understated and could be assimilated into the landscape without causing unacceptable harm to the appearance or character of the AONB.

#### 4 Conclusion

Blandford Forum is the main service centre in the southern part of the former North Dorset District Council area and is the fourth largest settlement in the new Dorset Council area. It is a Tier 2 settlement in the Settlement Hierarchy of the emerging Dorset Council Local Plan and as such is a sustainable location for development. This is demonstrated by Policy 16 of the adopted Local Plan Part 1 and proposed allocation BLAN7 of the emerging Dorset Council Local Plan. Since the Dorset Council Local Plan Options Consultation was published in January 2021 the standard method dwelling requirement for the plan area has increased by circa 5% from 1,793dpa to 1,880dpa. Given Blandford Forums position in the settlement hierarchy it is reasonable that the minimum requirement of 1,497 dwellings for the Blandford + NP plan area should also be increased by a minimum of 5% resulting in a minimum dwelling requirement 1,572 for the NP plan area.

There is only a 4.87 year housing land supply in the Dorset Council area and there is clear need to allocate additional land for housing. This, combined with the increased dwelling requirement referred to above, could be rectified by allocating the Wates land north of Black Lane for a mix of housing and public open space. This approach is supported by the sites proposed inclusion in the draft BLAN7 mixed use allocation in the emerging Dorset Council Local Plan.

The proposed changes to the NPPF provide five years' protection to NPs (an increase from the current two years). As a result, it is likely that the current made Neighbourhood Plan will be protected until June 2026 which would not justify continuing with the current NP Review. Wates considers that the NP Review should be delayed until there is greater certainty at the national level and the emerging Dorset Council Local Plan has progressed further. This approach would enable a full review of the NP based on and in conformity with an up-to-date Local Plan which could be adopted in spring 2026.

Preliminary investigations relating to flood risk, landscape; trees and transport matters; and the accompanying Vision Document consider various constraints and opportunities. Subject to careful consideration of the constraints and opportunities there is potential to provide between 80 to 90 dwellings plus significant amounts of public open space that forms a parkland setting to a development on land north of Black Lane. The inclusion of the site in the Blandford + NP would be a natural extension to the current Policy B2 mixed use allocation and would not overdevelop the area.

Finally, Wates has a strong record in the delivery of new homes throughout southern England including at Diamond Way, Blandford Forum (a Wates Developments/Persimmon Homes Joint Venture). This combined with the company's long-term promotion of the site demonstrates that Wates is strongly committed to the delivery of a sensitive high-quality development on the promotion site. The site is not affected by any physical constraints that would affect viability and owing to its size it could be developed quickly to provide much needed new housing in the district and at Blandford Forum.

I trust these representations are of assistance. Should you or the Examiner require additional information or further clarification Wates and its team would be pleased to assist.

Yours faithfully for Genesis Town Planning Ltd

Jeremy Farrelly BA (Hons) UPS DUPI MRTPI Director of Planning